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FINAL | November 2015

Highlander Hall Demolition Project Initial Study/ Mitigated Negative Declaration

Prepared for: University of California - Riverside

> Prepared by: Michael Baker International

FINAL

INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION

Highlander Hall Demolition Project

SCH No. 2015091050

LEAD AGENCY:

University of California, Riverside

1223 University Avenue, Suite 200 Riverside, California 92507 *Contact: Ms. Tricia Thrasher* 951.827.1484

PREPARED BY:

Michael Baker International

14725 Alton Parkway Irvine, California 92718 *Contact: Mr. Eddie Torres, INCE* 949.472.3505

November 2015

JN 144698

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1.0 Introduction

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1.0 Introduction

The approximate three-acre Highlander Hall Demolition Project (project) site is located on the University of California, Riverside campus (UCR), west of downtown City of Riverside and east of Interstate 215 (I-215)/State Route 60 (SR-60), in Riverside County, California. The site is specifically located at the southwest corner of University Avenue and I-215/SR-60, at 1150 and 1160 University Avenue (Assessor's Parcel Numbers [APNs] 253-050-007 and -006, respectively). The project site is currently developed with two vacant office buildings (Highlander Hall) totaling 61,251 square feet and a recently fire-damaged office building (Human Resources Building) totaling 8,242 square feet. The former Highlander Hall included offices and 96 parking spaces. The Human Resources Building, prior to a recent fire, included offices, a tutorial room, and a conference room. Considering the need to demolish Highlander Hall as a result of a "POOR" seismic rating under current seismic codes and a recent fire at the Human Resources Building, UCR has determined that additional surface parking for existing student, faculty, and staff displaced from other parking areas on campus could be added to this location. The proposed project involves the demolition of 61.251 square feet of vacant office space in the Highlander Hall structures and 8,242 square feet of vacant office space in the Human Resources Building. Upon completion of demolition, the project proposes to construct additional surface parking within a reconfiguration of the existing Parking Lot 50.

In accordance with the California Environmental Quality Act (CEQA) Guidelines, an Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared for the proposed Highlander Hall Demolition Project.

The IS/MND was made available for public review and comment pursuant to CEQA Guidelines Section 15070. The public review commenced on September 18, 2015 and concluded on October 19, 2015. The IS/MND and supporting attachments were available for review by the general public at:

- UCR's Official Website, http://pdc.ucr.edu/environmental/ceqadocs.html; and
- UCR Capital Planning, Capital Asset Strategies, 1223 University Avenue, Suite 240, Riverside, CA 92507-7209.



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2.0 Response to Comments

2.0 Response to Comments

During the public review period, comments were received on the IS/MND from certain interested public agencies and private parties. The following is a list of the persons, firms, or agencies that submitted comments on the IS/MND during the public review period:

Comment Letter No.	Person, Firm, or Agency	Letter Dated				
1	Scott Morgan, Director State Clearinghouse and Planning Unit Governor's Office of Planning and Research	October 20, 2015				
Late Letters	Late Letters Received After the Close of Public Review					
2	Mark Roberts, Office Chief California Department of Transportation District 8, Planning	October 21, 2015				

Although the CEQA Guidelines do not require a Lead Agency to prepare written responses to comments received (see CEQA Guidelines Section 15088), UCR has elected to prepare the following written responses with the intent of conducting a comprehensive and meaningful evaluation of the proposed project. The number designations in the responses are correlated to the bracketed and identified portions of each comment letter.

COMMENT LETTER 1



Edmund G. Brown Jr. Governor

October 20, 2015

Tricia D. Thrasher University of California, Riverside 1223 University Avenue, Suite 240 Riverside, CA 92507

Subject: Highlander Hall Demolition Project SCH#: 2015091050

Dear Tricia D. Thrasher:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. The review period closed on October 19, 2015, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely, 1/ngan 00

Scott Morgan Director, State Clearinghouse

STATE OF CALIFORNIA Governor's Office of Planning and Research State Clearinghouse and Planning Unit



1-1

Document Details Report State Clearinghouse Data Base

	State Cleaninghouse Data Dase
SCH# Project Title Lead Agency	2015091050 Highlander Hall Demolition Project University of California, Riverside
Туре	MND Mitigated Negative Declaration
Description	The project site is currently developed with two vacant office buildings (Highlander Hall) totaling 61,251 sf and a recently fire-damaged office building (Human Resources Building) totaling 8,242 sf. The former Highlander Hall included offices and 96 parking spaces. The Human Resources Building, prior to a recent fire, included offices, a tutorial room, and a conference room. considering the need to demolish Highlander Hall as a result of a "POOR" seismic rating under current seismic codes and a recent fire at the Human Resources Building, UCR has determined that additional surface parking for existing student, faculty, and staff displaced from other parking areas on campus could be added to this location. The proposed project involves the demolition of 61,251 sf of existing office uses in the Highlander Hall structures and 8,242 sf of existing office uses in the Human Resources Building. Upon completion of demolition, the project proposes to construct additional surface parking within a reconfiguration of the existing Parking Lot 50. The project site is not identified on any lists of hazardous waste sites compiled pursuant to California Government Code Section 65962.5.
Lead Agenc	v Contact
Name	Tricia D. Thrasher
Agency	University of California, Riverside
Phone	(951) 827-1484 Fax
email	
Address	1223 University Avenue, Suite 240
City	Riverside State CA Zip 92507
Project Loc County City Region Lat / Long Cross Streets Parcel No.	Riverside Riverside 33° 58' 29.80" N / 117° 20' 10.97" W University Avenue and Iowa Avenue 253-050-007 and -006
Township	2S Range 4W Section 30 Base SBB&M
Proximity to Highways Airports Railways Waterways Schools Land Use	I-215 and SR 60 Gage Canal UC Riverside Various
Project Issues	Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects; Other Issues
Reviewing Agencies	Resources Agency; Department of Fish and Wildlife, Region 6; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 8; Air Resources Board; Regional Water Quality Control Board, Region 8; Native American Heritage Commission

Document Details Report State Clearinghouse Data Base

 Date Received
 09/18/2015
 Start of Review
 09/18/2015
 End of Review
 10/19/2015

1. RESPONSES TO COMMENTS FROM STATE OF CALIFORNIA OFFICE OF PLANNING AND RESEARCH, STATE CLEARINGHOUSE, OCTOBER 20, 2015.

1-1 This comment indicates that the State Clearinghouse submitted the Draft EIR to select State agencies for review and that the comment period for the Draft IS/MND concluded on October 19, 2015. The comment indicates that the lead agency complied with the public review requirements for draft environmental documents pursuant to CEQA. As such, the comment does not provide specifics regarding information presented in the Draft IS/MND, and no further response is necessary.

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

DEPARTMENT OF TRANSPORTATION DISTRICT 8 PLANNING (MS 722) 464 WEST 4th STREET, 6th Floor SAN BERNARDINO, CA 92401-1400 PHONE (909) 383-4557 FAX (909) 383-5936 TTY (909) 383-6300 www.dot.ca.gov/dist8

October 21, 2015

Highlander Hall Demolition Project University of California, Riverside Tricia D. Thrasher 1223 University Avenue, Suite 240 Riverside, CA 92507-7209

Highlander Hall Demolition Project (RIV 215 PM 41.49)

Ms. Thrasher,

We have completed our review of the Notice of Completion & Environmental Document Transmittal for the above mentioned proposal of the demolition of 61,251 square feet of existing office uses in the Highlander Hall structure and 8,242 square feet of existing office in the Human Resource Building. At completion of demolition, the project proposes to construct additional surface parking within a reconfiguration of the existing Parking Lot 50. Project location is at the southwest corner of University Avenue and Interstate-215/State Route-60.

UCR

CAPITAL PLANNING

DATE RECEIVED ____

10.26

As the owner and operator of the State Highway System (SHS), it is our responsibility to coordinate and consult with local jurisdictions when proposed development may impact our facilities. Under the California Environmental Quality Act (CEQA), we are required to make recommendations to offset associated impacts with the proposed project. Although the project is under the jurisdiction of the City of Riverside due to the Project's potential impact to State facilities it is also subject to the policies and regulations that govern the SHS.

We recommend the following:

<u>Traffic</u>

- Exhibits 4, and 10; all the existing and horizon years turning peak hour volumes need to be balanced. We are aware of the roadway entry and exit points between the studied intersections, but unbalanced vehicles will disappear during the traffic simulation if volumes are not balanced. Therefore volumes must be balanced as part of the post process procedure especially at the on/off ramp intersections.
- Exhibit 10 (Forecast Existing Plus Project Conditions); AM & PM peak hour turning movement volumes have decreased at the several turning legs compared to the existing volumes (see Exhibit 4). Need justification.
- Need to include traffic data for an opening year with and without project conditions.



Serious drought Help save water!

COMMENT LETTER 2

EDMUND G. BROWN Jr, Governor



2-2

2-3

Ms. Thrasher October 21, 2015 Page 2

• At permit application, Developer's Engineer should provide a final drainage report demonstrating that the proposed development will not adversely impact any of Caltrans drainage facilities.

Prior to your submission for an Encroachment Permit, a follow-up Traffic Study Report letter will be required from the Department of Planning.

We appreciate the opportunity to offer comments concerning this project. If you have any questions regarding this letter, please contact Talvin Dennis at (909) 806-3957 or myself at (909) 383-4557 for assistance.

Sincerely,

Mark Rleit

MARK ROBERTS Office Chief Intergovernmental Review, Community and Regional Planning

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2-5

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's econ omy and livability"

2. RESPONSES TO COMMENTS FROM THE CALIFORNIA DEPARTMENT OF TRANSPORTATION, OCTOBER 21, 2015.

- 2-1 The traffic count volume differences on University Avenue between the Interstate 215 (I-215) southbound/State Route 60 (SR-60) eastbound ramp intersection and the I-215 northbound/SR-60 westbound ramp intersection are very small. The AM peak hour traffic differences are 20 vehicles in the eastbound direction and 29 vehicles in the westbound direction, which are less than one vehicle every 2 minutes. The PM peak hour traffic differences are one vehicle in the eastbound direction and one vehicle in the westbound direction. From a traffic analysis standpoint, these small traffic volume differences would not substantially affect the level of service results and the traffic simulation results. Both ramp intersections would continue to operate at a Level of Service (LOS) B and C, respectively, and would not cause significant project impact, as shown in <u>Table 4.16-5</u>, <u>Forecast Existing Plus Project Conditions AM and PM Peak Hour Study Intersection LOS</u>, of the Draft IS/MND.
- 2-2 The proposed project would not generate new trips in relation to the University of California, Riverside (UCR) campus operations since the proposed parking lot is intended to accommodate the existing parking demand from displaced parking supply resulting from the removal of existing parking spaces currently located on the main campus areas east of I-215/SR-60. The proposed project is not associated with an increase in land uses or student enrollment because the project results in redistribution of existing traffic that change their destination from the main campus parking areas east of I-215/SR-60 to the project site west of I-215/SR-60, as shown on Exhibit 7, *Forecast Project Trip Redistribution Patterns*, and Exhibit 8, *Existing Trip Distribution Patterns*, of the Traffic Impact Analysis provided in <u>Appendix 8.3</u>, <u>Traffic Impact Analysis</u>, of the Draft IS/MND. With no new project trips, the traffic redistribution would result in a traffic decrease on Campus Drive and University Avenue east of I-215/SR-60.
- 2-3 The "Existing Plus Project" condition is presented in the Draft IS/MND and Traffic Impact Analysis (enclosed in <u>Appendix 8.3</u>, <u>Traffic Impact Analysis</u>, of the Draft IS/MND), as the project only results in redistribution of existing traffic and no additional new traffic increase. As the proposed project would not result in any enrollment increase, no additional traffic growth is expected.
- 2-4 UCR would be required to comply with all standards and regulations should a Caltrans encroachment permit be required.
- 2-5 Refer to Response to Comment 2-4.



3.0 Mitigation Monitoring and Reporting Program

3.0 MITIGATION MONITORING AND REPORTING PROGRAM

3.1 INTRODUCTION

State California Environmental Quality Act (CEQA) Guidelines Section 15097 requires that when a public agency completes an environmental document which includes measures to mitigate or avoid significant environmental effects, the public agency must adopt a reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program must be designed to ensure compliance during project implementation.

As this analysis is tiered from the Long Range Development Plan (LRDP) EIR and LRDP Amendment 2 EIR, applicable established campus avoidance, minimization, and mitigation measures as contained in the adopted Mitigation Monitoring and Reporting Program (MMRP) for the LRDP EIR and LRDP Amendment 2 EIR to the proposed project. For ease of tracking, the 2005 LRDP EIR Planning Strategies (PSs), Programs and Practices (PPs), and Mitigation Measures (MMs) incorporated by the proposed project have been included in the project MMRP. The UCR Capital Planning office will coordinate monitoring and reporting of the implementation of the MMRP for the proposed project. Monitoring will include: (1) verification that each mitigation measure has been implemented; (2) recordation of the verification and any necessary notations regarding implementation of each mitigation measure; and (3) retention of records in the Highlander Hall Demolition Project Mitigation Monitoring file.

3.2 PURPOSE

A listing of all applicable 2005 LRDP, and LRDP Amendment 2, PSs, PPs, and MMs incorporated by the project is provided in this MMRP. The objectives of the MMRP for the Highlander Hall Demolition Project include the following:

- To provide assurance and documentation that mitigation measures are implemented as planned;
- To provide information to assist the campus administration in understanding the effectiveness of the adopted mitigation measures;
- To maintain a campus record of compliance with applicable mitigation measures.

The implementation of the mitigation measures applicable to the project shall be performed and monitored by the campus staff, consultants, and appropriate agencies in conjunction with project implementation as follows:

- Development of the design
- Preparation of Construction Contracts
- Construction phase
- Post-construction and project operation

By including both monitoring and reporting provisions, the campus has voluntarily exceeded the minimum requirements of the State CEQA Guideline Section 15097(c), which allows selection of monitoring or reporting, but does not require both.

3.3 **PROJECT OVERVIEW**

The approximate three-acre project site is located on the University of California, Riverside campus (UCR), west of downtown City of Riverside and east of Interstate 215 (I-215)/State Route 60 (SR-60), in Riverside County, California. The site is specifically located at the southwest corner of University Avenue and I-215/SR-60, at 1150 and 1160 University Avenue (Assessor's Parcel Numbers [APNs] 253-050-007 and -006, respectively). The project site is currently developed with two vacant office buildings (Highlander Hall) totaling 61,251 square feet and a recently firedamaged office building (Human Resources Building) totaling 8,242 square feet. The former Highlander Hall included offices and 96 parking spaces. The Human Resources Building, prior to a recent fire, included offices, a tutorial room, and a conference room. Considering the need to demolish Highlander Hall as a result of a "POOR" seismic rating under current seismic codes and a recent fire at the Human Resources Building, UCR has determined that additional surface parking for existing student, faculty, and staff displaced from other parking areas on campus could be added to this location. The proposed project involves the demolition of 61,251 square feet of vacant office space in the Highlander Hall structures and 8,242 square feet of vacant office space in the Human Resources Building. Upon completion of demolition, the project proposes to construct additional surface parking within a reconfiguration of the existing Parking Lot 50.

It has been determined that with incorporation of applicable LRDP and LRDP Amendment 2 Planning Strategies (PSs), Programs and Practices (PPs), and Mitigation Measures (MMs), this project would not result in any new significant impacts that are not examined in the UCR 2005 LRDP EIR as supplemented and updated by the UCR 2005 LRDP Amendment 2 EIR or in a significant increase in the previously identified impacts.

3.4 **RESPONSIBILITIES AND DUTIES**

The Environmental Planning unit of UCR Capital Planning would be responsible for coordinating the reporting of compliance with the mitigation measures listed in this MMRP. These responsibilities include:

- Coordination with UCR Architects & Engineers to ensure that design and construction contracts contain the relevant mitigation measures adopted in the Final IS/MND, and that these mitigation measures are implemented during the design and construction phases of the project.
- Coordination with Project Inspectors to assure compliance and reporting during the construction phase of the project.
- Coordination and assistance to other Campus units and/or Departments with monitoring and reporting responsibilities to ensure that they understand their charge and complete their reporting procedures accurately and on schedule, during construction and on-going project operations.

3.5 IMPLEMENTATION AND MONITORING PROCEDURES

In general, monitoring would consist of the responsible units verifying that the relevant mitigation measures were implemented.

Reporting consists of establishing a record that a mitigation measure is being implemented, and generally involves the following steps:

- Capital Planning distributes reporting forms to the appropriate responsible entity or employs the entity's existing reporting procedures for verification of compliance.
- Responsible entities verify compliance and document compliance by signing the monitoring form and/or documenting compliance using their own internal procedures when monitoring is triggered.
- Responsible entities provide Capital Planning with verification that monitoring has been conducted and ensure, as applicable, that mitigation measures have been implemented.

The project-specific reporting forms prepared by Capital Planning document the implementation status of the mitigation measures and applicable LRDP measures for the project. Project reporting forms and documentation will be available at Capital Planning, upon request, during normal business hours.

3.6 LIST OF APPLICABLE PROJECT-SPECIFIC MITIGATION MEASURES AND LRDP MEASURES

The following summary table lists the applicable LRDP and LRDP Amendment 2 measures, as well as the timing and responsible entities for their implementation, monitoring, and reporting. It is noted that there are no applicable project-specific mitigation measures required for the proposed project.

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Table 3-1Mitigation Monitoring and Reporting Program

Impact	Mitigation Measures	Responsible	Monitoring	Frequency of	Verif	ication of Comp	oliance
impact		Entity	Triggers	Reporting	Signature	Date	Remarks
Monitoring Triggers 1. Design stage 2. Construction docume 3. Construction 4. Commencement of c 5. Post-construction 6. On-going through Pre-	occupancy	UCR Responsible CAS – Capital Asse A&E – Architects & TAPS – Transporta Sustainability – Sus	et Strategies Engineers tion and Parking Serv	ices			
Aesthetics			I			I	
Substantially degrade the existing visual character or quality of the site and its surroundings.	Applicable LRDP EIR Planning Strategies: PS Open Space 4. Provide landscaped buffers and setbacks along campus edges, such as Valencia Hills Drive and its extension south of Big Springs Road, Martin Luther King Boulevard, and the I-215/SR-60	CAS	1	Once to confirm inclusion in Parking Lot design documents			
	freeway. <u>Applicable LRDP EIR Programs and Practices</u> : PP 4.1-2(b). The campus shall continue to relocate, where feasible, mature "specimen" trees that would be removed as a result of construction activities on the computer	CAS	1	Once to confirm inclusion in project design			
	the campus. (This is identical to Land Use PP 4.9-1(c).)						
Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.	Applicable LRDP EIR Planning Strategies: Refer to PS Open Space 4. Applicable LRDP EIR Programs and Practices:						
	PP 4.1-1. The campus shall provide design architects with the Campus Design Guidelines and instructions to implement the guidelines, including those sections related to use of consistent scale and massing, compatible architectural style,	A&E	1	Once to confirm in relation to Parking Lot design			

HIGHLANDER HALL DEMOLITION PROJECT

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Impact	Mitigation Measures	Responsible		Frequency of Reporting	Verification of Compliance		
inipact		Entity			Signature	Date	Remarks
	complementary color palette, preservation of existing site features, and appropriate site and exterior lighting design. Applicable LRDP EIR Mitigation Measures:						
	MM 4.1-3(b). All outdoor lighting on campus resulting from new development shall be directed to the specific location intended for illumination (e.g., roads, walkways, or recreation fields) to prevent stray light spillover onto adjacent residential areas. In addition, all fixtures on elevated light standards in parking lots, parking structures, and athletic fields shall be shielded to reduce glare. Lighting plans shall be reviewed and approved prior to project-specific design and construction document approval. (LRDP EIR)	A&E	1, 2	Once to confirm inclusion in Parking Lot design; Once to confirm inclusion in construction documents			
Air Quality		I					1
Conflict with or obstruct implementation of the applicable Air Quality Management Plan or Congestion Management Plan.	Applicable LRDP EIR Planning Strategies: PS Transportation 5. Provide bicycle parking at convenient locations.	CAS, A&E, TAPS	1, 2	Once to confirm inclusion in Parking Lot design; Once to confirm inclusion in construction documents			
	 PS Transportation 6. Implement parking management measures that may include: Restricted permit availability. Restricted permit mobility. Differential permit pricing. 	TAPS	6	Ongoing verification through LRDP monitoring and implementation	N/A	N/A	N/A

HIGHLANDER HALL DEMOLITION PROJECT

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Impact	Mitigation Measures	Responsible	Monitoring Triggers	Frequency of	Verification of Compliance		
impact	Mitigation measures	Entity		Reporting	Signature	Date	Remarks
	Applicable LRDP EIR Programs and Practices:						
	 PP 4.3-2(a). Construction contract specifications shall include the following: (i) Compliance with all SCAQMD rules and regulations. (ii) Maintenance programs to assure vehicles remain in good operating condition. (iii) Avoid unnecessary idling of construction vehicles and equipment. (iv) Use of alternative fuel construction vehicles. (v) Provision of electrical power to the site, to eliminate the need for on-site generators. 	A&E	2	Once to confirm inclusion in final bid specifications.			
	PP 4.3-2(b). The Campus shall continue to implement dust control measures consistent with SCAQMD Rule 403—Fugitive Dust during the construction phases of new project development. The following actions are currently recommended to implement Rule 403 and have been quantified by the	A&E	2	Once to confirm inclusion in final bid specifications.			
	SCAQMD as being able to reduce dust generation between 30 and 85 percent depending on the source of the dust generation. The Campus shall implement these measures as necessary to reduce fugitive dust. Individual measures shall be specified in construction documents and require implementation by construction contractor:	A&E	3	Periodic verification during construction.			
	 (i) Apply water and/or approved non-toxic chemical soil stabilizers according to manufacturer's specification to all inactive construction areas (previously graded areas that have been inactive for 10 or more days). (ii) Replace ground cover in disturbed areas as quickly as possible. 						

Impost	Mitigation Measures	Responsible	Monitoring	Frequency of	Verif	ication of Comp	liance
Impact	•	Entity	Triggers	Reporting	Signature	Date	Remarks
	 (iii) Enclose, cover, water twice daily, or apply approved chemical soil binders to exposed piles with 5 percent or greater silt content. (iv) Water active grading sites at least twice daily. (v) Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour over a 30-minute period. (vi) All trucks hauling dirt, sand, soil, or other loose materials shall be covered or maintain at least 2 feet of freeboard (i.e., minimum vertical distance between top of the load and the top of the trailer), in accordance with Section 23114 of the California Vehicle Code. (vii) Sweep streets at the end of the day if visible soil material is carried over to adjacent roads. (ix) Apply water three times daily or chemical soil stabilizers according to manufacturers' specifications to all unpaved parking or staging areas or unpaved road surfaces. (x) Post and enforce traffic speed limits of 15 miles per hour or less on all unpaved roads. 						
	MM 4.3-1a. For each construction project on the campus, the project contractor will implement Programs and Practices 4.3-2(a) and 4.3-2(b). In addition, the following PM10 and PM2.5 control measure shall be implemented for each construction project:	A&E	2, 3	Once to confirm inclusion in final bid specifications; Periodic verification during construction.			
	 Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. 						

HIGHLANDER HALL DEMOLITION PROJECT

Verification of Compliance

Date

Signature

Initial Study/Mitigated Negative Declaration

Remarks

Impact	Mitigation Measures	Responsible Entity	Monitoring Triggers	Frequency of Reporting
	This person shall respond and take corrective action within 48 hours. The phone number of the District shall also be visible to ensure compliance. (LRDP Amendment 2 EIR)			
	MM 4.3-1b. For each construction project on the campus, the University shall require that the project include a construction emissions control plan that includes a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower, that will be used for an aggregate of 40 or more hours during any portion of the construction project. During construction activity, the contractor shall utilize CARB certified equipment or better for all on-site construction equipment according to the following schedule:	A&E	2, 3	Once to confirm inclusion in final specifications; Periodic verificat during construction
	 January 1, 2011 to December 31, 2011: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 2 off-road emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could 			

emissions control strategy for a similarly sized engine as defined by CARB

January 1, 2012 to December 31, 2014: All off-road diesel-powered construction

equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used

regulations.

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UNIVERSITY OF CALIFORNIA

Impost	Mitigation Macouroo	Responsible	Monitoring	Frequency of	Verif	ication of Compl	iance
Impact	Mitigation Measures	Entity	Triggers	Reporting	Signature	Date	Remarks
	 Prohibit vehicle and engine idling in excess of 5 minutes and ensure that all off-road equipment is compliant with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449. Configure construction parking to minimize traffic interference. Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow. Provide dedicated turn lanes for movement of construction trucks and equipment on and off site. Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable. Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications. Use diesel-powered construction vehicles and equipment that operate on low-NOx fuel where possible. Reroute construction trucks away from congested streets or sensitive receptor areas. Maintain and tune all vehicles and equipment according to manufacturers' specifications. 						
	(LRDP Amendment 2 EIR) MM 4.3-1c. To minimize VOC emissions from the painting/finishing phase, for each construction project on the campus, the project contractor will implement the following VOC control measures:	A&E	2	Once to confirm inclusion in Parking Lot construction documents.			

luoneet	Misimotion Mecourse	Responsible	Monitoring	Frequency of	Verifi	ication of Comp	liance
Impact	Mitigation Measures	Entity	Triggers	Reporting	Signature	Date	Remarks
	 Construct or build with materials that do not require painting, or use prepainted construction materials. If appropriate materials are not available or are cost-prohibitive, use low VOC-content materials more stringent than required under SCAQMD Rule 113. (LRDP Amendment 2 EIR) 						
	MM 4.3-2b. UCR shall continue to participate in greenhouse gas (GHG) reduction programs such as the American College and University Presidents' Climate Commitment (ACUPCC) and shall adhere to the UC Policy on Sustainable Practices. The measures adopted by UCR are presented in Tables 4.16-9 and 4.16-10 in Section 4.16 Greenhouse Gas Emissions of the 2005 LRDP Amendment 2 EIR. While these measures are typically targeted at GHG emissions, many act to reduce energy consumption and vehicle use on campus and would consequently also reduce air pollutant emissions from both area and mobile sources. In accordance with the ACUPCC and the UC Policy on Sustainable Practices and through implementation of its Climate Action Plan, UCR shall commit to reducing GHG emissions to 1990 levels by 2020, which would require significant reductions (on the order of 70 percent) from these sources in terms of GHG and therefore reductions in other air pollutants as well. (LRDP Amendment 2 EIR)	Sustainability	6	Ongoing verification through LRDP monitoring and implementation.	N/A		
	MM 4.3-6. The University will implement Mitigation Measure 4.3-1 which is designed to reduce construction emissions. It will also implement Mitigation Measure 4.3-2b which will reduce air pollutant emissions resulting from traffic and energy consumption during campus operations. (LRDP Amendment 2 EIR)	N/A	N/A	See Previous Listing for individual MMs			

HIGHLANDER HALL DEMOLITION PROJECT

Initial Study/Mitigated Negative Declaration

Impact	Mitigation Measures	Responsible	Monitoring	Frequency of	Verif	ication of Compl	iance
Impact	Witigation Measures	Entity	Triggers	Reporting	Signature	Date	Remarks
Violate any air quality standard or contribute substantially to an existing or	Applicable LRDP EIR Programs and Practices: Refer to PP 4.3-2(a) and PP 4.3-2(b).						
projected air quality violation,	PP 4.3-2(c). The UCR shall continue to implement SCAQMD Rule 1403—Asbestos when demolishing existing buildings on the campus. <u>Applicable LRDP EIR Mitigation Measures</u> :	A&E	2, 3	Once to confirm inclusion in final bid specifications; Periodic verification during construction.			
	MM 4.3-2. Programs and Practices 4.3-2(a), (b), and (c), or their equivalent, shall be included in construction contract specifications. The contract specifications shall require the use of low NOX diesel fuel and construction equipment to the extent that it is readily available at the time of development. (LRDP EIR)	A&E	2	Once to confirm inclusion in construction specifications.			
	 MM 4.3-3. To reduce energy consumption and areawide emission of criteria pollutants, the campus shall annually inspect and enforce an emissions reduction control strategy, which may include, where feasible, the following: <u>Design</u> Provide electric vehicle charging systems at convenient location in campus parking facilities. (LRDP EIR) 	A&E	1	Once to confirm inclusion in Parking Lot design.			
Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is	Applicable LRDP EIR Programs and Practices: Refer to PP 4.3-1, PP 4.3-2(a) through PP 4.3-2(c). Applicable LRDP EIR Mitigation Measures:						

UCRIVERSITY OF CALIFORNIA

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Impact	Mitigation Measures	Responsible	Monitoring	Frequency of		ication of Comp	
-	Witigation Measures	Entity	Triggers	Reporting	Signature	Date	Remarks
nonattainment under an applicable Federal or State ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors).	Refer to MM 4.3-2 and MM 4.3-3.						
Biological Resources			1	1			
Interfere substantially with the movement of any native resident or migratory fish or wildlife species or	Applicable LRDP EIR Mitigation Measures: MM 4.4-4(a). Prior to the onset of construction activities that would result in the removal of mature trees that would occur between March and mid-	CAS	3	As needed, prior to start of construction.			
with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	August, surveys for nesting special status avian species and raptors shall be conducted on the affected portion of the campus following USFWS and/or CDFG (now CDFW) guidelines. If no active avian nests are identified on or within 250 feet of the construction site, no further mitigation is necessary. (LRDP EIR)						
	MM 4.4-4(b). If active nests for avian species of concern or raptor nests are found within the construction footprint or a 250-foot buffer zone, exterior construction activities shall be delayed within the construction footprint and buffer zone until the young have fledged or appropriate mitigation measures responding to the specific situation have been developed and implemented in consultation with USFWS and CDFG (now CDFW). (LRDP EIR)	CAS	3	As needed, prior to start of construction.			
Conflict with any local	Applicable LRDP EIR Planning Strategies:						1
policies or ordinances	DS Concernation 4. Drotest astrony assesses		4	Compliance			
protecting biological resources, such as	PS Conservation 1. Protect natural resources, including native habitat; remnant arroyos, and mature	CAS, Biologist	1	Compliance established,			
	trees, identified as in good health as determined by a			biological resources			

Impost	Misingstion Macouroo	Responsible	Monitoring	Frequency of	Verifie	cation of Comp	liance
Impact	Mitigation Measures	Entity	Triggers	Reporting	Signature	Date	Remarks
tree preservation	qualified arborist, to the extent feasible.			report provided in			
policy or ordinance	(LRDP EIR)			IS/MND.			
Cultural Resources							-
Directly or indirectly	Applicable LRDP EIR Programs and Practices:						
destroy a unique							
paleontological	PP 4.5-4. Construction specifications shall require	A&E	2, 3	Confirm inclusion in			
resource or site or	that if a paleontological resource is uncovered during			construction			
unique geologic	construction activities:			documents; ongoing			
feature.				verification during			
	(i) A qualified paleontologist shall determine			construction, if			
	the significance of the find.			required.			
	 (ii) The campus shall make an effort to preserve the find intact through feasible 						
	project design measures.						
	(iii) If it cannot be preserved intact, then the						
	University shall retain a qualified non-						
	University paleontologist to design and						
	implement a treatment plan to document						
	and evaluate the data and/or preserve						
	appropriate scientific samples.						
	(iv) The paleontologist shall prepare a report of						
	the results of the study, following accepted						
	professional practice.						
	(v) Copies of the report shall be submitted to						
	the University and the Riverside County						
	Museum.						
Disturb any human	Applicable LRDP EIR Programs and Practices:						
remains, including							
those interred outside			0				
of formal cemeteries.	PP 4.5-5. In the event of the discovery of a burial,	A&E	3	Confirm inclusion in			
	human bone, or suspected human bone, all			construction			
	excavation or grading in the vicinity of the find shall			documents; ongoing			
	halt immediately and the area of the find shall be			verification during			
	protected and the University immediately shall notify			ground disturbance			
	the Riverside County Coroner of the find and comply with the provisions of P.R.C. Section 5097 with			phases, if required.			
	respect to Native American involvement, burial						
	treatment, and re-burial, if necessary.						
	ucaunent, anu ic-bunai, ii necessary.						

lmneet		Responsible	Monitoring	Frequency of	Verification of Compliance		
Impact	Mitigation Measures	Éntity	Triggers	Reporting	Signature	Date	Remarks
	(LRDP EIR)						
Geology and Soils							T
Result in substantial soil erosion or the	Applicable LRDP EIR Planning Strategies:						
loss of topsoil.	Refer to PS Open Space 4						
	PS Conservation 2. Site buildings and plan site development to minimize site disturbance, reduce erosion and sedimentation, reduce stormwater runoff, and maintain existing landscapes, including healthy mature trees whenever possible.	CAS, A&E	1	Once to confirm inclusion in Parking Lot design;			
	Applicable LRDP EIR Programs and Practices:						
	PP 4.6-2(a). This is identical to Air Quality PP 4.3-2(b). (LRDP)						
Greenhouse Gas Emi	ssions						•
Generate greenhouse gas emissions, either	Applicable LRDP EIR Mitigation Measures:						
directly or indirectly, that may have a significant impact on the environment.	MM 4.16-1. All projects developed under the amended 2005 LRDP shall be evaluated for consistency with the GHG reduction policies of the UCR CAP and the UC Policy on Sustainable Practices, as may be updated from time to time by the University. GHG reduction measures, including, but not limited to, those found within the UCR CAP and UC Policy identified in Tables 4.16-9 and 4.16-10 shall be incorporated in all campus projects so that at a minimum an 8 percent reduction in emissions from BAU is achieved. It is expected that the GHG reduction measures in the UCR CAP will be refined from time to time, especially in light of the evolving regulations and as more information becomes available regarding the effectiveness of specific GHG reduction measures. As part of the implementation of the UCR CAP, the Campus will also monitor its progress in reducing GHG emissions to ensure it will	Sustainability	6	Ongoing verification through LRDP monitoring and implementation.	N/A	N/A	N/A

lmnast	Mitigation Macouroo	Responsible	Monitoring	Frequency of	Verifi	cation of Comp	iance
Impact	Mitigation Measures	Éntity	Triggers	Reporting	Signature	Date	Remarks
	attain the established targets.						
	(LRDP Amendment 2 EIR)						
Conflict with an	Applicable LRDP EIR Mitigation Measures:						
applicable plan,							
policy, or regulations	Refer to LRDP Amendment 2 EIR Mitigation Measure						
adopted for the	MM 4.16-1.						
purpose of reducing							
the emissions of							
greenhouse gases.	ue Meteriele						
Hazards and Hazardo	Applicable LRDP EIR Programs and Practices:						T
Create a significant hazard to the public	Applicable LKDF EIK Flogranis and Flactices:						
or the environment	PP 4.7-2. The campus shall perform hazardous	A&E	2, 3	Once to confirm			
through the routine	materials surveys on buildings and soils, if applicable,	AQL	2, 5	inclusion in			
transport, use, or	prior to demolition. When remediation is deemed			construction			
disposal of	necessary, surveys shall identify all potential			documents.			
hazardous materials.	hazardous materials within the structure to be			Periodic verification			
	demolished, and identify handling and disposal			during construction.			
	practices. The campus shall follow the practices			-			
	during building demolition to ensure construction						
	worker and public safety.						
Create a significant	Applicable LRDP EIR Programs and Practices:						
hazard to the public							
or the environment	Refer to PP 4.7-2.						
through reasonably							
foreseeable upset							
and accident conditions involving							
the release of							
hazardous materials							
into the environment?							
Emit hazardous	Applicable LRDP EIR Programs and Practices:						1
emissions or handle	<u></u>						
hazardous or acutely	Refer to PP 4.7-2.						
hazardous materials,							
substances, or waste							
within one-quarter							

line in a st	Mitigation Manual	Responsible	Monitoring	Frequency of	Verifi	cation of Compl	iance
Impact	Mitigation Measures	Entity	Triggers	Reporting	Signature	Date	Remarks
mile of an existing or							
proposed school.	Applicable LDDD FID Mitigation Macauma						
Impair implementation of or	Applicable LRDP EIR Mitigation Measures:						
with an adopted emergency response plan or emergency evacuation plan.	MM 4.7-7(a). Evacuation zones designated in the UCR Emergency Operations Plan will be avoided, to the extent feasible, when siting construction staging areas. Where evacuation zones cannot be avoided, alternative evacuation zones shall be identified. UCASD and the Riverside Fire Department shall be notified of alternative evacuation zones so that they can respond accordingly to any emergencies.	A&E	2	Once to confirm inclusion in final bid specifications.			
	(LRDP EIR)						
Hydrology and Water				1			1
Violate any water quality standards or waste discharge requirements.	Applicable LRDP EIR Programs and Practices: PP 4.8-1. The campus will continue to comply with all applicable water quality requirements established by the SARWQCB. (This is identical to Utilities PP 4.15-5.)	A&E	2	Once to confirm inclusion in construction specifications.			
Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site.	 Applicable LRDP EIR Programs and Practices: PP 4.8-3(c). This is identical to Air Quality PP 4.3-2(b) and Geology PP 4.6-2(a). (LRDP EIR) PP 4.8-3(d). In compliance with NPDES, the campus would continue to implement Best Management Practices, as identified in the UCR Stormwater Management Plan (UCR 2003): (i) Public education and outreach on stormwater impacts. (ii) Public involvement/participation. (iii) Illicit discharge detection and elimination. (iv) Pollution prevention/good housekeeping for facilities. 	A&E	2	Once to confirm inclusion in construction specifications.			

Impact	Mitigation Measures	Responsible	Monitoring	Frequency of	Verification of Compliance		
Impact	mitigation measures	Entity	Triggers	Reporting	Signature	Date	Remarks
	 (v) Construction site stormwater runoff control. 						
	(vi) Post-construction stormwater management						
	in new development and redevelopment.						
	(This is identical to Biological Resources PP 4.4-2(b)						
	and Geology and Soils PP 4.6-2(b).)						
Otherwise	Applicable LRDP EIR Programs and Practices:						
substantially degrade							
water quality.	Refer to LRDP Programs and Practices 4.8-1 and						
	4.8-3(d).						
Land Use and Plannin	0	I			I		1
Conflict with	Applicable LRDP EIR Planning Strategies:						
applicable land use							
plan, policy or	PS Land Use 7. Over time, relocate parking from	CAS	1	Once to confirm			
regulation of an	central campus locations to the periphery of the			inclusion in Parking			
agency with	academic core and replace surface parking with			Lot siting & design.			
jurisdiction over the	structures, where appropriate.						
project (including but	Refer to PS Open Space 4, PS Transportation 5, and						
not limited to the	PS Transportation 6.						
general plan, specific							
plan, coastal	Applicable LRDP EIR Programs and Practices:						
program, or zoning		CAS	1	Once to confirm			
ordinance) adopted	PP 4.9-1(b). The Campus shall continue to provide	CAS	I				
for the purpose of avoiding or mitigating	design professionals with the 2007 Campus Design			inclusion in project			
an environmental	Guidelines and instructions to develop project-			design			
effect.	specific landscape plans that are consistent with the						
eneci.	Guidelines with respect to the selection of plants,						
	retention of existing trees and use of water						
	conserving plants were feasible.						
	(This is identical to Aesthetics PP 4.1-2[a].)						
Noise	(LRDP EIR)						
	Applicable LPDD EIP Programs and Practices				I		
Exposure of persons to or generation of	Applicable LRDP EIR Programs and Practices:						
noise levels in excess	PP 4.10-7(a). To the extent feasible, construction	A&E	2	Once to confirm			
of standards	activities shall be limited to 7:00 a.m. to 9:00 p.m.	AQE	۷.	inclusion in			
established in the	Monday through Friday, 8:00 a.m. to 6:00 p.m. on			construction			
local general plan or	Saturday, and no construction on Sunday and			documents.			
noise ordinance, or	national holidays, as appropriate, in order to minimize			uocumento.			
	national nonuays, as appropriate, in order to minimize						

HIGHLANDER HALL DEMOLITION PROJECT

Initial Study/Mitigated Negative Declaration

Impact	Mitigation Measures	Responsible	Monitoring	Frequency of		ication of Comp	
Impact	-	Entity	Triggers	Reporting	Signature	Date	Remarks
applicable standards of other agencies.	disruption to area residences surrounding the campus and to on-campus uses that are sensitive to noise. (LRDP EIR)						
	PP 4.10-7(b). The campus shall continue to require by contract specifications that construction equipment be required to be muffled or otherwise shielded. Contracts shall specify that engine-driven equipment be fitted with appropriate noise mufflers. (LRDP EIR)	A&E	2	Once to confirm inclusion in construction documents.			
	PP 4.10-7(c). The campus shall continue to require that stationary construction equipment material and vehicle staging be placed to direct noise away from sensitive receptors. (LRDP EIR)	A&E	2	Once to confirm inclusion in construction documents.			
	PP 4.10-7(d). The campus shall continue to conduct regular meetings, as needed, with on campus constituents to provide advance notice of construction activities in order to coordinate these activities with the academic calendar, scheduled events, and other situations, as needed. (LRDP EIR)	A&E	2	Once to confirm communication prior to commencement of construction activities.			
	PP 4.10-8. The campus shall continue to conduct meetings, as needed, with off-campus constituents that are affected by campus construction to provide advance notice of construction activities and ensure that the mutual needs of the particular construction project and of those impacted by construction noise are met, to the extent feasible. (LRDP EIR)	A&E	2	Once to confirm communication schedule.			
Exposure of persons to or generation of excessive groundborne	Applicable LRDP EIR Programs and Practices: PP 4.10-2. The UCR campus shall limit the hours of exterior construction activities from 7:00 a.m. to 9:00	A&E	2, 3	Once to confirm inclusion in			

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Impost	Mitigation Measures	Responsible	Monitoring	Frequency of	Verif	ication of Compl	iance
Impact	•	Entity	Triggers	Reporting	Signature	Date	Remarks
vibration or groundborne noise levels?	p.m. Monday through Friday and 8:00 a.m. to 6:00 p.m. on Saturday when necessary. Construction traffic shall follow transportation routes prescribed for all construction traffic to minimize the impact of this traffic (including noise impacts) on the surrounding community.			construction documents; Ongoing verification during construction.			
	Applicable LRDP EIR Mitigation Measures:						
	MM 4.10-2(a). The campus shall notify all academic and residential facilities within 300 feet of approved construction sites of the planned schedule of vibration causing activities so that the occupants and/or researchers can take necessary precautionary measures to avoid negative effects to their activities and/or research. (LRDP EIR)	A&E	3	Once to confirm notification prior to commencement of vibration causing activities; Ongoing verification of precautionary measures, if any, during construction.			
A substantial	Applicable LRDP EIR Programs and Practices:						
temporary or periodic increase in ambient noise levels in the project vicinity above	Refer to PP 4.10-2, PP 4.10-7(a) through PP 4.10-7(d), and PP 4.10-8.						
levels existing without	Applicable LRDP EIR Mitigation Measures:						
the project?	Refer to LRDP EIR Mitigation Measure MM 4.10-2(a).						
Transportation/Traffic							
Conflict with an applicable plan,	Applicable LRDP EIR Planning Strategies:						
ordinance or policy establishing	Refer to PS Land Use 7 and PS Transportation 6.						
measures of effectiveness for the							
performance of the							
circulation system,							
taking into account all							
modes of transportation							

Impost	Mitigation Measures	Responsible	Monitoring	Frequency of	Verif	ication of Compl	iance
Impact	Miligation measures	Entity	Triggers	Reporting	Signature	Date	Remarks
including mass transit							
and non-motorized							
travel and relevant							
components of the							
circulation system,							
including but not							
limited to							
intersections, streets,							
highways and							
freeways, pedestrian							
and bicycle paths,							
and mass transit.							
Substantially increase	Applicable LRDP EIR Planning Strategies:						
hazards due to a	DD 444.4. The communicated design	A&E	1	Once to confirm in			
design feature (e.g.,	PP 4.14-4. The campus shall provide design	A&E		Once to confirm in			
sharp curves or	architects for roadway and parking improvements with the Campus Design Guidelines and instructions			relation to Parking Lot design			
dangerous intersections) or	to implement those elements of the guidelines			Lot design			
intersections) or incompatible uses	relevant to parking and roadway design.						
(e.g., farm	relevant to parking and roadway design.						
equipment)?							
equipment):							
Result in inadequate	Applicable LRDP EIR Mitigation Measures:						
emergency access.							
	Refer to MM 4.7-7(a).						
Utilities and Service S	,			_		-	
Have sufficient water	Applicable LRDP EIR Planning Strategies:						
supplies available to							
serve the project from	PS Conservation 5. Continue to adhere to the	A&E	2	Once to confirm			
existing entitlements	conservation requirements of Title 24 of the California			inclusion in			
and resources, or are	Code of Regulations and comply with any future			construction			
new or expanded	conservation goals or programs enacted by the			documents.			
entitlements needed?	University of California.						
	Applicable PDP EIP Programs and Practices						
	Applicable LRDP EIR Programs and Practices:						
	PP 4.15-1(b). To further reduce the campus' impact	A&E	1, 2	Once to confirm			

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Impact	Mitigation Measures	Responsible	Monitoring		Verification of Compliance		
impact		Entity	Triggers	Reporting	Signature	Date	Remarks
	 on domestic water resources, to the extent feasible, UCR will: (i) Install hot water recirculation devices (to reduce water waste). (ii) Continue to require all new construction to comply with applicable State laws requiring water-efficient plumbing fixtures, including but not limited to the Health and Safety Code and Title 24, California Code of Regulations, Part 5 (California Plumbing Code). (iii) Retrofit existing plumbing fixtures that do not meet current standards on a phased basis over time. (iv) Install recovery systems for losses attributable to existing and proposed steam and chilled-water systems. (iv) Prohibit using water as a means of cleaning impervious surfaces. (v) Install water-efficient irrigation equipment to local evaporation rates to maximize water savings for landscaping and retrofit existing systems over time. (This is identical to Hydrology PP 4.8-2(a).) (LRDP EIR) 			inclusion in Parking Lot design; Once to confirm inclusion in construction documents, if needed.			
	PP 4.15-1(c). The campus shall promptly detect and repair leaks in water and irrigation pipes. (This is identical to Hydrology PP 4.8-2(b).) (LRDP EIR)	TAPS/Grounds	6	Ongoing verification through LRDP monitoring and implementation.	N/A		
Encourage the wasteful or inefficient use of energy.	Applicable LRDP EIR Planning Strategies: Refer to PS Conservation 5.						
	Applicable LRDP EIR Programs and Practices:						
	Refer to PP 4.15-1(b) and PP 4.15-1(c).						



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