NORTH DISTRICT DEVELOPMENT PLAN

PROJECT # 958080

Final Environmental Impact Report

SCH # 2018061044

The following Environmental Impact Report has been prepared in compliance with CEQA.

Prepared for:

University of California, Riverside
Campus Planning
Office of the Campus Architect
Planning, Design, and Construction
1223 University Avenue, Suite 240
Riverside, California 92507

Prepared by:

Impact Sciences, Inc.
811 W. 7th Street, Suite 200
Los Angeles, California 90017

May 2019

Contact: Tricia D. Thrasher, ASLA, LEED AP, Principal Environmental Planner
CEQA@ucr.edu

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1.0 INTRODUCTION

1.1 PURPOSE OF THE FINAL ENVIRONMENTAL IMPACT REPORT

The California Environmental Quality Act, Public Resources Code Section 21000 et seq. (CEQA) and the CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3, Section 15000 et seq.), require lead agencies to disclose and consider the environmental consequences of proposed discretionary projects before taking approval action on such projects. As a lead agency, the University of California, Riverside (UC Riverside or University), is proposing to approve the North District Development Plan (NDD Plan or Project). This Final Environmental Impact Report (Final EIR) has been prepared pursuant to the requirements of CEQA, the CEQA Guidelines and the University of California procedures for implementing CEQA to address the environmental effects of the Project.

In December 2018, the University published the NDD Plan Draft EIR (Draft EIR), which assessed and disclosed the potentially significant environmental impacts of the proposed NDD Plan project. The Draft EIR was circulated for agency and public comment for an initial period of 45 days that ended on February 1, 2018. The University also conducted one public hearing during the Draft EIR review period.

During the time that the Draft EIR was circulating the University advanced the design of the project. Changes to the project included modifications to the proposed emergency evacuation plan for the site, slight changes to the numbers of beds planned for each phase, and changes to the sustainability and energy use narrative. Also during the Draft EIR circulation period, the University received comments requesting, among other things, additional analysis and clarification regarding the noise impacts; potential impacts to local recreational facilities; and clarification regarding the project's traffic impacts. In view of the project description changes and comments received, especially related to energy use, noise, traffic, recreation, and alternatives, the University circulated a Revised Draft EIR for the amended project for agency and public review. This Revised Draft EIR replaces in full the previously published Draft EIR.

The Revised Draft EIR was circulated beginning on February 28, 2019, for a 45-day public comment period that ended on April 15, 2019. During this period, UC Riverside held a public hearing on the Revised Draft EIR on April 4, 2019, to receive verbal comments. The hearing was held at Bannockburn Village, Conference Room J-102 located at 3615 Canyon Crest Drive, from 5:30 PM to 7:30 PM. A court reporter prepared a transcript of this hearing.

The Final EIR is an informational document prepared by the Lead Agency that must be considered by decision makers before approving or denying the proposed project. CEQA Guidelines Section 15132 specifies that the Final EIR shall consist of the following:

1. the Draft EIR or a revision to the draft;
2. comments and recommendations received on the Draft EIR either verbatim or in summary form;
3. a list of the persons, organizations, and public agencies commenting on the Draft EIR;
4. the response of the Lead Agency to significant environmental points raised in review and consultation process; and
5. any other information added by the Lead Agency.

The Revised Draft EIR, which is incorporated by reference, and this document (including revisions to the Revised Draft EIR, comments, responses to comments, and the Mitigation Monitoring and Reporting Program [MMRP]) constitute the Final EIR. Copies of the Final EIR are available for review during normal business hours at UCR at the following address and Web site:

Campus Planning – Office of the Campus Architect
Planning, Design, and Construction
1223 University Avenue, Suite 240
Riverside, California 92507
Contact: Tricia D. Thrasher, ASLA, LEED AP. Principal Environmental Planner

CEQA@ucr.edu
http://odc.ucr.edu/

This document has been prepared pursuant to the *State CEQA Guidelines*. The Final EIR incorporates comments from public agencies and the general public, and contains responses by the Lead Agency to those comments that raise significant environmental issues that are relevant to the Revised Draft EIR analysis. The Board of the Regents of the University of California (The Regents) or its delegate is responsible for reviewing and certifying the adequacy of this EIR and making a decision with respect to the proposed project.

1.2 ORGANIZATION OF THIS FINAL EIR

This document is organized into five sections. Following this introduction (**Section 1.0**), **Section 2.0, Revisions to the Revised Draft EIR**, presents changes to the text of the Revised Draft EIR. **Section 3.0, Comments on the Revised Draft EIR and Responses to Comments**, contains a list of persons, agencies, and organizations that submitted written comments on the Revised Draft EIR; transcripts of the Revised Draft EIR public hearing; reproductions of the written comments; and responses to those comments. Each comment is labeled with a number in the margin. **Section 4.0, Mitigation Monitoring and Reporting Program**, contains the MMRP for the project, and **Section 5.0**, **List of Preparers,** lists persons involved in the preparation of the Final EIR.

2.0 REVISIONS TO THE REVISED DRAFT EIR

Revisions have been made to the Revised Draft Environmental Impact Report (EIR) in response to comments received regarding the Revised Draft EIR. This chapter provides the location, chapter or section number, title, and page number from the Revised Draft EIR, and shows the complete sentence(s) where the change was made. Text added to the Revised Draft EIR is shown in underline format, and deleted text is shown in ~~strikethrough~~.

This chapter, in combination with the Revised Draft EIR, the responses to comments, and the Mitigation Monitoring and Reporting Program constitutes the Final EIR. Due to the nature of the text changes that are presented below, the changes are cited individually rather than in a reproduction of the entire Revised Draft EIR. This presentation of revisions to the Revised Draft EIR is consistent with *State CEQA Guidelines* Section 15162 detailing required Final EIR contents.

Section 2.0, Executive Summary,

The following text on page 2.0-15 has been modified as shown below:

Impact 4.2-2				
Construction and operation of the proposed project could result in emissions that violate an air quality standard or contribute substantially to an existing or projected air quality violation.	Significant	MM 4.3-1b MM 4.3-1c MM 4.3-2(a) MM 4.3-2(b) MM 4.3-2(c)	**MM AIR-1**: When re-applying architectural coatings (e.g., paint), the campus shall use coatings that have no greater than a rating of 50 grams per liter of VOC. **MM AIR-2:** The cleaning supplies used in common areas of campus facilities shall be designated as low-VOC products.	Significant and unavoidable

The following text on page 2.0-18 has been modified as shown below:

Impact 4.6-2				
Construction of the proposed project could result in substantial temporary or periodic increase in ambient noise levels at certain sensitive uses in the project vicinity.	Significant	PP 4.10-7(a) PP 4.10-7(b) PP 4.10-7(c) PP 4.10-7(d) PP 4.10-8	**MM NOI-1:** Barriers such as plywood structures or flexible sound control curtains shall be erected between the proposed project and adjacent sensitive receptors minimize the amount of noise during construction. These temporary sound barriers shall be capable of achieving a sound attenuation of at least 5 dB(A) and block the line-of-sight between the project site and these adjacent land uses. Sound barriers between the project site and the UCR Child Development Center shall be capable of achieving a sound attenuation of at least 16 dB(A) and block the line-of-sight between the project site and the Child Development Center.	Less than Significant

Section 3.0, Project Description

Figure 3.0-7 on page 3.0-20 has been revised to show the correct bicycle facility classifications.

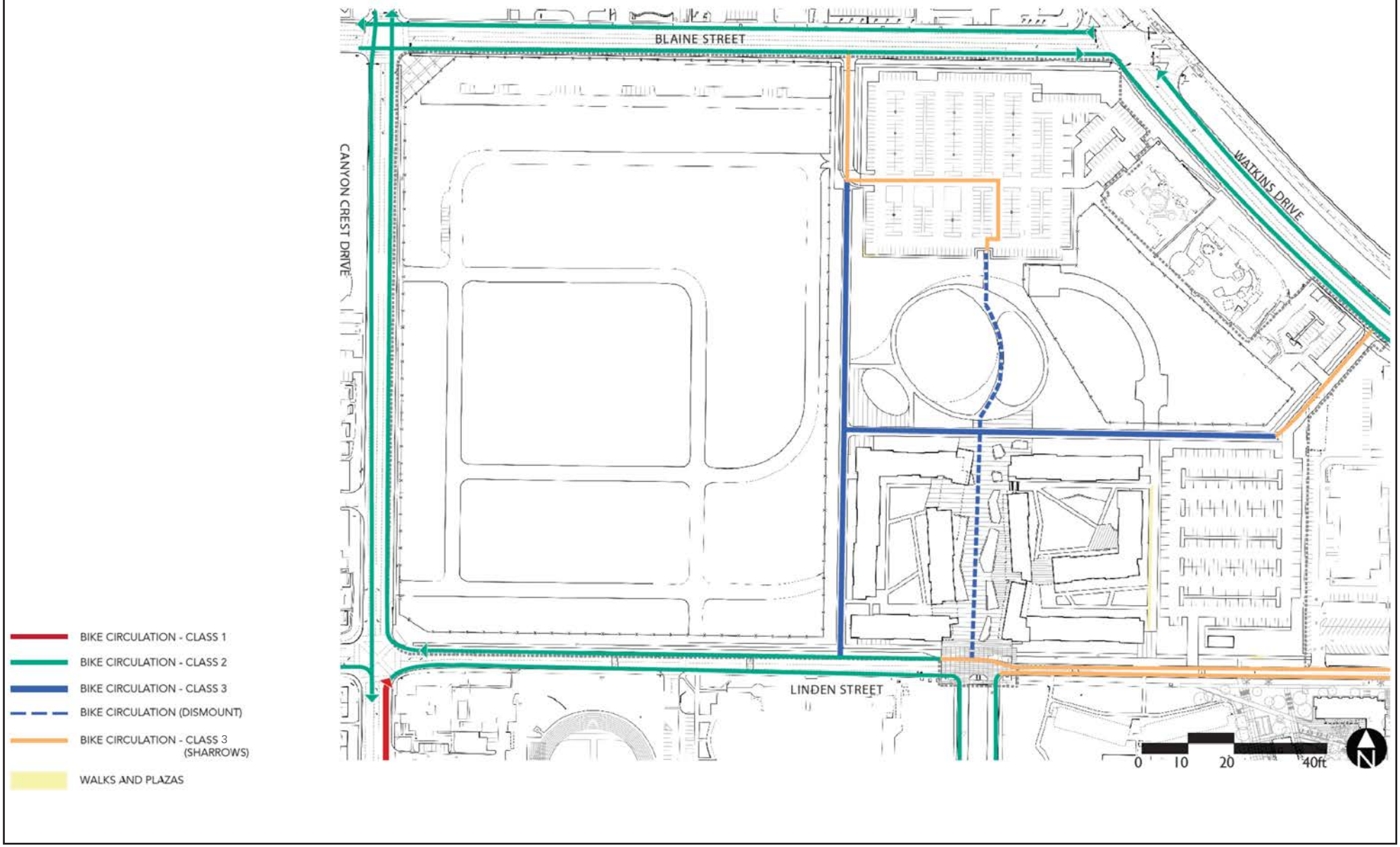
Section 4.2, Air Quality

Table 4.2-8 on page 4.2-26 is revised as follows:

Table 4.2-8
Estimated Project Operational Emissions

	Maximum Emissions in Pounds per Day					
~~Construction Year~~Phase	VOC	NOx	CO	SOx	PM10	PM2.5
NDD Plan Phase 1						
Maximum Daily Emissions	25	57	191	1	46	13
SCAQMD Regional Threshold	~~75~~55	~~100~~55	550	150	150	55
Exceeds Threshold?	**No**	**~~No~~Yes**	**No**	**No**	**No**	**No**
Localized Project Emissions	13	<1	34	<1	<1	<1
SCAQMD Localized Threshold	N/A	270	1,577	N/A	4	2
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Remaining NDD Plan Phases (Minus Phase 1)						
Maximum Daily Emissions	61	107	415	<1	119	33
SCAQMD Regional Threshold	~~75~~55	~~100~~55	550	150	150	55
Exceeds Threshold?	**~~No~~Yes**	**Yes**	**No**	**No**	**No**	**No**
Localized Emissions	37	1	103	<1	1	1
SCAQMD Localized Threshold	N/A	270	1,577	N/A	4	2
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
NDD Plan (Phase 1 + Remaining Phases)						
Maximum Daily Emissions	**86**	**165**	**606**	**2**	**165**	**45**
SCAQMD Regional Threshold	~~75~~55	~~100~~55	550	150	150	55
Exceeds Threshold?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**No**
Localized Emissions	50	2	138	<1	1	1
SCAQMD Localized Threshold	N/A	270	1,577	N/A	4	2
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

*Source: Impact Sciences, Inc. Emissions calculations are provided in **Appendix 4.2**.*
Totals in table may not appear to add exactly due to rounding in the computer model calculations.



SOURCE: Solomon Cordwell Buenz, 2018

FIGURE **3.0-7**

IMPACT SCIENCES

Multi-Modal Routes Phase 1 Project

1031.004•04/19

Section 4.3, Greenhouse Gas Emissions

The final paragraph on page 4.3-36 is revised as follows:

> While the project would exceed SCAQMD recommended threshold of significance for individual projects, the campus as a whole would comply with the UC Policy on Sustainable Practices, and therefore achieve or exceed emissions reductions necessary to meet state targets. Specifically, the campus would achieve carbon neutrality for scopes 1 and 2 emissions by 2025. This carbon neutrality policy is a more stringent target than SB 32 because it requires net zero Scope 1 and 2 emissions. As shown in **Table 4.3-5 Campus-Wide Greenhouse Gas Emissions Totals Before Mitigation**, Scope 1 & 2 emissions would be approximately 20,322 $MTCO_2e$ per year less than existing conditions by the year 2030. By~~by~~ achieving carbon neutrality of Scope 1 and 2 emissions, UC Riverside would reduce Scope 1 & 2 annual GHG emissions to approximately 52,307 MT of CO_2e by 2030~~, even as the student population continues to increase,~~ which would enable the campus to achieve ~~be below~~ the 40 percent GHG emission reductions necessary to achieve the SB 32 target for 2030.

Section 4.11, Utilities and Service Systems

4.11.2.2, Wastewater

The final paragraph on page 4.11-4 is revised as follows:

> The Sewerage Systems Services Program and its Treatment Services unit, administered by the ~~RPU~~ City of Riverside Public Works Department, collects, treats, and disposes of all wastewater generated within the City of Riverside and is responsible for compliance with State and federal requirements governing the treatment and discharge of wastewater.

3.0 COMMENTS ON THE REVISED DRAFT EIR AND RESPONSES TO COMMENTS

3.1 INDEX TO COMMENTS

As described in **Section 1.0, Introduction,** all comments on the Revised Draft Environmental Impact Report (EIR) received in writing have been numbered, and the numbers assigned to each comment are indicated on the written communications that follow. No comments on the analysis of environmental impacts in the Revised Draft EIR were received during the public hearing held for the project. A transcript of the public hearing is provided at the end of this section. All agencies, organizations, and individuals who commented on the Revised Draft EIR are listed in **Table 3.0-1, Index to Comments,** below.

Table 3.0-1
Index to Comments

Commenter Number	Agency/Organization/Individual – Date
State Agencies	
1	Governor's Office of Planning and Research, State Clearinghouse and Planning Unit – April 16, 2019
Local Agencies	
1	South Coast Air Quality Management District – April 9, 2019
2	City of Riverside – April 15, 2019
Organizations	
1	Earthjustice, Sierra Club & Center for Community Action and Environmental Justice – April 15, 2019
Individuals	
1	Robert A. Phillips – April 15, 2019
Transcript	
PH	Public Hearing – April 4, 2019

3.2 RESPONSES TO INDIVIDUAL COMMENTS

This section presents all written comments received on the Revised Draft EIR and responses to individual comments.

SA-1

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Gavin Newsom
Governor

Kate Gordon
Director

April 16, 2019

APR25'19 PM12:44

JCR CAPITAL PROGRAMS

Tricia Thrasher
University of California, Riverside
1223 University Ave., Suite 240
Riverside, CA 92507-7209

Subject: North District Devleopment Plan
SCH#: 2018061044

Dear Tricia Thrasher:

The State Clearinghouse submitted the above named EIR to selected state agencies for review. The review period closed on 4/15/2019, 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 visit: https://ceqanet.opr.ca.gov/2018061044/3 for full details about your project.

1

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,

Scott Morgan
Director, State Clearinghouse

Letter SA-1: Governor's Office of Planning and Research, State Clearinghouse and Planning Unit

Response SA-1-1

The letter documents compliance with CEQA review requirements and indicates that no comment letters were received by their office, but does not state a specific concern or question regarding the adequacy of the analysis contained in the Revised Draft EIR. Therefore, a response is not required pursuant to CEQA. However, the comment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration.

LA-1

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

April 9, 2019

CEQA@ucr.edu
Tricia D. Thrasher, ASLA, LEED AP, Principal Environmental Planner
University of California, Riverside
Campus Planning, Office of the Campus Architect
Planning, Design, and Construction
1223 University Avenue, Suite 240
Riverside, CA 92507

Revised Draft Environmental Impact Report (RDEIR) for the Proposed North District Development Plan (SCH No. 2018061044)

South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

SCAQMD Staff's Summary of Project Description

The Lead Agency is proposing the phased construction of 1,635,000 square feet of student housing, containing 5,200 student beds, and approximately 210,000 square feet of associated facilities on 51 acres (Proposed Project). Phase one of the Proposed Project includes construction of 416 residential units, containing 1,502 student beds and 155,000 square feet of associated facilities. Phase one is expected to occur over 25 months and become operational in 2021[1]. Construction of full buildout is expected to begin after 2022, as needed. Additionally, future phases will undergo independent environmental analysis, using project-level details unknown at this time, to determine their level of significance, and any resulting mitigation measures[2]. The Proposed Project is located on the northwest corner of Canyon Crest Drive and West Linden Street in the City of Riverside.

1

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction and operational air quality emissions and compared those emissions to SCAQMD's regional and localized air quality CEQA significance thresholds. The Lead Agency found that the Proposed Project would result in less than significant regional and localized air quality impacts for criteria pollutants during construction, after the implementation of mitigation measure (MM) 4.3-1b and MM 4.3-1c[3,4]. MM 4.3-1b requires construction contractors to employ the use of Tier 4 off-road diesel-powered construction equipment and/or best available control technology (BACT) retrofits that achieve Tier 3 emissions reductions at a minimum, where available[5]. Additionally, MM 4.3-1b requires construction contractors to limit onsite idling of heavy duty trucks to five minutes or less, minimize the traffic impacts resulting from the Proposed Project's construction, utilize low-NOx diesel fuel, and reroute haul trucks and/or construction equipment away from traffic congestion and sensitive receptors[6]. MM 4.3-1c requires construction contractors to use pre-painted materials, where available, and low VOC paints that comply with SCAQMD Rule 1113 at a minimum[7]. The Lead Agency also found that phase one of the Proposed Project would result in less than significant impacts

[1] RDEIR. Section 2, *Executive Summary*, Page 3.0-24.
[2] RDEIR. Section 2, *Executive Summary*, Page 2.0-1 and 2.0-2.
[3] RDEIR. Section 4.2, *Air Quality*, Table 4.2-7, *Estimated Project Construction Emissions – Mitigated*, Page 4.2-25.
[4] UCR's Long Range Development Plan (LRDP) Planning Strategies, Planning Principles, and Mitigation Measures have been incorporated by reference in Appendix 1.0.
[5] RDEIR. Section 4.2, *Air Quality*, Page 4.2-23.
[6] *Ibid.*
[7] *Ibid.*

during operation for all criteria pollutants[8], and full buildout would result in significant and unavoidable impacts for criteria pollutants NOx and VOCs[9]. 1

SCAQMD Staff's Comments

Upon review of the RDEIR, SCAQMD staff found that the Lead Agency compared the Proposed Project's *operational* emissions to SCAQMD's regional thresholds for *construction* to determine that the Proposed Project's operational air quality impacts would be less than significant (See Table 1 below). For example, the Lead Agency compared the operational NOx emissions to SCAQMD's CEQA air quality significance threshold of 100 pounds per day (lbs/day) for construction instead of 55 lbs/day for operation. The Proposed Project's operational VOC emissions were also compared to SCAQMD's CEQA air quality significance threshold of 75 lbs/day for construction instead of 55 lbs/day for operation.

Figure 1: SCAQMD Staff's Copy of Table 4.2-8, *Estimated Project Operational Emissions*

Table 4.2-8
Estimated Project Operational Emissions

	Maximum Emissions in Pounds per Day					
Construction Year	**VOC**	**NOx**	**CO**	**SOx**	**PM10**	**PM2.5**
NDD Phase 1						
Maximum Daily Emissions	25	57	191	1	46	13
SCAQMD Regional Threshold	75	100	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No
Localized Project Emissions	13	<1	34	<1	<1	<1
SCAQMD Localized Threshold	N/A	270	1,577	N/A	4	2
Exceeds Threshold?	No	No	No	No	No	No
NDD Plan						
Maximum Daily Emissions	61	107	415	<1	119	33
SCAQMD Regional Threshold	75	100	550	150	150	55
Exceeds Threshold?	No	Yes	No	No	No	No
Localized Emissions	37	1	103	<1	1	1
SCAQMD Localized Threshold	N/A	270	1,577	N/A	4	2
Exceeds Threshold?	No	No	No	No	No	No
NDD Plan (Phase 1 + Remaining Phases)						
Maximum Daily Emissions	**86**	**165**	**606**	**2**	**165**	**45**
SCAQMD Regional Threshold	75	100	550	150	150	55
Exceeds Threshold?	Yes	Yes	Yes	No	Yes	No
Localized Emissions	50	2	138	<1	1	1
SCAQMD Localized Threshold	N/A	270	1,577	N/A	4	2
Exceeds Threshold?	No	No	No	No	No	No

2

Therefore, SCAQMD staff recommends that the Lead Agency revise the Air Quality Analysis in the Final EIR by comparing all operational emissions to SCAQMD's regional CEQA significance thresholds for *operation* and revise the level of significance determination for any criteria pollutants that exceed their respective significance thresholds.

SCAQMD's 2016 Air Quality Management Plan 3

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP)[10], which was later approved by the California Air Resources Board on March 23, 2017. Built upon

[8] *Ibid.* Table 4.2-8, *Estimated Project Operational Emissions*, Page 4.2-26.
[9] *Ibid.*

the progress of implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin (Basin). The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment.

As described in the 2016 AQMP, achieving NOx emissions reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attaining the ozone NAAQS as expeditiously as practicable. If, upon revisions of the Air Quality Analysis, the Lead Agency finds that operation of phase one of the Proposed Project would result in significant air quality impacts, particularly NOx emissions, feasible mitigation measures would be required pursuant to CEQA Guidelines Section 15126.4.

Recommended Mitigation Measures

SCAQMD staff has compiled a list of recommended mitigation measures as suggested resources and guidance to the Lead Agency to assist the identification of feasible mitigation measures for incorporation in the Final EIR to reduce emissions and minimize significant air quality impacts, particularly from NOx and VOCs. Additional information on potential mitigation measures as guidance to the Lead Agency is available on the SCAQMD CEQA Air Quality Handbook website[11].

3

a) Require that 240-Volt electrical outlets or Level 2 electric vehicle (EV) charging stations be installed in at least 5% of all vehicle parking spaces that would enable charging of EVs and/or battery powered vehicles. Vehicles that can operate at least partially on electricity have the ability to substantially reduce the significant NOx and ROG impacts from this project. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting existing infrastructure. Therefore, SCAQMD staff recommends the Lead Agency require phase one, and all future phases of the North District Development Plan, to provide the appropriate infrastructure to facilitate sufficient electric charging for vehicles to plug-in. The Lead Agency should also include analyses to evaluate and identify sufficient power available for zero emission trucks and supportive infrastructures in the Energy and Utilities and Service Systems Sections of the Final EIR, where appropriate.

b) Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs throughout the North District Development Plan Area to generate solar energy for each respective building facility.

c) Provide incentives for employees working at the Proposed Project in order to encourage the use of public transportation or carpooling, such as discounted transit passes or carpool rebates.

d) Implement a rideshare program for employees working at the Proposed Project and set a goal to achieve a certain participation rate over a period of time.

e) Limit parking supply and unbundle parking costs.

f) Require use of electric or alternatively fueled street-sweepers with HEPA filters.

g) Require use of electric lawn mowers and leaf blowers.

[10] South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan*. Accessed at: http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan.

[11] South Coast Air Quality Management District. Accessed at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook.

h) Maximize the planting of trees in landscaping and parking lots.

i) Use light colored paving and roofing materials. 3

j) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.

Closing

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Further, when the Lead Agency makes the finding that the recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Robert Dalbeck, Assistant Air Quality Specialist, CEQA- IGR Section, at RDalbeck@aqmd.gov, or (909) 396-2139 if you have any questions regarding the enclosed comments. 4

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS:RD
RVC190305-02
Control Number

Letter LA-1 South Coast Air Quality Management District

Response to Comment LA 1-1

This comment is a set of general introductory remarks restating the proposed Project description and the methodology used in the air quality analysis. It presents no significant environmental issues and no specific response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed Project.

Response to Comment LA 1-2

The SCAQMD notes that the analysis used the SCAQMD construction regional thresholds of significance instead of the SCAQMD operational regional thresholds of significance. **Table 4.2-8** has been revised to reflect the operational thresholds.

Table 4.2-8
Estimated Project Operational Emissions

	Maximum Emissions in Pounds per Day					
~~Construction Year~~Phase	VOC	NOx	CO	SOx	PM10	PM2.5
NDD Plan Phase 1						
Maximum Daily Emissions	25	57	191	1	46	13
SCAQMD Regional Threshold	~~75~~55	~~100~~55	550	150	150	55
Exceeds Threshold?	**No**	**~~No~~Yes**	**No**	**No**	**No**	**No**
Localized Project Emissions	13	<1	34	<1	<1	<1
SCAQMD Localized Threshold	N/A	270	1,577	N/A	4	2
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Remaining NDD Plan Phases (Minus Phase 1)						
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NDD Plan (Phase 1 + Remaining Phases)						
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Exceeds Threshold?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**No**
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SCAQMD Localized Threshold	N/A	270	1,577	N/A	4	2
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

*Source: Impact Sciences, Inc. Emissions calculations are provided in **Appendix 4.2**.*
Totals in table may not appear to add exactly due to rounding in the computer model calculations.

The Revised Draft EIR concluded that even with implementation of all feasible mitigation, operation of the NDD Plan would result in significant and unavoidable regional emissions of VOC and NOx. While **Table 4.2-8** has been updated to clarify that portions of the NDD Plan would also exceed SCAQMD regional significance thresholds for operation (Phase 1 for NOx and the remaining phases for VOC), this revision does not affect the Revised Draft EIR's conclusion that operational emissions of VOC and NOx would be significant and unavoidable.

Response to Comment LA 1-3

All feasible mitigation measures to reduce the NDD Plan's impacts to air quality, including those suggested by SCAQMD, have been included in the Revised Draft EIR or incorporated into the proposed Project as design features. **MM AIR-1** and **MM AIR-2** will reduce VOC emissions from area sources to the extent feasible by requiring low-VOC architectural coatings and cleaning supplies. As identified in the Revised Draft EIR, the proposed Project already includes feasible design features to reduce vehicle emissions, such as electric vehicle charging, bicycle parking, and a mixed-use design. This includes complying with electric vehicle charging requirements specified in the California Building Code Title 24. As the campus is providing more than 201 parking spaces, the requirement for electric vehicle charging is 6% of total parking spaces.

Page 3.0-16 of the Revised Draft EIR notes that the NDD Plan would be an all-electric project. Per the UC Policy on Sustainable Practices section of the Greenhouse Gas (GHG) chapter (page 4.3-25 of the Revised Draft EIR), the campus will operate on 100% clean electricity by the year 2025. The proposed Project would be consistent with this policy. The campus will utilize all available GHG reduction measures to meet this goal, including on-site solar to the extent feasible.

As noted on page 4.3-43 of the Revised Draft EIR, the campus already employs a successful vanpool program, and additional routes are continuously being considered. Additionally, SCAQMD recommends incentives for public transportation. As noted on page 4.3-42 of the Revised Draft EIR, UCR students, faculty, and staff can already ride RTA buses at no-cost. Participants in the Public Transit Program also receive complimentary parking privileges on campus. Discounted vouchers for Metrolink are also available to students, and RTA bus service connects the campus to the downtown Riverside Metrolink station.

The SCAQMD further recommends light colored pavement and roofing materials as a mitigation measure. Both of these are already included as project design features per Campus Design Guidelines.

SCAQMD staff recommends use of Energy Star heating, cooling, lighting devices, and appliances. Like the other suggested mitigation measures, this is already included as a design feature, consistent with the UC Policy on Sustainable Practices.

Response to Comment LA 1-4

The comment requests written responses to the SCAQMD comments, which have been provided above.

As required under CEQA Guidelines Section 15088(b) the Final EIR will be made available for review to all commenting agencies and interested parties for 10 days prior to any action being taken on the proposed project regarding the certification of the EIR.

LA-2

Community & Economic Development
Department

City of Arts & Innovation

April 15, 2019

Ms. Tricia Thrasher, ASLA, LEED AP
Principal Environmental Planner
University of California Riverside
1223 University Avenue, Suite 240
Riverside, CA 92521

Subject: City of Riverside's Review of a Revised Environmental Impact Report (EIR) for UC Riverside's North District Development Plan (Project # 958080) (SCH # 2018061044)

Dear Ms. Thrasher:

Thank you for the opportunity to review and comment on the Revised Draft Environmental Impact Report (DEIR) for UCR's North District Development (NDD) Plan.

The NDD Plan involves redevelopment of approximately 51 acres in the northern portion of UCR's campus, at the former Canyon Crest Family Student Housing site. The proposed project, as described in the Revised DEIR, would provide for higher density student housing of up to 5,200 student beds; would provide for the phased development of apartments, mixed-use residential, resident amenity/support spaces, living/learning/community/administration spaces, seminar rooms, a food lab, dining facilities, athletics facilities, and parking. A competition athletics field is identified with seating of up to 5,000 people; and parking could account for up to 4,895 spaces, including 695 surface spaces and two 2,100 space parking garages. 1

The Revised DEIR has been routed to City of Riverside (City) departments, and the following represents a compilation of city comments on the Revised DEIR, for consideration by UCR Staff and the Board of Regents.

Community & Economic Development – Planning Division:

- Tables 2.0-2 and 3.0-4 reflects the project description, indicating that the project will be composed of up to 5,200 beds. However, Tables 2.0-1 and 3.0-2 – *Proposed Land Use Designations and Districts*, identifies a range of density for five (5) different residential and mixed use district, wherein the total for all districts equates to 7,300 beds. The Revised DEIR does not clarify that the development potential in each of these districts would be capped, such that the cumulative total of beds would not 2

exceed 5,200. Rather, Tables 2.0-1 and 3.0-2 are described as presenting the "*intensity of land uses planned for each land use district*". Failure to clarify and document the relationship of Tables 2.0-2 and 3.0-4 with Tables 2.0-1 and 3.0-2 is of significant concern to the City, as UCR's representation of the project, and the City's evaluation, do not reflect 7,300 beds. Please revise Tables 2.0-1 and 3.0-2 to clarify that the project evaluated in the Revised DEIR is capped at 5,200 beds, and any subsequent increase in beds within the NDD would be subject to additional environmental review. 2

- Tables 2.0-1 and 3.0-2 indicates that the project has the potential to contain up to 157,000 square feet of "Mixed Use" uses. Additionally, the table does not clarify what the types (mix) of uses are in the Revised DEIR, and whether the uses in Tables 2.0-2 and 3.0-4 are included in the mixed use category.

  A review of the DEIR's traffic analysis states that the mixed-uses reflect "retail" space, and that the uses listed in Table 2.0-2 and 3.0-4 are not included (i.e., they are part of the residential building). Unfortunately, the DEIR traffic analysis only accounts for 62,800 square feet of mixed-use retail at build-out; which is significantly lower than the potential "intensity" of mixed uses shown in Tables 2.0-1 and 3.0-2 (157,300 sq. ft.). Similar to the comment above, if it is the intent of the Revised DEIR to "cap" the project at 62,800 square feet of retail mixed-use, than Tables 2.01 and 3.0-2 need to be clarified, and the Revised DEIR would need to state that any subsequent increase in retail mixed-use would require additional environmental review. 3

Public Works Department – Traffic Division:

- The Public Works Department has reviewed the Traffic Impact Study included in the Revised DEIR, and has the following comments:

  1. As discussed between the UCR Campus Planning team and the City of Riverside on April 15, 2019, please provide additional details regarding the development and inclusion of cumulative project vehicular trips in the Traffic Impact Analysis. 4

  2. Figure 5 (North District Development Plan - Multi-Modal Routes) identifies sharrows as Class 4 bicycle lane. As per established bikeway classifications, a lane marked with a sharrow is a Class 3 bicycle lanes. 5

  The following additional communication was sent to the City regarding the Traffic Impact Analysis:

  > "The University will pay the City the proportional share of the actual cost of implementing mitigations at the time of implementation. The University's proportional share will be based on the North District Development project's total traffic contribution to the impacted intersections. The City mentioned that several mitigation measures will conflict with existing or planned bicycle lanes, or that the suggested mitigation measures will not alleviate traffic 6

congestion based on prior studies conducted by the City. Therefore, University will work with the City to identify mitigations considered feasible for implementation at impacted intersections in the City of Riverside's jurisdiction."

6

3. Please calculate the proportional fair share responsibility for all identified impacts and include them in the Traffic Impact Analysis.

4. It is unclear under what form of agreement or commitment the identification of feasible mitigation and subsequent payment of proportional share will occur, please include additional details.

7

5. In the interest of developing agreed upon solutions for anticipated traffic deficiencies, the City requests that concept illustrations of proposed mitigations are included as part of the analysis, and additionally offers the following comments on the mitigation measures within the Traffic Impact Analysis:

   a) On page 58; Third Street & Chicago Avenue – The TIA states indicates that there is no bicycle lane at the intersection of Third Street and Chicago Avenue. However, the City's Bicycle Master Plan proposes a bicycle facility for Chicago Avenue. The mitigation needs to confirm that the bicycle lane can co-exist with the improvements specified. Otherwise the mitigation measure is not applicable.

   b) On page 59; Canyon Crest Drive and Blaine Street – The mitigation proposes removing an existing Class 2 bike lane on Linden Street. Linden Street is not applicable to this intersection. If the mitigation is proposing a bicycle lane at Canyon Crest Drive and Blain Street, then the mitigation measure is not feasible because the impacts to the bicycle lanes is not acceptable. A feasible mitigation will need to be developed to improve the Level of Service (LOS) at the intersection that does not involve the removal of bicycle lanes.

8

   c) On page 60; Iowa Avenue and Linden Street – An appropriate Level of Service (LOS) for the intersection appears to be achieved by retiming the signal to a split phase 3. This is not feasible because this would lower the operating times to levels substantially below the minimum green time identified in the City's adopted TIA Guidelines.

   d) On page 60; Canyon Crest Drive & Linden Street – The mitigation requires the removal of the Class 2 bike lane along Linden Street. Removing the bicycle creates unacceptable impacts to bicyclists. A feasible mitigation will need to be developed to improve the Level of Service (LOS) at the intersection without removing bicycle lanes.

e) On page 61; University Avenue & Iowa Avenue: The mitigation requires the removal of a Class 2 bike lane. Removing the bicycle creates unacceptable impacts to bicyclists. A feasible mitigation will need to be developed to improve the LOS at the intersection without removing bicycle lanes.

8

f) On page 62; Big Springs Road and Watkins Drive – The City's Traffic Division has assessed this intersection for a single-lane roundabout. The City's assessment has identified that a roundabout at the intersection will not operate with an acceptable LOS. A feasible mitigation will need to be developed to improve the intersection without using a single-lane roundabout.

Public Works Department – Sewer Division:

- At the time of the Initial Study (IS), the City's Public Works Department stated that a sewer capacity study should be prepared to appropriately analyze project impacts to the City sewer system, and identify mitigation for potentially significant impacts related to wastewater impacts. Unfortunately, the City's Public Works Division was not provided the opportunity to review the sewer capacity study before it was published. The following comments are being provided in response to the Revised DEIR and supplemental Sewer System Study (SSS) prepared Charles Marr Consulting and dated February 26, 2019:

9

a. Revised DEIR Section 4.11.2.2 Wastewater identifies that the Sewer Systems Services Program and its Treatment Services Unit is administered by the Riverside Public Utilities (RPU). This is incorrect. Sewer and treatment is administered by the City's Public Works Department.

b. Table 1 on Page 2 of the SSS totals the maximum "Building Area" column as 172,000 sf. It appears the table incorrectly totaled all numbers in the Building Area column, such that the 15,000 sf in Phase 1 was calculated twice. Mathematically the column should add up to 157,000 sf, instead of 172,000 sf.

10

c. The first full paragraph on Page 3 of the SSS states, "*The Study estimates current operating peak depth ratios in the three sewers at approximately 23.6 to 28.4 percent (Table 2). It is estimated that adequate capacity is available within the 18-inch University Drive sewer for Phase 1 and buildout of the NDDP plus current weather flow, which confirms the findings of the October 2018 Carollo report.*" This statement is inaccurate, as the sewer system at project buildout has not been analyzed.

11

d. Table 3 on Page 5 of the SSS identifies 92 gpm as the maximum average flow for Phase 1. Mathematically, 59 + 4 + 30 equals 93 gpm. Similarly, the

12

future minimum total at the bottom of the table identifies 278 gpm; whereas adding all the numbers shown in the column equal only 277 gpm. The City assumes the mathematical error is due to rounding decimals. 12

e. Page 9 of the SSS, Linden Street 8-inch Sewer section: The report fails to add tables for proposed minimum and maximum peak flows for future phases (not just phase 1). 13

f. Page 9 of the SSS, Linden Street 9-inch Sewer section: The report states "*Because this should be considered maximum allowed capacity, it is recommended that the on-site sewer system for all future phases of NDDP be designed to convey flows directly to the Canyon Crest Drive sewer.*" This statement needs to be substantiated by analyzing the sewer for the final buildout phase. The final buildout was not analyzed. 14

g. Page 9 of the SSS, Canyon Crest Drive 8-inch Sewer section: The last paragraph states "*...if allowed to flow at a depth ratio of 75 percent, including wet weather conditions.*" 50 percent is the maximum allowed for pipes under 18 inches in diameter. Please revise the report and analysis. 15

h. Page 10 of the SSS, University Avenue 18-inch Sewer: Please confirm that there are no deficiencies beyond the direct connections. 16

i. Page 10 of the SSS, University Avenue 18-inch Sewer: The conclusions and recommendations 2, 4 and 6 need to be evaluated and, if necessary, revised, since capacity is limited to 50% (as stated above). The report needs to verify if upsizing or paralleling will be necessary in phase 1 as a result of 50% capacity limit. 17

<u>Park, Recreation and Community Services Department:</u>

- The City's Parks, Recreation and Community Services Department (PRCSD) has reviewed the Draft EIR, and has the following comments:

a) Impact 4.9-2 – The proposed housing project will provide capacity for up to 5,200 new beds on the project site, including family housing. Per the City of Riverside's RMC Chapter 16, all new development within the City shall pay the local, regional and aquatic fees to provide funding for such new or improved facilities to meet the City's established standards. The City's established standards for local parks is 3 acres for every 1000 residents. With the potential of 5,200 potential additional residents the City's existing public recreational facilities are not sufficient to serve the proposed increase in populations and would require an additional 15.6 acres of developed local (Neighborhood or Community) park. Therefore, the project would have a significant impact on public recreational resources. 18

b) The offsite recreational impact could be mitigated to less than significant through payment of park fees per Chapter 16 of the RMC, which will compensate the City for the cost of new or improved recreational services needed to serve the students and their families. If this impact isn't mitigated, the City's existing recreational services, such as Trails, Regional Parks, Community gyms/courts/fields and local playgrounds, etc. will quickly deteriorate from over use by students and their family's seeking public recreation and programs outside of campus. 18

Please contact Randy McDaniel, Principal Park Planner, should you have any specific questions regarding PRCSD comments. Randy can be reached at (951) 826-2006, or rmcdaniel@riversideca.gov.

Riverside Police Department:

- The City's Police Department has reviewed the proposed North District Development Plan, and does not identified any immediate, high-risk public safety concerns. However, as identified in the attached memo, dated February 1, 2019, the Police Department has provided the following requests: 19

  a. Before plans are finalized, the University should seek a thorough review from a police professional within the University of California system to provide input regarding Crime Prevention Through Environmental Design (CPTED) philosophies.

  b. This proposal, and the many other capital improvement projects and expansions on the UC Riverside Campus, will have an effect on the consumption of public safety services. The Police Department would expect UC Riverside to maintain, if not expand, its police force, and remain committed to the partnership with the City's Police Department through the University Neighborhood Enhancement Team (UNET).

  c. The University ensure provisions are in place to mitigate traffic safety impacts during project construction.

Riverside Fire Department:

- The City's Fire Department has reviewed the proposed North District Development Plan, and provided a memo, dated April 15, 2019: 20

  a. Fire Department Station No. 4, located at 3510 Cranford Street, responded to 3,688 calls in 2018, which exceeds the calls responded to by other stations within the City. The proposed project (5,200 beds and mixed retail uses), in

combination with other UCR projects, could greatly impact Station No. 4 personnel. An increase in calls is expected.

b. Due to the buildings height, size and type of occupancy, the Fire Department would require more personnel to respond to any large incident, in order to safely mitigate any and all life hazards. 20

c. Station No. 4 currently houses one engine and four (4) personnel. To safely mitigate the impacts of the project, the Department would look to propose a new fire station that would house additional apparatus (a fire paramedic squad and a 107 ft. ladder truck), and accommodate additional personnel to support the current and projected demands for the area.

The City of Riverside appreciates your consideration of the comments within this letter. Please forward responses to these comments to the City of Riverside Planning Division. Should you have any questions, please contact Doug Darnell, AICP, Senior Planner, at (951) 826-5219, or by e-mail at ddarnell@riversideca.gov. 21

We thank you again for the opportunity to provide review this important proposal, and we look forward to working with the University to address the concerns contained herein.

Sincerely,

Jay Eastman, AICP
Principal Planner

attachment:
Police Department memo, dated February 1, 2019
Fire Department memo, dated April 15, 2019

cc: Rusty Bailey, Mayor
Riverside City Council Members
Al Zelinka, FAICP, CMSM, City Manager
Rafael Guzman, Assistant City Manager
David Welch, Community & Economic Development, Interim Director
Kris Martinez, Public Works Director
Todd Jorgensen, Public Utilities Interim General Manager
Adolfo Cruz, Parks, Recreation and Community Services Director
Sergio Diaz, Police Chief
Michael Moore, Fire Chief
Kristi Smith, Chief Assistant City Attorney

LA-2

MEMO

Police Department

DATE: February 1, 2019

TO: DOUG DARNELL

FROM: KEVIN TOWNSEND
LIEUTENANT, POLICE DEPARTMENT

RE: UCR NORTH DISTRICT DEVELOPMENT PLAN

We have completed an initial review of the University of California at Riverside North District Development Plan (Project #958080) dated June 2018.

The Police Department does not have any immediate, high-risk public safety concerns, however, we have several requests.

Before plans are finalized, the planning group should seek a thorough review from a police professional within the University of California system to provide input for Crime Prevention Through Environmental Design (CPTED) philosophies. These often include considerations such as lighting, fences and gates, placement of walkways, shrubbery, and surveillance cameras, building access systems, and vehicle parking concerns.

This proposal, in particular when considering the many other potential capital improvement projects and expansions of the UC Riverside campus, will have an effect on the consumption of public safety services. It is difficult to forecast an exact impact but this individual project alone will add thousands of student residents into high-density housing, dining and recreational activities, a sports field, and additional parking areas, which will require more policing services to ensure it is a safe environment for students, staff, and visitors. As such, the Police Department would expect UC Riverside to maintain, if not expand, its police force and remain committed to the partnership with our department through the University Neighborhood Enhancement Team (UNET).

Finally, Nathan Mustafa in the city's Traffic Engineering department already detailed some traffic issues in a separate memorandum, however, the Police Department would ask that if and when this project is approved there would be provisions in place to mitigate traffic issues during the construction phase.

The Police Department supports the university's endeavors but would respectfully remind planners that adding thousands of residents along with its many wonderful amenities requires more policing services, which should primarily come from the UC Riverside system. We are happy to support the project with this in mind and offer our assistance as needed.

LA-2

CITY OF RIVERSIDE

MEMORANDUM

Fire Department

Administration

DATE: April 15, 2019

TO: MR. DOUG DARNELL

FROM: MICHAEL MOORE, FIRE CHIEF

CC: AL ZELINKA, CITY MANAGER
LEA DEESING, ASSISTANT CITY MANAGER
RAFAEL GUZMAN, ASSISTANT CITY MANAGER

RE: UCR NORTH DISTRICT DEVELOPMENT PLAN EIR

After reviewing the EIR for the UC North District Development Plan, our Fire Department comments have been noted below. Our Station 4, is currently located at 3510 Cranford St. and responded to 3,688 calls in 2018. This new development along with other new and proposed projects could greatly impact our Station 4 Personnel along with other surrounding units in the immediate area.

1. Due to the increased number of students being proposed (5,200) and other additional employees that would be onsite at any given time, the fire department would see an increase of calls annually.

2. Due to the buildings height, size and type of occupancy, the fire department would require more personnel to respond to any large incident in order to safely mitigate any and all life hazards.

3. Currently the existing Station 4 only houses one engine and four personnel. Our department would look at proposing a new fire station that would house additional apparatus (Fire Paramedic Squad and 107 ft. Ladder Truck) and accommodate additional personnel to support the current and projected demands of this area.

Letter LA-2 City of Riverside

Response to Comment LA 2-1

This comment is a set of general introductory remarks restating the proposed project description. It presents no environmental issues within the meaning of CEQA and no specific response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response to Comment LA 2-2

As discussed in **Section 3.0, Project Description**, the proposed North District Development Plan (NDD Plan) would provide up to 5,200 student beds on the East Campus on an approximately 51-acre site located in the northeastern portion of the campus. The NDD Plan comprises Phase 1, which involves the construction of about 1,500 student beds and associated facilities by 2021 and a future phase(s), which involves the construction of up to 3,700 student beds and associated facilities after 2022, as feasible and needed. Tables 2.0-1 and 3.0-3 are solely intended to inform readers about the general intensity of the development, which may vary between districts. Any subsequent increase in student beds beyond that analyzed in the Revised Draft EIR would be subject to additional environmental review.

Response to Comment LA 2-3

As previously discussed, **Tables 2.0-1** and **3.0-3** are solely intended to inform readers about the general intensity of the development, which may vary between districts. Any subsequent increase in the proposed retail/commercial uses on the project site beyond that analyzed in the Revised Draft EIR would be subject to additional environmental review.

Response to Comment LA 2-4

To develop future forecasts for the Future Year (2025) conditions, including growth associated with cumulative projects, the Riverside Traffic Analysis Model (RivTAM) was used. As described in the Transportation Impact Study, both the land use and roadway network in the model were reviewed for consistency with planned projects within a five-mile radius of the study area. A list of cumulative projects was requested from the City of Riverside at the initiation of the Transportation Impact Study and was reviewed with land use assumptions in the future year model to ensure that all known reasonably foreseeable projects within a five-mile radius of UC Riverside were accounted for in the future year traffic forecasts and impact analysis. This process resulted in an average growth rate of 2% per year during the AM peak hour and 3% per year during the PM peak hour in the study area. Appendix B of the Traffic Impact Analysis has been revised to include growth assumed in the RIVTAM model for all reasonably foreseeable development projects.

Response to Comment LA 2-5

Figure 3.0-7, North District Development Plan – Phase 1 – Multi-Modal Routes has been updated to correct the bicycle facility classifications. Please refer to Section 2.0, Revisions to the Revised Draft EIR.

Response to Comment LA 2-6

In response to the City's request that the University calculate the proportional fair share responsibility for all identified impacts and include them in the Traffic Impact Analysis, the following information is provided:

Intersection ID	N/S Street	E/W Street	AM Peak Hour	PM Peak Hour
			Proportional Share	Proportional Share
2	Chicago Avenue	3rd Street	**4%**	**8%**
5	Iowa Avenue	Blaine Street	**6%**	**13%**
7	Canyon Crest Drive	Blaine Street	**13%**	**28%**
9	Iowa Ave	Linden Street	4%	**9%**
10	Canyon Crest Drive	Linden Street	15%	**26%**
12	Iowa Avenue	University Avenue	4%	**8%**
15	Watkins Drive	Big Springs Road	**3%**	**7%**

Bold text indicates impacted peak hour.
Source: Fehr & Peers, April 23, 2019

Response to Comment LA 2-7

The University will pay the City the proportional share of the actual cost of traffic improvements, determined and constructed by the City to address impacts to which the project contributes at the time that the implementation of such improvements is reasonably certain, and no later than the start of construction of the improvements. Request for funds would be made by the City using existing communication channels between the City and the University. The University's proportional share will be based on the NDD Plan project's total traffic contribution to the impacted intersections, as determined by the traffic impact analysis prepared for the project, and shown above in **Response to Comment LA 2-6**.

Response to Comment LA 2-8

The solutions presented in the revised Draft EIR for the intersections that under the sole jurisdiction of the City of Riverside are meant as examples of potential roadway realignments that could serve to mitigate traffic impacts, however these solutions are by no means meant to be final or prescriptive, and no concept illustrations have been produced. The University will work with the City to identify

mitigations considered feasible for implementation at impacted intersections in the City of Riverside's jurisdiction, and will pay a proportional share of the actual cost of the traffic improvements at the time that the implementation of the traffic improvements are reasonably certain, and no later than the start of construction of the traffic improvements.

Response to Comment LA 2-9

The final paragraph on page 4.11-4 is revised as follows:

4.11.2.2 Wastewater

The Sewerage Systems Services Program and its Treatment Services unit, administered by the ~~RPU City of Riverside Public Works Department,~~ collects, treats, and disposes of all wastewater generated within the City of Riverside and is responsible for compliance with State and federal requirements governing the treatment and discharge of wastewater.

Response to Comment LA 2-10

The comment notes that Table 1 on page 2 of the Sewer System Study produced by Charles Marr Consulting is incorrectly tallied, a corrected version of the table is shown below.

Table 1 – North District Development Project

Segment	Land Use	Acres	Quantity	
			Quantity	Building Area
Phase 1 – MAXIMUM DENSITY				
1	Student Residential 1	2.125	1,000 beds	
	Mixed Use District 1	2.125		15,000 sf
2a	Student Residential 2a	1.183	500 beds	
	Dining Commons	--		
Phase 1 MAXIMUM Total		***5.433***	***1,500 beds***	***15,000 sf***
Future Phase – MAXIMUM DENSITY				
2B	Student Residential 2b	1.892	800 beds	
	Mixed Use District 2	3.075		22,000 sf
	Dining Commons	--		
3	Student Residential 3	2.725	1,400 beds	
	Mixed Use District 3	2.725		50,000 sf
4	Student Residential 4	4.2	2,600 beds	
	Mixed Use District 4	4.2		70,000 sf

5	Student Residential 5	1.7	1,000	
	Mixed Use District 5	1.7		--
6	Events Center	5.7	7,000 seats	
7	Open Space	11.6		
8	Parking 1	2.15		
8	Parking 2	4.05		
Future Phase MAXIMUM Total			***5,800***	***145,000 sf***

As previously discussed, the numbers provided in **Table 3.0-3** are solely intended to inform readers about the general intensity of the development, which may vary between districts. As such, given that the numerical error overstates the amount of development that could occur under the NDD Plan, the Sewer System Study presents a worst-case conservative analysis of potential impacts at full buildout.

Response to Comment LA 2-11

The comment incorrectly states that the sewer system at project buildout has not been analyzed. Contrary to the commenter's assertion, the two sewer system studies that were performed to evaluate current wastewater flows and to estimate future flows generated by the proposed NDD Plan, one by Carollo, submitted to the City of Riverside in October 2018 (included as **Appendix 4.11b** to the Revised Draft EIR), and a second, supplemental sewer study (SSS) provided to UCR by Charles Marr Consulting dated February 26, 2019 (included as **Appendix 4.11c** to the Revised Draft EIR) included calculations for wastewater generation for Phase 1 of the NDD Plan and at full project buildout.

Response to Comment LA 2-12

The comment notes that totals on Table 3 of the Sewer System Study are incorrectly tallied, and further states that it is assumed that this error is due to rounding; this is correct.

Response to Comment LA 2-13

The comment states that the SSS fails to add information related to future NDD Plan phases. As discussed in Section 3.0, Project Description of the Revised Draft EIR, the phasing of the remainder of the NDD Plan development is uncertain at this time and may occur in one or more phases. As such, it would be speculative to provide information for construction of the interim phases of the NDD Plan leading to full buildout; per *CEQA Guidelines* Section 15145 an EIR need not engage in "sheer speculation" as to future environmental consequences.

The analyses in both the Carollo study and the SSS include calculations for wastewater generation for Phase 1 of the NDD Plan and at full project buildout.

Response to Comment LA 2-14

As previously discussed, the analyses in both the Carollo study and the SSS include calculations for wastewater generation for Phase 1 of the NDD Plan and at full project buildout, which indicate that the existing Linden Street and Canyon Crest Drive sewer capacities would be sufficient for Phase 1 NDD Plan flows. Under project buildout, and depending on on-site sewer collection design, the Linden Street 8-inch sewer may require upsizing beyond Phase 1. In like manner, the 8-inch sewer in Canyon Crest Drive north of Linden Street may also require upsizing beyond Phase 1. The Canyon Crest Drive sewer south of Linden Street will require upsizing or paralleling prior to ultimate buildout of the NDD Plan.

Thus, to minimize the impacts of the proposed NDD Plan on the Linden Street and Canyon Crest Drive sewers, **Mitigation Measures UTL-1** and **UTL-2** (as shown below) would be implemented. Due to its size, the University Avenue sewer has adequate capacity to manage potential future peak flows, estimated at maximum of 1,365 gpm.

MM UTL-1 The on-site wastewater system should be designed to limit flows to the Linden Street sewer. Conveyance of dry-weather flow from the NDD Plan site should be limited to 333 to 400 gpm.

MM UTL-2 Following the completion of Phase 1 of the NDD Plan, the Campus shall perform new sewer monitoring to determine the existing flows. The Canyon Crest sewer shall be paralleled or upsized to meet the wastewater utilities demands generated by the proposed NDD Plan at buildout. The upgrades would consider wet weather flows, peaks that may not coincide with existing flows, and flow attenuation.

Response to Comment LA 2-15

As discussed above, implementation of **Mitigation Measure UTL-2** prior to the completion of full buildout of the NDD Plan would ensure that the Canyon Crest sewer section would have the capacity to manage potential future peak flows, including wet weather flows.

Response to Comment LA 2-16

The comment requests that the University confirm that there are no deficiencies beyond the direct connections. It is not clear which 'direct connections' the commenter is referring to, as these are not discussed in either report. As discussed above, and required by **Mitigation Measures UTL-1** and **UTL-2**, all future improvements to the sewer lines will be development driven and would be completed based on the timing of new development within the service area.

Response to Comment LA 2-17

As discussed on page 2 of the Carollo study, when sizing new sewer pipelines, it is common practice to adopt different flow depth criteria for various pipe sizes. Design d/D ratios typically range from 0.5 to 0.92, with the lower values typically used for smaller pipes, which may experience flow peaks greater than design flow or blockages from debris, paper, or rags. The recommended d/D criteria for sizing new trunk lines are as follows; for pipelines 10 inches and smaller in diameter, the maximum d/D value is 0.5 or 50 percent of the pipeline depth, for pipelines that are 12 inches to 18 inches in diameter, the recommended maximum d/D is 0.67, and for pipelines larger than 18 inches in diameter, the maximum d/D is 0.75.

As previously discussed, the analyses in both the Carollo study and the SSS provide include calculations for wastewater generation for Phase 1 of the NDD Plan and at full project buildout (refer to Manning's Spreadsheet #1 and Manning's Spreadsheet #2 in the Appendix to the SSS), which indicate that the existing Linden Street and Canyon Crest Drive sewer capacities would be sufficient for Phase 1 NDD Plan flows.

Response to Comment LA 2-18

The comment asserts that implementation of the NDD Plan would have a significant impact on public recreational resources, but that the impact could be mitigated through the payment of park fees per Chapter 16 of the Riverside Municipals Code.

As discussed on page 4.9-5 in **Section 4.9, Recreation**, in the Revised Draft EIR, the NDD Plan would not increase enrollment, and therefore would not have an effect on the demand for regional parks or recreational facilities. The NDD Plan would concentrate the demand for recreational facilities on the UC Riverside campus. However, unmet demand for recreational facilities could lead to use of off-campus facilities. As determined under City of Hayward v. Trustees of the California State University (2015) 242 Cal.App.4th at 833 (City of Hayward v. CSU), it is not UCR's responsibility to build new City recreational facilities, but only to mitigate physical impacts of construction of such facilities if they are determined necessary as a result of UCR actions. Therefore, if and when the City decides to construct any additional recreational facilities, UCR will negotiate its proportional share of funding for the mitigation of environmental impacts from the construction of the facilities. Therefore, the potential impact of additional users in the immediate vicinity of the project site would be less than significant and no project-level mitigation would be required.

Response to Comment LA 2-19

It is standard procedure for campus architectural design development to incorporate *Crime Prevention Through Environmental Design* (CPTED) concepts in the design of buildings, lighting, and landscaping.

The UCR Police Department is represented on campus project design teams. The campus also remains committed to participation in ongoing coordination with the City through the University Neighborhood Enhancement Team (UNET) and the joint City/University Coordinating Committee, providing opportunities for City input regarding relevant design features.

As discussed in the Revised Draft EIR in **Section 4.8, Public Services**, in order to maintain or improve existing service levels as the campus grows, the 2005 LRDP included the projected expansion of police facilities. Development of such facilities would adhere to the following LRDP Programs and Practices:

PP 4.12-2 (a) *As development under the LRDP occurs, the Campus will hire additional police officers and support staff as necessary to maintain an adequate level of service, staff, and equipment, and will expand the existing police facility when additional space is required.*

PP 4.12-2 (b) *The Campus will continue to participate in the "UNET" program (for coordinated police response and staffing of a community service center), which provides law enforcement services in the vicinity of the campus, with equal participation of UCR and City police staffs.*

Regarding potential traffic safety impacts during construction, as discussed in **Section 4.10, Transportation and Traffic**, to minimize construction impacts on traffic and circulation, the following LRDP Program and Practice (PP) would be implemented:

PP 4.14-2 *The campus will periodically assess construction schedules of major projects to determine the potential for overlapping construction activities to result in periods of heavy construction vehicle traffic on individual roadway segments, and adjust construction schedules, work hours, or access routes to the extent feasible to reduce construction-related traffic congestion.*

Even with the implementation of **PP 4.14-2**, the impact on vehicular circulation on roads leading to the project site would be potentially significant. To address this potentially significant impact, a project specific mitigation measure (**Mitigation Measure TRA-2**) is proposed that requires the Project Developer to prepare and implement a Construction Traffic Management Plan (CTMP) to manage the movement of construction vehicles in a safe and effective manner. The CTMP would include information such as the number and size of trucks per day, times of the day when truck movement is allowed, truck circulation patterns, location of staging areas, location/amount of construction employee parking, and the proposed use of traffic control/partial street closures on public streets. The CTMP would also include both vehicular and pedestrian way-finding signage. The overall goal of the CTMP would be to minimize traffic impacts to campus and public streets and maintain a high level of safety for all vehicles and pedestrians.

Response to Comment LA 2-20

As discussed on page 4.8-7 of **Section 4.8, Public Services**, it is acknowledged that implementation of the proposed NDD Plan would increase demand for fire services in the project area, as it would transition from vacant buildings up to approximately 1.4 million net new square feet of development (including 5,200 students beds, dining commons, commercial/retail space, and a field house) at full buildout.

However, to meet the fire service needs of the project at full buildout, the following 2005 LRDP Programs and Practices (PP) would ensure adequate fire protection as the Campus expands and population increases:

PP 4.12-1 (a) *As development occurs, the following measures will be incorporated:*

(i) New structures would be designed with adequate fire protection features in compliance with State law and the requirements of the State Fire Marshal. Building designs would be reviewed by appropriate campus staff and government agencies.

(ii) Prior to implementation of individual projects, the adequacy of water supply and water pressure will be determined in order to ensure sufficient fire protection services.

(iii) Adequate access will be provided to within 50 feet of the main entrance of occupied buildings to accommodate emergency ambulance service.

(iv) Adequate access for fire apparatus will be provided within 50 feet of standpipes and sprinkler outlets.

(v) Service roads, plazas, and pedestrian walks that may be used for fire or emergency vehicles will be constructed to withstand loads of up to 45,000 pounds.

(vi) As implementation of the LRDP occurs, campus fire prevention staffing needs would be assessed, increases in staffing would be determined through such needs assessments.

PP 4.12-1(b) *(i) Accident prevention features shall be reviewed and incorporated into new structures to minimize the need for emergency response from the City of Riverside.*

(ii) Increased staffing levels for local fire agencies shall be encouraged to meet needs generated by LRDP project related on-campus population increases.

In order to maintain or improve existing service levels as the community grows, the RFD is already planning to expand their facilities.[1] The environmental consequences of developing these new facilities would be evaluated in a separate CEQA analysis, conducted by the City of Riverside acting as the Lead Agency. As determined under *City of Hayward v. Trustees of the California State University* (2015) 242 Cal.App.4th at 833, it is not UCR's responsibility to build a new fire station, but only to mitigate physical impacts of construction of such facilities if they are determined necessary as a result of UCR actions. Therefore, if and when the City decides to construct a new facility, UCR will negotiate its proportional share of funding for the mitigation of environmental impacts from the construction of the facility. As the RFD would expand to meet the needs of the growing community and campus population, with or without the proposed NDD Plan, the impact generated by the implementation of the proposed NDD Plan related to fire protection services would be less than significant.

Response to Comment LA 2-21

This comment is a set of general conclusory remarks, and requests a copy of the responses to the comments made by the City, and the City's intention to continue to work with the University to address its concerns. It presents no environmental issues within the meaning of CEQA and no specific response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response to Comment LA 2-22

Please refer to **Response to Comment LA 1-19**.

Response to Comment LA 2-23

Please refer to **Response to Comment LA 1-20**.

1 City of Riverside Fire Department Strategic Plan 2017-2022, website: https://www.riversideca.gov/fire/pdf/forms/administrative/Strategic-Plan-2017-2022.pdf , accessed November 9, 2018.

ORG-1

Via Electronic Mail

April __, 2019

Tricia Thrasher
Principal Environmental Planner
University of California, Riverside
Email: tricia.thrasher@ucr.edu

Re: Earthjustice, Sierra Club and CCAEJ Comments on the Revised Draft Environmental Impact Report for the North District Development Plan

Earthjustice, Sierra Club and Center for Community Action and Environmental Justice ("CCAEJ") appreciate the opportunity to comment on the Revised Draft Environmental Impact Report ("RDEIR") for the North District Development Plan ("the NDD Plan"). The NDD Plan, which contemplates thousands of units of student housing and supporting facilities, is an opportunity for the University of California, Riverside ("UCR") to implement the University of California's ("UC") pledge to achieve carbon neutrality by 2025.[1] Commensurate with the devastating impact of global climate disruption on the planet, the UC committed to take action to end its reliance on fossil fuels.[2] We strongly support the improvements made in the RDEIR regarding sustainability and the energy use narrative. In particular, we welcome the clarified commitment that the Plan would be an all-electric project, in keeping with the UC Policy on Sustainability.[3] The RDEIR does not equivocate on its commitment, stating that "[d]espite the addition of approximately 1.843 million gsf of building space associated with the NDD Plan, there would be no increase in natural gas demand on campus as the NDD Plan would solely use electricity for space and water heating."[4] Completing the NDD Plan and providing housing and amenities for the UC Riverside community that will not rely on fossil fuels for operation is an essential and important achievement. While many institutions will seek the fanfare of bold sustainability announcements, true leadership is distinguished by action. Thus, we applaud the RDEIR for demonstrating that the University intends to uphold its Sustainability Policy that "[n]o new building or major renovation that is approved after June 30, 2019 shall use onsite fossil fuel combustion (e.g., natural gas) for space and water heating)."[5]

1

[1] UC, *Carbon Neutrality Initiative*, https://ucop.edu/carbon-neutrality-initiative/index.html.
[2] *Id.*
[3] UCR, *North District Development Plan RDEIR* at 3.0-16 (Feb. 2019), https://cpp.ucr.edu/environmental/ndd_revised_deir_all_sections.pdf

[4] *Id.* at 4.11-25
[5] Justin Gerdes, *California Universities Are Transitioning to All-Electric Buildings*, Greentech Media (Sept. 24, 2018), https://www.greentechmedia.com/articles/read/california-universities-are-transitioning-to-all-electric-buildings#gs.FKNL6a4v

We also strongly support the RDEIR's finding that construction of new gas infrastructure "could cause significant environmental impacts."[6] The earlier version of the Plan's Draft Environmental Impact Report ("DEIR") claimed on the one hand that no natural gas would be utilized on the project site and on the other hand states that extensions of existing natural gas distribution infrastructure would need to serve new development.[7] This version prevaricated about the need for expanding gas distribution lines, was inconsistent with UC Sustainability Policy, and inexplicably concluded that "the construction of these distribution lines would not cause significant environmental effects".[8] By contrast, the RDEIR recognizes that construction of new gas production or transmission facilities "could cause significant environmental impacts" and unambiguously states that "given the all-electric design of the NDD Plan, no modifications or extensions of existing natural gas distribution infrastructure on the campus would be required to serve new development, and this impact would be less than significant."[9] We welcome these important revisions, and the clarity with which they reflect UCR's commitment to mitigating significant impacts. 1

While the NDD Plan avoids the significant impacts associated with building fossil fuel infrastructure, it acknowledges that greenhouse gas (GHG) impacts associated with the development will still be significant. The proposed mitigation measure for the GHG impacts is to rely on the University's overall objective of purchasing carbon offsets and renewable energy certificates (RECs) to achieve carbon neutrality by 2025. UCR can and should take the opportunity to do more than rely on credits to mitigate GHG impacts.

In the background section on GHG emissions, the RDEIR paints a bleak picture of what is at stake—loss of significant portions of the State's forestland, sea level rise that will magnify storm surges, ocean acidification that will affect food systems, rapidly declining snowpack, and more frequent and more extreme storms and hurricanes (to name a few).[10] The paragraph on climate disruption concludes: "[c]onsequently, the best available science must drive effective climate policy."[11] However, the best available science does not appear to drive the measures to mitigate the significant GHG impacts of the NDD Plan. Carbon offsets have notoriously questionable environmental integrity. Most studies show that they do little, if anything, to impact climate change, and in many cases have actually had negative environmental and human rights impacts.[12] Similarly, RECs offer the impression of buying renewable energy generation, but cannot actually claim to cause new renewable energy to be created.[13] Studies of the voluntary 2

[6] *Id.* at 4.11-25

[7] UCR, *North District Development Plan DEIR* at 4.11-25 (Dec. 2018), https://cpp.ucr.edu/environmental/combined_draft_eir.pdf.

[8] *Id.*

[9] UCR, *North District Development Plan RDEIR* at 4.11-25, 4.11-26 (Feb. 2019), https://cpp.ucr.edu/environmental/ndd_revised_deir_all_sections.pdf

[10] RDEIR, 4.3-2 to 4.3-4

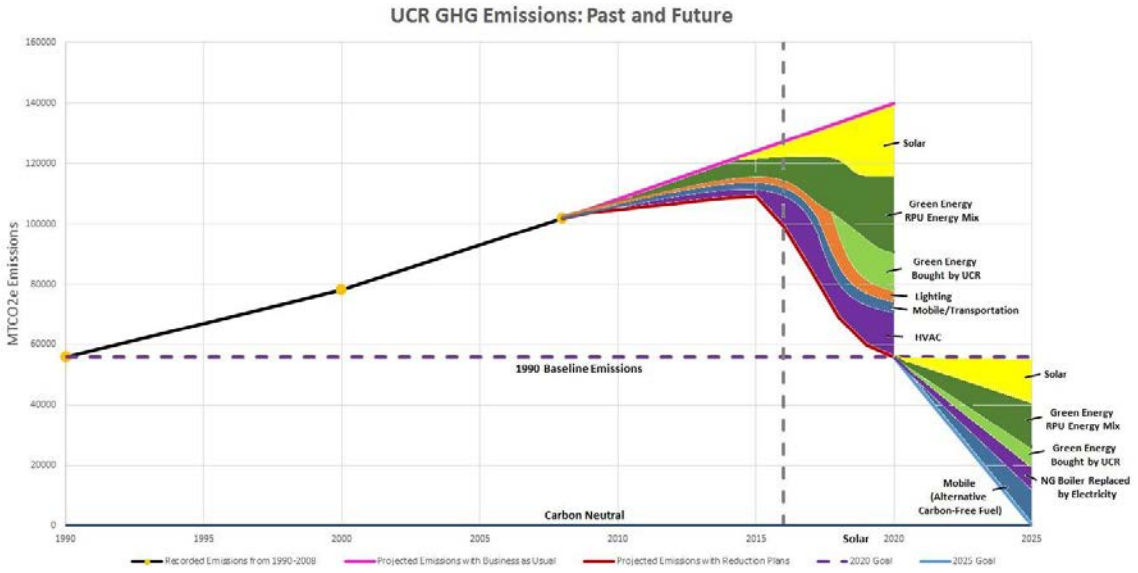
[11] Ibid. 4.3-4

[12] *See e.g.* Kotchen, Matthew J. "Offsetting green guilt." *Stanford Social Innovation Review* 7.2 (2009): 26-31; and Böhm, Steffen. *Upsetting the offset: the political economy of carbon markets*. London: MayFlyBooks, 2009.

[13] Edward Holt *et al.*, *The Role of Renewable Energy Certificates in Developing New Renewable Energy Projects*, NREL, at 19 (June 2011) ("voluntary RECs generally do not by themselves [drive project development]."), https://www.nrel.gov/docs/fy11osti/51904.pdf.

REC market found certificates to have "negligible influence" on additional investment in renewable power generation capacity.[14]

As the RDEIR acknowledges, GHG reduction measures are expected to be refined "as more information becomes available regarding the effectiveness of specific GHG reduction measures."[15] We have known since at least 2009 that carbon offsets, RECs, and other paper exercises in paying for emission reductions are wholly inadequate to address the challenge of climate change. Achieving a truly carbon-neutral and sustainable campus will require powering every feasible function of the University with zero-emission, renewable energy. This can only happen if UCR takes each opportunity for furtherance of that goal with serious ambition. The campus has taken promising steps in building its own renewable energy generating capacity, with plans to add over 13 MW of solar capacity, coupled with thermal energy and battery storage.[16] To leverage the benefits of this renewable energy buildout, the campus should maximize the number of end uses that it can transition from combustion and fossil fuels to clean electricity.



Source: UCR and the UC's Carbon Neutrality Initiative: Where are we now? (Mar. 13, 2017) https://www.cert.ucr.edu/news/2017/2017-03-13.html

Post-2020, the campus envisions meeting its targets through greater shares of renewable energy, and converting more gas appliances to operate on electricity. For these strategies to take effect, the work must begin now. We recommend the campus double-down on its commitment to real sustainability, and mitigate its GHG emissions through onsite reductions in existing campus buildings. Rather than purchase carbon offsets, the NDD Plan can mitigate its GHG impacts

2

[14] Michael Gillenwater *et al.*, *Additionality of wind energy investments in the U.S. voluntary green power market*, Renewable Energy, Vol. 63, at 15 (Mar. 2014), https://www.sciencedirect.com/science/article/pii/S0960148113005338.
[15] *Id.* at 4.3-38
[16] Sustainability at UC Riverside, https://sustainability.ucr.edu/

onsite by committing to replace existing gas appliances with efficient, electric alternatives at the end of their useful life. 2

Earthjustice, Sierra Club and CCAEJ strongly support the improvements made to the RDEIR. We are encouraged that the NDD Plan will realize the urgent and responsible measures laid out in the UC Policy and demonstrate that it is committed to ending the campus's reliance on fossil fuel combustion. All-electric new construction is the surest way to comply with UC Policy and CEQA, and to feasibly mitigate the impacts of expanding infrastructure that would pollute our air and climate for decades to come. We encourage UCR to deepen its impact by mitigating its GHG impacts with a serious commitment to move beyond combustion in its existing building stock. 3

Thank you for your consideration of these comments.

Sincerely

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Letter ORG-1 Earthjustice, Sierra Club and Center for Community Action and Environmental Justice

Response to Comment ORG 1-1

This comment is a set of general introductory remarks stating EarthJustice (et al.) support of the redesign of the NDD Plan as an all-electric project. It presents no environmental issues within the meaning of CEQA and no specific response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response to Comment ORG 1-2

This comment discusses the University's intention to utilize the purchase of carbon offsets and renewable energy certificates (RECs) to achieve the goal of carbon neutrality by 2025. The commenter goes on to state that "carbon offsets, RECs, and other paper exercises in paying for emission reductions are wholly inadequate to address the challenge of climate change", and recommends that the campus implement a number of alternative strategies to reduce campus GHG emissions immediately.

UCR and the UC system prioritize onsite reductions in GHG emissions reductions through energy efficiency and also prioritize onsite renewable generation and new renewable generation in offsite power procurement. Because UCR's energy demand even after all cost-effective efficiency investments are made will still exceed the amount of potential onsite renewable energy production, especially as clean electricity replaces natural gas uses, the campus will need to procure additional green power from off-campus. Riverside Public Utilities (RPU) is UCR's electricity supplier. The campus's contract with RPU provides several options for the supply of renewable electricity. UC's recently-adopted systemwide policy calls for 100% clean electricity supplies by 2025. The electricity supplied to the proposed project, and all other campus buildings, will comply with this policy.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response to Comment ORG 1-3

This comment encourages UCR to continue to deepen its commitment to mitigating GHG impacts. It presents no environmental issues within the meaning of CEQA and no specific response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

IND-1

April 15, 2019

Robert A. Phillips
3511 Watkins Drive
Riverside, California 92507-4654

University of California, Riverside
Office of Planning, Design & Construction
1223 University Avenue, Suite 240
Riverside, California 92507
Attn: Tricia D. Thrasher, ASLA, LEED AP

Re: Draft Environmental Impact Report, North District Development Plan, Project #958080

Dear Ms. Thrasher:

The following are my comments regarding the Draft Environmental Impact Report (DEIR) for the North District Development Plan. I have italicized the material quoted from the DEIR. 1

Page 3.0-15

General Access and Circulation: *Vehicular access would be provided from Linden Street, Blaine Street, and Watkins Drive.*

No driveway access should be provided to the project site from Watkins Drive, for numerous reasons:

- During peak hours, the traffic volume on Watkins Drive is already well beyond the capacity of that roadway to handle it.
- Currently, during the PM peak period on weekdays, vehicles back up almost to Blaine Street from the intersection of Watkins Drive and Valencia Hill Drive. The backup often extends beyond the Child Development Center and would certainly block a driveway at the location proposed in the DEIR.
- A seven-level parking garage would generate, at a minimum, hundreds of daily vehicle trips on Watkins Drive and would seriously degrade the already compromised functionality of that street.
- Several upcoming traffic-generating projects affecting Watkins Drive are known to UCR but were deliberately omitted from the analysis in the DEIR: 2
    - At least two huge warehouse developments are planned for the area south of Spruce Street. (They are listed in Fehr and Peers' Transportation Impact Analysis.) Hundreds of employees and customers will reach these developments via Watkins Drive each day.
    - There is a proposal to build a large apartment complex at the intersection of Watkins Drive and Big Springs Road, which will be a major traffic generator for an intersection that already functions at LOS "F" (not "E," as your consultant stated) and will increase traffic on Watkins Drive.
    - UCR and the Riverside Unified School District have signed a memorandum of understanding (MOU) regarding construction of a STEM high school at the

intersection of Watkins Drive and Valencia Hill Drive. The proposed school would have driveways opening onto Watkins Drive, would accommodate 800-1200 students, and would generate huge amounts of traffic several times during the day as parents drop off or pick up their children for morning and afternoon sessions. This would occur at the same time as the existing STEM school at Watkins Drive and Mount Vernon Avenue is snarling traffic on Watkins Drive. 2

- The existing driveways along UCR's property on Watkins Drive create hazards when motorists stop in traffic to turn into the driveways or dart out of the driveways into heavy traffic. Adding another driveway will only make things worse.

Page 4.1-9

Impact 4.1-3: Implementation of proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or substantially degrade the visual character or quality of the project site and its immediate surroundings. *. . . Although there are some sources of light and glare currently on the project site, implementation of the NDD Plan, including the Phase 1 project, would result in the construction of a large number of new substantially taller buildings with increased sources of light and/or glare. . . . The NDD Plan project site is located in an area that is fully developed with both multi-family and commercial uses, and associated light and glare sources.* 3

Two seven-level parking garages and a clutch of five- to six-story dormitories would tower over nearby structures, such as Gethsemane Lutheran Church, the shopping centers on the north side of Blaine Street, the Riverside Sports Center, the Child Development Center, the Corporation Yard, and the Environmental Health and Safety (EH&S) building, and any lighting on the NDD buildings' exteriors would be conspicuous and obnoxious.

Page 4.1-10

Impact 4.1-4: Cumulative development, including the proposed project and related projects, would not substantially degrade the visual character or quality of the campus and the immediate surrounding area. *The area surrounding the NDD Plan site is already built out, and no additional development in this portion of the campus is anticipated in the 2005 LRDP, as amended. . . . Development under the 2005 LRDP, as amended, would be visually consistent with the surroundings and would not result in a cumulative impact to visual character or quality. Development under the NDD Plan and related projects would also be expected to be visually consistent with the surroundings and thus would not alter the conclusions of the previous cumulative impact analysis.* 4

As stated above (response to Impact 4.1-3), huge parking garages and dormitories would be inconsistent with the existing off-campus and most of the nearby on-campus buildings, and therefore, they would result in a cumulative impact to visual character and quality. Since UCR has offered the Glen Mor Recreational Fields as a site for a STEM high school, it is an outright lie to state that "the area surrounding the NDD Plan site is already built-out, and no additional development in this portion of the campus is anticipated."

Pages 4.2-8 and 4.2-9

Sensitive Receptors *. . . Nearby off-site sensitive receptors to the proposed project include residences and schools. The nearest off-site residences are located approximately 300 feet to the north of the project site. The closest schools are Highland Elementary School, located* 5

approximately 800 feet northeast of the site; the Islamic Academy of Riverside, situated 1,000 feet southwest; and the REACH Leadership Academy, 1,200 feet to the west. The nearest on-site sensitive receptor is the UCR Child Development Center located approximately 50 feet to the northeast of the project site.

The DEIR fails to mention the aforementioned STEM high school proposed for the site currently occupied by the Glen Mor Recreational Fields. Unless the STEM project has been irrevocably canceled, it needs to be included in the DEIR's analysis. 5

Page 4.3-31

Petition the City of Riverside to develop live/work communities downtown. *Work with master planners for the City of Riverside to bring live/work developments to the downtown Riverside area. Providing housing and amenities near the University can draw faculty and staff closer to their place of employment and reduce commute distances.*

A better idea would be for UCR to pursue its objectives in a way that enhances the surrounding residential neighborhood. When I purchased my home on Watkins Drive in 1985, a substantial percentage of my neighbors were UCR professors and other UCR employees. As UCR's rampant growth and utter lack of concern for local residents accelerated the neighborhood's decline into student-ghetto status, the professors and UCR employees sold their homes and moved away. Massive construction projects that turn the local neighborhood into a noisy, congested mess directly contradict UCR's stated objective to provide "housing and amenities near the University [that] can draw faculty and staff closer to their place of employment and reduce commute distances." UCR's relentless, self-centered actions have driven its faculty and staff away from the University Neighborhood in droves. 6

Page 4.4-17

Impact 4.4-3: Implementation of the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one quarter mile of an existing or proposed school. *. . . There are no existing or proposed public schools within one-quarter mile of the NDD Plan area, including the project site. However, the UCR Child Development Center, which includes a preschool, kindergarten, and childcare facility, is located immediately adjacent to the NDD Plan site to the east. Although the proposed NDD Plan development would handle hazardous materials and wastes, as described above, operations would comply with federal, State, and local regulations, including 2005 LRDP* ***PP 4.7-1****, pertaining to hazardous wastes. Adherence to these regulations, policies, and mitigation which require proper handling techniques, disposal practices, and/or clean-up procedures, would ensure that risks associated with hazardous emissions or materials to the UC Riverside Child Development Center would be reduced to a less than significant level.* 7

Once again, the DEIR has failed to take into account the proposed STEM high school, a public school that would be a few hundred feet east of the project site. In addition, there is no mention of the EH&S building, to which all waste generated during project operation would be transported. The DEIR should include a list of all hazardous materials and wastes that will be found at the site. The DEIR should delineate the haul routes that would be used to dispose of those materials and explain the procedures for disposing of each type of hazardous waste. The DEIR should analyze the potential for exposure to each type of hazardous waste and specify the potential negative results of such exposure. The DEIR should analyze the potential outcomes of exposure to hazardous materials in worst-case scenarios, such as a strong earthquake (an

inevitability in this area) or a train derailment (three have occurred in recent memory on the tracks just north of Watkins Drive). The DEIR should analyze the possibility of a rupture in Kinder Morgan's high-pressure jet-fuel pipeline (a distinct possibility in a strong earthquake). Alleged adherence to regulations does not guarantee that there will be no exposure to hazardous materials and cannot be used as a rationale to declare that there is no significant impact. The best course is to situate the project away from hazards and sensitive receptors. In that regard, the Alternative 2 site is far superior to the proposed site. 7

Page 4.5-13

Even if the cumulative land use impact of future development would be significant, the contribution of the proposed NDD Plan to such impacts would not be cumulatively considerable. For reasons presented in ***Impact 4.5-1*** *above, development under the proposed NDD Plan would be compatible with the off-campus land uses that surround it[;] in light of the continuation of the residential, mixed-use, athletics, parking and open space land uses, and the campus'[s] geographical separation from related projects, the impact would be less than significant.*

As stated above, the project, because of its massive scale, is utterly incompatible with adjacent off-campus land uses and will have a significant impact on traffic and livability. 8

Page 4.6-6

4.6.2.3 Noise-Sensitive Land Uses: *Existing noise-sensitive off-site sensitive receptors to the proposed project include residences and schools. The nearest off-site residences are located approximately 300 feet to the north of the project site. The closest schools are Highland Elementary School, located approximately 800 feet northeast of the site; the Islamic Academy of Riverside, situated 1,000 feet southwest; and the REACH Leadership Academy, approximately 1,200 feet to the west. On-site receptors include the UCR Child Development Centers, located approximately 50 feet to the northeast; Aberdeen-Inverness Residence Hall, located approximately 100 feet to the south; Stonehaven Apartments, located approximately 200 feet to the northwest; and the Falkirk (student) Apartments, located approximately 115 feet to the west of the project site.* 9

Again, there is no mention of the proposed STEM high school. If, despite the aforementioned MOU, it has been decided that that facility will not be built, then the analysis should include the Glen Mor Recreational Fields, since athletes are sensitive receptors.

Page 4.6-9

Railroad Noise: *The BSNF railroad tracks are located along the northern border of the East Campus, across Watkins Drive northeast of the project site, and produce noise from train pass-bys. Noise measurements taken at 396 East Big Springs Road, located 0.5 mile to the northeast of the campus, and at 277 Nisbet Way, located approximately 500 feet to the east of the campus, range from 54 dB(A) at 125 feet from the tracks to 62 dB(A) at 90 feet from the tracks, respectively.* 10

These noise measurements might be meaningful if they were made in the presence of a train! The curvature of the tracks along Watkins Drive causes the trains to travel slowly and emit deafening wheel squeal. The above-stated dB measurements, which differ little from the ambient noise level, are ridiculously understated.

Pages 4.6-20 and 4.6-21

Impact 4.6-2: Construction of the proposed project could result in substantial temporary or periodic increase in ambient noise levels at certain sensitive uses in the project vicinity. (Less than Significant with Mitigation) *The basic types of activities that would be expected to generate noise during construction of the NDD Phase 1 and NDD Plan are demolition and site clearance, grading and excavation, building construction, paving, architectural coating, and landscaping. . . . The nearest on-campus sensitive receptors are approximately 50 feet from construction activity, and off-campus sensitive receptors are located about 225 feet from the proposed project site. Daytime construction noise levels could temporarily reach approximately 89 dB(A) at 50 feet from the source. . . . Noise levels at the nearest residential buildings could periodically reach 83 dB(A) during project construction. This is an increase of more than 10 dB(A) Leq over the existing daytime noise levels at the affected locations. . . . Construction noise levels could substantially increase existing noise levels at residential uses on and off campus during normal construction hours.*

Building the project on the Alternative 2 site would dramatically reduce the impact of construction noise on nearby sensitive receptors.

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Page 4.7-4

Residential Distribution of Campus Population: Table 4.7-5, UCR Population Distribution (2017)*, shows the residential distribution of student and faculty/staff, based on enrollment and parking information. Approximately 28 percent of the students live on campus, and about 19 percent live off-campus in the City of Riverside. With respect to faculty and staff, about 41 percent live in the City and the rest in other communities in the County and in other neighboring counties.*

Since 53 percent of UCR's students and 59 percent of UCR's faculty and staff live outside the City of Riverside, UCR's failure to provide adequate and affordable parking in all its new projects is inexcusable and prompts students, faculty, and staff to park in the surrounding neighborhood. These parked vehicles attract break-ins and car thefts.

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Page 4.9-2

In Table 4.9-1, the Glen Mor Recreation Fields are listed as a recreational facility. However, UCR has offered them as a site for the STEM high school, so they can't be counted in an inventory of UCR's recreational facilities.

13

Pages 4.10-1 and 4.10-2

4.10.2.2 Project Study Intersections: *Within the study area, the following intersections were selected as study intersections based on the likely approach and departure routes for the project traffic and their proximity to the proposed NDD Plan project site:*

1. Iowa Avenue/Massachusetts Avenue
2. Chicago Avenue & 3rd Street
3. I-215 SB & 3rd Street
4. I-215 NB & 3rd Street
5. Iowa Avenue & Blaine Street
6. Rustin Avenue & Blaine Street
7. Canyon Crest Drive & Blaine Street
8. Watkins Drive & Blaine Street

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9. Iowa Avenue & Linden Street
10. Canyon Crest Drive & Linden Street
11. Aberdeen Drive & Linden Street
12. Iowa Avenue & University Avenue
13. I-215 SB & University Avenue
14. I-215 NB & University Avenue
15. Watkins Drive & Big Springs Road

This analysis cannot be complete without including the intersection of Watkins Drive and Valencia Hill Drive. Any project that adds traffic to Watkins Drive will dramatically affect the functionality of this intersection. Also, the weekday traffic backup that extends northwest from this intersection during the evening peak would interfere with the proposed driveway on Watkins Drive. In addition, the traffic volume analysis fails to account for the proposed STEM high school, the plans for which currently include a driveway exit onto Valencia Hill Drive near Watkins Drive, as well as two driveways on Watkins Drive. The analysis also fails to include the traffic that will be generated by enormous warehouse installations just south of Spruce Street and a new apartment building at Watkins Drive and Big Springs Road. 14

Page 4.10-18 and 4.10-19

Trip Distribution: *The project trip distribution reflects the regional distribution of trips traveling to and from the project site. To determine where trips traveling to and from the Project site would originate and end, a select zone analysis was performed for a traffic analysis zone (TAZ) near the proposed Plan area that had a similar land use mix to the NDD Plan. The results of the select zone analysis and local knowledge were combined to develop the regional distribution. As shown in* ***Figure 4.10-3, Project Trip Distribution****, the project trip distribution was determined to be:*

• 20% - 3rd/Blaine Street
• 15% - University Avenue
• 10% - Watkins Drive
• 25 % - Iowa Avenue
• 5% - Chicago Avenue
• 10% - I-215 SB
• 10% - I-215 NB
• 5% - Linden Street

15

The traffic analyst has produced data that make no sense, and he/she doesn't appear to possess much "local knowledge." The idea that only 10 percent of project-generated traffic will use Watkins Drive is ludicrous. The vast majority of westbound motorists on State Route 60 headed for UCR exit at Central Avenue/Watkins Drive, rather than sit in heavy congestion all the way to the University Avenue and Blaine Street exits. Commuters have demonstrated that they prefer to use Watkins Drive as a cut-around route to avoid gridlock at the 60/215/91 interchange. The increase in traffic volume on Watkins Drive from the project will far exceed 10 percent, and the numbers that the consultant has pulled out of the air are worthless.

Note that the Watkins Drive/Valencia Hill Drive intersection was not considered as a study intersection, as the Valencia Hill Drive intersection is a three-leg intersection and would not be utilized by project trips due to the fact that it does not connect to the south.

The intersection of Watkins Drive and Valencia Hill Drive should definitely be considered as a study intersection, since any motorist using Watkins Drive to travel between the project site and

the freeway ramps at Central Avenue will have to traverse it, and it functions at LOS F for several hours each day. 15

Page 4.10-21

*As shown in **Table 4.10-7, Existing Plus Phase 1 Impacts on LOS for Study Area Intersections**, the proposed NDD Plan would result in the degradation of the intersection at Big Springs Road and Watkins Drive under existing conditions plus the development of Phase 1 to LOS F. Although the intersection currently operates unacceptably, the delay caused by Phase 1 is more than 1.0 second and is considered a significant impact under City of Riverside thresholds. Reconfiguring the intersection to a single-lane roundabout would mitigate the impact from LOS F to LOS B during both AM and PM peak hours.* 16

Absent from this analysis is the consideration of pedestrians, mostly UCR students, who are responsible for a significant portion of the delay at Big Springs Road and Watkins Drive. A traffic signal would be very useful in controlling their use of the crosswalks, preventing them from occupying them continuously for several minutes. It is unfortunate that UCR, whose students, faculty, and staff are responsible for much of the congestion at Big Springs Road and Watkins Drive, is unwilling to contribute significantly to the cost of installing traffic signals there. Many drivers find roundabouts confusing and dangerous, since they demand continuous attention to merging movements. Having observed UCR students' oblivious driving habits for the last 34 years, I don't think that they could use a roundabout in a safe, considerate manner. Also, roundabouts are difficult for pedestrians to negotiate.

Page 4.10-26

***Mitigation Measure MM TRA-2:** The University shall require the Project Developer to prepare and implement a Construction Traffic Management Plan that will . . . identify proposed truck routes to be used.* 17

Those routes should already have been determined and should be included in the DEIR. They are very significant in determining the environmental impact of any proposed project, and their omission from the DEIR constitutes a violation of CEQA.

Pages 4.10-33 and 4.10-34

***4.10.4.7 Cumulative Impacts and Mitigation Measures: Subsection 4.10.4.5**, Project Impacts and Mitigation Measures, above, evaluates the potential traffic impacts from the development and buildout of the NDD Plan in terms of the increased traffic along roadways used by the campus-related population to access the site, and the impacts of this traffic on roadway intersections. . . . Impacts 4.10-1, and 4.10-3 evaluate the traffic that would result from growth in regional traffic through 2025 combined with the buildout of the NDD Plan. . . . This analysis found that significant impacts related to LOS would occur at [eight] intersections. . . . Three freeway segments would operate at a deficient Level of Service during the AM peak period, and two freeway segments would operate at a deficient Level of Service during the PM peak period under Future (2025) conditions. . . . [B]ecause implementation of the intersection improvements determined necessary to reduce the project's impacts on off-campus intersections is outside the control of the University, Impact 4.10-1 would remain **significant and unavoidable** for seven intersections. Furthermore, because improvements to existing freeway segments are not feasible, Impact 4.10-3 is found to be **significant and unavoidable** for three freeway segments.* 18

This analysis uses regional growth estimates and doesn't account for the fact that development-related increases of traffic volume will be much higher than average in the subject area because of the rampant construction of large warehouses and industrial facilities in the area east of Iowa Avenue and north of Spruce Street, extending into Highgrove. Watkins Drive will be a gridlocked nightmare, and it would serve UCR better to locate the project at the Alternative 2 site, away from the unbearable traffic congestion on Watkins Drive. 18

Page 6.0-9

Alternative 2—Agricultural and Forest Resources: *Development on the West Campus Alternative site would result in the conversion of approximately 55 acres of Important Farmland to non-agricultural uses. This would be a* ***significant and unavoidable impact****.*

"Important Farmland"? If UCR continues its unchecked growth, it will be more important to provide a minimally disruptive location for student housing (Alternative 2) than to preserve an orange grove. The conversion of 55 acres to non-agricultural use is not a deal-breaker or an excuse to build the "NDD Plan" at the Linden Street site. Several years ago, when UCR proposed revamping the West Campus to accommodate a medical school and numerous associated facilities extending all the way to Iowa Avenue, it was poised to eliminate huge tracts of agricultural land without batting an eye. The hand-wringing in the current DEIR about the 55 acres of agricultural land is disingenuous. 19

Air Quality: *It should be noted that locating housing proximate to on-going agricultural uses may expose sensitive receptors to objectionable odors due to the use of chemicals used as fertilizers, herbicides, and pesticides.*

But UCR finds it perfectly acceptable to locate housing, a childcare center, and a STEM high school immediately adjacent to a toxic-waste storage and processing facility (EH&S). This is no excuse for rejecting the Alternative 2 site. What stinks is UCR's insistence on overdeveloping the East Campus to the detriment of the surrounding area.

Page 6.0-12

Land Use: *The Alternative 2 site is located in an area of the West Campus currently in use as agricultural teaching and research fields and has a an 2005 LRDP Land Use Designation of primarily Family, Apartment Housing and related Support, Athletics and Recreation, with some smaller areas of Open Space. Development of a the site with a student housing complex, commercial uses and an athletic facility under this alternative thus would be generally consistent with applicable land use plans and policies because it would be generally consistent with the LRDP land use designations, though some minor adjustments would be required. In addition, because Alternative 2 would require additional internal roadways, it would impede implementation of the adopted land use plan for the West Campus.* 20

UCR's plans for the West Campus are in constant flux, and Alternative 2 wouldn't impede implementation of anything. The land-use plan could easily be amended and cannot be used as an excuse to reject the Alternative 2 site.

Implementation of Alternative 2 would result in the development of approximately 55 acres of an approximately 117-acre area currently managed by UCR Agricultural Operations for agricultural teaching and research, resulting in a reduction of the area available for agricultural research and teaching. For this reason, Alternative 2 would have a significant impact related to land use. No mitigation is feasible, and the impact would remain significant and unavoidable.

Even with Alternative 2, UCR still has plenty of land for agricultural teaching and research. This "significant and unavoidable" impact is not an excuse to reject the Alternative 2 site. 20

Page 6.10-14

Alternative 2 would also limit bicycle and pedestrian access to the Campus when compared to the proposed project site. While access to Campus is provided by Class II facilities on Martin Luther King Jr. Boulevard, the site analyzed under the proposed project would provide more direct access for bicyclists and pedestrians with the planned North Recreational Mall. The proposed retail land uses would also likely attract more multi-modal trips on the NDD Plan site than under Alternative 2 given the access to multiple transit routes and direct access to Campus. 21

Looking at a map, one can see that Alternative 2 is about the same distance from the campus core as the proposed project site is. There is nothing that would limit bicycle and pedestrian access to the campus from Alternative 2. If UCR's students can't figure out how to cross Martin Luther King Boulevard, perhaps they're not ready for college. Also, if the retail establishments are attractive to students, they will find a way to get there, particularly if UCR provides adequate parking.

Page 6.0-14

Alternative 2 would meet the prime project objective of providing more affordable on-campus housing, along with a new dining facility and an athletics event center. Alternative 2 would only partially meet the project objective of enhancing the student experience by integrating the principles of residential and academic life as the Alternative 2 site is located on the West Campus, on the opposite side of the freeway from most campus academic and recreational locations on the East Campus.

Does this mean that UCR students' quality of life will be irretrievably compromised if they have to walk or ride their bicycles and scooters under the freeway? As stated above, the distance from Alternative 2 to campus facilities is about the same as the distance from the proposed project site to campus facilities. Again, this argument is a transparently lame excuse. 22

In addition, this location may increase travel on public roadways, as students and staff travel to classes and other student activities.

If students living at Alternative 2 were driving to "classes and other student activities" on campus, wouldn't they have to purchase parking permits? Most UCR students I've encountered have done everything possible to avoid paying to park on campus. (They park in front of my house instead.) The proposed NDD location would definitely increase travel on public roadways, turning already overcrowded and unsafe Watkins Drive into a parking lot.

Page 6.10-15

Alternative 2 would not meet the project objective of establishing a new iconic gateway to the Campus on the corner of Blaine Street and Canyon Crest Drive.

I can't believe that campus planners actually think that the State of California should spend money on an "iconic gateway," whatever that is. If UCR is concerned with aesthetics, why on earth did it construct that useless eyesore labeled "Fine Arts" at the University Avenue entrance to the campus? Why do several other recent campus buildings resemble prison towers, complete with a catwalk for the guards at the top? Forget the gateway. It's unnecessary and wasteful. Your previous projects have irredeemably destroyed the appearance of a once-beautiful campus. 23

This alternative would not be entirely consistent with the existing land use designation, and as such, it would require an LRDP amendment in order to be approved and implemented.
So amend the LRDP. In the past, you've had no problem whipping up an amendment to suit your immediate desires, such as the erection of your toxic-waste facility next to the Child Development Center, dormitories, and a residential neighborhood.

23

Sincerely,

Robert A. Phillips

Letter IND-1 Robert A. Phillips

Response to Comment IND 1-1

This comment is a set of general introductory. It presents no environmental issues within the meaning of CEQA and no specific response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response to Comment IND 1-2

The comment expresses concern that existing driveways along UCR's property on Watkins Drive create hazards, and that "Adding another driveway will only make things worse."

The University remains committed to traffic safety, once final design and engineering for the site are completed, including site access, the appropriate traffic controls (e.g., installation of control devices such as stop signs or signal lights as needed) will be provided at the project driveways in order to allow for people traveling to and from the site to safely access the surrounding roadway network.

Further, the proposed NDD Plan would implement the following existing campus Program and Practice (PP) related to parking and roadway design.

PP 4.14-4 The campus shall provide design architects for roadway and parking improvements with the Campus Design Guidelines and instructions to implement those elements of the guidelines relevant to parking and roadway design.

For a discussion regarding the analysis of cumulative traffic volumes, please refer to **Response to Comment LA 2-4**.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response to Comment IND 1-3

The comment expresses an opinion that light and glare produced through implementation of the NDD Plan would be 'conspicuous and obnoxious' [*sic*].

As discussed on page 4.1-9 of **Section 4.1, Aesthetics**, all future development on the campus, including the proposed project, would continue to comply with existing campus Programs and Practices, PP 4.1-1, which require that buildings be designed to be consistent with the Campus Design Guidelines.

Aesthetics PP 4.1-1 The Campus shall provide design professionals with the 2007 Campus Design Guidelines and instructions to implement the guidelines, including those sections related to use of

consistent scale and massing, compatible architectural style, complementary color palette, preservation of existing site features, and appropriate site and exterior lighting design.

Further, as discussed in section **3.0, Project Description**, under ***Sustainable Design Features***, the NDD Plan will be designed to minimize light pollution by using the International Dark Sky Association's (IES/IDA) Model Lighting Ordinance light fixture selection criteria.

Further, the NDD Plan, would also implement 2005 LRDP mitigation measures MM 4.1-3(a) through MM 4.1-3(c), which would require that building materials be made of non-reflective materials, that lighting be directed to the intended illumination site to reduce spill onto adjacent areas, and that all parking lots be designed to minimize the night-time glare of vehicle headlights:

MM 4.1-3(a) *Building materials shall be reviewed and approved as part of project-specific design and through approval of construction documents. Mirrored, reflective glass is prohibited on campus.*

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.*

MM 4.1-3(c) *Ingress and egress from new parking areas shall be designed and situated so as to minimize the impact of vehicular headlights on adjacent uses. Walls, landscaping or other light barriers will be provided. Site plans shall be reviewed and approved as part of project-specific design and construction document approval.*

For these reasons, and with implementation of the proposed Sustainable Design Features, and 2005 LRDP Programs and Practices and Mitigation Measures, the analysis in the Revised Draft EIR found that implementation of the NDD Plan would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area, and this impact would be less than significant.

Response to Comment IND 1-4

Please refer to **Response to Comment IND 1-3**.

Regarding the Science, Technology, Engineering, and Mathematics (STEM) High School, UCR entered into a non-binding 'Partnership Agreement' with the Riverside Unified School District (RUSD) on behalf of its Riverside STEM Academy (RSA) in July 2015 that included an agreement to:

"Support the curriculum and program elements described above; as well as have continued conversations about expanding the RSA program, including a long-term facility, lab and/or land

> lease on the University campus, fixed number of RAS enrollment lottery slots dedicated to University faculty, etc."

In September 2018 UCR signed a 'Ground Lease Term Sheet' with RUSD, the 1st paragraph of which states:

> "This transaction Term Sheet (the "Term Sheet") outlines the material business terms negotiated by the Regents of the University of California (the "Regents" or the "University") and Riverside Unified School District ("RUSD") with respect to a proposed Ground lease ("Ground Lease" or "Agreement") for the development and operation of a Science, Technology, Engineering, and Mathematics High School ("STEM High School") for grades 9 through 12 by the Riverside Unified School District ("Project") on the Regent's Land. This Term Sheet is not contractually binding and does not obligate either party to proceed with negotiations nor to enter into a formal written agreement. The parties shall not be contractually bound unless and until a formal agreement is executed by the parties, which agreement must be in form and content satisfactory to each party and its counsel in their sole discretion."

In other words, despite the commenter's assertion, there is no commitment by either party at this time to proceed with the development of a STEM high school on the UCR campus; copies of both documents are included in **Appendix 3.0b and 3.0c** of this Final EIR. Additionally, there are multiple sites being considered for the possible siting of a STEM high school; the feasibility and location of a STEM high school remains under study. As such, the construction of a STEM high school remains speculative; per *CEQA Guidelines* Section 15145 an EIR need not engage in "sheer speculation" as to future environmental consequences.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response to Comment IND 1-5

Please refer to **Response to Comment IND 1-4** for a discussion regarding the construction of the STEM high school project.

Response to Comment IND 1-6

The comment expresses opinions regarding the growth of the University and its impacts to the surrounding neighborhood since 1985. As provided in Section 15064(f)(5), unsubstantiated opinion or narrative does not constitute substantial evidence. Further, the comment presents no environmental issues within the meaning of CEQA and no specific response is required.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response to Comment IND 1-7

Please refer to **Response to Comment IND 1-4** for a discussion regarding the construction of the STEM high school project.

The Revised Draft EIR provides a full discussion and disclosure of potential impacts regarding hazardous materials in **Section 4.4, Hazards and Hazardous Materials**. Further, in 2015, the California Supreme Court in CBIA v. BAAQMD held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project, including future users and residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. For example, if construction of the project on a hazardous waste site will cause the potential dispersion of hazardous waste in the environment, the EIR should assess the impacts of that dispersion to the environment, including to the project's residents. As the proposed NDD Plan is a mixed-use retail and student housing (residential) project; once the project is finished, it is not expected to generate or use any hazardous materials besides those commonly used within other residential areas on campus (i.e., for cleaning and maintenance purposes).

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response to Comment IND 1-8

The comment expresses opinions regarding the scale of the proposed NDD Plan and its impact on adjacent off-campus land uses related to traffic and livability. The comment presents no significant environmental issues and no specific response is required.

A full analysis of potential land use impacts was included in **Section 4.5, Land Use and Planning**, The proposed NDD Plan is consistent with campus planning principles regarding location and design maximizing and efficiently using available developable space on campus. Furthermore, an amendment to the 2005 LRDP would be prepared to document the land use changes and ensure compatibility with the 2005 LRDP. Additionally, development of the proposed NDD Plan has been guided by a range of LRDP PSs and PPs. The following 2005 LRDP PSs and PPs are relevant to land use on the project site and the adjacent areas:

PS Land Use 4	*Pursue a goal of housing 50 percent of student enrollment in on campus or campus controlled housing.*
PS Land Use 7	*Over time, relocate parking from central campus locations to the periphery of the academic core and replace surface parking with structures, where appropriate.*
PS Open Space 4	*Provide landscaped buffers and setbacks along campus edges, such as Valencia Hill Drive and its extension south of Big Springs Road, Martin Luther King Boulevard, and the I-215/SR-60 freeway.*
PS Campus & Community 1	*Provide sensitive land use transitions and landscaped buffers where residential off campus neighborhoods might experience noise or light from UCR activities.*
PS Transportation 6	*Implement parking management measures that may include* • *Restricted permit availability* • *Restricted permit mobility* • *Differential permit pricing*
PS Development Strategy 1	*Establish a design review process to provide regular review of building and landscape development on campus.*
Land Use PP 4.9-1(a)	*The Campus shall provide design professionals with the 2007 Campus Design Guidelines and instructions to implement the guidelines, including those sections related to use of consistent scale and massing, compatible architectural style, complementary color palette, preservation of existing site features, and appropriate site and exterior lighting design. (Identical to Aesthetics PP 4.1.1)*
Land Use PP 4.9-1(b)	*The Campus shall continue to provide design professionals with the 2007 Campus Design Guidelines and instructions to develop project-specific landscape plans that are consistent with the Guidelines with respect to the selection of plants, retention of existing trees, and use of water conserving plants, where feasible. (Identical to Aesthetics PP 4.1-2(a))*

In addition, the campus remains committed to participation in ongoing coordination with the City and local stakeholders through the University Neighborhood Enhancement Team (UNET) and the joint City/University Coordinating Committee, providing opportunities for City and local stakeholder input regarding relevant land uses and project design features.

An analysis of traffic impacts, including cumulative impacts, was included in the Revised Draft EIR in **Section 4.10, Transportation and Traffic**.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response to Comment IND 1-9

Please refer to **Response to Comment IND 1-4** for a discussion regarding the construction of the STEM high school project.

Regarding potential noise impacts to the Glen Mor Recreational Fields, the Glen Mor Recreation Fields are located approximately 1,330 feet east of the project site, near the intersection of Linden Street and Pentland Way. The Glen Mor Recreational Fields were not included as a receptor because of the numerous closer sensitive receptors to the project site which would experience construction and stationary source noise more acutely.

As noted in **Section 4.6, Noise**, under Impact 4.6-2 of the Revised Draft EIR, sound generated by on-site construction equipment would attenuate at a rate of approximately 6 dB(A) for each doubling of distance from the source (construction activity) to the receptor (Glen Mor Recreation Fields). Daytime construction noise levels could temporarily reach noise levels of approximately 89 dB(A) at 50 feet from the noise source. This would result in a noise level of approximately 60.5 dB(A) during project construction after the 6 dB(A) attenuation is accounted for. As identified in **Table 4.6-3 Existing Ambient Noise Levels**, ambient noise levels in the project vicinity during off-peak hours range from approximately 55.5 to 62.2 dB(A) L_{eq}. With no credit given for intervening structures or attenuating landscape features (trees, shrubs, etc.), the resulting ambient noise levels would range from approximately 61.7 to 64.4 dB(A) L_{eq}, an increase of approximately 2.2 to 6.2 dB(A) L_{eq}. When intervening structures are taken into account, resulting ambient noise levels range from approximately 57.0 to 62.2 dB(A) L_{eq}. In either case, construction noise levels would not exceed the threshold of a 10 dB(A) L_{eq} increase during project construction, and would therefore not result in a substantial temporary or periodic increase in ambient noise levels.

Stationary Source Noise

As noted on page 4.6-17, the worst-case sensitive receptors, located approximately 1,000 feet nearer to the project site than the Glen Mor Recreation Fields, would not experience a significant noise impact exceeding 5 dB(A) L_{eq} during project operation. The Glen Mor Recreation Fields, because of the substantial distance between the fields and the project site, is not expected to experience an audible noise level increase from stationary sources (e.g., HVAC systems or parking noise) during project operation. Stationary sources during project operation would not cause a substantial permanent increase in ambient noise levels at the Glen Mor Recreation Fields.

Mobile Source Noise

The Glen Mor Recreation Fields are located along Linden Street, east of Aberdeen Drive. This roadway segment was already analyzed in the DEIR, on page 4.6-16 and 4.6-17. The Linden Street, East of Aberdeen Drive roadway segment would experience a noise level increase of between 0.8 to 3.0 dB(A) CNEL, which is less than the significance threshold of 5 dB(A). The proposed project would not generate traffic volumes needed to cause a substantial permanent increase in ambient noise levels at the Glen Mor Recreation Fields.

Response to Comment IND 1-10

The comment expresses opinions regarding the noise measurement taken for the analysis provided in the Revised Draft EIR, **Section 4.6, Noise**.

As previously discussed in **Response to Comment IND 1-7**, an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. Further, given its intermittent nature, train noise is not considered to be part of a typical, ambient (continuous) noise level. Therefore impacts related to railroad noise were not assessed in the Revised Draft EIR; no further response is required.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response to Comment IND 1-11

The comment expresses the opinion that constructing the NDD Plan on the West Campus (Alternative 2) site would reduce the impact of construction noise on nearby sensitive receptors.

The discussion on page 6.0-12 in **Section 6.0, Alternatives,** acknowledges that this would be the case.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response to Comment IND 1-12

The comment expresses an opinion regarding parking on and off-campus, but does not provide data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to *CEQA Guidelines* Section 15064, an effect shall not be considered significant in the absence of substantial evidence. In addition, there is no threshold in the CEQA Guidelines that requires an analysis of parking impacts. Therefore, further response is not required

pursuant to CEQA. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Notwithstanding the above, the following information is provided for the record:

Temporary and visitor automobile parking would be provided for all residential buildings, the NCAA field, and the dining facility at a rate of 2.5 percent of the maximum occupancy, with a minimum of four spaces per building; the parking will be clustered in two surface lots for phase one, converting to structured parking in future phases. Multi-modal transportation routes would be provided to encourage walking and riding bicycles to and from the campus with the intent of creating a pedestrian friendly experience for students, staff, and visitors to the North District. Additional pedestrian walks, plazas, and bicycle routes would be developed under the NDD Plan. Bike lanes shall be included on all major streets. Bike parking would be provided throughout the NDD Plan area. Secure bike parking would be included in outdoor, secure parking facilities. These would be provided at a rate of one stall per ten residents.

In order to reduce commuter traffic to the campus, as noted on page 4.3-43 of the Revised Draft EIR, the campus employs a successful vanpool program, and additional routes are continuously being considered. As noted on page 4.3-42 of the Revised Draft EIR, UCR students, faculty, and staff can ride RTA buses at no-cost. Participants in the Public Transit Program also receive complimentary parking privileges on campus. Discounted vouchers for Metrolink are also available to students, and RTA bus service connects the campus to the downtown Riverside Metrolink station.

Further, To help minimize traffic impacts under Future plus Project Buildout conditions, consistent with LRDP Amendment 2 MM 4.14-1(b) and 4.14-1(c), UCR will continue to implement and enhance its existing TDM program to reduce employee vehicle trips to the campus, including those associated with the proposed projects and related projects.

MM 4.14-1(b): *Travel Demand Management. To reduce on- and off-campus vehicle trips and resulting impacts, the University will enhance its Transportation Demand Management (TDM) program. TDM strategies will include measures to increase transit and Shuttle use, encourage alternative transportation modes including bicycle transportation, implement parking policies that reduce demand, and other mechanisms that reduce vehicle trips to and from the campus. The University shall monitor the performance of campus TDM strategies through annual surveys.*

MM 4.14-1(c): *Transit Enhancement. To enhance transit systems serving the campus, the University will work cooperatively with the RTA, and other local agencies to coordinate service routes with existing and proposed Shuttle and transit programs.*

Response to Comment IND 1-13

Please refer to **Response to Comment IND 1-4** for a discussion regarding the construction of the STEM high school project.

Response to Comment IND 1-14

To develop future forecasts for the Future Year (2025) conditions, including growth associated with cumulative projects, the Riverside Traffic Analysis Model (RivTAM) was used. As described in the Transportation Impact Study, both the land use and roadway network in the model were reviewed for consistency with planned projects within a five-mile radius of the study area. A list of cumulative projects was requested from the City of Riverside at the initiation of the Transportation Impact Study and was reviewed with land use assumptions in the future year model to ensure that all known reasonably foreseeable projects within a five-mile radius of UCR were accounted for in the future year traffic forecasts and impact analysis. This process resulted in an average growth rate of 2% per year during the AM peak hour and 3% per year during the PM peak hour in the study area. The list of projects provided by the City of Riverside and reviewed for consistency with the RivTAM land use is included in Appendix B of the Transportation Impact Study.

The Valencia Drive intersection was not considered as a study intersection, as the Valencia Drive intersection is a three-leg intersection and would not be utilized by project trips due to the fact that it doesn't connect to the south.

As no formal agreement has been entered into between the University and the Riverside School District, regarding the STEM High School and a location has not been determined, this project remains speculative and is not required to be considered as part of the traffic analysis. Please refer also to **Response to Comment IND 1-4.**

Response to Comment IND 1-15

The comment states that the traffic analysis uses data 'that make no sense' [*sic*], but does not provide data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to *CEQA Guidelines* Section 15064, an effect shall not be considered significant in the absence of substantial evidence. Therefore, further response is not required pursuant to CEQA.

Notwithstanding the above, the following information is provided for the record:

The project trip distribution developed for this project is based on the proposed land uses at the project site. The project proposes campus residential uses and retail uses, which would serve local users, rather

than attract longer regional trips. As such, it is expected that a majority of users traveling to the site will be making local trips, rather than utilizing the freeway for regional travel. This is reflected in the large portion of trips proposed to use 3rd/Blaine Street, University Avenue, and Iowa Avenue.

The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response to Comment IND 1-16

The comment raises concerns regarding pedestrian safety at the intersection of Big Springs Road and Watkins Drive, and further states that 'roundabouts are difficult for pedestrians to negotiate' [*sic*]. The comment does not provide data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to *CEQA Guidelines* Section 15064, an effect shall not be considered significant in the absence of substantial evidence. Therefore, further response is not required pursuant to CEQA.

Notwithstanding the above, the following information is provided for the record:

As discussed in **Response to Comment LA 2-8**, the solutions presented in the revised Draft EIR are meant as examples of potential roadway realignments that could serve to mitigate traffic impacts, however these solutions are by no means meant to be final or prescriptive, and no concept illustrations have been produced. The University will work with the City of Riverside to identify a feasible mitigation measure that will serve all users at the Big Springs Road and Watkins Drive intersection.

Response to Comment IND 1-17

The comment expresses the opinion that construction traffic route should already have been determined. The proposed NDD Plan project is being constructed via a public-private partnership (P3) delivery method. Under the P3 model, project delivery is a comprehensive process including the planning, design and construction required to execute and complete a building facility or other type of project, the methodology of which is under the direction of the private developer, in this case, American Campus Communities. Since under this methodology, the construction documents for the project have not yet been completed, it is not possible to determine the specific routes construction traffic would take. Further, as discussed in **Section 3.0, Project Description** of the Revised Draft EIR, the phasing of the remainder of the NDD Plan development is uncertain at this time and may occur in one or more phases. As such, it would be speculative to provide information for construction of the interim phases of the NDD Plan leading to full buildout; per *CEQA Guidelines* Section 15145 an EIR need not engage in "sheer speculation" as to future environmental consequences.

Project specific mitigation measure (**Mitigation Measure TRA-2**) would require that the Project Developer prepare and implement a Construction Traffic Management Plan (CTMP) to manage the movement of construction vehicles in a safe and effective manner. The CTMP would include information such as the number and size of trucks per day, times of the day when truck movement is allowed, truck circulation patterns, location of staging areas, location/amount of construction employee parking, and the proposed use of traffic control/partial street closures on public streets. The CTMP would also include both vehicular and pedestrian way-finding signage. The overall goal of the CTMP would be to minimize traffic impacts to campus and public streets and maintain a high level of safety for all vehicles and pedestrians.

Response to Comment IND 1-18

To develop future forecasts for the Future Year (2025) conditions, including growth associated with cumulative projects, the RivTAM was used. A list of cumulative projects was requested from the City of Riverside at the initiation of the Transportation Impact Study and was reviewed with land use assumptions in the future year model to ensure that all reasonably foreseeable projects within a five-mile of UCR were accounted for in the future traffic forecasts.

Please also refer to **Response to Comment IND 1-14.**

Response to Comment IND 1-19

The comment expresses opinions regarding the potential loss of Important Farmland should the West Campus site (Alternative 2) be selected, rather than the currently proposed project site. However, the comment presents no environmental issues within the meaning of CEQA and no specific response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response to Comment IND 1-20

The comment expresses opinions regarding the potential loss of Important Farmland should the West Campus site (Alternative 2) be selected, rather than the currently proposed project site. However, the comment presents no environmental issues within the meaning of CEQA and no specific response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response to Comment IND 1-21

The comment expresses opinions regarding bicycle and pedestrian access should the West Campus site (Alternative 2) be selected, rather than the currently proposed project site. However, the comment presents no environmental issues within the meaning of CEQA and no specific response is required. The

comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response to Comment IND 1-22

The comment expresses opinions regarding the potential change to traffic patterns, and bicycle and pedestrian access should the West Campus site (Alternative 2) be selected, rather than the currently proposed project site. However, the comment presents no environmental issues within the meaning of CEQA and no specific response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response to Comment IND 1-23

The comment expresses opinions regarding the existing aesthetics of the campus, as well as the siting of currently existing uses on the campus. However, the comment presents no environmental issues within the meaning of CEQA and no specific response is required. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Notwithstanding the above, the following information is provided for the record:

As discussed in **Section 4.1, Aesthetics**, in order to preserve and enhance the visual character and quality of the project site and the surrounding areas the following LRDP Planning Strategy was incorporated in the NDD Plan:

PS Campus & Community 1 *Provide sensitive land use transitions and landscaped buffers where residential off campus neighborhoods might experience noise or light from UCR activities.*

The proposed NDD Plan project would be consistent with the relevant LRDP Planning Strategy as the proposed NDD Plan would include improvements along Blaine Street and Canyon Crest Drive, which form edges of the campus. The new landscaped edge would provide visual screening of the new buildings and parking lots/structures as well as reduce noise and light effects that could be perceived from nearby locations.

With continued implementation of the following existing campus Program and Practice, the visual character and quality of the campus and surrounding area would also be preserved and enhanced:

Aesthetics PP 4.1-1 *The Campus shall provide design professionals with the 2007 Campus Design Guidelines and instructions to implement the guidelines, including those sections related to use of consistent scale and massing, compatible architectural style, complementary color palette, preservation of existing site features, and appropriate site and exterior lighting design.*

(This is identical to Land Use PP 4.9-1(a).)

Aesthetics PP 4.1-2(a) The Campus shall continue to provide design professionals with the 2007 Campus Design Guidelines and instructions to develop project-specific landscape plans that are consistent with the Guidelines with respect to the selection of plants, retention of existing trees, and use of water conserving plants, where feasible.

(This is identical to Land Use PP 4.9-1(b).)

The proposed NDD Plan project has been and will continue to be designed to be consistent with the 2007 Campus Design Guidelines, including consistent scale and massing, compatible architectural style, and landscaping.

In addition, UCR remains committed to participation in ongoing coordination with the City and local stakeholders through the University Neighborhood Enhancement Team (UNET) and the joint City/University Coordinating Committee, providing opportunities for City and local stakeholder input regarding relevant land uses and project design features.

Please also refer to **Responses to Comment IND 1-3** and **IND 1-8**.

PH

NORTH DISTRICT DEVELOPMENT PLAN

DRAFT EIR

UNIVERSITY OF CALIFORNIA, RIVERSIDE

3637 CANYON CREST DRIVE

BANNOCKBURN, ROOM J-102

RIVERSIDE, CALIFORNIA 92507

---oOo---

Thursday, April 4, 2019

TRANSCRIPT OF PROCEEDINGS

PUBLIC COMMENTS FOR DRAFT EIR

PUBLIC HEARING

Reported By:

Joshua Manea, CSR No. 13754

Job Number 530856

Agenda

Thursday, April 4, 2019

5:32 p.m.

---oOo---

MS. KAUFMAN: Good evening. I'm Lynn Kaufman from Impact Sciences. Also with us here today is Ms. Tricia Thrasher, Principal Environmental Planner from Campus Planning, Office of the Campus Architect.

We are here for the public hearing for the North District Development Plan Project circulated revised draft EIR. There being no members of the public or agencies present, we will wait for their arrival.

(Off the record.)

MS. KAUFMAN: It is now 6:30. No members of the public or any agency have arrived. We are now officially closing the hearing.

(The proceeding concluded at 6:36 p.m.)

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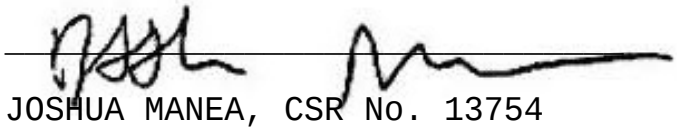
CERTIFICATE OF COURT REPORTER

I certify that the foregoing proceedings in the within-entitled cause were reported at the time and place therein named; that said proceedings were reported by me, a duly Certified Shorthand Reporter of the State of California, and were thereafter transcribed into typewriting.

I further certify that I am not of counsel or attorney for either or any of the parties to said cause of action, nor in any way interested in the outcome of the cause named in said cause of action.

IN WITNESS WHEREOF, I have hereunto set my hand this 4th day of April, 2019.



JOSHUA MANEA, CSR No. 13754

Public Hearing Transcript

The transcript includes brief opening and closing remarks. It presents no environmental issues within the meaning of CEQA and no specific response is required. The transcript will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

4.0 MITIGATION MONITORING AND REPORTING PROGRAM

4.1 INTRODUCTION

The 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.

The Final Environmental Impact Report (EIR) for the North District Development Plan (Project #958080), State Clearinghouse number 2018061044, includes nine project-specific mitigations measures along with the applicable 2005 Long Range Development Plan Amendment 2 (LRDPA) Final EIR (SCH 2010111034) Mitigation Measures (MMs), as well as campus Planning Strategies (PSs) and Planning Practices (PPs) that currently reduce environmental impacts.

The 2005 LRDPA EIR PSs, PPs, and MMs incorporated by the North District Development Plan (NDD Plan) project will continue to be monitored under the existing 2005 LRDPA Mitigation Monitoring and Reporting Program (MMRP). In addition, the University of California, Riverside (UCR) Campus Planning, Planning, Design, and Construction (CP-PDC) will coordinate monitoring the implementation of the nine project-specific mitigation measures, and in conjunction with the 2005 LRDPA MMRP, the applicable LRDPA measures for the NDD Plan project. Monitoring will include: (1) verification that each mitigation measure has been implemented; (2) recording of the verification and any necessary notations regarding implementation of each mitigation measure; and (3) retention of records in the NDD Plan project Mitigation Monitoring file.

4.2 PURPOSE

A listing of the nine project-specific mitigation measures incorporated by the project is provided in this MMRP. All applicable 2005 LRDPA PSs, PPs and MMs, to be monitored under the existing 2005 LRDPA MMRP are listed in **Appendix 4.0** of this Final EIR.

The objectives of the MMRP for the NDD Plan 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; and

- to maintain a campus record of compliance with project 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 and on-going implementation of the 2005 LRDPA EIR MMRP as follows:

- Development of the design
- Preparation of Construction Contracts
- Construction phase
- 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.

4.3 PROJECT OVERVIEW

The proposed NDD Plan would provide up to 5,200 student beds on the East Campus on an approximately 55-acre site located in the northeastern portion of the campus. The NDD Plan includes Phase 1, which involves the construction of about 1,500 student beds and associated facilities by 2021 and a future phase(s), which involves the construction of up to 3,700 student beds and associated facilities. The project site is developed with Canyon Crest Family Student Housing that was occupied by student families until 2017 and is currently vacant. The site is designated for *Family, Apartment Housing and Related Support, Residence Hall and Related Support*, *Athletics and Recreation*, and *Parking* in the UC Riverside 2005 Long Range Development Plan.

At this time, project-level details are available only for Phase 1 development. With respect to the future phase(s) of development, the NDD Plan provides a development program and a land use diagram, but does not have details with respect to specific buildings.

The construction under the NDD Plan would occur from 2019 through buildout. Construction would occur in phases, with Phase 1 providing about 1,500 beds and occurring from 2019 to 2021. The phasing of the remainder of the NDD Plan development is uncertain at this time and may occur in one or more phases.

4.4 RESPONSIBILITIES AND DUTIES

The Environmental Planning unit of the UCR Campus Planning office, Planning, Design, and Construction (CP-PDC) will be responsible for coordinating the reporting of compliance with the mitigation measures listed in this MMRP. These responsibilities include:

- Coordination with the Project Manager and/or the third-party developer representative to ensure that design and construction contracts contain the relevant mitigation measures adopted in the Final Environmental Impact Report, and that these mitigation measures are implemented during the design and construction phases of the project.

- Coordination with the 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.

4.5 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:

- CP-PDC 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 CP-PDC with verification that monitoring has been conducted and ensure, as applicable, that mitigation measures have been implemented.

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

Applicable 2005 LRDPA EIR PSs, PPs and MMs, that are incorporated as part of this project, will continue to be monitored under the existing 2005 LRDPA MMRP and reporting will be done through that established process.

4.6 LIST OF APPLICABLE PROJECT AND 2005 LRDPA EIR MITIGATION MEASURES

The following summary table, **Table 4.0-1, Mitigation Monitoring and Reporting Program,** lists the project-specific Mitigation Measures, as well as the timing and responsible entities for their implementation, monitoring, and reporting. A table listing 2005 LRDPA EIR measures applicable to the NDD Plan project, including the timing and responsible entities for their implementation, monitoring, and reporting is included in **Appendix 4.0** of this Final EIR. **Appendix 4.0** provides a resource to ensure implementation of the applicable program-level provisions in detailed design and construction of the NDD Plan project.

Table 4.0-1
Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
Monitoring Triggers 1. Design stage 2. Construction documents 3. Construction 4. Commencement of occupancy 5. Post-construction 6. Ongoing through project operation		Responsible Entities PM-PDC – Project Management - Planning, Design and Construction CP-PDC – Campus Planning - Planning, Design, and Construction EH&S – Environmental Health & SafetyFS – Facilities Services TAPS – Transportation & Parking Services Sustainability – Office of Sustainability					
AIR QUALITY							
Construction and operation of the proposed project could result in emissions that violate an air quality standard or contribute substantially to an existing or projected air quality violation.	**MM AIR-1:** When re-applying architectural coatings (e.g., paint), the campus shall use coatings that have no greater than a rating of 50 grams per liter of VOC.	PM-PDC, FS	2, 3 & 6	Ongoing monitoring to verify acceptable product usage			
	MM AIR-2: The cleaning supplies used in common areas of campus facilities shall be designated as low-VOC products.	FS	6	Ongoing monitoring to verify acceptable product usage			
GREENHOUSE GAS EMISSIONS							
Construction and operation of the proposed project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	**MM GHG-1:** By May 1, 2026, UC Riverside shall purchase carbon offsets and/or renewable energy certificates to achieve campus-wide carbon neutrality in Scope 1 and 2 emissions by 2025, consistent with the UC Policy on Sustainable Practices.	FS, EH&S and/or Sustainability	6	Ongoing monitoring to verify offset purchases			

Impact	Mitigation Measure	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
NOISE							
Construction of the proposed project could result in substantial temporary or periodic increase in ambient noise levels at certain sensitive uses in the project vicinity.	**MM NOI-1**: Barriers such as plywood structures or flexible sound control curtains shall be erected, as needed, between the proposed project and adjacent sensitive receptors minimize the amount of noise during construction. These temporary sound barriers shall be capable of achieving a sound attenuation of at least 5 dB(A) and block the line-of-sight between the project site and these adjacent land uses. Sound barriers between the project site and the UCR Child Development Centers shall be capable of achieving a sound attenuation of at least 16 dB(A) and block the line-of-sight between the project site and the Child Development Centers.	PM-PDC	2, 3	Once to confirm inclusion in construction plans; on-going throughout construction			
Construction associated with the proposed project would expose persons on- or off-campus to excessive groundborne vibration levels.	**MM NOI-2:** Noise and groundborne vibration construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise- and vibration-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.	PM-PDC	2, 3	Once to confirm inclusion in construction plans; on-going throughout construction			
TRANSPORTATION AND TRAFFIC							
Implementation of the proposed NDD Plan would result in additional vehicular trips, which would increase traffic volume and degrade intersection levels of service.	**MM TRA-1:** The Campus shall review operations at the intersection of Aberdeen Drive & Linden Street following the completion of Phase 1 of the NDD Plan; should the intersection have degraded from acceptable operations, implement improvements, including but not limited to, a signal with a pedestrian/bike only phase during future phase(s) to return the intersection operation to an acceptable level.	TAPS	6	Once to review operations at the intersection and implement improvements as needed			

Impact	Mitigation Measure	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
Implementation of the proposed NDD Plan would result in the generation of construction-related vehicle trips, which could temporarily impact traffic conditions along roadway segments and at individual intersections.	**MM TRA-2:** The University shall require the Project Developer to prepare and implement a Construction Traffic Management Plan that will include, but will not necessarily be limited to, the following elements: • Identify proposed truck routes to be used. • Specify construction hours, including limits on the number of truck trips during the AM and PM peak traffic periods (7:00 – 9:00 AM and 4:00 – 6:00 PM), if conditions demonstrate the need. • Include a parking management plan for ensuring that construction worker parking results in minimal disruption to surrounding uses. • Include a public information and signage plan to inform student, faculty and staff of the planned construction activities, roadway changes/closures, and parking changes. • Store construction materials only in designated areas that minimize impacts to nearby roadways. • To minimize disruption of emergency vehicle access, affected jurisdictions (Campus Police, City Police, County Sheriff, and City Fire Department) will be consulted to identify detours for emergency vehicles, which will then be posted by the construction contractor. • Ensure that access to fire hydrants remains available at all times.	PM-PDC	2, 3	Once prior to start of construction to verify plan preparation and required consultations; on-going throughout construction			

Impact	Mitigation Measure	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
UTILITIES							
Development under the proposed NDD Plan would generate additional wastewater on the campus, which could require the construction of new or expanded wastewater treatment facilities.	**MM UTL-1**: The on-site wastewater system should be designed to limit flows to the Linden Street sewer. Conveyance of dry-weather flow from the NDD Plan site should be limited to 333 to 400 gpm.	PM-PDC	1, 2	Once to ensure inclusion in wastewater system design; once to ensure inclusion in CDs			
	MM UTL-2: Following the completion of Phase 1 of the NDD Plan, the Campus shall perform new sewer monitoring to determine the existing flows. The Canyon Crest sewer shall be paralleled or upsized to meet the wastewater utilities demands generated by the proposed NDD Plan at Buildout. The upgrades would consider wet weather flows, peaks that may not coincide with existing flows, and flow attenuation.	PM-PDC, FS	5, 6	Ongoing monitoring to verify acceptable flows			

5.0 LIST OF PREPARERS

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