University of California Riverside

Environmental Health & Safety Expansion (Project #950456), Parking Lot 27 (Project #956452), and Related Corporation Yard Reorganization and Existing EH&S Buildings Re-Use

Final Environmental Impact Report
SCH NO. 2011061014

Prepared for
University of California, Riverside
Capital Programs
Capital Resource Management

Prepared by
Impact Sciences, Inc.
555 12th Street, Suite 1650
Oakland, California 94607

February 2012

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1.0 INTRODUCTION

1.1 PURPOSE OF THE FINAL ENVIRONMENTAL IMPACT REPORT

Pursuant to the California Environmental Quality Act (CEQA) and the University of California procedures for implementing CEQA, the University of California, as the Lead Agency under CEQA, issued a Draft Environmental Impact Report (EIR) for the proposed EH&S Expansion and Parking Lot 27 (hereinafter the proposed projects) and the related Corporation Yard Reorganization and Existing EH&S Buildings Reuse (hereinafter the related projects) on December 9, 2011. The Draft EIR was circulated for a 45-day public comment period that ended on January 23, 2012. During this period, UCR held a public hearing on the Draft EIR on January 11, 2012, to receive verbal comments. The hearing was held at Alumni Visitor's Center located at 3701 Canyon Crest Drive from 6:00 PM to 7:00 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 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 Draft EIR, which is incorporated by reference, and this document (including revisions, comments, and 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:

Capital Resource Management
1223 University Avenue, Suite 200
Riverside, California 92507-7209
Contact: Tricia D. Thrasher, ASLA, LEED AP

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 are relevant to the 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 RESPONSE TO COMMENTS DOCUMENT

This document is organized into five sections. Following this introduction (**Section 1.0**), **Section 2.0, Revisions to the Draft EIR**, presents changes to the text of the Draft EIR. **Section 3.0, Comments on the Draft EIR and Responses to Comments**, contains a list of persons, agencies, and organizations that submitted written comments on the Draft EIR; transcripts of the 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 DRAFT EIR

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

This chapter, in combination with the Draft EIR, the responses to comments, 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 Draft EIR. This presentation of revisions to the Draft EIR is consistent with *State CEQA Guidelines* Section 15162 detailing required Final EIR contents.

Section 4.4, Hazards and Hazardous Materials, page 4.4-35

The following text in Section 4.4 has been modified as shown below:

Mitigation Measures: No mitigation is required. However, to further reduce the less than significant impact from off-haul of hazardous wastes, the following mitigation measure will be imposed on the proposed EH&S Expansion project.

MM 4.4-2 EH&S staff shall provide all drivers removing hazardous materials or hazardous waste from the EH&S Expansion facility with printed directions clearly indicating the mandated haul route, exiting the EH&S Expansion facility left onto Watkins Drive and proceeding northwest to Blaine Street, then west on Blaine to the I-215/SR-60 freeway entrance ramps.

Although this mitigation measure requires waste off-haul trucks to use the Blaine Street route to the freeway, in the event of an emergency, project-related traffic, including off-haul trucks, could use other routes including Linden Street to Canyon Crest Drive and then University Avenue or Watkins Drive to I-215/SR-60. While these routes would not be preferred under normal operating conditions, they would provide adequate alternatives if needed. Because the frequency of use of these alternate routes would be very low and would occur only in the event of an emergency closure of the preferred route, the impact of such use would remain less than significant.

3.0 COMMENTS ON THE DRAFT EIR AND RESPONSES TO COMMENTS

3.1 INDEX TO COMMENTS

As described in **Section 1.0, Introduction,** all comments on the 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 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 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 – Name
A	Governor's Office of Planning and Research
B	City of Riverside Community Development Department
C	Kevin Dawson
D	Barbara and Frederick Gable
E	Frederick Gable
F	Jorun B. Johns
G	Karl Johns
H	Robert A. Phillips
PH	Public Hearing

3.2 RESPONSES TO INDIVIDUAL COMMENTS

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

Letter A

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

January 24, 2012

Tricia Thrasher
The Board of Regents of the University of California
1111 Franklin Street, 12th Floor
Oakland, CA 94607

Subject: UC Riverside Environmental Health and Safety Expansion
SCH#: 2011061014

Dear Tricia Thrasher:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on January 23, 2012, 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.

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

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2011061014
Project Title UC Riverside Environmental Health and Safety Expansion
Lead Agency University of California, Regents of the

Type EIR Draft EIR

Description The proposed project includes three components: 1) Environmental Health and Safety (EH&S) Expansion; 2) Parking Lot 27; and 3) Renovation and Reuse of Existing EH&S Building. The new EH&S building would include approximately 27,265 gross square feet (gsf) of space, including about 18,674 assignable square feet (asf). Uses would include administrative/office space, a safety learning center, laboratories, and materials handling and storage for chemical, radiation, biomedical, and universal waste and building support services. A new parking lot with 50 spaces would be provided at the east end of the new EH&S building. Related projects not seeking approval at this time include reorganization of the campus Corporation Yard and relocation of campus Mail Services and Printing & Reprographic Services to the existing EH&S facility.

Lead Agency Contact

Name Tricia Thrasher
Agency The Board of Regents of the University of California
Phone 951 827-1484 **Fax**
email
Address 1111 Franklin Street, 12th Floor
City Oakland **State** CA **Zip** 94607

Project Location

County Riverside
City Riverside
Region
Lat / Long
Cross Streets Walkins Drive and Valencia Hills Drive
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways Hwy 215, 60, 91
Airports
Railways
Waterways
Schools Highland, Hyatt, North
Land Use Campus Support

Project Issues Air Quality; Noise; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Landuse; Aesthetic/Visual

Reviewing Agencies Resources Agency; Department of Fish and Game, Region 6; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 8; Regional Water Quality Control Board, Region 8; Department of Toxic Substances Control; Native American Heritage Commission

Date Received 12/09/2011 **Start of Review** 12/09/2011 **End of Review** 01/23/2012

Note: Blanks in data fields result from insufficient information provided by lead agency.

Response to Comment Letter A – Governor's Office of Planning and Research

Response to Comment A-1

The Office of Planning and Research is indicating that the Campus has complied with the State Clearinghouse review requirements. This comment is acknowledged. Because this comment does not address the content of the Draft EIR, no further response is required.

Letter B

Community Development
Department
Planning Division

CITY OF
RIVERSIDE

January 23, 2012

Tricia D. Thrasher, ASLA, LEED AP, Principal Environmental Project Manager
Attn: EH&S Expansion, Parking Lot 27 and related projects
UCR Capital Programs – Capital Resource Management
1223 University Avenue, Suite 200
Riverside, CA 92507

SUBJECT: ENVIRONMENTAL HEALTH & SAFETY EXPANSION: NOTICE OF AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT

Dear Ms. Thrasher:

Thank you for the opportunity to comment on the Notice of Availability (NOA) of a Draft Environmental Impact Report (DEIR) for the proposed Environmental Health and Safety Expansion (EH&S) project. The project proposes to expand the EH&S facility and carry out related reorganization of campus support functions on the University of California, Riverside (UCR) campus. City staff understands that the project, more specifically, includes the following components:

Environmental Health & Safety Expansion: Located on the northeast portion of the UCR campus, north of Linden Street, south of Watkins Drive, west of Valencia Hill Drive, and east of the UCR Corporation Yard and Transportation and Parking Services (TAPS) building, this component includes construction of a new single-story, 27,265 square-foot EH&S building that would allow the relocation of the EH&S functions from their present location in the south-central area of the campus and provide space for administrative/office uses, training, laboratories, and hazardous materials handling and storage. A new parking lot with approximately 50 parking spaces would be built adjacent to the proposed EH&S expansion site to jointly serve the EH&S facility and the adjacent recreation fields. The land use designation of the proposed EH&S site under the UCR Long Range Development Plan (LRDP) is "Campus Support." As such, the proposed use is consistent with the LRDP.

Renovation and Reuse of Existing EH&S Building: The existing EH&S facility consists of a 6,200 square-foot building and a 2,400-square-foot modular building and is located on the south-central portion of the UCR campus, along south Campus Drive and immediately east of I-215. After both buildings are renovated, Mail Services, currently located at the Corporation Yard, will occupy the existing EH&S modular building and Printing & Reprographic Services, currently located off campus, will occupy the existing EH&S building.

Corporation Yard Reorganization: As the proposed EH&S building and yard will use the existing TAPS yard area, these functions will need to be relocated. The Corporation Yard will accommodate

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TAPS uses while transferring some units to the existing EH&S building.

Given the location of the proposed EH&S facility in proximity to an established residential neighborhood and child day care center, City staff has reviewed the NOA and offers the following comments for your review and consideration:

Aesthetics

- Further environmental analysis will be required as part of the Final EIR to assess the probable aesthetic impacts associated with the development of the EH&S expansion project onto the surrounding area, including the adjacent residential neighborhood. The plans and building elevations included in the DEIR do not provide sufficient information to fully understand the aesthetic impacts of the project. The Final EIR needs to include more detailed information on the aesthetic impacts of yards, outdoor storage and truck delivery/pick-up areas on public views. Plans for such areas need to provide more information on the proposed measures to screen these areas along Watkins Drive, including the species and size of the proposed trees as well as details on the aesthetics of the proposed screen wall. 1

Hazards and Hazardous Materials

- *Seismic Activity* – As identified in the City of Riverside General Plan 2025, the eastern portions of the City are more susceptible to seismic activity. As a matter of fact, the only known fault line within the City limits is located approximately 0.5 miles from the UCR campus boundary. A seismic study was completed for the UCR campus in 2003 to address seismic concerns in this area. As such, the Final EIR needs to reference this document and determine that the proposed project will include the appropriate measures to lessen any negative impacts resulting from the project to less than significant during a seismic event. 2

- *Transport of Hazardous Materials* – The DEIR includes a mitigation measure to require all drivers delivering or removing hazardous materials or hazardous waste from the EH&S facility to follow a specific travel route along Watkins Drive to Blaine Street and onto the I-215/SR-60 freeway. Although this route is the shortest distance from the EH&S facility to the freeway, drivers will, nonetheless, travel adjacent to residential areas and other sensitive uses. As such, this issue continues to be a concern for the Riverside Fire Department. The Final EIR and needs to fully analyze and mitigate impacts associated with the transport of hazardous materials including, but not limited to, types of transport vehicles, materials transported, quantity of material transported, number of anticipated transport vehicle trips, and days and times of transports. 3

- *Release of Hazardous Materials* – Although the DEIR states that the types and quantities of hazardous materials to be stored on site are not large enough to cause a major explosion or airborne release that could affect nearby sensitive receptor, the Riverside Fire Department continues to have concerns with this issue. As such, the Final EIR must consider the following in the event of a release of hazardous materials:

    - In the event of a spill of a liquid hazardous material, the Final EIR needs to include a discussion on the measures that will be in place to contain and direct any runoff from an accidental spill away from any nearby sensitive receptors. 4

- In the event of a gaseous release of hazardous materials, the Final EIR needs to include a discussion on the measures that will be in place to contain and dissipate any odors, fumes and gases prior to reaching all nearby sensitive receptors. 5

- The Final EIR needs to include a discussion on the notification and evacuation contingency plans for the UCR campus population and nearby residential areas in the event of a hazardous materials release. 6

Your continued cooperation with the City of Riverside is greatly appreciated. Should you have any questions regarding this letter, please contact Gus Gonzalez, Associate Planner, at (951) 826-5277 or by email at ggonzalez@riversideca.gov.

Sincerely,

Steve Hayes, AICP
Interim City Planner

cc: Ronald Loveridge, Mayor
Riverside City Council Members
Scott Barber, City Manager
Belinda Graham, Assistant City Manager
Deanna Lorson, Assistant City Manager
Kristi Smith, Supervising Deputy City Attorney
Dan Chudy, Interim Community Development Director
Steve Earley, Fire Chief
Mike Esparza, Deputy Fire Chief
William Schellhous, Fire Marshal

Response to Comment Letter B – City of Riverside Community Development Department

Response to Comment B-1

The draft EIR adequately describes the changes in visual character and quality of the project site and its vicinity as a result of project implementation. As described on page 4.1-9 of the Draft EIR, the proposed project includes planting of evergreen trees along the project site's frontage on Watkins Drive. Figure 3.0-4 in the Draft EIR presents the site plan for the proposed projects. As shown in Figure 3.0-4, the exterior operational areas for the proposed EH&S Expansion, including outdoor storage areas and truck delivery/pickup areas, would be located within the existing fencing around the Corporation Yard. This fencing currently provides some visual screening from Watkins Drive. The existing fencing would be retained, with sections of the fencing replaced where necessary to accommodate the proposed new gate. The gate would be kept closed at all times except for brief, occasional (less than daily) openings to allow trucks to enter and exit. As described in the Draft EIR on pages 3.0-13, 4.1-9, and 4.1-10, the proposed projects would include adding a row of 36-inch box evergreen trees along the street side of the existing fencing along Watkins Drive. The fence and trees would provide increased screening of the new EH&S Expansion as compared to existing conditions. Most vehicle traffic to and from the EH&S Expansion, including daily campus waste transport truck trips, would access the site from Linden Street and due to the orientation of the loading docks as well as the screening provided by the fence and trees along Watkins Drive, these vehicles, as well as loading and unloading activities, would not be visible from Watkins Drive or the residential areas to the north.

Response to Comment B-2

Impacts related to geology and soils from the development of those lands were evaluated in the 2005 LRDP EIR; the analysis took into account the geotechnical report prepared for the 2005 LRDP EIR in 2001, as well as a geologic conditions update for the project area prepared in 2011 that found that the Box Springs fault, which had previously been mapped on the northeast corner of the campus near the project site, is considered inactive and is no longer shown on updated earthquake hazard maps prepared by the State of California. The 2005 LRDP (as amended) includes campus programs and practices, such as PP 4.6-1(a) through (c), which would require preparation of site-specific geotechnical studies, and requires compliance with the University of California's Policy for Seismic Safety. A site-specific geotechnical report was prepared for the proposed EH&S Expansion in 2005 and updated in 2011. The facility has been designed consistent with the recommendations of that report. Recommended measures included overexcavation and fill compaction prior to foundation work; the use of reinforced spread footings; reinforced slab-on-grade foundations; and limitations on prewetting of soils during foundation work. Consistent with these recommendations, the building design includes conventional interior and exterior

shallow strip footings with 2-foot minimum embedment into the lowest adjacent grade, spread footings under the columns, and concrete slab on grade with minimal reinforcing.

The building will have a steel space frame with steel beams and girders and columns supporting a steel roof deck, and steel beams and girders supporting metal decks with a lightweight concrete infill floor system. Building exteriors would consist of concrete masonry units and glass curtain walls in some portions of the building, with exterior perimeter concrete block bearing walls in the remainder. The lateral building would include steel braced frames, steel moment-resisting frames, or a combination of the two systems, as well as the perimeter concrete block walls, to resist lateral forces that could be placed on the building. These design features are consistent with both the 2010 California Building Code (CBC) and the recommendations of the geotechnical report as updated.

Furthermore, as discussed in Section 4.4, Hazards and Hazardous Materials of the Draft EIR, numerous operational controls that are in compliance with applicable laws and regulations are implemented at the EH&S facility to minimize the risk from accidental releases of stored materials, including accidental releases that could result from strong seismic ground shaking. In addition, as discussed in response to comment B-6 below, UCR has developed an Emergency Response Plan that covers a broad range of emergency situations related to both human-made and natural disasters and establishes protocols and procedures to be implemented in the event of a natural disaster or emergency. As discussed in the Initial Study for the proposed projects (Appendix 1.0 of the Draft EIR), compliance with LRDP programs and practices and University policies would ensure that impacts related to seismic activity would be less than significant.

Response to Comment B-3

Section 4.4, Hazards and Hazardous Materials, of the Draft EIR presents detailed information regarding the types, amounts, and frequency of hazardous waste off-haul from the proposed facility. Materials that would typically be hauled are described on pages 4.4-4 through 4.4-6 of the Draft EIR and would include chemical, radioactive, and biohazardous/medical wastes. As also described in that section, quantities of each material would range from less than a gallon to several 55-gallon drums, as well as cubic-yard-quantity boxes for dry waste and electronic waste. The largest liquid waste container would be an 85-gallon drum; however, 55-gallon drums would be used to contain the great majority of liquid waste. As stated on page 4.4-31, all waste transporters would be licensed to haul hazardous waste and would carry manifests detailing waste quantities and types, as required by federal law. The types of vehicles used would range from box panel trucks to a 53-foot tractor-trailer. The number of trucks would be approximately 2 to 3 per month, as described in Section 4.8, Transportation and Traffic (see page 4.8-10 of the Draft EIR). Days and times of such truck trips would vary, but would occur during regular

business hours. The Campus will continue to comply with all rules and regulations related to the transport of hazardous waste and materials. Given the quantities of waste involved, the low frequency of off-haul events, and the fact that all off-haul would be conducted by licensed vendors, the impact from the transport of materials would be less than significant.

The Campus acknowledges that implementation of the proposed mitigation measure (which designates a specific route to be used by the vendors to off-haul the waste) would cause the haul trucks to travel past residences. However, as noted in the Draft EIR, the compliance with applicable federal and State laws related to transport of hazardous materials would continue to reduce the likelihood and severity of accidents during transport and minimize impacts on receptors near the haul route. Further analysis of this issue and additional mitigation is not required.

Response to Comment B-4

Measures to control potential spills or releases of hazardous materials are described in Section 4.4 of the Draft EIR and would include secondary containment to capture any liquid or solid spills in both indoor and outdoor waste handling areas, as well as emissions venting through high-speed exhaust fans to provide rapid dispersal of any trace amounts of emissions (see pages 4.4-23 through 4.4-25 of the Draft EIR). Loading and unloading of waste containers at the loading dock would involve transfer of sealed containers and the loading dock would have a secondary containment system that would prevent any materials that might be spilled during loading and unloading from reaching the storm drain system or from reaching public outdoor areas (see page 4.4-29 of the Draft EIR). In addition, EH&S personnel are trained in spill containment and clean-up materials would be available at the EH&S loading dock to handle accidental spills and releases. Similarly, licensed waste haulers are equipped and trained to comply with regulatory requirements which include procedures to be followed in the event of a spill or release during transport.

The Campus will continue to comply with all rules and regulations related to the handling and management of hazardous waste and materials; compliance with these regulations and standard safety procedures would minimize risk of accidental releases and would prevent any spills that might occur from being released to the building exterior or to municipal storm drains or sanitary sewers.

Response to Comment B-5

As described in Section 4.4 of the Draft EIR, hazardous waste bulking and testing would be performed indoors and within fume hoods to reduce the potential for releases and to control any air emissions. Any gaseous release that may occur would generally be contained within the building or truck dock and would be channeled into the building's exhaust system, which would be vented through high-velocity exhaust fans to dissipate any fumes, gases, or odors (see page 4.4-25 of the Draft EIR). As also discussed

on that page of the Draft EIR, the project is undergoing a wind study for design of the exhaust system; the results of this study will be used to finalize the design to ensure adequate dispersal of any emissions. As described in Section 4.4 (page 4.4-29 of the Draft EIR), the largest quantities of hazardous materials handled are limited to a few 55-gallon drums, with most wastes present in much smaller quantities, ranging from less than an ounce to a few gallons. Materials would not be handled or stored at the EH&S Expansion in very large quantities that could cause industrial-scale accidents such as the release of toxic gases or explosions that could affect off-site locations. The quantities of materials that are typically handled by EH&S and that could produce gaseous emissions are very small, generally less than 5 percent of the total waste volume. In addition, about 50 percent of the volume of waste EH&S typically handles consists of materials that may evaporate given the right conditions, producing vapors. The amount of vapors and their potential distribution depends on the nature of the materials, their vapor pressure, and weather conditions, including temperature, wind speed, and in some cases relative humidity. A very small proportion – less than 1 percent, and possibly as little as less than 0.01 percent – of stored materials are toxic enough to potentially have a measurable effect some distance from the site. Given these very small quantities, the risk of a release of gaseous materials or vapors is very low and the associated impact is less than significant, as concluded in Section 4.4 of the Draft EIR.

Response to Comment B-6

As described in Section 4.4 of the Draft EIR, the UCR Business Plan provides information to the City of Riverside Fire Department (RFD) that includes emergency procedures to follow in the event of an accidental release of hazardous materials. The information about the proposed EH&S Expansion facility would be provided to the RFD along with periodic updates on any inventory changes at the facility and at other campus facilities (see page 4.4-33 of the Draft EIR). In addition, a building emergency plan (BEP) would be prepared for the EH&S Expansion which would be tailored to the specific needs and circumstances of the occupants of the building. A comprehensive BEP will contain the emergency evacuation procedures; a map that shows the location of the building's Emergency Assembly Areas (EAA); a building floor plan that shows emergency evacuation routes and the location of emergency equipment (fire extinguishers, fire alarm stations, emergency response kits); a list of pertinent safety personnel, including contact information; and building-specific emergency response procedures.

As described in the 2005 LRDP Amendment 2 EIR (UCR 2011; page 4.7-18), EH&S has developed an Emergency Response Plan that covers a broad range of emergency situations related to both human-made and natural disasters and works with RFD to continually review and update policies and procedures to ensure a coordinated approach to hazardous materials incident planning and response. The Campus Emergency Operations Plan (EOP) details procedures for notification and evacuation, if

necessary, of both the campus population and nearby residential areas. The plan is available online at http://ehs.ucr.edu/forms/eop.pdf.

In the event of an incident or emergency that could affect populations on or off campus, EOP procedures would be initiated to assess risks to the campus and local residents and take appropriate response actions. Depending on the nature and severity of the incident, these procedures may include notification to and coordination with RFD, which in turn may implement the City's emergency response and recovery plan. The Campus EOP outlines several public notification procedures for emergency situations; among these are use of the federal Emergency Alert System, which allows local area television, AM/FM radio stations and cable television systems to broadcast emergency information to the areas they serve. If necessary, UCR can request the use of the Emergency Alert System to distribute UCR-specific information within the campus's geographical region.

Letter C

January 23, 2012

Kevin Dawson
269 Goins Ct.
Riverside, CA 92507-4654

Ms. Tricia D. Thrasher, ASLA, LEED AP
UCR Capital Programs
Capital Resource Management
1223 University Ave., Ste. 200
Riverside, CA 92507

Re: Comments on UC Riverside EH&S Expansion Draft EIR

Dear Ms. Thrasher,

I offer the following comments in response to the UCR EH&S Expansion Draft EIR. Passages quoted from that document appear in italics.

From Page 4.4-36: *As discussed under Impact 4.4-2 above, compliance with hazardous materials transportation regulations and campus emergency response planning and procedures would minimize the potential for accident releases in the vicinity of the Child Development Center.*

This is a statement and not an analysis of potential impact. Where is the discussion of current and future hazardous waste storage dangers? Where is the detail of what is going to be stored at this facility and their risks? Where is discussion of possible worst case accidents/incidents, and what measures are being incorporated into the project to minimize or mitigate such possibilities? Where is any discussion as to the risks involved with hauling the waste through high density neighborhoods along Blaine St? Where is the discussion for how to mitigate those risks? Where is consideration of alternative routes? 1

The fact that there is no detailed discussion is a fatal flaw for this DEIR and I respectfully request that the DEIR be re-circulated. Without an analysis of the quantities and types of waste to be stored, now and in the future, verses the design features of the proposed facility, the lead agency will not have enough information to make an informed decision. The current DEIR, by omission of these material details, understates and misrepresents the true nature of this facility. 2

This proposed land use is distinctly different than adjunct uses. Hazardous waste storage vs. high density residential/child care represent two vastly different extremes of uses. The consequences of that possible conflict could be extreme and the lead agency has an obligation to explore and disclose any possible risk in detail. How can a board give approval without full knowledge and analysis of possible risk? How can the public or outside agencies access the possible risk without full disclosure and analysis of possible risk? 3

Impact 4.6-2 Implementation of the proposed EH&S Expansion, Parking Lot 27 (proposed projects,) and related projects would not conflict with a land use plan, policy,

or regulation of a local agency. The impact would be less than significant.

UCR, which meets regularly with the City, maintains an ongoing exchange of ideas and information, and pursues mutually acceptable solutions for issues that confront both the campus and the community. To foster this process, UCR participates in and communicates with City and community organizations, and sponsors various meetings and briefings to keep local organizations, associations, and elected representatives apprised of ongoing planning efforts. UCR participated in the development of the current City of Riverside General Plan and the University Neighborhood Plan in an effort to coordinate planning efforts between the City of Riverside and the Campus.

The above statement contains false and misleading information. The city's general plan never envisioned UCR would imprudently propose to put a hazardous waste storage facility in the middle of a residential neighborhood. This proposed Hazardous Waste Storage facility also conflicts with the city of Riverside's University Neighborhood plan. There is NO industrial element in the UNP. There is NO waste storage element in the UNP. The EH&S is an industrial facility and should not be located the primarily residential designated area. You have included statements to give the impression that the city or elected officials are approving of this project, and yet our elected officials have stated publically they are **not** supportive of the hazardous waste component of this project. 4

From Page 6.0-17: ***[Land Use:]*** *The 2005 LRDP Amendment 2 (2011) added a planned School of Medicine (SOM) to be sited at the northeast corner of Iowa and MLK on the West Campus and increased the planned density of the West Campus [a]cademic core. It also deleted the location of one West Campus parking structure. Under the LRDP, as amended, the Alternative 2 site is designated entirely for parking. Development of a portion of the site with the EH&S Expansion under this alternative thus would conflict with applicable land use plans and policies because it would be inconsistent with the LRDP land use designation. In addition, because Alternative 2 would require additional internal roadways that would reduce the land area available for planned uses, it would impede implementation of the adopted land use plan for the West Campus. Alternative 2 would therefore result in land use impacts greater than those analyzed for the proposed projects.*

When this project was first proposed (just after the Arroyo Student housing project but before the 2005 LRDP Amendment), we raised the issue that the proposed waste storage use didn't conform to the then 2005 LRDP. We were told then, at the public scoping meeting, that it didn't matter that it didn't conform to the LRDP, that the LRDP was just a guidance document. We now see that the campus solution to creating or inventing support or justification was to amend the LRDP to designate the Watkins location at the preferred target location, and make the MLK location inconsistent with the LRDP. 5

No matter how the campus tries to justify this project as needing to be located to the Watkins Dr. location, the material facts still stand: Hazardous Waste Storage doesn't belong next to single family homes, high density dorms, or child care faculties. 6

Kevin Dawson
269 Goins Ct.
Riverside, CA 92507

Response to Comment Letter C – Kevin Dawson

Response to Comment C-1

Risks associated with hazardous waste storage on site are discussed in Section 4.4, Hazards and Hazardous Materials of the Draft EIR (see pages 4.4-24 through 4.4-25 and pages 4.4-29 through 4.4-30). The types and quantities of materials stored are discussed on pages 4.4-3 through 4.4-6 and page 4.4-21. As described on page 4.4-4, chemical wastes are placed in sealed containers that are segregated based on the type and characteristics of the waste, and stored for a maximum of 90 days, although they are generally removed approximately every 60 days. The risks of accidents and other incidents involving hazardous wastes storage and handling on site are discussed on pages 4.4-29 through 4.4-31, and the measures included in the project to reduce such risks are described on pages 4.4-23 through 4.4-27 and pages 4.4-29 through 4.4-34. Risks related to hazardous waste transport are discussed on pages 4.4-31 through 4.4-32 and measures to reduce such risks are discussed on pages 4.4-32 through 4.4-35. In addition, the Draft EIR includes a discussion of regulations intended to reduce transport-related risks on page 4.4-13 and page 4.4-17.

Implementation of the proposed mitigation measure (which designates a specific route to be used by the vendors to off-haul the waste) would cause the haul trucks to travel past residences on Blaine Street. However, as noted in the Draft EIR, due to the small number of project-related truck trips (approximately 2 to 3 per month) that would be made on the designated truck route and the compliance with applicable federal and State laws related to transport of hazardous materials, the likelihood and severity of accidents during transport would be reduced and impacts on receptors near the haul route would be minimized. Although the mitigation measure requires waste off-haul trucks to use the Blaine Street route to the freeway, in the event of an emergency, project-related traffic, including off-haul trucks, could use other routes including Linden Street to Canyon Crest Drive and then University Avenue or Watkins Drive to I-215/SR-60. While these routes would not be preferred under normal operating conditions, they would provide adequate alternatives if needed. The EIR text has been revised to discuss these alternative routes, please see **Section 2.0, Revisions to the Draft EIR,** of this document.

Response to Comment C-2

As outlined in the response to **Comment C-1** above, the Draft EIR includes an analysis of the types and quantities of wastes that would be stored both under current conditions and in the future, as well as facility features and operating procedures that would provide for safe handling and transport of hazardous wastes. These discussions fully describe and disclose the nature of the facility and its operations, which would be regulated by the US EPA and the Cal/EPA. No recirculation of the Draft EIR is necessary.

Response to Comment C-3

Land use considerations and potential impacts are discussed in Section 4.6, Land Use and Planning of the Draft EIR. Compatibility of the proposed EH&S Expansion with nearby uses, including on- and off-campus residences and the UCR Child Development Center, is discussed on pages 4.6-11 through 4.6-15. As discussed in Section 4.6 as well as in Section 4.4, the proposed projects include safety measures, noise and light/glare screening, and operational procedures that would minimize potential conflicts with and risks to adjacent land uses. The Regents or its delegate will consider these factors in making a decision to approve or deny the projects.

Response to Comment C-4

As a state entity, the University of California is not subject to municipal land use plans, policies, or regulations. For this reason, the City's General Plan and University Neighborhood Plan (UNP) do not include University property.

However, the Draft EIR explains that the Campus has worked cooperatively with the City in the past during the development of the City's General Plan and the preparation of the UNP and that the Campus will continue to work with the City to coordinate development on campus with off-campus uses and development. The plan includes objectives and policies that relate to providing affordable housing for residents and UCR students, faculty and staff, including the provision of high-density mixed uses along University Avenue, as well as protecting and enhancing nearby single-family neighborhoods. The General Plan and the UNP do not address adjacent on-campus uses, and the UNP is intended to guide development only of off-campus areas in the City of Riverside.

Response to Comment C-5

The proposed project site on Linden Street has always been designated for *Campus Support* uses (see Figure 13: Land Use Plan on page 61 of the 2005 LRDP), and the proposed EH&S Expansion is an allowed use under this designation (see pages 73-74 of the 2005 LRDP and pages 87-88 of the 2005 LRDP Amendment 2). The LRDP Amendment 2 did not make any changes to the land use designation of the proposed project site on Linden Street. The amendment included a change in land use designation for the Alternative 2 (MLK/Canyon Crest) site from *Parking* and *Campus Support* to *Parking* only. As explained in both the 2005 LRDP Amendment 2 EIR (UCR 2011) and in Section 6.0, Alternatives of the Draft EIR (see pages 6.0-17 through 6.0-18 of the Draft EIR), this change was made in order to provide adequate parking for the long-term buildout of the campus, including the School of Medicine, and to optimize use of limited available campus land. Use of the MLK/Canyon Crest site for the proposed EH&S Expansion would preclude provision of adequate parking under the 2005 LRDP as amended. Because the land use designation change was adopted for the purpose of providing adequate parking, there would be a land

use conflict related to placement of the proposed EH&S Expansion on the MLK/Canyon Crest site under the 2005 LRDP as amended.

Response to Comment C-6

See the response to **Comment C-3** above.

Letter D

From: barbgable@aol.com
Sent: Monday, January 23, 2012 5:27 PM
To: Tricia D Thrasher; CEQA@ucr.edu; Chancellor
Subject: Hazardous waste facility

Dear Chancellor White, Ms. Thrasher, and the Regents of the University of California,

The hazardous waste facility planned by UCR for the Watkins Drive and Valencia Hill corner should not be built in this residential area close to the University Childcare Center, several student dormitories, and many residences. In case of an accident or an earthquake, the danger to children, students, and residents of leaking poisons is simply too great. Vehicles transporting chemicals or pathogens to and from this facility would also add to the danger. How could such a building project in this location receive approval in an Environmental Impact report? 1

Across the freeway, where there are plans to build the anticipated School of Medicine, there is space for such a facility, located well away from residences and care facilities. Please reconsider the placement of this building and help save the University neighborhood, already decaying because of aging housing and absentee landlords. A hazardous waste facility would not only endanger our health and safety but also further deteriorate the value of our homes and the livability of what was once a nice neighborhood. 2

Sincerely yours,

Barbara and Frederick Gable
270 Barret Road
Riverside, CA 92507

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Response to Comment Letter D – Barbara and Frederick Gable

Response to Comment D-1

The potential risks of locating a hazardous waste facility near residences, dormitories, and the Child Development Center are addressed in Sections 4.4, Hazards and Hazardous Materials; 4.6, Land Use; and 4.8, Transportation and Traffic of the Draft EIR. The Regents or its delegate will consider such risks, which the EIR concluded would be less than significant, in its decision on whether to approve or deny the projects.

Response to Comment D-2

Section 6.0, Alternatives of the Draft EIR discusses alternative locations for the proposed projects, including alternate sites on the West Campus. As described in the analysis of Alternative 2, the West Campus alternative site, there are significant drawbacks to this location. These include its inability to meet important project objectives, including the objective of locating the EH&S Expansion close to the main campus waste generators, and its land use designation for *Parking* uses under the 2005 LRDP (as amended). Use of the Alternative 2 site would have significant land use impacts and would impede achievement of both project and LRDP objectives. The Regents or its delegate will consider these factors in its decision on whether to approve or deny the projects.

Letter E

From: FredGable@aol.com
Sent: Monday, January 23, 2012 4:13 PM
To: Chancellor; Tricia D Thrasher; CEQA@ucr.edu
Subject: UCR Hazardous waste facility location

Dear Chancellor White, Ms. Thrasher and UC Regents,
as an emeritus UCR faculty member and also a resident of the area east of the campus, I protest the decision to relocate the hazardous waste facility to the housing area at Watkins and Valencia Hill.
Safety is always a concern at UCR, I realize and assurances can usually be believed, but accidents do happen! We see them in the news every day: oil tankers, cruise ships, drilling platforms, etc. Why take the chance that an accident at the waste facility in Riverside might endanger hundreds of students in the new dormitories and numerous Riverside residents, when its placement on the former location's relatively unoccupied land would lessen the tragedy? We can't stop growth of the campus in our direction, but this move is not a question of growth. Surely a different use of this unusually- shaped space can be found.
I concur completely with Karl Johns' eloquent statement to this effect.

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Respectively submitted,
Frederick K. Gable
Prof. of Music, emeritus

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Response to Comment Letter E –Frederick Gable

Response to Comment E-1

Please see the responses to **Comments D-1** and **D-2**, above.

Letter F

From: ariadnepress@aol.com
Sent: Monday, January 23, 2012 9:57 AM
To: CEQA@ucr.edu
Subject: HazardousWasteFacility

January 21, 2012

Dear Chancellor White, Dear Ms. Thrasher, Dear Regents of the University of California:

I would like to say a few words in support of the remarks made by Kevin Dawson at the recent Regents' meeting on the UC Riverside campus.

It concerns the planned move of the Hazardous Waste Facility from the west side of the campus – near the proposed medical school and other lab facilities with easy freeway access -- to the east side, the residential side of the campus. The proposed sight is close to the existing dormitories, as well as those presently under construction, it is next to the Child Development Center and across the street from the railroad track. It is 1 ½ miles from the freeway and accessible only from city streets, with no special access for emergency vehicles.

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We would like to ask you to look into the matter once more before making a decision, which would impact student life as well as the residential area adjacent to the east side of the campus.

Many thanks for your consideration,

Jorun B. Johns
Professor of German
California State University, San Bernardino

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Response to Comment Letter F – Jorun B. Johns

Response to Comment F-1

Please see the responses to **Comments D-1** and **D-2**, above.

Letter G

From: KarlTJohns@aol.com
Sent: Sunday, January 22, 2012 6:26 PM
To: CEQA@ucr.edu
Subject: HazardousWasteDisposal

Dear Chancellor White, Ms. Thrasher and UC Regents,

After the Riverside campus had planned to place a newly expanded hazardous waste facility in the vicinity of the UCR School of Medicine near the intersection of Martin Luther King Boulevard and Canyon Crest Drive in the southwest area of the UCR campus, neighborhood residents were suddenly informed that the facility could not be built anywhere other than in the residential area between Watkins Drive and Linden Street at the corner of Valencia Hill Drive. Since the campus was first built, the entire area around Linden Street has been consistently devoted to residential functions for students and faculty. 1

Campus officials have assured us that all traffic and storage functions are completely safe, but this cannot be guaranteed for the future. The lot at Watkins and Valencia Hill is situated directly above a pipe supplying water to the only residential neighborhood in walking distance of the campus – where Chancellor White himself lives. It is also above a branch of the San Andreas Fault and above a jet fuel pipe connecting the March and the Norton Airbases. It is within one hundred feet of the campus childcare facility and across the street from a BNSF rail line. 2

This misstep will create dangers far more menacing than placing the recently built Chemistry and Engineering buildings in a flood plain or the flooding of the Arts building. Accidents are possible here in a way they would not be at the originally planned site, and the results will be far more damaging to the campus than other errors in planning such as the lack of automobile access to many campus facilities. The railroad will never be under any local influence, and previous derailments in the vicinity have fortunately not involved chemicals – as was the case recently at the Cajon Pass. 3

The University must recognize that it is in its own interest to cultivate an amenable residential neighborhood close to the campus and its libraries, lecture halls and arts venues, and not to take an action that will be negatively perceived by and create bad feeling among faculty, staff, alumni and students who have been living in this neighborhood since the campus was founded. It is our hope that the more prudent previous plan will be resumed. 4

Sincerely yours,

Karl Johns
270 Goins Court
Riverside, CA 92507

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Response to Comment Letter G – Karl Johns

Response to Comment G-1

As described in Section 6.0, Alternatives of the Draft EIR, the University considered other locations, including the site at MLK/Canyon Crest, for the proposed EH&S Expansion. For reasons outlined in that section, the proposed project location between Linden Street and Watkins Drive is preferred over alternative locations. Although the surrounding area is mainly developed with on- and off-campus residential uses, the proposed site has a common boundary with the existing campus Corporation Yard, which has been in operation at this location since the 1960s.

Response to Comment G-2

The proposed EH&S Expansion would not overlie the existing water main, and use of the adjacent portion of the project site for Parking Lot 27 would not affect operation of this line. A geologic conditions update for the project area prepared in 2011 found that the Box Springs fault, which had previously been mapped on the northeast corner of the campus near the project site, is considered inactive and is no longer shown on updated earthquake hazard maps prepared by the State of California. The report (included in **Appendix 3.0** of this Final EIR) concluded that the fault does not pose a seismic hazard to the campus. The project site does not overlie the nearby jet fuel pipeline, as asserted in the comment. As discussed in Section 4.4, Hazards and Hazardous Materials of the Draft EIR, the proposed project site is about 100 to 150 feet from the pipeline and is separated from it by Watkins Drive (see page 4.4-28 of the Draft EIR). The proposed EH&S Expansion site is located about 1,200 feet from the Child Development Center, not within 100 feet as stated in the comment. It is located across Watkins Drive from the existing rail line. Risks related to location of the project in proximity to the jet fuel pipeline, Child Development Center, and rail line are discussed in full in Section 4.4 of the Draft EIR and impacts related to these risks were found to be less than significant (see pages 4.4-37 through 4.4-39 of the Draft EIR).

Response to Comment G-3

Please see the responses to **Comments C-1** and **C-3**, above. The potential impacts related to accident and upset are discussed in Section 4.4 of the Draft EIR and were found to be less than significant (see pages 4.4-28 through 4.4-34 of the Draft EIR). Risks related to the nearby rail line are discussed on pages 4.4-38 through 4.4-39 of the Draft EIR and were found to be less than significant.

Response to Comment G-4

The University will continue to work with the local community on land use planning issues and The Regents or its delegate will take public comments into account in its decision on whether to approve or deny the projects at the proposed location. Please also see the response to **Comment C-4**, above.

Letter H

January 22, 2012

Robert A. Phillips
3511 Watkins Dr.
Riverside, CA 92507-4654

Ms. Tricia D. Thrasher, ASLA, LEED AP
UCR Capital Programs
Capital Resource Management
1223 University Ave., Ste. 200
Riverside, CA 92507

Re: Comments on UC Riverside EH&S Expansion Draft EIR

Dear Ms. Thrasher,

I offer the following comments in response to the UCR EH&S Expansion Draft EIR. Passages quoted from that document appear in italics.

6.0—ALTERNATIVES

The alternatives analysis selects Alternative 3 (Parking Lot 13) as "the environmentally superior alternative" and rejects Alternative 2 (MLK/Canyon Crest Site) because of an alleged "significant and unavoidable land use impact." The analysis is riddled with omissions and is obviously skewed to support the Watkins Drive site, rather than to consider all options fairly. Careful consideration demonstrates that Alternative 2 is clearly superior to both Alternative 3 and the proposed project location on Watkins Drive. 1

From Page 6.0-13: ***Air Quality:*** *Under Alternative 2, the proposed EH&S Expansion . . . would involve construction and operational emissions similar to those of the proposed projects. . . . The less than significant air quality impacts of the proposed projects . . . and the cumulative impact related to cumulatively considerable increases in criteria pollutants for which the Air Basin is in nonattainment would also be less than significant under Alternative 2.* With Alternative 2, the air quality impacts would actually be lessened, because the distance required to transport hazardous waste from the EH&S facility to the freeway would be shortened dramatically, resulting in a reduction in air pollution in the immediate vicinity of the campus. The Alternative 2 site is immediately adjacent to the MLK on-ramps to the 60/215 Freeway, while the proposed site on Watkins Drive is a couple of miles from the Blaine Street on-ramps to that freeway. Trucks hauling toxic waste from the Watkins Drive site would travel through, and disperse diesel exhaust in, a residential neighborhood that includes numerous apartment complexes along Blaine Street, while trucks accessing the freeway from the Alternative 2 site would not traverse any residential areas. Once the School of Medicine is built, the Alternative 2 site will be closer to the campus's primary generators of hazardous waste than the Watkins Drive site will; therefore, Alternative 2 will reduce haul distances and air pollution both on campus and off campus. 2

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From Page 6.0-15: ***[Geology and Soils:]*** *. . . [T]he Initial Study for the 2005 LRDP Amendment 2 EIR . . . found that cumulative impacts related to effects from seismic ground shaking would be significant . . . The cumulative geology and soils impacts under Alternative 2 would generally be the same as the less than significant impacts under the proposed projects because neither site contains any unique geologic or soil conditions.* In the event of a major earthquake, toxic materials might be spilled into and/or leak from the outdoor secondary containment facilities at the EH&S building. If that occurred, the Alternative 2 site would be far superior to the Watkins Drive site, where children at UCR's Child Development Center or the residents from nearby dormitories and homes might come into contact with the toxic waste. 3

From Page 6.0-15: ***[Hazards and Hazardous Materials:]*** *. . . [T]the prohibition on EH&S vehicles transporting campus hazardous wastes on public roadways would restrict access to the Alternative 2 site for daily EH&S campus waste collection vehicles to a single route by way of Canyon Crest Drive where it comes under the freeway.* This objection to the Alternative 2 site has no merit, since all of the alternatives, including the Watkins Drive site, share a similar condition. The Watkins Drive site would restrict daily EH&S campus waste collection vehicles to a single route: Linden Street. 4

Page 6.0-15 continues: *Most of the hazardous waste generation locations on campus are and would continue to be located on the East Campus.* According to EIR data, construction of the School of Medicine and other campus growth will result in a fourfold increase in all varieties of waste (not just medical waste), so the West Campus will be generating at least as much of that waste as the East Campus. Furthermore, the haul distance from current East Campus laboratories to the Alternative 2 site would not be significantly greater than the distance to the Watkins Drive site. The laboratories are located along Campus Drive; campus waste collection vehicles could take that roadway directly to Canyon Crest Drive and travel a few hundred feet to the Alternative 2 site. 5

Page 6.0-15 continues: *An emergency or accident on either Canyon Crest Drive or the freeway that blocked this route would slow or cut off access to the facility from the campus, impairing the ability of EH&S staff to provide waste removal services or respond to hazardous materials incidents on campus and potentially increasing risks associated with hazardous materials handling or release on campus. These risks could be greater than those of the proposed projects and could have potentially significant impacts with regard to emergency access and emergency response.* The analysis fails to describe how an accident on the freeway could block access to the Alternative 2 site from the campus. Does this scenario involve vehicles careening over the freeway's edge and nose-diving onto Canyon Crest Drive? And how many accidents have occurred on the university-owned segment of Canyon Crest Drive that blocked access to or from the campus for significant periods of time? I can find no evidence of such accidents in on-line databases. An accident on Linden Street could block access to and from the Watkins Drive site. In that scenario, EH&S staff would have to use Watkins Drive and travel a significant distance around the periphery of the campus to reach another access point. Perhaps UCR should invest in some four-wheel-drive vehicles so that EH&S personnel could travel over curbs and other obstacles in case of emergency. 6

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From Page 6.0-17: ***[Land Use:]*** *The 2005 LRDP Amendment 2 (2011) added a planned School of Medicine (SOM) to be sited at the northeast corner of Iowa and MLK on the West Campus and increased the planned density of the West Campus [a]cademic core. It also deleted the location of one West Campus parking structure. Under the LRDP, as amended, the Alternative 2 site is designated entirely for parking. Development of a portion of the site with the EH&S Expansion under this alternative thus would conflict with applicable land use plans and policies because it would be inconsistent with the LRDP land use designation. In addition, because Alternative 2 would require additional internal roadways that would reduce the land area available for planned uses, it would impede implementation of the adopted land use plan for the West Campus. Alternative 2 would therefore result in land use impacts greater than those analyzed for the proposed projects.* In other words, UCR changed the land use designation in the LRDP expressly to exclude the EH&S facility at the Alternative 2 site. Then, a few months later, UCR says that placing the EH&S facility at the Alternative 2 site is undesirable because it conflicts with the newly changed land use designation. This deliberately circular reasoning constitutes the worst kind of dishonesty. The solution to this UCR-manufactured dilemma is simple. Amend the LRDP further to return the EH&S facility to the Alternative 2 site. UCR changed it once, and UCR can change it again.

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From Page 6.0-18: ***[Land Use:]*** *The EH&S Expansion would require approximately 3 acres of the 6-acre site. The resulting reduction of the area available for parking to about 3 acres would reduce the functionality of the proposed parking structure overall and would not accommodate a larger parking structure needed to serve the West Campus academic core, as well as the west end of the East Campus academic core, to provide adequate stacking space on city and campus roads, and to provide total capacity required under the LRDP as amended. This alternative thus would not allow for provision of adequate total parking capacity to serve future Campus uses. For these reasons, Alternative 2 would have a significant impact related to land use. No mitigation is feasible, and the impact would remain significant and unavoidable.* "No mitigation"? "Significant and unavoidable"? Give me a break! If placing the EH&S facility at the Alternative 2 site means that UCR must reduce the size of the adjacent parking garage, then UCR can build an additional parking garage somewhere else on its hundreds and hundreds of undeveloped acres on the West Campus, or it can expand one of the other planned parking garages. UCR still has complete flexibility in the planning of its School of Medicine and other buildings on the West Campus. Using a parking garage as an excuse to place a toxic waste facility in the middle of a residential area and to route waste-hauling trucks through a high-density residential neighborhood demonstrates complete disregard for the community and for UCR's own students (especially the residents of Glen Mor I) and the children of its staff members.

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The "Transportation and Traffic" analysis on Page 6.0-21 omits one very significant disadvantage of the Watkins Drive site. During evening peak hours on weekdays, eastbound traffic on Watkins Drive backs up from the stop-sign-controlled intersection at Valencia Hill Drive to the Child Development Center, completely blocking the entrance to the Corporation Yard and the proposed entrance to the EH&S site. This would prevent EH&S waste haulers from exiting the facility. Furthermore, there is a great deal of pedestrian traffic and bicycle traffic along the south side of Watkins Drive in that area, and the potential for accidents at that

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EH&S exit would be far higher than at the Alternative 2 site. Students and UCR staff members park bumper-to-bumper along the south side of Watkins Drive, further reducing visibility. 10

The "Transportation and Traffic" analysis also omits the fact that the short haul distance from the Alternative 2 site, as compared to the Watkins Drive site, will reduce air pollution and eliminate the potential of hazardous waste spillage in a densely populated residential area. 11

From Page 6.20-24: *Alternative 2 would not meet the project objective of locating and designing the proposed and related projects to represent optimal investment of land and capital in the future of the campus and to maximize and efficiently use available developable space on campus, consistent with campus planning principles.* On the contrary, Alternative 2 is an optimal location for the EH&S facility with regard to the "future of the campus," since it will be near the School of Medicine, with its numerous toxic-waste-generating facilities, and will thereby reduce the risks and pollution associated with transporting that waste to the East Campus. Alternative 2's immediate proximity to the freeway is a huge advantage over the Watkins Drive site and demonstrates an extremely efficient use of land, a desire to reduce air pollution and potential spills, and respect for residents on and off the campus. Alternative 2 would well satisfy the project objective to "provide a facility proximate to on-campus generators to enable safe transport from generators to the EH&S facility in accordance with State and federal regulations, while ensuring access to off-campus haul routes." The 6-acre site can be quite efficiently used to accommodate both EH&S and a parking garage, and additional parking can be provided elsewhere on the West Campus. If UCR's planners can't figure out how to do that, it's time to hire some new planners. 12

All of the above considerations, along with the impact reductions described in the EIR, show clearly that Alternative 2 is superior to the Watkins Drive site and all of the other listed alternatives. 13

In addition, a very significant impact not addressed in the EIR involves property values in the UCR neighborhood. UCR has already destroyed the value of my property by placing athletic fields across the street, so that I am treated to incessant screaming and whistles from 5:00 p.m. to 10:00 p.m. or later most every night. Why would anyone buy a house next to that? If I should attempt to sell my house and be forced to disclose that there is a toxic waste facility a few hundred feet to the west, no one would buy it except, perhaps, an absentee landlord who intended to rent it to students, further deteriorating the quality of life in the neighborhood. Alternative 2 would avoid this impact. 14

4.8—TRANSPORTATION AND TRAFFIC

The analysis in this section fails to account for the student apartments currently under construction on the northeast corner of the intersection of Blaine Street and Iowa Avenue, along the haul route for the proposed project. These apartments will generate hundreds of vehicle trips on Blaine Street each day, adding to the congestion at the intersection and increasing the potential for serious accidents, since students tend to drive carelessly. The Blaine Street driveway for these apartments will be directly across the street from the driveway for the busy complex on the southeast corner that includes Starbucks, Subway, and other businesses. 15

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Frequently, the queue of motorists attempting to enter the Starbucks drive-through extends onto Blaine Street, causing other drivers to swerve suddenly to avoid collisions. RTA buses often stop along the north curb of Blaine Street in that area. Adding hazardous-waste-hauling trucks to this situation is a prescription for disaster. The Alternative 2 site, with its immediate freeway access and avoidance of congested residential areas, is far superior to the Watkins Drive site. 15

From Page 4.8-11: *Sightlines along this stretch of Watkins Drive for drivers exiting the driveway would be several hundred feet in each direction, which is adequate for safe turning. Because of the infrequent nature of these truck trips and adequate sight lines, there would be no significant conflicts between truck turning movements and vehicle and pedestrian traffic along Watkins Drive.* As stated above, cars and trucks are parked bumper-to-bumper along the south curb of Watkins Drive every weekday while UCR is in session. Pedestrians and bicyclists are numerous in that area. If the waste-hauling truck is high enough to allow the driver to see over the cars, there is a distinct possibility that the driver won't be able to see pedestrians and bicyclists that are crossing directly in front of him or her. As I have attempted to back out of my driveway onto Watkins Drive, UCR students have demonstrated to me repeatedly that they don't have enough sense to stay away from a moving vehicle. They assume that the driver can see them. It can be difficult or impossible for drivers of large trucks to see pedestrians and bicyclists that are directly in front of them, and UCR students will insist on their right-of-way, not realizing that they might be invisible to the truck driver. The situation on Watkins Drive remains dangerous, regardless of the purported length of the sightlines. 16

4.4—HAZARDS AND HAZARDOUS MATERIALS

From Page 4.4-36: *As discussed under Impact 4.4-2 above, compliance with hazardous materials transportation regulations and campus emergency response planning and procedures would minimize the potential for accident releases in the vicinity of the Child Development Center*. Use of the Alternative 2 site would eliminate the potential, not just "minimize" it. 17

From Page 4.4-37: *According to Kinder Morgan, maintenance of the [jet fuel] line includes visual inspections on the ground and from the air as well as internal inspections with computerized equipment that measures the thickness of the pipe's wall.* Kinder Morgan cannot be trusted to guarantee the safety of the jet fuel line. For example, along Watkins Drive, a portion of the pipeline was exposed, even though Kinder Morgan maintained that the entire line was buried. Rather than bury the exposed portion of the pipe, Kinder Morgan painted it yellow. The line is old and is subject to vibration from nearby railroad tracks. The statement on Page 4.4-38 that "potential failure of the pipeline cannot be characterized as reasonably foreseeable" is wrong. 18

The second full paragraph on Page 4.4-38 refers extensively to the EIR for the Perris Valley Line project. That EIR is rife with fraudulent and deceptive data and is currently the subject of a lawsuit. The calculation of derailment probability is ridiculous to anyone who knows anything about mathematics. UCR should not rely on any information in that EIR. 19

4.6—LAND USE AND PLANNING

From Page 4.6-1: *In response to the Notice of Preparation (NOP) issued for this EIR, the campus community requested that the Draft EIR consider the compatibility of the proposed EH&S facility with nearby sensitive receptors, including neighboring residences and the UCR Child Development Center.* The campus community, including me, also asked that the EIR include athletes on the intramural fields and residents of Glen Mor I as sensitive receptors, since they fit the definition of that term. These receptors were omitted from the analysis. 20

From Page 4.6-11: *The location is close to major roadways and freeway access and is easily accessible from on-campus generator locations, and is therefore consistent with project objectives regarding proximity to on-campus generators and off-campus haul routes to allow for safe transport of hazardous materials to and from the EH&S facility.* The Alternative 2 site is far closer to freeway access than the Watkins Drive site and is therefore more consistent with project objectives. 21

From Page 4.6-14: *For the same reasons discussed for on-campus land uses above, there would be no significant traffic effects associated with the proposed projects that could result in impacts related to incompatible [off-campus] land uses.* This statement fails to recognize that waste-hauling trucks on Watkins Drive will be about 100 feet from homes on Campus View Drive. A severe accident could cause the contents of a fully loaded truck to spill onto the roadway or adjacent land, potentially endangering residents, drivers, and pedestrians. 22

Respectfully submitted,

Robert A. Phillips
(951) 788-1694

Response to Comment Letter H – Robert A. Phillips

Response to Comment H-1

Analysis of alternatives and the reasons for selecting Alternative 3, the Parking Lot 13 alternative, as the environmentally superior alternative are provided in Section 6.0, Alternatives of the Draft EIR. Responses to more specific comments, as summarized in this comment, are provided below.

Response to Comment H-2

As discussed in Section 4.2, Air Quality, of the Draft EIR, project impacts related to construction and operational air quality would be less than significant. These less than significant impacts are primarily related to vehicle trips associated with EH&S employees and waste collection trips; the number and type of such trips would not change if the project were to be located at the Alternative 2 site instead of at the proposed location. While some campus waste collection trips to and from the EH&S Expansion facility would be shorter for the Alternative 2 location, others would be longer, and the net difference would be minimal. Diesel emissions from trucks using Blaine Street to gain access to the freeway from the proposed project site would result in a less than significant impact on air quality. Although the distance to the freeway for such truck trips would be shorter from the Alternative 2 site, given the small number of such trips (2 to 3 per month), the difference in emissions for the two locations would be very small, and Alternative 2 would not substantially reduce this already less than significant impact. As discussed in both Section 4.4, Hazards and Hazardous Materials of the Draft EIR and the 2005 LRDP Amendment 2 EIR, most medical waste is currently picked up directly from on-campus generators of such waste and is not handled by EH&S; this is expected to continue to be the case when the School of Medicine is completed (see pages 4.4-21 through 4.4-22 of the Draft EIR).

Response to Comment H-3

As discussed in the Initial Study prepared for the proposed projects (Appendix 1.0 of the Draft EIR) and in Section 4.4 of the Draft EIR, the risks of a release of hazardous materials related to an earthquake would be less than significant. As the EH&S Expansion would be a 90-day storage facility, hazardous chemical waste would not be present in the facility in quantities that would cause a major threat to public safety even in the unlikely event of a release (see pages 4.4-3 through 4.4-6 and page 4.4-21 of the Draft EIR). Furthermore, all wastes would be stored indoors within segregated areas with secondary containment. In addition, the Campus has an Emergency Response Plan that covers a broad range of emergency situations related to both human-made and natural disasters. For these reasons, risks related to a potential release of hazardous materials following a major earthquake would be low and impacts would be less than significant for the proposed project site. Although it is true that there are no residents

or children near the Alternative 2 site, the potential to affect off-site receptors at the proposed project site is low.

Response to Comment H-4

As noted in the comment, campus waste transport vehicle access to the proposed project site would be limited to Linden Street because such vehicles are prohibited from operating on public roadways. However, most hazardous waste generators are on the East Campus and would continue to be located there. Linden Street is a low-traffic internal campus roadway that would be considerably less likely to be blocked or affected by a major traffic incident, and there are several campus roadways that provide access to intermediate points along Linden Street and that could serve as alternative routes to the project site for campus waste transport vehicles. Routine access to the proposed EH&S Expansion site is therefore less susceptible to disruption from traffic incidents than the Alternative 2 site would be.

Response to Comment H-5

See the response to **Comment H-2** above. Because most medical waste would continue to be picked up directly from on-campus generators of such waste and not handled by EH&S, a substantial increase in medical/biohazardous waste from the School of Medicine would not contribute a high proportion of the increased waste expected to be handled by EH&S under buildout of the LRDP. Most waste generators would continue to be located on the East Campus, and would have more secure access to the proposed project site for the reasons described in the response to **Comment H-4** above.

Response to Comment H-6

Traffic backups on surface streets and freeway ramps as a result of an accident on the freeway could significantly delay or prevent EH&S vehicles from reaching the Alternative 2 site. Past accident data is not necessarily a reliable predictor of future accident frequency, given that traffic volumes will increase on both Canyon Crest Drive and the freeway as a result of both regional growth and campus buildout under the 2005 LRDP. A traffic accident or incident on Linden Street would be less likely to impede access from the East Campus to the proposed EH&S Expansion site for the reasons outlined in the response to **Comment H-4** above.

Response to Comment H-7

See the response to **Comment Letter 3, Comment 5** above.

Response to Comment H-8

See the response to **Comment C-5** above. The 2005 LRDP Amendment planning process included consideration of the appropriate size and location of parking facilities to serve buildout of the campus under the LRDP, including the School of Medicine, while making optimal use of University-owned land.

The Alternative 2 site is one of the best locations on the campus to provide parking. It is adjacent to the freeway and the Canyon Crest Drive underpass and is on the periphery of both the East and West Campuses. Due to its central location, it is within a 10-minute walking distance to academic facilities on both the East and the West Campus. Because of these factors, any reduction in the capacity of the parking structure at this location cannot be addressed by putting a parking structure elsewhere on the West Campus, as it would increase the travel time to the East Campus academic facilities. For these reasons, the Draft EIR concluded that mitigation was not feasible.

Response to Comment H-9

As described in Section 4.8, Transportation and Traffic, the number of waste off-haul truck trips would be approximately 2 to 3 per month (see page 4.8-10 of the Draft EIR). Days and times of such truck trips would vary, and would not take place at fixed times, other than during regular business hours. Given the infrequent nature of truck entry and exit use of the Watkins Drive gate (2 to 3 trips per month), conflicts with PM peak-hour traffic would likely occur very seldom and would not represent a significant impact.

Response to Comment H-10

See the response to **Comment H-9** above. For the same reasons, truck entry and exit during periods of heavy pedestrian and bicycle traffic would likely occur very seldom and would not represent a significant impact. As described in Section 4.8 of the Draft EIR, sightlines along this stretch of Watkins Drive for waste off-haul truck drivers exiting the driveway would be several hundred feet in each direction, which is adequate for safe turning. Because of the infrequent nature of these truck trips and adequate sight lines, there would be no significant conflicts between truck turning movements and vehicle and pedestrian traffic along Watkins Drive (see pages 4.8-10 through 4.8-11 of the Draft EIR).

Response to Comment H-11

See the response to **Comment H-2** above regarding air quality effects of the proposed project site compared to those of Alternative 2. See the response to **Comment C-1** above regarding risks related to hazardous materials spills.

Response to Comment H-12

See the responses to **Comments H-2, H-4,** and **H-5** above. As discussed in the 2005 LRDP Amendment 2 EIR, the full 6-acre site at MLK/Canyon Crest is needed to provide adequate parking while meeting campus design and land use criteria. The selection of parking structure locations on the West Campus was made in part to respond to the 2005 LRDP Amendment 2 objective of providing reasonable access from parking to the West Campus academic core and to provide noise buffers between the academic core and the I-215/SR-60 freeway (see page 3.0-9 of the 2005 LRDP Amendment 2 EIR). In order to accommodate the required SOM parking in the parking structure at MLK/Canyon Crest, a larger

footprint encompassing the entire site was required to provide adequate stacking space from MLK to the entrance to the structure and to accommodate the needed additional stalls. The site boundaries of this triangular parcel, as well as its location adjacent to the freeway and the Canyon Crest Drive underpass, made it very difficult to accomplish the stacking distance and circulation of the parking structure without using the whole site. Other parking sites that were considered under the 2005 LRDP Amendment 2 planning process were found to have other issues with stacking distance as well and were also expanded to provide some of the parking spaces deleted from a parking structure planned under the previous land use plan. For all of these reasons, the former 3-acre *Parking* parcel within the triangular area at MLK/Canyon Crest could not function within the context of the amended LRDP and was therefore redesignated under the 2005 LRDP Amendment 2 to include the entire triangular area on MLK/Canyon Crest.

Response to Comment H-13

For the reasons outlined in Section 6.0 of the Draft EIR, and restated in the responses to **Comment H-2** through **H-12** above, the University has determined that Alternative 3, the Parking Lot 13 alternative, is the environmentally superior alternative as defined under CEQA.

Response to Comment H-14

The *State CEQA Guidelines* state that economic and social changes resulting from a project shall not be treated as significant effects on the environment. *Guidelines* Section 15064 (e) states that "Economic or social changes may be used, however, to determine that a physical change shall be regarded as a significant effect on the environment. Where a physical change is caused by economic or social effects of a project, the physical change may be regarded as a significant effect in the same manner as any other physical change resulting from the project. Alternatively, economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment." Such effects have typically been interpreted to include creation of a blight condition – for example, the project would eliminate jobs or reduce demand for local services, creating business vacancies and thus blight. However, with respect to the proposed project, it would be speculative to suggest that it would affect nearby property values and would also be speculative to assume that such effects would lead to blight conditions. The Regents or its delegate will take public comments, including those about effects on and relations with the local community, into account in its decision on whether to approve or deny the projects at the proposed location.

Response to Comment H-15

The traffic analysis prepared for the 2005 LRDP Amendment 2 included traffic from planned projects, including residential development in the City of Riverside, in its background conditions for comparison

to traffic that would be added by campus buildout under the 2005 LRDP as amended. The proposed projects were included in the 2005 LRDP Amendment 2 traffic analysis, and the conclusions in the Draft EIR are based in part on that analysis. As discussed in the response to **Comment B-3** above, the number of trucks added to the referenced segment of Blaine Street would be very small (approximately 2 to 3 per month). As described in Section 4.8, the small number of additional trips would not create a significant safety impact (see page 4.8-11 of the Draft EIR).

Response to Comment H-16

See the responses to **Comments H-9, H-10,** and **H-15** above regarding the number of truck trips that would exit the Watkins Drive gate and potential conflicts with pedestrians and bicycle traffic. The comment refers to bumper-to-bumper parking along Watkins Drive; the proposed Parking Lot 27 is intended to help reduce on-street parking on Watkins Drive by providing additional parking for the nearby recreational fields and other campus uses, as well as the EH&S Expansion. Comments regarding pedestrian behavior are noted; truck drivers would be expected to use standard precautions and safe driving techniques to avoid collisions.

Response to Comment H-17

The comment is noted. As discussed in Section 4.4, Hazards and Hazardous Materials, and Section 4.6, Land Use, of the Draft EIR, the risks associated with potential releases of hazardous materials and associated impacts would be less than significant.

Response to Comment H-18

The assessment of risks of pipeline failure was based on extensive industry data and studies, as well as on information from Kinder Morgan. The studies reviewed for the Draft EIR analysis indicated that the overall risk of pipeline failure is extremely low (see page 4.4-38 of the Draft EIR). The proposed project itself would not increase the risk of failure of the existing pipeline.

Response to Comment H-19

The assessment of risks of train derailment was based on industry data from the Federal Railway Administration and BNSF, as well as on information from the Perris Valley Line EIR, which was certified in July 2011 by the RCTC. The studies reviewed for the Draft EIR analysis indicated that the risk of derailment is low at any given location; BNSF, which operates the rail line adjacent to the project site, had an overall rate of 3.19 derailments per million miles traveled in 2005 (Federal Railway Administration, 2011). The proposed project itself would not increase the risk of derailment on the existing rail line.

Response to Comment H-20

Impacts on sensitive receptors that include the residents of campus dormitories are analyzed throughout the Draft EIR. The discussion of Impact 4.6-1 in Section 4.6 (page 4.6-11 of the Draft EIR) specifically identifies nearby student residences, including Glen Mor 1, and the discussion of Impacts 4.7-4, 4.7-5, and 4.7-6 in Section 4.7, Noise, provide an analysis of potential noise impacts on student residences, including Glen Mor 1. The users of the campus recreational fields adjacent to the proposed project site are not considered to be sensitive receptors because users of the fields are present intermittently and for short periods of time, and are therefore not subject to long-term exposure to air emissions or noise associated with the proposed project.

Response to Comment H-21

The comment is noted. The consistency of the Alternative 2 location is discussed in Section 6.0 (see pages 6.0-23 through 6.0-24 of the Draft EIR). As described in that section, Alternative 2 would not meet several other objectives of the projects, including proximity and access to campus waste generators.

Response to Comment H-22

The Draft EIR describes the location of the project site relative to nearby residences, as well as waste hauling transport along Watkins Drive (see pages 4.4-23, 4.4-33, and 4.8-10 through 4.8-11). As noted in the comment, the northern curbline of Watkins Drive is located slightly more than 100 feet from the nearest residences along Campus View Drive. Regarding the potential for accidents along the transport route, which includes Watkins Drive, to cause a release of hazardous materials, see the response to **Comment C-1**.

CERTIFIED COPY

CERTIFIED TRANSCRIPT OF

January 11, 2012

UCR Capital Public Hearing Re EH&S Facility Expansion

Judith W. Gillespie, CSR 3710
Job #: 70666JG

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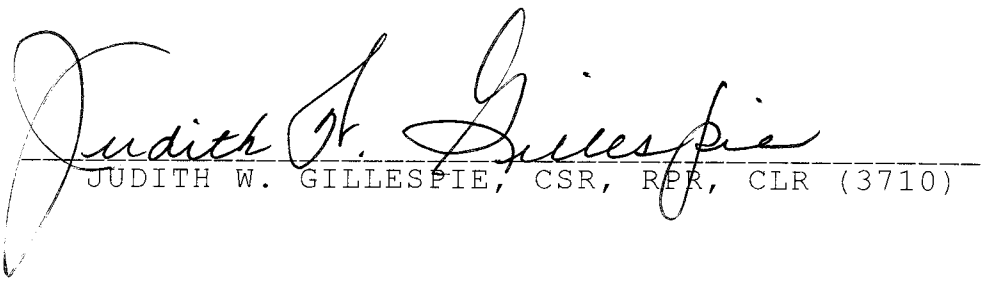
R E P O R T E R ' S C E R T I F I C A T E.

I, Judith W. Gillespie, a Certified Shorthand Reporter, No. 3710, for the State of California, do hereby certify that the foregoing pages comprise a full, true and correct transcription of the proceedings had and the testimony taken at the hearing in the hereinbefore-entitled matter of January 11, 2012.

Dated this 23rd day of January, 2012, at Riverside, California.



JUDITH W. GILLESPIE, CSR, RPR, CLR (3710)

UNIVERSITY OF CALIFORNIA, RIVERSIDE^

UCR CAPITAL

PUBLIC HEARING ON THE EH&S FACILITY EXPANSION DRAFT EIR	

REPORTER'S TRANSCRIPT OF PROCEEDINGS

LOCATION: UCR Alumni-Visitors Center
3701 Canyon Crest Drive
Riverside, CA 92507

DATE AND TIME: Wednesday, January 11, 2012
6:21 p.m.

REPORTED BY:

JUDITH W. GILLESPIE, CSR, RPR

(No. 3710)

JOB NO. 70666JG

A P P E A R A N C E S

PRESENTER:
Elizabeth Purl - Impact Sciences, Inc.

STAFF PRESENT:
Russell Vernon - UCR Environmental Health and Safety
Tim Ralston - UCR Capital Programs
Don Caskey - UCR Campus Architect
Kristin Hill - UCR Capital Resource Management
Nita Bullock - UCR Capital Resource Management
Tricia Thrasher - UCR Capital Resource Management

Riverside, CA Wednesday, January 11, 2012

P-R-O-C-E-E-D-I-N-G-S

MS. THRASHER: You have all signed the sign-in, so we have a record of our staff people here. So this is the public hearing on the Environmental Health and Safety Expansion Building and related projects on the Draft EIR. Is there anyone here to speak?

I open the public hearing.

(No public in attendance to comment.)

I'm closing the public hearing. You can go home.

(The proceedings concluded at 6:21 p.m.)

R E P O R T E R ' S C E R T I F I C A T E.

I, Judith W. Gillespie, a Certified Shorthand Reporter, No. 3710, for the State of California, do hereby certify that the foregoing pages comprise a full, true and correct transcription of the proceedings had and the testimony taken at the hearing in the hereinbefore-entitled matter of January 11, 2012.

Dated this 23rd day of January, 2012, at Riverside, California.

_____

JUDITH W. GILLESPIE, CSR, RPR, CLR (3710)

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 Environmental Health & Safety Expansion (Project #950456), Parking Lot 27 (Project #956452), and Related Corporation Yard Reorganization And Existing EH&S Buildings Re-Use Project (EH&S Expansion and related projects) (State Clearinghouse number 2011061014) includes two 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 programs and practices (PPs) that currently reduce environmental impacts.

The 2005 LRDPA EIR PSs, PPs, and MMs incorporated by the EH&S Expansion and related projects will continue to be monitored under the existing 2005 LRDPA Mitigation Monitoring and Reporting Program (MMRP). In addition, the University of California, Riverside (UCR) Capital Programs, Capital Resource Management (CRM) will coordinate monitoring the implementation of the two project-specific mitigation measures, and in conjunction with the 2005 LRDPA MMRP, the applicable LRDPA measures for the EH&S Expansion 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 EH&S Expansion project Mitigation Monitoring file.

4.2 PURPOSE

A listing of the two 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 1.0 of the EH&S Expansion and related projects Final EIR.

The objectives of the MMRP for the EH&S Expansion and related projects 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 the2005 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 EH&S Expansion project includes construction of a new single-story EH&S building that would allow UCR to relocate the EH&S functions from their present location in the southeast area of the East Campus. The new EH&S Expansion facility is intended to provide a long-term, consolidated campus facility for all EH&S functions in a building designed using principles of environmental sustainability. The building would include approximately 27,265 gross square feet (gsf) of space, including about 18,674 assignable square feet (asf). The west wing of the building would be about 30 feet high and the east wing would be about 22 feet high. Uses would include about 6,823 asf of administrative/office space; 2,158 asf for a safety learning center, seating up to approximately 60 people; 1,358 asf of laboratories; and 8,335 asf of materials handling and storage space for chemical, radiation, biomedical, and universal waste and building support services. Outside yard areas, with an area of about 6,400 square feet, would house specialized storage containers and provide secure materials handling access.

A new parking lot, Parking Lot 27, would be built at the east end of the proposed EH&S Expansion site to jointly serve the EH&S Expansion facility and the adjacent recreational fields. Approximately 50 parking spaces would be provided.

Construction of the EH&S Expansion and Parking Lot 27 is expected to be complete by Fall 2014. The number of EH&S employees is projected to increase by about 8 employees, from 22 full-time equivalent (FTE) employees at the present time to approximately 30 FTE.

Because the proposed EH&S Expansion building and secured service yard would use a portion of the existing TAPS yard area, functions currently located in the TAPS yard would need to be relocated. Under the proposed reorganization, the Corporation Yard would accommodate the displaced TAPS uses while transferring some units currently located in the Corporation Yard to the existing EH&S building once it is vacated. Elements of the reorganization include the following:

- The Mail Services operations, currently located in the north-central portion of the Corporation Yard, would be relocated to the existing EH&S facility. The existing Mail Services building, which has an area of approximately 2,800 gsf, would be demolished.

- Corporation Yard Warehouse #2, which has an area of approximately 4,000 gsf, would be demolished because of its age and its construction, which does not meet current building standards. The materials stored inside Warehouse #2 would be relocated, as needed, to a new, replacement warehouse building of approximately 5,400 gsf to be constructed in the north-central portion of the Corporation Yard near the location of the current Mail Services operation.

- The TAPS/Special Events program storage and operations area currently located north of the TAPS building would be transferred to a replacement facility in the south-central portion of the Corporation Yard, at the current location of Warehouse #2. Support structures would be constructed at this location.

The existing EH&S facility would be renovated and backfilled by two functions that currently occupy space elsewhere. Mail Services, currently located at the Corporation Yard, would occupy the existing 2,400-square-foot EH&S modular building, after renovation. Printing & Reprographic Services, currently located off campus in a UC-owned building at 2100 Atlanta Avenue in Riverside, would occupy the existing 6,200-square-foot EH&S building after its renovation.

The renovation and reuse of the existing EH&S buildings and the Corporation Yard reorganization are expected to be completed by Fall 2016. There would be no increase in employees associated with the related projects.

4.4 RESPONSIBILITIES AND DUTIES

The Principal Environmental Project Manager from the UCR Capital Programs, Capital Resource Management would be responsible for coordinating the reporting of compliance with the mitigation measures listed in this MMRP. These responsibilities include:

- Coordination with the Project Manager 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:

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

The project-specific reporting forms prepared by CRM document the implementation status of the mitigation measures for the project. Project reporting forms and documentation will be available at CRM, 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 LRDP EIR MITIGATION MEASURES

The following summary table, **Table 4.0-1,** 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 EH&S Expansion project, including the timing and responsible entities for their implementation, monitoring, and reporting is included in Appendix 1.0 of the Draft EIR. Appendix 1.0 provides a resource to ensure implementation of the applicable program-level provisions in detailed design and construction of the EH&S Expansion and related projects.

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 A&E – Architects & Engineers CRM – Capital Resource Management EH&S – Environmental Health and Safety					
HAZARDS AND HAZARDOUS MATERIALS							
Impact 4.4-2: Implementation of the proposed EH&S Expansion, Parking Lot 27 (proposed projects), and related projects would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. The impact would be less than significant.	**MM 4.4-2:** EH&S staff shall provide all drivers removing hazardous materials or hazardous waste from the EH&S Expansion facility with printed directions clearly indicating the mandated haul route, exiting the EH&S Expansion facility left onto Watkins Drive and proceeding northwest to Blaine Street, then west on Blaine to the I-215/SR-60 freeway entrance ramps.	EH&S	6	Quarterly, to report continued operational compliance			

Impact	Mitigation Measure	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
TRANSPORTATION AND TRAFFIC							
Impact 4.8-2: Implementation of the EH&S Expansion and Parking Lot 27 (proposed projects) and related projects would result in the generation of construction related vehicle trips that would not substantially affect traffic conditions at the study intersections. The impact would be less than significant.	**MM 4.8-2:** Prior to commencement of construction, the construction contractor shall prepare a traffic control plan for the project and submit it to the UCR Office of Architects & Engineers and Capital Resource Management for approval. Preparation of and compliance with the traffic control plan shall be included as a condition of all construction contracts. The traffic control plan shall include the following:	A&E, CRM	2	Once to confirm inclusion in final bid specifications			
	(1) The plan shall specify the truck route to be taken by construction contractors for travel between the project site and I-215/SR-60 freeway. No construction traffic shall be allowed to travel east of the project site on Watkins Drive or southward onto Big Springs Road.	A&E, CRM	3	Once prior to start of construction to verify plan preparation and required consultations			
	(2) As part of its review of the traffic control plan, the UCR Office of Architects & Engineers and Capital Resources Management will consult with UCPD, EH&S, RFD, and RPD, as appropriate, to disclose roadway closures and identify alternative travel routes, if necessary. The UCR Office of Architects & Engineers and Capital Resource Management will consult with the City	A&E, CRM	3	Once to review requirements at pre-construction meeting			

Impact	Mitigation Measure	Responsible Entity	Monitoring Triggers	Frequency of Reporting	Verification of Compliance		
					Signature	Date	Remarks
	Public Works Department to obtain its concurrence regarding the adequacy of traffic control along off-campus roads. The traffic control plan shall identify lane closures, show the limits of construction work, areas with temporary restriping of lanes and crosswalks, flagging operations, signage, alternate routes, and other actions necessary to maintain safe traffic conditions for vehicles, bicyclists, and pedestrians. Any lane closures specified in the traffic control plan will be announced on UCR's web site (www.community.ucr.edu).	A&E, CRM	3	Ongoing verification of adherence through inspection reports			

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