

Appendix A

Comment Letters

Letter F1

From: [Cheryl Madrigal](#)
To: ceqa@ucr.edu; [Stephanie Tang](#)
Cc: [Deneen Pelton](#)
Subject: 2021 Long Range Development Plan
Date: Friday, July 16, 2021 9:42:30 AM
Attachments: [2021 Long Range Development Plan.pdf](#)

Stephanie,

Please see attached response letter to above mentioned project. If you have any questions or comments, please contact us.

Thank you for the opportunity to protect our cultural assets.

Cheryl

Cheryl Madrigal

Cultural Resources Manager
Tribal Historic Preservation Officer
Cultural Resources Department

Rincon Band of Luiseño Indians

1 West Tribal Road | Valley Center, CA 92082
Office: (760) 749 1092 ext. 323 | Cell: 760-648-3000
Fax: 760-749-8901
Email: cmadrigal@rincon-nsn.gov



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Rincon Band of Luiseño Indians

CULTURAL RESOURCES DEPARTMENT

One Government Center Lane | Valley Center | CA 92082
(760) 749-1092 | Fax: (760) 749-8901 | rincon-nsn.gov



July 16, 2021

Sent via email: ceqa@ucr.edu

University of California, Riverside
Planning, Design & Construction
Ms. Stephanie Tang
1223 University Avenue, Suite 240
Riverside, CA 92507

Re: 2021 Long Range Development Plan

Dear Ms. Tang,

This letter is written on behalf of the Rincon Band of Luiseño Indians (“Rincon Band” or “Band”), a federally recognized Indian Tribe and sovereign government. Thank you for providing us with the Notice of Availability of a Draft Environmental Impact Report (DEIR) for the above referenced project. The identified location is within the Territory of the Luiseño people, and is also within Rincon’s specific area of Historic interest.

F1-1

The Band has reviewed the provided documents and we have no further comments regarding this project and can conclude consultation at this time. We understand that other Tribes potentially have knowledge particular to this project site and may request additional measures. Please note that the Rincon Band supports all efforts to completely avoid cultural resources as preferred mitigation.

F1-2

We do request that the Rincon Band be notified of any changes in project plans. In addition, we request a copy of the final monitoring report, when available. If you have additional questions or concerns, please do not hesitate to contact our office at your convenience at (760) 749-1092 or via electronic mail at cmadrigan@rincon-nsn.gov. We look forward to working together to protect and preserve our cultural assets.

F1-3

F1-4

Sincerely,



Cheryl Madrigal
Tribal Historic Preservation Officer
Cultural Resources Manager

Letter S1

From: [Stephanie Tang](#)
To: [Jillian Knox](#)
Subject: RE: Hard Copy NOC/NOA for 2020070120
Date: Monday, July 26, 2021 10:32:00 AM

Hi Jillian,

Thank you for your email. Our 2021 LRDP Draft EIR and associated notices was submitted online to the CEQA database. We had OPR/SCH on our mailing distribution list, but good to know you do not require mailers of any sort any more.

Thanks,

Stephanie Tang

Campus Environmental Planner

UNIVERSITY OF CALIFORNIA, RIVERSIDE
PLANNING, DESIGN & CONSTRUCTION
1223 UNIVERSITY AVE | SUITE 240 | RIVERSIDE CA 92507
951.827.1484 | cpp.ucr.edu

From: Jillian Knox <Jillian.Knox@OPR.CA.GOV>
Sent: Friday, July 23, 2021 3:38 PM
To: Stephanie Tang <stephanie.tang@ucr.edu>
Subject: Hard Copy NOC/NOA for 2020070120

Hello,

Office of Planning and Research (OPR), State Clearinghouse (SCH) Unit is **no longer** accepting **hard copies** of **environmental documents** and **notices of determinations and exemptions** starting on **November 3rd, 2020**. Email method of **notices of exemptions and determinations** to the state.clearinghouse@opr.ca.gov are also no longer be accepted as of that date. All agencies are required to submit online to the CEQA Database, where your CEQA notices and documents will be filed and posted. Please email the State Clearinghouse to request registry to the database.

We cannot accept environmental document through email, so if you would like to file with the State Clearinghouse, you can email us at state.clearinghouse@opr.ca.gov to request registry to the online database.

Thanks,

Jillian Knox
State Clearinghouse

S1-1

Letter L1

From: [Watson, Scott](#)
To: [Stephanie Tang](#)
Cc: [Murray, David](#); [Kopaskie-Brown, Mary](#)
Subject: RE: [External] Notice of Availability of a Draft EIR for the UCR 2021 Long Range Development Plan
Date: Tuesday, July 20, 2021 2:30:44 PM

Thank you Stephanie

Scott K. Watson
City of Riverside
Community & Economic Development, Historic Preservation
Main: 951.826.5371
Direct: 951.826.5507
[RiversideCA.gov](#)

From: Stephanie Tang <stephanie.tang@ucr.edu>
Sent: Tuesday, July 20, 2021 2:19 PM
To: Watson, Scott <SWatson@riversideca.gov>
Cc: Murray, David <DMurray@riversideca.gov>; Kopaskie-Brown, Mary <MKopaskie-Brown@riversideca.gov>
Subject: RE: [External] Notice of Availability of a Draft EIR for the UCR 2021 Long Range Development Plan

Hi Scott,

Just to close the loop on this – I dropped off a USB flash drive with all the DEIR documents/appendices, LRDP, and Corrected NOA, which you were able to copy over onto your computer earlier today.

Please let me know if you have any other questions or need anything else. Thanks!

Stephanie Tang
Campus Environmental Planner
UNIVERSITY OF CALIFORNIA, RIVERSIDE
PLANNING, DESIGN & CONSTRUCTION
1223 UNIVERSITY AVE | SUITE 240 | RIVERSIDE CA 92507
951.827.1484 | cpp.ucr.edu

From: Watson, Scott <SWatson@riversideca.gov>
Sent: Monday, July 19, 2021 4:56 PM
To: Stephanie Tang <stephanie.tang@ucr.edu>; Murray, David <DMurray@riversideca.gov>
Cc: Kopaskie-Brown, Mary <MKopaskie-Brown@riversideca.gov>
Subject: RE: [External] Notice of Availability of a Draft EIR for the UCR 2021 Long Range Development Plan

Stephanie,

Either works for us. Of course you know I'm always happy to see you, but if share file site work best, that's great.

Thank you.

Scott K. Watson
City of Riverside
Community & Economic Development, Historic Preservation
Main: 951.826.5371
Direct: 951.826.5507
[RiversideCA.gov](#)

From: Stephanie Tang <stephanie.tang@ucr.edu>
Sent: Monday, July 19, 2021 4:42 PM
To: Watson, Scott <SWatson@riversideca.gov>; Murray, David <DMurray@riversideca.gov>
Cc: Kopaskie-Brown, Mary <MKopaskie-Brown@riversideca.gov>
Subject: RE: [External] Notice of Availability of a Draft EIR for the UCR 2021 Long Range Development Plan

Hi Scott,

Not a problem. I will bring a flash drive with all the documents over to City Hall tomorrow. I can also provide a share file site with all the documents as well, if that helps.

Thank you,

Stephanie Tang

Campus Environmental Planner
UNIVERSITY OF CALIFORNIA, RIVERSIDE
PLANNING, DESIGN & CONSTRUCTION
1223 UNIVERSITY AVE | SUITE 240 | RIVERSIDE CA 92507
951.827.1484 | cpp.ucr.edu

From: Watson, Scott <SWatson@riversideca.gov>
Sent: Monday, July 19, 2021 4:38 PM
To: Stephanie Tang <stephanie.tang@ucr.edu>; Murray, David <DMurray@riversideca.gov>
Cc: Kopaskie-Brown, Mary <MKopaskie-Brown@riversideca.gov>
Subject: RE: [External] Notice of Availability of a Draft EIR for the UCR 2021 Long Range Development Plan

Hi Stephanie,

Would it be possible to get a flash drive with the documents? I can meet up with you if that helps.

Scott K. Watson
City of Riverside
Community & Economic Development, Historic Preservation
Main: 951.826.5371
Direct: 951.826.5507
RiversideCA.gov

From: Stephanie Tang <stephanie.tang@ucr.edu>
Sent: Monday, July 19, 2021 4:32 PM
To: Murray, David <DMurray@riversideca.gov>
Cc: Watson, Scott <SWatson@riversideca.gov>; Kopaskie-Brown, Mary <MKopaskie-Brown@riversideca.gov>
Subject: RE: [External] Notice of Availability of a Draft EIR for the UCR 2021 Long Range Development Plan

Hi David,

Thank you for your email. There was an IT update over the weekend that inadvertently made the links on the website containing the 2021 LRDP, NOA/NOC, and Draft EIR and associated appendices temporarily inaccessible. The website has now been restored and the documents can be viewed at the same website provided in the NOA: <https://pdc.ucr.edu/environmental-planning-ceqa>. We will be extending the public comment period to account for the time during which the documents were inaccessible, which will be outlined in the corrected NOA/NOC.

Please let me know if you run into any issues or whether you would like me to drop off a flash drive containing all the documents.

Thank you,

Stephanie Tang
Campus Environmental Planner
UNIVERSITY OF CALIFORNIA, RIVERSIDE
PLANNING, DESIGN & CONSTRUCTION
1223 UNIVERSITY AVE | SUITE 240 | RIVERSIDE CA 92507
951.827.1484 | cpp.ucr.edu

From: Murray, David <DMurray@riversideca.gov>
Sent: Monday, July 19, 2021 11:18 AM
To: Stephanie Tang <stephanie.tang@ucr.edu>
Cc: Watson, Scott <SWatson@riversideca.gov>; Kopaskie-Brown, Mary <MKopaskie-Brown@riversideca.gov>
Subject: RE: [External] Notice of Availability of a Draft EIR for the UCR 2021 Long Range Development Plan

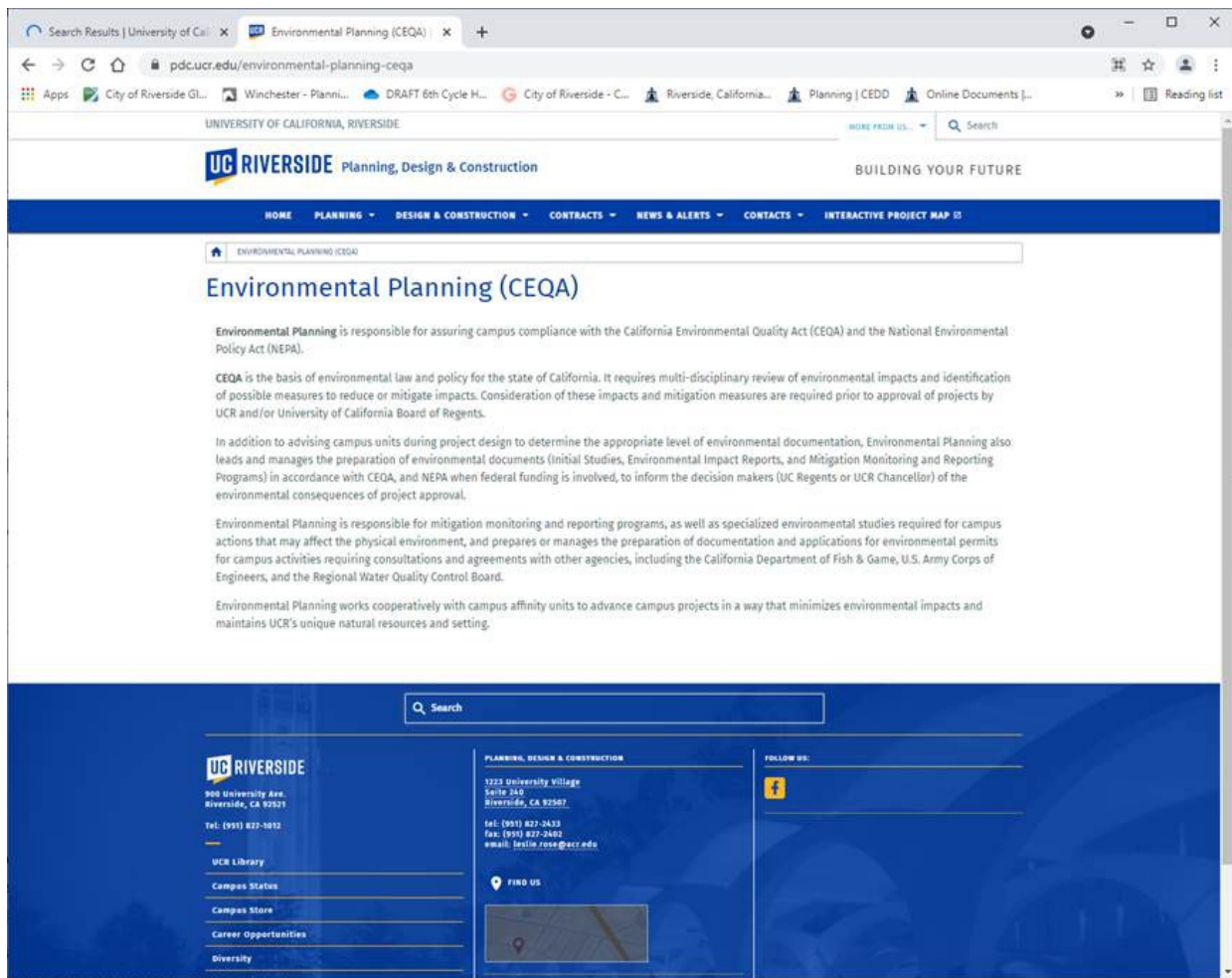
Hey Stephanie,

I tried looking for the LRDP documents today, but they don't seem to be on the website (see screenshot below). Can you please verify the link/website and direct us to the documents?

Thanks,
Dave

L1-2

L1-1



David Murray, Principal Planner

City of Riverside | Community & Economic Development Department | Planning Division
3900 Main Street, Third Floor | Riverside, CA 92522
(951) 826-5773
dmurray@riversideca.gov

From: Stephanie Tang <stephanie.tang@ucr.edu>
Sent: Tuesday, July 13, 2021 5:46 PM
To: Stephanie Tang <stephanie.tang@ucr.edu>
Subject: [External] Notice of Availability of a Draft EIR for the UCR 2021 Long Range Development Plan

This email's attachments were cleaned of potential threats by The City of Riverside's Security Gateway.
Click [here](#) if the original attachments are required (justification needed).

Hi,
Pursuant to the State of California Public Resources Code 21091 (a) and Sections 15087 and 15085 of the Guidelines of the Implementation of the California Environmental Quality Act (CEQA Guidelines), the University of California, Riverside (UCR) has released for public review a Draft Environmental Impact Report (DEIR) on the 2021 Long Range Development Plan (2021 LRDP).

The proposed 2021 LRDP is intended to guide development on the main UCR campus (900 University Avenue Riverside, California 92521) for the next 15 years. Development under the proposed 2021 LRDP is designed to accommodate a total projected enrollment of approximately 35,000 students (Fall quarter headcount) by the academic year 2035/2036. The proposed 2021 LRDP would guide long-range land use development, open space preservation and improvements, multi-modal mobility planning, and infrastructure sustainability and resiliency efforts. Through gradual phased development, the goal of the

proposed 2021 LRDP is to accommodate the enrollment growth and meet program needs in an efficient and sustainable manner.

To accommodate the anticipated increase of approximately 11,078 students (7,419 undergraduate and 3,659 graduate) and 2,806 faculty and staff by academic year 2035/2036, the proposed 2021 LRDP proposes a net increase in development of approximately 3.7 million assignable square feet (asf) (approximately 5.5 million gross square feet (gsf)) of additional academic buildings, support facilities, and student housing. The proposed 2021 LRDP would provide on-campus or campus-controlled student housing for approximately 40 percent of eligible students (or 68 percent of the increase in student population), equal to approximately 7,489 new on-campus beds. The proposed 2021 LRDP includes the following land use designations: Academics & Research, Campus Support, Land-based Research, Open Space Reserve, Recreation & Athletics, Student Neighborhood, Agricultural/Campus Research, UCR Botanic Gardens, Canyon Crest Gateway, and University Avenue Gateway.

The proposed 2021 LRDP is a plan to guide development, but it is not an implementation plan. Adoption of the proposed 2021 LRDP does not constitute a commitment to any specific project. Rather, development under the proposed 2021 LRDP would occur over time, based on campus needs and funding availability. The Regents and/or its delegated authorities must approve each development proposal, as appropriate. At the campus level, the review of campus development proposals is informed by a process that involves input from staff, faculty, and students (and the local community as appropriate).

Implementation of the 2021 LRDP would result in environmental impacts, on the following environmental resource areas: aesthetics, agricultural resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, noise, recreation, transportation, tribal cultural resources, and wildfire. The 2021 LRDP would also result in less than significant impacts, with no mitigation required, related to the following environmental issue areas: hydrology and water quality, population and housing, public services, and utilities and service systems. The 2021 LRDP would also result in no impacts related to the following environmental issue areas: land use and planning, and mineral resources.

A copy of the Draft EIR and the proposed 2021 LRDP are available for viewing at the UCR Planning, Design & Construction (PD&C) office located at 1223 University Avenue Suite 240 Riverside, CA 92507, or for downloading on the UCR PD&C Environmental Planning website: <https://pdc.ucr.edu/environmental-planning-ceqa>.

The 45-day public review period for the Draft EIR begins on Wednesday, **July 14, 2021** and ends on Monday, **August 30, 2021**. Comments must be received in writing no later than **5:00 PM on August 30, 2021** to:

Stephanie Tang, Campus Environmental Planner
Planning, Design & Construction
1223 University Avenue, Suite 240
Riverside, CA 92507

Your name should be included with your comments. Please send your written comments to the attention of Stephanie Tang at the address noted above. Comments can also be submitted via email to the following address: CEQA@ucr.edu. **Comments must also be received no later than 5:00 PM on Monday, August 30, 2021.**

As a result of the ongoing outbreak of COVID-19, recommendations placed on in-person gatherings throughout California, and based on Governor Newsom's signed Executive Order N-29-20 allowing local and state agencies to hold virtual meetings via teleconference, UCR will host an online public session/hearing to receive verbal comments on the Draft EIR, rather than an in-person event. The University will hold a virtual public hearing **Wednesday, August 4, 2021 at 6:00 p.m. – 7:30 p.m.** **Please refer to the attached Notice of Availability for information on how to login/attend the 2021 LRDP Draft EIR virtual public hearing.** All other comments outside of this hearing must be submitted in writing, as outlined above.

Thank you,

Stephanie Tang
Campus Environmental Planner
UNIVERSITY OF CALIFORNIA, RIVERSIDE
PLANNING, DESIGN & CONSTRUCTION
1223 UNIVERSITY AVE | SUITE 240 | RIVERSIDE CA 92507
951.827.1484 | cpp.ucr.edu

Keep Riverside healthy: Maintain healthy diet and exercise, wash your hands, and get vaccinated.

RiversideCA.gov/COVID-19

Stephanie Tang

From: Johnson, Sharon <sjohnson@RIVCO.ORG>
Sent: Wednesday, August 4, 2021 11:22 AM
To: ceqa@ucr.edu
Subject: 2021 Long Range Development Plan
Attachments: UCR 2021 LRDP 2nd District Interest Letter.pdf; City of Riverside LRDP 7.17.20 Letter.pdf

Hi Stephanie.

Attached please find the District's comment letter for the 2021 Long Range Development Plan, along with the previous comment letter for the project.

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[County of Riverside California](#)



RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

239460

August 3, 2021

University California, Riverside
Planning, Design & Construction Department
1223 University Avenue, Suite 240
Riverside, CA 92507

Attention: Stephanie Tang

Re: 2021 Long Range Development Plan
2nd Submittal

The Riverside County Flood Control and Water Conservation District (District) does not normally recommend conditions for land divisions or other land use cases in incorporated cities. The District also does not plan check City land use cases or provide State Division of Real Estate letters or other flood hazard reports for such cases. District comments/recommendations for such cases are normally limited to items of specific interest to the District including District Master Drainage Plan facilities, other regional flood control and drainage facilities which could be considered a logical component or extension of a master plan system, and District Area Drainage Plan fees (development mitigation fees). In addition, information of a general nature is provided.

L2-1

The District's review is based on the above-referenced project transmittal, received July 23, 2021. The District **has not** reviewed the proposed project in detail, and the following comments do not in any way constitute or imply District approval or endorsement of the proposed project with respect to flood hazard, public health and safety, or any other such issue:

- This project would not be impacted by District Master Drainage Plan facilities, nor are other facilities of regional interest proposed.
- This project involves District proposed Master Drainage Plan facilities, namely _____, _____. The District will accept ownership of such facilities on written request of the City. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required.
- This project proposes channels, storm drains 36 inches or larger in diameter, or other facilities that could be considered regional in nature and/or a logical extension of the adopted ___ Master Drainage Plan. The District would consider accepting ownership of such facilities on written request of the City. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required.

L2-2

- This project is located within the limits of the District's _____ Area Drainage Plan for which drainage fees have been adopted. If the project is proposing to create additional impervious surface area, applicable fees should be paid by cashier's check or money order only to the Flood Control District or City prior to issuance of grading or building permits. Fees to be paid should be at the rate in effect at the time of issuance of the actual permit.
- An encroachment permit shall be obtained for any construction related activities occurring within District right of way or facilities, namely, Box Springs Storm Drain. For further information, contact the District's Encroachment Permit Section at 951.955.1266.
- The District's previous comments are still valid (see attached letter dated 7/17/20).

L2-2
cont'd

GENERAL INFORMATION

This project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. Clearance for grading, recordation, or other final approval should not be given until the City has determined that the project has been granted a permit or is shown to be exempt.

L2-3

If this project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, then the City should require the applicant to provide all studies, calculations, plans, and other information required to meet FEMA requirements, and should further require that the applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation, or other final approval of the project and a Letter of Map Revision (LOMR) prior to occupancy.

L2-4

If a natural watercourse or mapped floodplain is impacted by this project, the City should require the applicant to obtain a Section 1602 Agreement from the California Department of Fish and Wildlife and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, or written correspondence from these agencies indicating the project is exempt from these requirements. A Clean Water Act Section 401 Water Quality Certification may be required from the local California Regional Water Quality Control Board prior to issuance of the Corps 404 permit.

L2-5

Very truly yours,

DEBORAH DE CHAMBEAU
Engineering Project Manager

Attachment

ec: Riverside County Planning Department
Attn: Phayvanh Nanthavongdouangsy

SLJ:ju



RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

232323

July 17, 2020

City of Riverside
Planning Department
3900 Main Street
Riverside, CA 92522

Attention: Stephanie Tang

Re: 2021 Long Range
Development Plan (2021 LRDP)

The Riverside County Flood Control and Water Conservation District (District) does not normally recommend conditions for land divisions or other land use cases in incorporated cities. The District also does not plan check City land use cases, or provide State Division of Real Estate letters or other flood hazard reports for such cases. District comments/recommendations for such cases are normally limited to items of specific interest to the District including District Master Drainage Plan facilities, other regional flood control and drainage facilities which could be considered a logical component or extension of a master plan system, and District Area Drainage Plan fees (development mitigation fees). In addition, information of a general nature is provided.

The District's review is based on the above-referenced project transmittal, received July 8, 2020. The District **has not** reviewed the proposed project in detail, and the following comments do not in any way constitute or imply District approval or endorsement of the proposed project with respect to flood hazard, public health and safety, or any other such issue:

- This project would not be impacted by District Master Drainage Plan facilities, nor are other facilities of regional interest proposed.
- This project involves District proposed Master Drainage Plan facilities, namely _____, _____. The District will accept ownership of such facilities on written request of the City. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required.
- This project proposes channels, storm drains 36 inches or larger in diameter, or other facilities that could be considered regional in nature and/or a logical extension of the adopted ____ Master Drainage Plan. The District would consider accepting ownership of such facilities on written request of the City. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required.
- This project is located within the limits of the District's _____ Area Drainage Plan for which drainage fees have been adopted. If the project is proposing to create additional impervious surface area, applicable fees should be paid by cashier's check or money order only to the Flood

City of Riverside

Re: 2021 Long Range
Development Plan (2021 LRDP)

232323

Control District or City prior to issuance of grading or building permits. Fees to be paid should be at the rate in effect at the time of issuance of the actual permit.

- An encroachment permit shall be obtained for any construction related activities occurring within District right of way or facilities, namely, Box Springs Storm Drain or University Wash Spruce Street Storm Drain. For further information, contact the District's Encroachment Permit Section at 951.955.1266.
- The District's previous comments are still valid.

L2-6

GENERAL INFORMATION

This project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. Clearance for grading, recordation, or other final approval should not be given until the City has determined that the project has been granted a permit or is shown to be exempt.

If this project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, then the City should require the applicant to provide all studies, calculations, plans, and other information required to meet FEMA requirements, and should further require that the applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation, or other final approval of the project and a Letter of Map Revision (LOMR) prior to occupancy.

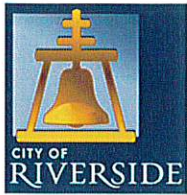
If a natural watercourse or mapped floodplain is impacted by this project, the City should require the applicant to obtain a Section 1602 Agreement from the California Department of Fish and Wildlife and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, or written correspondence from these agencies indicating the project is exempt from these requirements. A Clean Water Act Section 401 Water Quality Certification may be required from the local California Regional Water Quality Control Board prior to issuance of the Corps 404 permit.

Very truly yours,

DEBORAH DE CHAMBEAU
Engineering Project Manager

c: Riverside County Planning Department
Attn: John Hildebrand

SLJ:blm



City of Arts & Innovation

September 2, 2020

Stephanie Tang
Campus Environmental Planner
Planning, Design & Construction
1223 University Avenue, Suite 240
Riverside, CA 92507

Subject: Draft Environmental Impact Report Prepared for UC Riverside's 2021 Long Range Development Plan

Dear Ms. Tang:

The City of Riverside (the City) has reviewed, and hereby submits comments, on the Draft Environmental Impact Report (DEIR) prepared for the UC Riverside's (UCR's) 2021 Long Range Development Plan (LRDP).

UCR is an important part of the City of Riverside's history and the social, environmental, and economic fabric comprising California's 12th largest municipality. In the context of our shared geography, the University and the City have achieved much together, and the formal and informal partnerships have yielded many local and regional benefits. As with all beneficial relationships, shared responsibilities also need to be openly identified, articulated and addressed. In this instance, given the ambitious expansion of UCR represented in the LRDP, the City of Riverside greatly appreciates the ability to review the LRDP and DEIR in order to better understand UCR's growth plans in order to articulate the possible effects of that growth on the Riverside community and City services.

L3-1

The 2021 LRDP will guide development on the main UCR campus for the next 15 years and impacts various matters such as long-range land use development, open space preservation and improvements, multi-modal mobility planning, and infrastructure sustainability and resiliency efforts. The Draft LRDP proposes a net increase in development of approximately 5.5 million gross square feet of additional academic buildings, support facilities; and student housing of approximately 7,489 new on-campus beds to accommodate the anticipated increase of approximately 11,000 students and 2,845 faculty and staff by academic year 2035/2036.

After reviewing the DEIR and Draft LRDP, the City is seriously concerned about the lack of any enforceable commitment by UCR to provide adequate housing and the necessary City services for current and future students, staff and faculty, as well as mitigation of the impacts of the growth on the quality of life for all Riversiders. As explained in the *Save Berkeley's Neighborhoods v. Regents of the University of California* case, "CEQA requires public universities to mitigate the environmental impacts of their growth and development."

L3-2

In this context, growth includes student enrollment increases, which the Legislature has acknowledged “may negatively affect the surrounding environment.” “Consistent with the requirements of [CEQA],” the Legislature intends that the University of California “sufficiently mitigate significant off-campus impacts related to campus growth and development.” (*Id.*, (2020), 51 Cal.App.5th 226, 231) The CEQA Guidelines mandate that a lead agency should consider impacts to population and housing when analyzing a project. (Cal. Code Regs., tit. 14, § 15126.2 (a), (e) [“Guidelines § 15126.2 (a), (e)”] [EIR must discuss “changes induced in population distribution” “population concentration” and must “[d]iscuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment.”]) The state CEQA Guidelines’ Checklist Form asks the lead agency to determine whether the project (“(b) would [d]isplace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.” (Guidelines, appx. G, § XIV, subs. (a), (b).)

L3-2
cont'd

Each public agency shall mitigate or avoid the significant effects on the environment of projects it carries out or approves whenever it is feasible to do so. (Pub. Res. Code § 21002.1; see also Pub. Res. Code §21002) Even if a lead agency finds that environmental impacts would remain significant, it must still adopt feasible measures to mitigate or avoid those impacts.

Given the influence of UCR on many dimensions of the City, the absence of meaningful mitigation to address impacts is not representative of the years of collaboration between UCR and the City. To this end, the following comments outline the City’s concerns with the DEIR and Draft LRDP – all of which the City expects meaningful consideration and good-faith mitigation:

Chapter 4.1: Aesthetics

The UCR main campus is identified as being within the City, with levels of light typical for a highly urbanized setting with substantial sources of ambient lighting. In 2018, the City adopted an ordinance to reduce night-sky light pollution. The UCR main campus is located within Zones 2 and 3.

<https://riversideca.legistar.com/View.ashx?M=F&ID=6711468&GUID=3C2E377C-3A93-418B-AC0E-0A4B8635DBC6>.

L3-3

To avoid light impacts to the surrounding community and biological resources, all future development must conform with the development standards for outdoor lighting as specified in Chapter 19.556 of the Riverside Municipal Code, or an equivalent-or-higher standard of UCR’s own choosing. This must be addressed in the EIR.

The DEIR analysis does not consider the additional light and glare from the additional vehicular traffic associated with the LRDP. Those impacts must be addressed too.

L3-4

Chapter 4.2: Agricultural Resources

The DEIR states that the proposed LRDP would reduce land available for agricultural research on farmland in comparison to existing conditions, and the impact is significant and unavoidable. The City of Riverside prides itself on its rich agricultural heritage that is still prominent in the Arlington Greenbelt as well as the UCR campus. With increased development pressure, the remaining farmland is under constant threat of disappearance.

L3-5

The DEIR makes no effort at all to mitigate for the loss of farmland. CEQA demands that UCR make a good-faith effort to identify and adopt mitigation measures, and to mitigate for the impacts to the extent feasible. "A gloomy forecast of environmental degradation is of little or no value without pragmatic, concrete means to minimize the impacts." (*Environmental Council of Sacramento v. City of Sacramento* (2006) 142 Cal.App.4th 1018, 1038). If UCR agricultural lands contiguous or adjacent to "urbanizing" areas are planned for development, obvious mitigation would include preservation of other farmland in the immediate area or areas in close proximity to the UCR campus.

As stated in the DEIR, the 2005 LRDP resulted in the acquisition of 540 acres of farmland in the Coachella Valley, approximately 80 miles east of main campus, rather than locally. The DEIR states that the "City has identified the Arlington Heights Greenbelt and the Arlanza-La Sierra lands as important lands for protection..." yet the DEIR does not consider agricultural lands in the Arlington Heights Greenbelt as potential sites for mitigation of lost agricultural lands on campus. The City requests that UCR seek to acquire property in the Arlington Heights Greenbelt for future agricultural land mitigation efforts prior to the development of existing campus agricultural land. This would surely be superior mitigation than acquiring property in the faraway, environmentally distinct Coachella Valley, as was done in the past.

L3-6

The DEIR states that not all of the land presumed to be converted in the 2005 LRDP was actually converted, but that is not relevant. Any mitigation developed for the earlier LRDP is specific to that earlier plan, and does not carry over to this new set of impacts. UCR's observation that only 43 out of 125 acres were converted instead demonstrated that 82 acres remain available for preservation, and also constitute the appropriate baseline for impacts analysis; further, if the remaining 82 acres are to be developed, then this acreage should be preserved by UCR in the Arlington Heights Greenbelt or other nearby locations.

Chapter 4.3: Air Quality

To analyze air quality impacts due to construction, the DEIR states that projections were based on 700,000 gross square feet (gsf) of construction in one year. The justification for this amount of construction is impermissibly vague, stating that "historically the campus has developed at a much lower number than 700,000 gsf per year, with only the most intensive years approaching this number." This square footage appears to be arbitrarily chosen, as the highest amount of construction previously completed within one year was not provided. There is no evidence to support if the 700,000 gsf exceeds or is less than the previous maximum buildout within a year. Additionally, the historic average amount of annual construction must be provided for comparison.

L3-7

The assessment for Impact AQ-1 assumes that the 2016 AQMP growth projections accounts for the increase in campus population as part of the regional population growth. This assumption is not supported with appropriate documentation. Impacts to air quality would occur if the campus growth is in addition to the regional projects. This must be resolved.

L3-8

Chapter 4.5: Cultural Resources

Women's and LGBT Resources Centers are mentioned under the *Civil Rights Movement and Student Activism at UCR, 1960-1975* theme, but the contributions of these groups to the history and significance UCR are not explored and not included in the analysis.

L3-9

While it is understood that UCR is a constitutionally-created State entity and is not subject to municipal regulations of surrounding local governments, Section 21084.1 of CEQA specifies that "Historical resources included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1, are presumed to be historically or culturally significant for purposes of this section, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant." To fully analyze impacts to historic resources, the Cultural Resources section needs to evaluate structures for local listing eligibility.

L3-10

Policy LU-4.6 of the City's General Plan is included in this Section, yet this policy is only applicable to the Tribal Cultural Resources. Please refer to the Historic Preservation element of the City's General Plan for applicable Objectives and Policies.

L3-11

https://riversideca.gov/cedd/sites/riversideca.gov.icedd/files/pdf/planning/general-plan/16_Historic_Preservation_Element.pdf.

MM CUL-1 Protection of Historical Resources: The City requests to receive a copy of all HABS-like documentation completed as part of this mitigation. Please provide a copy to the Local Historic Archives at the Main Riverside Public Library.

L3-12

MM CUL-2 Tribal Cultural Resources/Archaeological Monitoring: This mitigation applies to areas with a medium or high potential to encounter undisturbed native soils including Holocene alluvium soils. The technical studies and the DEIR do not identify areas with medium or high potential. These areas must be identified to clarify when this mitigation is applicable.

Chapter 4.8: Greenhouse Gas Emissions

The analysis for Impact GHG-1 does not take into account greenhouse gas emissions from student, staff, and faculty transportation to and from the campus. As only 40% of all students (68% of increased enrollment) will be housed on campus, the majority of students and faculty will be commuting to campus. The Air Quality section DEIR indicates 85% of the campus population resides within a one-hour commute to the campus. This assumption is inadequate because it does not give a clear picture of the exact percentage of the campus population that commutes rather than using alternative methods of transportation or public transit. With an increase in campus population, the majority of which will not be housed on campus, the amount of commuter transit will increase. This increase in commuters is likely to cause an increase in greenhouse gas emissions.

L3-13

Chapter 4.10: Hydrology and Water Quality

The LRDP Hydrology Study states that "the City municipal storm drain system receives runoff from the UCR campus and ultimately discharges to the Santa Ana River," yet it fails to identify specific City discharge locations, and impacts to City storm drainpipes as a result of the increase in impervious surface being constructed with the future development projects. The Hydrology study

L3-14

needs to identify any impacts to City drainage infrastructure and mitigate those impacts as appropriate.

L3-14
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Chapter 4.12: Population and Housing

The Draft EIR establishes a benchmark of providing on-campus housing for only 40% of the student population (68% of project increase in student population) and claims this percentage is a result of factors outside of UCR's control, including privately-owned housing options in the neighboring community, projected new supply created by private developers, and future expansion of transit options that will expand the campus' physical reach farther into the community. However, the LRDP's "goal" to provide that housing is based on uncertain, unenforceable "objectives and policies supportive of the increased enrollment and housing goals...." (LRDP p. 4.12-17) Those aspirations are unsupported in facts or data. Given the unrelenting housing crisis in Riverside and surrounding areas, UCR must analyze student housing based on current, concrete proposals to perform an adequate analysis, not aspirational 'goals based on supportive policies.' Because the 40% on-campus assumption is unsupported, an impact analysis based on 40% of student residing in on-campus housing is insufficient. If those assumed housing sources are not available, there will be additional, unaddressed impacts to the existing housing supply within the City and neighboring communities. Historic problems associated with inadequate student housing supplies include overcrowding of UCR-area homes, noise complaints, vehicular access and safety issues, and other neighborhood livability issues. Should UCR continue to assume the surrounding area will absorb its LRDP enrollment, then the impacts must be analyzed, addressed and mitigated.

L3-15

Per the DEIR, "a primary goal of the proposed 2021 LRDP is to expand enrollment capacity up to 35,000 students through 2035, a net increase of approximately 11,000 students or a 46 percent increase from the 2018/2019 academic year student population." The City and the residents of the communities surrounding the UCR campus have historically been impacted by the ever-increasing enrollment and UCR's lack of providing sufficient on-campus housing. This has resulted in quality-of-life impacts such as noise, overcrowding, increased traffic and parking as well as physical changes to established single family neighborhoods resulting from the modification of single-family homes into mini-dormitories.

L3-16

In 2014-2015 the City worked closely with residents of the University Neighborhood and the Canyon Crest Neighborhood to develop a "Residential Protection Overlay Zone" to help combat the direct physical and indirect quality-of-life impacts of these so called "cut-ups." The City Council adopted the RP Overlay Zone on September 22, 2015. Hundreds of hours of staff time were used to develop the RP Overlay Zone, including hosting monthly meetings for over a year with the residents, UCR students, faculty, staff, real estate representatives, Fair Housing representatives, and property management representatives, all as a direct result of UCR's lack of providing adequate on-campus housing. Those impacts from inadequate student housing were significant, and UCR's increasing off-campus private housing will cause those very same impacts. UCR must address, analyze, and mitigate those very real impacts.

The Housing and Population chapter of the DEIR identifies an 1,831-unit surplus on the Regional Housing Needs Assessment (RHNA) count that could be associated to lower income residents. The existence of this surplus beyond a planning number is questionable, as is the unsupported hope that solely UCR students and staff, rather than the general public, might fill the units. The DEIR cannot rely on this potential surplus as a means to house the increase in campus population. (DEIR p. 4.12-6). To the extent the DEIR does rely upon that, it displaces residents who the City will have

L3-17

to accommodate elsewhere, with the attendant impacts. UCR must analyze the full impacts of its population growth, and cannot presume that it disappears somewhere in the City without impacts. Impacts need to be analyzed, addressed and mitigated.

L3-17
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The DEIR states that “due to their numbers in Riverside, college students are considered to have special housing needs” but does not articulate what the needs are, and how UCR fully plans to meet those needs. The analysis notes that there has been a market rate student housing shortage around the UCR campus, but never correlates that shortage with UCR's inadequate plans to only house a portion of its increased student load, which necessarily spills over to the greater overall development market with no analysis. (DEIR p. 4.12-7)

L3-18

The Population and Housing analysis does not analyze how distance/online learning might impact the need for housing.

L3-19

The Accessory Dwelling Units (ADUs) section of the Population and Housing chapter is inadequate. The DEIR recommends that the City make efforts to increase the development of ADUs in order to offset UCR's expansion. While ADUs could conceivably help to fill some small part of the housing gap for the campus population, this is speculative, and cannot be considered as part of this analysis without much more study. Additionally, ADUs are being used to meet market and affordable housing needs in general; there is no basis offered by the LRDP for them to be considered solely as student housing. (DEIR p. 4.12-3)

L3-20

The DEIR presumes that, “...The RHNA factors in the housing needs generated by universities in the region, including UCR,” but never explains how the RHNA analysis considers campus growth and its development impacts. (DEIR p. 4.12-16) In fact, the City's RHNA analysis does not account for student housing. The DEIR must correct that error in presumptions and analysis.

L3-21

The DEIR assumes in studies and projections throughout that campus growth is accommodated at the local and regional level, but never correlates these analyses with specific needs for campus growth. The DEIR must analyze whether local residential development growth can accommodate the students, staff, and faculty increases. Campus growth is an exogenous factor to other population and economic growth factors that drive the need for housing, even as the study makes clear that the campus is exempted from local requirements. Effectively, UCR has improperly exempted itself from analyzing its growth impacts on the City. While UCR is exempt from local requirements, the University is a part of the Riverside community and the impacts it has on Riverside must be identified, analyzed, addressed and mitigated; the DEIR's information in this regard is unacceptable.

L3-22

The DEIR admits that a 46% increase in students and a corresponding 60% increase in faculty and staff will result from campus growth by 2035. The study admits that only 40% of students can be housed on campus at buildout. Faculty and staff must be accommodated off-campus. The DEIR takes as fact the commuter nature of the campus will continue, and presumes that increasing local growth levels will cover any housing impacts. However, the DEIR never addresses the increase in other service levels related to residential development (public safety, infrastructure, additional economic growth) that will be needed to serve stated population increases. (DEIR p. 4.12-17)

L3-23

The Mobility section of Population and Housing Chapter notes that the campus would “promote” public transit. A mobility hub project at UCR failed last year. The mobility section study needs more

L3-24

specific actions related to car use and access to public transit for what is assumed to be a dependent population. Recommendations are unclear and have no clear targets or funding sources to provide assurances of implementation. (DEIR p. 4.12-18) Speculative, uncertain future acts cannot serve as substantial evidence to support analysis, or mitigation. To effectively "promote" public transportation, the LRDP must make actual, quantifiable, detailed commitments in the LRDP and fund those commitments. The DEIR and the LRDP do not make those commitments, and thus cannot rely upon such uncertain speculation.

L3-24
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The DEIR mentions providing housing in "privately-owned housing options in the neighboring community..." The City has had to reduce student impacts to single family neighborhoods. In SFR neighborhoods around campus, there have been City efforts to address student rentals, overcrowding, etc., that impact quality of life for these areas. "Privately owned" housing is no assurance that there will be no impacts; in fact, the contrary has shown to be the rule. (DEIR p. 4.12-20) Off-campus impacts induced or caused by the envisioned growth and expansion of the University and its associated population of students, faculty, and staff must be identified, analyzed, addressed, and mitigated.

L3-25

The DEIR notes that, "In 2018, approximately 59 percent of new California freshmen enrollees and 64 percent of new California transfer enrollees at UCR previously resided in a home within a 50-mile radius of the campus (UC 2019)," demonstrating that Riverside and surrounding communities bear the brunt of that growth. As international student attendance won't match that of larger UC campuses, local student growth would be the largest driver at UCR. This equates to thousands of new students and related faculty and staff. The Study's reliance on RHNA and other sources merely speculates that housing may be built, not that regional residential market units will be built. The analysis does not consider if projected housing is not constructed. As California has a long history of not meeting housing goals, and as economic downturns have impacted the local market, it is not a given that the growth will occur. (DEIR p. 4.12-21)

L3-26

The DEIR concludes that, "...Therefore, the new campus population residing in non-UCR affiliated housing could be absorbed into the existing housing stock, and there would be no need to construct new housing or infrastructure as a direct result of the proposed 2021 LRDP." The DEIR mentions previously that there has been a shortage of market rate housing for students around campus. The impacts of student growth would need to be absorbed regionally in additional projected (40,000 per decade) ambient population growth in Riverside. The analysis fails to fully analyze the impacts if a shortage of market rate housing for students continues.

The DEIR states, "It is conservatively assumed the entire new campus population would be from outside the region, necessitating relocation upon enrollment or employment with UCR." This implies that Riverside and surrounding cities that must bear the brunt of new growth, as it assumed to not be localized in nature. Yet, the DEIR fails to analyze impacts to the surrounding communities that would be impacted by the inadequate on-campus housing. (DEIR 4.12-24) Off-campus impacts induced or caused by the envisioned growth and expansion of the university and its associated population of students, faculty, and staff must be identified, analyzed, addressed, and mitigated.

L3-27

Chapter 4.13: Public Services

Riverside Police Department (RPD) has comments that UCR Police Department (UCRPD) will not be able to address the anticipated increase in crime and livability issues occurring on the UCR

L3-28

campus and in the University Neighborhood that will be generated by the increased campus population. UCR currently attracts thousands of people, most who live within close proximity to the University area, yet UCRPD has been partially defunded. Currently, UCRPD has six vacancies, four officers, one in dispatch, and one administrative. Of the four officer vacancies, one is the Police Chief, and one is a Lieutenant.

Furthermore, even though other UC campus police departments are currently hiring sworn officers, UCR is not. The four officers that have been defunded came from the University Neighborhood Enhancement Team (UNET) which was a collaborative effort between the Riverside Police Department and UCRPD to specifically address crime and livability issues within the University Neighborhood. UCR pulled its officers from UNET last year, citing budget issues. Both Riverside residents and UCR students live within the University Neighborhood and there is currently no collaborative strategy between RPD and UCRPD to deal with the crime and livability issues due to UCRPD being understaffed. Expansion of the campus will add a greater burden on RPD to provide police services in the University Neighborhood. That burden brings with it environmental impacts, which must be analyzed and mitigated. UCR must invest in personnel and measures that implement community safety in coordination with the Riverside Police Department and that advances UCR's community policing program and addresses campus and student-induced demands for proactive public safety measures, community engagement, collaboration with RPD, responses to calls for service, and crime prevention both on- and off-campus.

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Engine #4, which provides service to the UCR campus, is the busiest single company unit in the City, with 4,024 calls for service in 2019. The City of Riverside Fire Department is the primary source of emergency medical services to the UCR, which has no such services on campus. The additional traffic, students, faculty, and construction would have a definite increased call volume for that station and the City as a whole. That additional burden which could require new facilities would have impacts, must be analyzed, addressed and mitigated for. All new fire facilities would require a commitment of proportionate and ongoing funding by UCR to operate, manage, and maintain the facilities and fire services

L3-29

The additional buildings and high-rises would require additional resources such as Truck Companies (the closest truck is downtown) that are used for these types of structures. That additional burden, which could require new facilities or construction, which would have impacts, which must also be analyzed under CEQA. All new fire facilities would require a commitment of proportionate and ongoing funding by UCR to operate, manage, and maintain the facilities and fire services

The expansion of the East Campus is a high-risk area with dorms and labs. The fire department does not have fire facilities on the east side of the freeway, which may cause problems in earthquakes and potential lack of access to East Campus. The increased demand for fire services could require new facilities or construction, which would have impacts, must be analyzed too. All new fire facilities would require a commitment of proportionate and ongoing funding by UCR to operate, manage, and maintain the facilities and fire services

There is no direct route through campus for existing fire station locations. Example: to access to Valencia Hill, Big Springs, and E. Campus, the fire department experiences longer-than-industry-standards response times. A fire station located on the East Campus side would mitigate these areas of concern. However, new facilities or construction, which would have impacts, must be

analyzed under CEQA. All new fire facilities would require a commitment of proportionate and ongoing funding by UCR to operate, manage, and maintain the facilities and fire services

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Chapter 4.14: Recreation

The City's Trail Master Plan includes a multi-purpose trail segment through the UCR campus, connecting the campus population to neighboring residential neighborhoods, retail/commercial centers, services, open space and other points of interest to both the north and south of campus. The LRDP has the potential to impact city parks and that trail system, as described below.

The City assesses a Local Park Development Impact fee (LPF) on development projects to mitigate for negative impacts of increased park use associated with increases in population (City Municipal Code Chapter 16.60). However, this fee is not assessed on projects with governmental use by the state, and therefore the impacts of additional UCR student population on public parks needs to be fully assessed in the EIR and appropriately mitigated. It is unrealistic to assume that students residing on-campus will only use on-campus recreational facilities. Students, especially those with families, will look to surrounding city parks to supplement their recreational needs for sports courts/fields, playgrounds, barbecues, picnic shelters, and other park amenities.

The Operation – Off-Campus discussion on page 4.14-17 states that “The campus population would continue to have full access to on-campus parks and recreational facilities, which would reduce the need to use off-campus community facilities,” which is internally inconsistent and thus erroneous. “Continuing” access does nothing to “reduce” off-campus park use; if anything, it continues the current trend. Furthermore, this discussion also overlooks the thousands of faculty and staff and their families, who will also use City parks and facilities. After listing several City facilities within a mile of UCR, the DEIR speculates that “because these facilities are not in the immediate vicinity of UCR, they are unlikely to be used by campus population on a regular basis.” That is in direct conflict with UCR’s claim elsewhere in the DEIR that “In 2018, approximately 59 percent of new California freshmen enrollees and 64 percent of new California transfer enrollees at UCR previously resided in a home within a 50-mile radius of the campus (UC 2019).” The DEIR itself admits the greater area where the newly attracted students will live, which is well beyond the unsupported, arbitrary “immediate vicinity of UCR”, outside of which the new students and all of the new staff and faculty, and their families and friends, are impermissibly assumed to not recreate.

L3-30

UCR clearly, impermissibly shifts the burden of mitigating the impacts of its LRDP to the City when it states that “it is the responsibility of each jurisdiction to provide and maintain recreational facilities, and it is anticipated that this would occur pursuant to its General Plan and/or community plans.” (DEIR p. 4.14-17). UCR cannot intentionally increase its enrollment, faculty, and staff, refuse to accommodate them, and then wash its hands of their needs. UCR knows it is increasing the population and attendant burdens on parks and recreation, and thus pursuant to CEQA it must analyze those impacts and must mitigate for them in accordance with CEQA’s dictates.

The proposed increase in beds for on-campus student housing has the potential to create financial and quality of life impacts on the City. Without mitigation, the project will not contribute a fair share to the refurbishment, improvement, and expansion of City parks. The LRDP proposes to add 7,500 additional beds. Assuming that each residence hall, undergrad apartment, and graduate apartment unit would represent two student beds, and each of the 220 family housing units would represent one student bed, approximately 3,855 new units would be created. If the

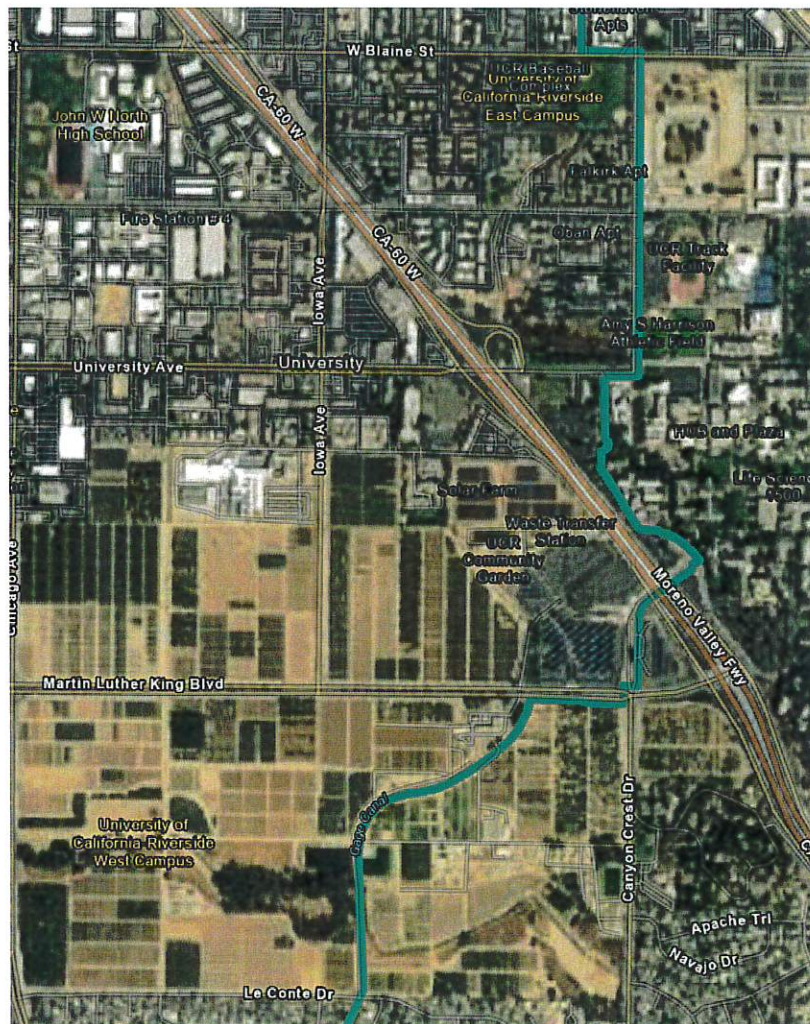
L3-31

multi-family/apartment rate of \$3,045 per unit for the Local Park Development Impact Fee were applied, the total fees from the new units would amount to about \$11,737,000. The project's exemption from these fees is significant to the City's park system, and leaves impacts unmitigated. While UCR is exempt from local requirements, the University is a part of the Riverside community fabric and the impacts it has on Riverside must be identified, analyzed, addressed and mitigated; the DEIR's information in this regard is unacceptable.

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The PRCSD requests that the Gage Canal Trail project through the UCR campus be incorporated in the LRDP and associated EIR at a programmatic level. The inclusion of the Gage Canal Trail within the LRDP would assist the City in leveraging grants to bring the trail to fruition. The proposed Gage Canal Trail alignment, as adopted by the City Council on August 17, 2021, is shown below as a green line. Please add the Gage Canal Trail, in the alignment shown below, into the Circulation Framework exhibits of the LRDP. The trail compliments the campus circulation system and provides infrastructure encouraging the use of active transportation to commute to UCR from neighborhoods to the north and south of campus.

L3-32



It should also be noted in the Draft EIR that the City will be constructing a 3-mile-long segment of the Gage Canal Trail from the UCR campus at Blaine Street north to Palmyrita Avenue. Construction is anticipated to be complete in late 2022/early 2023. The trail segment will include a paved bike path, a decomposed granite recreation trail, lighting, signage and other trail support amenities. The project will provide an off-street commuting and recreation option to connect residential and business centers to the campus.

L3-32
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Under the section "Existing UCR Campus Bicycle and Trail Network," the analysis fails to consider the City Trails Master Plan, similar to the reference for the City Bicycle Master Plan. Also, on August 17, 2021, the Riverside City Council adopted a comprehensive Pedestrian Safeguarding Plan, Active Transportation Plan, Complete Streets Ordinance, and Trail Master Plan update. This comprehensive document should be referenced in this Draft EIR, as it pertains to recreation as well as mobility. The City Council Report with links to the document can be found online at:

L3-33

<https://riversideca.legistar.com/View.ashx?M=A&ID=863112&GUID=FE04FF9C-4D32-467A-AA72-F1A961FD63D3>.

Section 4.14-14, Recreation Impact Analysis contains inadequate information; for example, there is no quantification of demand. How many students will live on campus, and how many acres of park/recreational land on campus will serve the campus residents? How does this compare to the City General Plan ratio of 3 acres of park land to 1,000 residents? This section must describe whether the types of recreation provided on campus will provide for the needs of students with families, or if use of City parks is anticipated to supplement on-campus recreational resources. In its current state, this analysis is lacking in data and detail, and is instead unsupported assumptions.

L3-34

Chapter 4.15: Transportation

The VMT analysis indicates that the project meets screening threshold to result in a less-than-significant impact under "Transit Priority Area Screening." according to the City of Riverside TIA Guidelines, the presumption is not be appropriate if the project:

- Has a Floor Area Ratio (FAR) of less than 0.75;
- Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
- Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
- Replaces affordable residential units with a smaller number of moderate- or high-income residential units

L3-35

The DEIR must explain and support the project's eligibility to screen out based on screening thresholds included in the City of Riverside's VMT analysis guidelines. Failing that, the DEIR must evaluate the VMT performance using City of Riverside's TIA Guidelines (attached), in addition to the VMT analysis that has been conducted using regional thresholds and considering the physical location of the project.

The total amount of on-site housing does not support the assertion of minimal VMT impacts. The DEIR must analyze the LRDP's VMT impacts based on Residential Home-Based VMT and Home-Based Work VMT, which will provide more appropriate results. Please elaborate if the model was adjusted to account for multimodal infrastructure or not.

L3-36

Cumulative Plus Project - The section includes, "This increase in opportunities for goods and services along with the increase in students and employees can result in a varied trend of the VMT per Service Population Cumulative Plus Project condition as compared to the Baseline Plus Project Condition" – Please elaborate on this sentence regarding the increase in goods and services, so the City (and the public) can verify the assumptions and the impacts derived therefrom.

L3-37

Regarding the transit system, the LRDP supports a new Metrolink station on Watkins Drive but does nothing to actually advance this effort. What does UCR propose for shuttle service if a new Metrolink station is not constructed? Without some real commitment to build the Metrolink station, UCR must provide realistic alternative options in the event that the proposed Metrolink station is not built on time.

L3-38

The Bicycle Network section concludes that "The Project will have UC Riverside continuing to work with the City of Riverside and University advocates to improve the quality and functionality of an integrated bicycle path network that connects within the campus and to the wider community beyond." In order for the City to determine whether coordination with UCR will be effective for the purposes on CEQA review, the DEIR and the LRDP must provide exhibits and more details about bicycle path network; details on connectivity between campuses (East Campus and West Campus); and elaborate how the Gage Canal trail would be accommodated through campus.

L3-39

Construction Management Plans must be submitted to the City of Riverside to review impacts to public streets.

L3-40

Regarding bicycle facilities, please include the recently constructed two-way cycle tract on the east side of Iowa Avenue between Everton Place and Martin Luther King Boulevard. Please add this location to the list and the map.

L3-41

Plans for the Martin Luther King Boulevard interchange are not included in the LRDP. In order to avoid transportation impacts, that interchange should be expanded/modified to allow direct access to campus.

L3-42

The City, the Riverside Transit Agency, and UCR have worked closely on a mobility hub at Canyon Crest Drive and University Avenue. However, no reference to those plans and efforts are evident in the LRDP or its DEIR. If the mobility hub remains viable, it must be discussed and analyzed. If it is no longer viable, the City (and likely RTA) will have to reconsider the LRDP impacts to circulation based upon that new information. Coordination now can prevent the need for recirculation of the DEIR later.

L3-43

There is no clear commitment to allow shared mobility / micro mobility on campus. Without commitment, any mention of shared or micro mobility is speculation.

L3-44

Due to the project size, a Level of Service based analysis must be conducted to address potential traffic circulation deficiencies associated with the proposed Long Range Development Plan. VMT analysis does not consider, and thus does not replace, impact analysis to emergency access, response times, circulation, noise, light and glare, and many other factors important to environmental analysis.

L3-45

The DEIR does not adequately address impacts to the regional transportation and roadway system, which are anticipated to be significant due to the continual increase in students, faculty, staff and visitors facilitated by the LRDP. The Western Riverside County Association of Governments (WRCOG) developed and administers the Transportation Uniform Mitigation Fee (TUMF), a program that ensures that new development pays its fair share for the increased traffic that it creates; however UCR is currently exempt from participating in and contributing to the TUMF program. The City strongly encourages UCR to participate in the TUMF program and contribute to its fair share improvements of the regional roadway network.

L3-46

Chapter 4.17: Utilities and Service System

The DEIR states that "the City and UCR have a wastewater discharge agreement that allows UCR to discharge 1.55 cubic feet per second (approximately one MGD) from the campus into the portion of the City trunk line located in East Campus between Valencia Hills Drive and Canyon Crest Drive (UCR 2005)." However, the DEIR (Section 4.17.1) states that based upon the population density analysis, the average daily flow rate on East Campus was calculated at approximately 1.7 MGD, and peak flow was calculated at approximately 5.6 MGD. UCR must enter into a new wastewater discharge agreement which would accommodate for the increase in discharge created due of the increase in density resulting from the LRDP. Without a commitment to do so, the impacts from increased sewage flow must be reconsidered, new construction to accommodate those increased flows would have environmental impacts, requiring further analysis on UCR's part.

L3-47

The City of Riverside Wastewater Treatment Plant performed an update to the Sewer Master Plan in 2019 which included an update to the City Sewer Model. The City uses the Sewer Model to identify deficiencies in the sewer collection system. UCR must coordinate with the City of Riverside Public Works Department to update the Sewer model based on the land use proposed in UCR's LRDP. UCR will need to hire the City's Consultant (Carollo Engineers) to update the model, or the City can provide the model to UCR to utilize their own consultant to update the City's sewer model. It is important to update the City model to identify potential cumulative impacts to the City's sewer collection system as a result of UCR's future development projects. If UCR refuses at this point to coordinate, impacts from increased sewage flow must be reconsidered, new construction to accommodate and treat those increased flows would have environmental impacts, requiring further analysis on UCR's part.

L3-48

The DEIR's analysis of wastewater impacts is incomplete because it fails to compare the existing wastewater flows to reasonably foreseeable increases in flows with the incremental buildout of the LRDP. The LRDP states that "wastewater from the campus is conveyed into the City's sanitary sewer city system for treatment. At the time of preparation of this LRDP, there are known capacity constraints in the City's sanitary sewer system that will need to be addressed as future building projects are added to the campus." UCR must conduct the analysis of system capacity, with relevant upstream data provided by the City's sewer model to determine if LRDP-related wastewater flows can be accommodated now, as part of this EIR. Otherwise, those admitted impacts constitute impermissible deferral of analysis. If the analysis finds that LRDP-related wastewater flows would significantly impact the system, the EIR must also identify measures to mitigate those impacts (i.e., upsizing City's sewer mains if existing mains are insufficient in meeting the projects' wastewater needs.) This must be addressed now, or recirculation of this DEIR will almost certainly be required.

L3-49

UCR could work with the City of Riverside to devise development impact fees to mitigate the impacts of future projects. Such fees include:

- Sewer Capacity Fees - \$570/1000 S.F. of building area (fee subject to change depending on specific use of buildings with potentially higher sewer generation);
- Traffic and Railroad Signal Mitigation Fee - \$0.25 / S.F. of building area;
- Storm Drain Fee - \$186.00, plus:
 - \$28.00 for each 100 square feet, or portion thereof, of roof area in excess of 750 square feet but not in excess of 3,000 square feet of roof area
 - \$0.06 for each square foot of roof area in excess of 3,000 square feet
 - \$0.02 for each square foot of site area included in the lot or parcel of ground constituting the work site as described in the application for the building permit, provided that this surcharge shall be charged only once on any lot or recorded parcel of ground and provided that the building official may waive a portion of this fee when it is apparent that the lot or recorded parcel of ground is subject to future development

L3-50

The DEIR relies on Riverside Public Utilities' 2016 Urban Water Management Plan for analysis. RPU updated the UWMP in 2020 and it was adopted by City Council in June 2021. Although it is recognized that the DEIR and UWMP were being drafted concurrently, RPU recommends that the 2020 UWMP be used for any future analyses.

L3-51

The LRDP states that UCR evaluated their campus water system for the 2016 Physical Master Plan Study, which indicated that the existing conveyance infrastructure [UCR's Water System] adequately supports the campus water demands. However, the LRDP does not identify impacts from future developments that would need to be served directly from RPU's water system, and not from the UCR Water System. Additional information regarding project-specific demands and their respective points of service are needed in order to determine whether RPU's system will be able to adequately serve future UCR development directly off of RPU's infrastructure.

L3-52

The LRDP and its DEIR do not provide enough information about the future electric loads and facility locations. Thus, Riverside Public Utilities (RPU) cannot determine if the impacts described in the DEIR are complete or accurate. The LRDP fails to provide specific project descriptions or locations with estimated loads in KW. RPU has estimated the cost for providing electric service based on UCR's LRDP load projections to be approximately \$12 Million. RPU estimates this cost based on land use types and the additional infrastructure needed to serve the additional loads for only those new campus uses proposed in the LRDP. These costs are based on RPU Electric Rules which state that the applicant/user is responsible for all civil infrastructure needed to serve the loads associated with the development projects. These costs don't include any infrastructure facilities, which include trenching, vaults, conduits, street paving, etc. that the applicant will be responsible for at the time of construction. These are only Electric Service Fees for the additional estimated load growth associated with the LRDP. These fees are typically paid during the design/construction of the development project and are paid upfront prior to RPU installing any electrical facilities. In accordance with RPU Rules, UCR must pay all applicable fees associated with their projects prior to RPU installing any facilities.

L3-53

The DEIR erroneously assumes no new RPU facilities will be needed to serve the over 10,000 new students. UCR must analyze the environmental impacts of RPU's providing the additional transformer and feeder facilities. RPU recognizes that UCR has the option to serve some of the load from their own onsite distribution system, but also recognizes that at some point will require an expansion of the existing substation to include the addition of a new transformer bank and associated facilities. RPU anticipates that additional distribution feeders will be needed, especially for the Canyon Crest Avenue Gateway areas based on the land use description. The estimated cost of \$12 Million is based on new substation expansion and distribution feeders needed. Actual service fees will be calculated at time of development, if applicable to install new facilities. RPU sees the need to expand the existing University Substation due to the LRDP growth. Loads may be served from a different substation, which would require major underground facilities to be extended to serve additional loads. Those facilities would require trenching, conduits, vaults, etc. That major work could take several months to construct depending on the number of circuits needed to serve the additional load.

L3-54

The DEIR also commits to replacing gas-fired items such as boilers and heaters with electric versions, which will increase electric demand. Furthermore, the DEIR commits to increasing the amount of clean energy (with a stated policy goal of 100%) and maximizing solar panels. Solar generation peak does not coincide with demand peak, meaning that UCR will be exporting more power to RPU during solar peak, and importing more power during demand peak. While the net consumption may decrease, the instantaneous load on RPU's system, and UCR's connection(s) thereto, will increase, requiring significant equipment upgrades. Those impacts must be explained, analyzed, and mitigated.

L3-55

Chapter 6: Alternatives

The City requests that Alternative 3 be considered for approval over the proposed LRDP. This Alternative is the Environmentally Superior Alternative and would result in fewer impacts related to air quality, fuel consumption, GHG emissions for Scope 3 sources, population and housing, and transportation. Although the City believes that none of the LRDP alternatives provide enough on-campus or University-operated housing, Alternative 3 would reduce impacts to the City and surrounding neighborhoods due to the increased campus population, by providing on-campus housing for 60% of the student population.

L3-56

In conclusion, the City of Riverside appreciates your serious consideration of the comments provided in this letter. While the City appreciates its innumerable collaborations and partnerships with UCR, the interests of its tax payers, rate payers, and community members – and their quality of life – must be respected and upheld through shared responsibility for identifying, analyzing, addressing, and mitigating impacts in a good-faith manner; the UCR LRDP, as presented, will have off-campus impacts induced or caused by the envisioned growth and expansion of the university and its associated population of students, faculty, and staff.

L3-57

The City strongly urges UCR to include as mitigation within the EIR a formal agreement or agreements with the City in the form of a Memorandum of Understanding and Municipal Service Agreement(s), including a cost reimbursement program and schedule, to offset and remunerate the City and Riverside Public Utilities for the provision of all municipal services that support and are directly impacted by the increased growth facilitated by the LRDP – it is the important to the City that such agreements with UCR shall be in place prior to any development or improvement under the auspices of the LRDP. UCR should coordinate with the City and RPU to initiate discussions to negotiate and draft the terms of these agreements.

L3-58

Should you have any questions regarding this letter, please contact Scott Watson, Historic Preservation Officer, at (951) 826-5507, or by e-mail at swatson@riversideca.gov. Please be advised that the City, including its various departments, reserve the right to supplement or augment these comments, and reserve the right to submit additional comments.

L3-59

We thank you again for the opportunity to provide comments on this proposal and look forward to working with you in the future.

Sincerely,



Al Zelinka, FAICP, CMSM,
City Manager

cc: Patricia Locke Dawson, Mayor
Riverside City Council Members
Rafael Guzman, Assistant City Manager
Kris Martinez, Interim Assistant City Manager
Phaedra Norton, City Attorney
David Welch, Community & Economic Development, Director
Todd Corbin, Public Utilities General Manager
Randy McDaniel, Interim Parks, Recreation and Community Services Director
Mike Staley, Deputy Fire Chief
Frank Assumma, Deputy Chief of Police
Mary Kopaskie-Brown, City Planner



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

September 2, 2021

CEQA@ucr.edu

Stephanie Tang, Campus Environmental Planner
University of California, Riverside
Planning, Design & Construction
1223 University Avenue, Suite 240
Riverside, California 92507

Draft Environmental Impact Report (DEIR) for the Proposed 2021 Long Range Development Plan (Proposed Project) (SCH No.: 2020070120)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The University of California, Riverside is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include recommended revisions to the CEQA air quality analysis for regional construction impacts from cleanup activities and information on South Coast AQMD rules and permits that the Lead Agency should incorporate into the Final EIR.

L4-1

South Coast AQMD Staff's Summary of Project Descriptions in the Draft EIR

Based on the Draft EIR, the Proposed Project consists of development of strategies, actions, and programs to accommodate increases in enrollment capacity from 23,922 students to 35,000 students and 3.7 million square feet of academic buildings with a planning horizon of 2036 on 1,108 acres. Certain locations on campus may have been contaminated by various hazardous substances because of the former uses such as leaks from unidentified underground storage tanks, or unidentified buried debris that could contain hazardous substances or hazardous byproducts¹. As such, Mitigation Measure HAZ-1 requires additional environmental site assessments be conducted, and based on results of the assessments, remediation or corrective action would be conducted prior to or during construction in compliance with applicable federal and state laws and regulation².

L4-2

South Coast AQMD Staff's Comments

Based on a review of the Draft EIR and supporting technical appendices, South Coast AQMD staff has two comments.

CEQA Air Quality Analysis for Regional Construction Impacts from Cleanup Activities

L4-3

Based on the Hazards and Hazardous Materials Section in the Draft EIR, remediation or corrective actions such as removal of contaminated soil, in-situ treatment, capping, and engineering controls is reasonably foreseeable and would be conducted as part of project construction³. The Lead Agency did not quantify emissions from cleanup activities. Cleanup

¹ Draft EIR. Section 4.9. Hazards and Hazardous Materials. 4.9.1 – Environmental Setting. Page 4.9-2.

² *Ibid.* Pages ES-41 and 42.

³ *Ibid.*

activities will likely involve the use of heavy-duty, diesel-fueled trucks for soil export and result in emissions from vehicle trips by workers that will be required to conduct cleanup activities. Additionally, cleanup activities will likely require the use of additional equipment that may be different from typical equipment for grading and site preparation for construction. Since cleanup activities are reasonably foreseeable at the time the EIR is prepared, the Lead Agency should use good faith, best efforts to provide information on the scope, types, and duration of cleanup activities, quantify emissions from cleanup activities, and include those emissions in the Proposed Project's construction emissions profile to be compared to South Coast AQMD's air quality CEQA significance thresholds for construction to determine the level of significance in the Final EIR. Alternatively, if emissions from cleanup activities are not included in the Final EIR, the Lead Agency should provide reasons for not including them supported by substantial evidence in the record or consider making the following revisions to the existing Mitigation Measure HAZ-1 to include a commitment that potential environmental impacts from future cleanup activities will be required to be evaluated under CEQA prior to commencing any remediation or corrective actions. The recommended revisions are shown in underline.

MM HAZ 1 Property Assessment – Phase I and II ESAs. During the pre-planning stage of campus projects on previously developed sites or on agricultural lands (current or historic), and in coordination with EH&S, UCR shall obtain documentation from EH&S or prepare a Phase I Environmental Site Assessment (ESA) assessing the land use history of the proposed project site and identify potential hazardous materials concerns, including, but not limited to, fuel tanks, chemical storage, presence of elemental mercury, elevator pistons and associated hydraulic oil reservoirs and piping, heating-oil USTs, or agricultural uses. If the Phase I ESAs, or similar documentation, identify recognized environmental conditions or potential concern areas, a Phase II ESA would be conducted in coordination with EH&S to determine whether the soil, groundwater, and/or soil vapor has been impacted at concentrations exceeding regulatory screening levels for residential or commercial/industrial type land uses (as applicable). If the Phase II ESA concludes that the site is or may be impacted and could affect the planned development, assessment, remediation, or corrective action (e.g., removal of contaminated soil, in-situ treatment, capping, engineering controls) would be conducted prior to or during construction under the oversight of federal, State, and/or local agencies (e.g., US EPA, DTSC, RWQCB, RFD, RCDEH) and in full compliance with current and applicable federal and State laws and regulations, including but are not limited to the California Environmental Quality Act (CEQA). Assessment, remediation, or corrective action must be evaluated under CEQA prior to commencing the assessment, remediation, or corrective action. Additionally, Voluntary Cleanup Agreements may be used for parcels where remediation or long-term monitoring is necessary.

Responsible Agency and South Coast AQMD Permits and Rules

Disturbing and excavated soils that may contain hydrocarbons or toxic air contaminants are subject to the requirements of South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil⁴, and Rule 1466 – Control of Particulate Emissions

⁴ South Coast AQMD. Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

from Soils with Toxic Air Contaminants⁵. Since the soil and environmental site assessments are reasonably foreseeable under Mitigation Measure (MM) HAZ-1, the Lead Agency should include a discussion on South Coast AQMD Rules 1166 and 1466 in the Air Quality Section of the Final EIR.

L4-4
cont'd

If the soil and environmental site assessments involve the use of equipment which either emits or controls air pollution, South Coast AQMD staff should be consulted in advance to determine whether or not any permits or plans are required to be filed and approved by South Coast AQMD prior to the operation of such equipment, and to identify if any other South Coast AQMD Rules, such as Rule 431.2 – Sulfur Content of Liquid Fuels⁶ and Rule 1110.2 – Emissions from Gaseous and Liquid-Fueled Engines⁷ will be applicable to the Proposed Project and discussed in the Final EIR.

L4-5

Operation of portable engines and portable equipment units of 50 brake horsepower or greater (> 50bhp) that emit particulate matter requires a permit from South Coast AQMD or registration under the Portable Equipment Registration Program (PERP) through the California Air Resources Board (CARB)⁸. The Lead Agency should consult with South Coast AQMD's Engineering and Permitting staff to determine if there is any diesel-powered equipment during implementation that will require a South Coast AQMD permit or if the equipment will need to be registered under the PERP through CARB. If a permit from South Coast AQMD is required, South Coast AQMD is a Responsible Agency for the Proposed Project and should be identified in the Final EIR. Any assumptions used in the Air Quality Analysis in the Final EIR will be used as the basis for permit conditions and limits for the Proposed Project. Should there be any questions on permits, please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>. For more information on the PERP Program, please contact CARB at (916) 324-5869 or visit CARB's webpage at: <https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp>.

L4-6

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, if the Lead Agency makes the findings that recommended revisions to the existing mitigation measures are

L4-7

⁵ South Coast AQMD. Rule 1466 – control of Particulate Emissions from Soils with Toxic Air Contaminants. Accessed at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>.

⁶ South Coast AQMD. Rule 431.2 – Sulfur Content of Liquid Fuels. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-431-2.pdf>.

⁷ South Coast AQMD. Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1110-2.pdf>.

⁸ South Coast AQMD. *Portable Equipment Registration Program (PERP)*. Accessed at: <http://www.aqmd.gov/home/permits/equipment-registration/perp>.

not feasible, the Lead Agency should describe the specific reasons supported by substantial evidence for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at lsun@aqmd.gov should you have any questions.

L4-7
cont'd

Sincerely,

Lijin Sun

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:ST

RVC210713-08

Control Number



September 3, 2021

VIA E-MAIL

Stephanie Tang
Campus Environmental Planner
Planning, Design & Construction
University of California, Riverside
1223 University Avenue, Suite 240
Riverside, CA 92507
ceqa@ucr.edu

Re: Draft Environmental Impact Report for the University of California Riverside 2021 Long Range Development Plan (SCH# 2020070120)

Dear Ms. Tang,

This letter is submitted on behalf of University Neighborhood Association in connection with the draft Environmental Impact Report (EIR) for the 2021 Long Range Development Plan (LRDP) for the University of California Riverside (UCR).

O1-1

I. Introduction

The California Environmental Quality Act ("CEQA"), Pub. Res. Code §§ 21000 - 211 77, must be interpreted "so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language." *Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal. App. 3d 247, 259. If an EIR fails to provide agency decision-makers and the public with all relevant information regarding a project that is necessary for informed decision-making and informed public participation, the EIR is legally deficient, and the agency's decision must be set aside. *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal. App. 3d 692, 712. An EIR is "aptly described as the 'heart of CEQA'"; its purpose is to inform the public and its responsible officials of the environmental consequences before they are made. *Laurel Heights Improvement Assoc. v. University of California* (1988) 47 Cal.3d 376, 392.

O1-2

The proposed EIR violates CEQA in that the discussion of associated impacts is inadequate, it fails to adequately consider the cumulative impacts of the LRDP on neighboring communities, it fails to adequately consider feasible mitigation measures, and it was not prepared with a sufficient degree of analysis. For these reasons, the University Neighborhood Association urges you to reject the EIR as drafted.

O1-2
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II. The Draft EIR's Discussion of Associated Impacts is Inadequate

The EIR's analysis of potential impacts of the proposed 2021 LRDP is inadequate. "An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences." CEQA Guidelines § 15151. A review of the sufficiency of an EIR must evaluate "for adequacy, completeness and a good-faith effort at full disclosure." *Berkley Keep Jets of the Bay Committee v. Board of Port Commissioners of the City of Oakland* (2001) 91 Cal.App.4th 1344, 1355 (quoting *Rio Vista Farm Bureau Center v. City of Solano* (1992) 5 Cal.App.4th 351, 368).

O1-3

"A prejudicial abuse of discretion occurs "if the failure to include relevant information precludes informed decisionmaking and informed public participation, thereby thwarting the statutory goals of the EIR process.'" *See Berkley*, 91 Cal.App.4th at 1355 (quoting *San Juaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 722). Regarding the sufficiency of an EIR's analysis, the question is "whether the EIR contained sufficient information about a proposed project, the site and surrounding area and the projected environmental impacts arising as a result of the proposed project or activity to allow for an informed decision." *Id.* at 1355 – 1356.

A. Aesthetics

The EIR claims that construction of new facilities, renovations of existing structures, and other physical changes to the UCR campus will not degrade the visual character of the campus or surrounding areas. EIR at 4.1-48. The EIR claims no mitigation measures are required as impacts would be less than significant. *Id.* However, the LRDP's Land Use objectives of increasing student housing from 27% to 40% by creating higher density structures and student life facilities directly contradicts this notion as this will certainly change the visual character of the campus significantly. EIR at 4.1-44. Thus, the EIR fails to adequately associate the impacts of future growth on the aesthetics of the campus.

O1-4

The EIR focuses on the aesthetics of the UCR campus but makes no acknowledgment of how this development will change the aesthetics of the neighboring residential neighborhoods. The EIR simply mentions projects implemented under the 2021 LRDP will comply with existing procedures pertaining to development within the UCR Physical Design Framework but doesn't provide details on how that design review will assure impacts remain less than significant, particularly on surrounding communities. EIR at 4.1-47. Thus, the EIR appears to improperly omit such analysis by claiming that consistency with its own Framework will be determined in the future on a project-by-project basis. Such piecemealing of a required analysis in an EIR is

O1-5

forbidden under CEQA. See *Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1222.

O1-5
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B. Air Quality

The EIR claims the proposed LRDP would not generate population, housing, or employment growth exceeding forecasts in the 2016 Air Quality Management Plan and therefore impacts would be less than significant. EIR at 4.3-29. However, the EIR assumes that “much of the campus population projected in the proposed 2021 LRDP will have already been accounted for in existing and/or projected population growth in the inland Southern California region.” EIR at 4.3-30. The EIR provides no facts or evidence that this assumption is true. Further, this only accounts for most of the population and not the entire projected growth. Thus, the EIR cannot reasonably assume the LRDP will not generate population, housing, or employment growth outside of current forecasts. By making this assumption the EIR fails to adequately analyze the potential impacts to air quality on campus and the surrounding neighborhoods.

O1-6

The EIR states that construction of the proposed LRDP would generate reactive organic gases, nitrogen oxides, and particulate matter beyond significant thresholds established by the South Coast Air Quality Management District, but that these impacts are unavoidable even with the implementation of mitigation measures. EIR at 4.3-31. The EIR also concedes the impacts would not only occur during the construction phase, but “would result in long-term air pollution emissions over the course of operations” as well. EIR at 4.3-32. Finally, the EIR acknowledges “at this stage of planning, project design features and mitigation are not available that would feasibly reduce impacts...to a less-than-significant level. Therefore, impacts from construction and operational emissions would be significant and unavoidable.” EIR at 4.3-33.

O1-7

Thus, the EIR fails to adequately consider and analyze mitigation measures for these emissions and simply claims no feasible measures to mitigate the long-term effects of emissions exists. In such an instance, the EIR “must make a finding that mitigation is infeasible and overruling considerations outweigh the significant environmental effects.” *Federation of Hillside and Canyon Assoc. v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1260 (Federation) (quoting Pub. Resources Code § 21081(a)); see also CEQA Guidelines § 15091(a). But the EIR here fails to make any such finding relating to mitigation of air quality.

C. Energy

The EIR states the proposed LRDP would consume electricity, natural gas, and fuel during construction and operation that would exceed the UCR and Annualized Regional 2018 Per Capita Energy Use threshold, but that impacts will be less than significant with implementation of mitigation. EIR at 4.6-28. The EIR’s mitigation measures focus on the purchase of “100 percent clean-sourced electricity through either Riverside Public Utilities and/or through the installation of on-site clean-sourced electricity sources for all new buildings by 2025.” EIR at 4.6-33. However, the EIR goes on to say that funding for these mitigation measures will come from future annual budgets which have not yet been established or created. *Id.* This is improper. Fee-based mitigation may be sufficient under CEQA but only when there is

O1-8

evidence that the mitigation will actually occur. Also, fee-based mitigation from one source requires such funds be set aside for that purpose. Speculative future monetary contributions cannot be used as an effective mitigation method. *Endangered Habitats League v. County of Orange* (2005) 131 Cal.App.4th 777, 793. Here, there is no evidence that such mitigation will actually occur as the budget plans will not be created until a future date.

O1-8
cont'd

Additionally, the EIR states the impacts to energy usage due to construction and operation of the new and renovated buildings under the LRDP would be less than significant and requires no mitigation measures because they will comply with applicable state and UCR energy policies and regulations. EIR at 4.6-36. As stated above, UCR cannot omit analysis or depend on compliance with other policies and regulations as a means to mitigate future impacts on the environment. This analysis is improper and inadequate. *See supra, Banning Ranch Conservancy* (2017) 2 Cal.5th 918, 936.

O1-9

D. Greenhouse Gas Emissions

The EIR states the proposed LRDP will directly and indirectly generate greenhouse gas emissions that will have a significant impact on the environment, but that through mitigation measures the impact will diminish to less than significant status. EIR at 4.8-32. However, the mitigation measures presented by the EIR are insufficient. One consists of the same mitigation measure presented in the Energy impacts section 4.6, relying on monetary funding from future annual budgets for the purchase of 100 percent clean-sourced electricity. EIR at 4.8-36. Additionally, a separate mitigation measure states UCR will purchase biogas for at least 40 percent of the total on-campus natural gas usage but doesn't provide any details on when this will occur or with what funds. EIR at 4.8-35. As discussed above, speculative future monetary contributions cannot be used as an effective mitigation method. *See supra, Endangered Habitats League* (2005) 131 Cal.App.4th 777, 793.

O1-10

Other mitigation measures mention UCR will "prioritize" construction of all-electric building design for new buildings and structures and "discourage" the construction and connection of new fossil fuel combustion infrastructure on campus. EIR at 4.8-35. These plans are vague and show no evidence on whether they will actually occur. CEQA is premised in part on "a belief that citizens can make important contributions to environmental protection and ... notions of democratic decision-making ..." *Concerned Citizens of Costa Mesa, Inc. v. 32nd Agricultural Assoc.* (1986) 42 Cal.3d 929, 936. "Environmental review derives its vitality from public participation." *Ocean View Estates Homeowners Assn. v. Montecito Water Dist.* (2004) 116 Cal.App.4th 396, 400. The failure to provide adequate information deprives the public of adequate notice and the opportunity for public input regarding the Project.

O1-11

Additionally, the EIR states "in order to obtain electricity from 100 percent renewable source(s) for all existing buildings by 2045, UCR shall renegotiate its contractual agreement with Riverside Public Utilities to establish a schedule and specific goals for obtaining 100 percent renewable electricity for the campus." EIR at 4.8-36. Mitigation measures cannot be based on future contracts and agreements that have not yet come to fruition and must be based on reliable and confirmed methods of forecasting in order to provide evidence of actual reductions in impact

O1-12

levels. When a project requires deferral of specific mitigation measures to a later time, an agency may not simply require future negotiations or studies but must “articulate specific performance criteria and make further approvals contingent on finding a way to meet them.” *See supra, Endangered Habitats League* (2005) 131 Cal.App.4th 777, 793 (discussing *Defend the Bay v. City of Irvine* (2004) 119 Cal.App.4th 1261 – 1275 – 1276). The EIR fails to meet this requirement.

O1-12
cont'd

Finally, the ERI states emissions during construction and operation are projected to exceed the state targets and UCR-derived Greenhouse gas emission threshold and therefore would conflict with the goals of applicable plans, policies, and regulations adopted for the purpose of reducing emissions from greenhouse gases. The EIR states that with mitigation measures implemented the impact will be less than significant. EIR at 4.8-42. However, as discussed above, the mitigation measures proposed by the EIR are insufficient in that they lack the required detail and evidence to support the findings, the measure are fee-based without any guarantee the funds will be available and actually used for these purposes and are relying on future contract negotiations with local utilities. As such the mitigation measures are inadequate and do not comply with CEQA and thus cannot be relied on to diminish the significant impact of these emissions on the environment.

O1-13

E. Hazards and Hazardous Materials

The EIR states the LRDP could result in an increased use, transport, or disposal of hazardous materials during facility operations, but that impacts would be less than significant because UCR is subject to federal, state, and UCR policies designed to minimize risk of endangerment to the campus population, the public, and the environment. EIR at 4.9-30. As stated above, UCR cannot omit analysis or depend on compliance with other policies and regulations as a means to mitigate future impacts on the environment. This analysis is improper and inadequate. *See supra, Banning Ranch Conservancy* (2017) 2 Cal.5th 918, 936.

O1-14

The EIR only mentions these regulations but fails to properly incorporate them as to provide the public with adequate notice and detail in order to make an informed decision on the adequacy of the EIR. EIR at 4.9-30. Access to referenced documents is critical for informed participation in the CEQA process. *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 730 (quoting *McQueen v. Board of Directors* (1988) 202 Cal.App.3d 1136, 1143).

O1-15

F. Hydrology and Water Quality

The EIR states construction and operation of the LRDP will occur in compliance with applicable water quality standards and waste discharge requirements to an extent where potential water quality impacts would be less than significant without the implementation of any mitigation measures. EIR at 4.10-34. It also states that potential impacts to groundwater supplies and recharge would be less than significant requiring no mitigation. *Id.*

O1-16

There is an inadequate discussion of drought or possible water shortages of future water

O1-17

supplies for the LRDP and the area as a whole. “An EIR must address the impacts of likely future water sources, and the EIR’s discussion must include a reasoned analysis of the circumstances affecting the likelihood the water’s availability.” *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 430 – 32

O1-17
cont'd

G. Noise

The EIR acknowledges vibration from construction may exceed applicable standards and are potentially significant but claim impacts will diminish to less than significant with mitigation measures. EIR at 4.11-30. However, the EIR fails to provide specific performance criteria for associated mitigation measures, and simply states that nearby academic and residential facilities will be notified of construction activities, a method which will not decrease impact in the slightest. EIR at 4.11-31. The EIR improperly calls for future vibration analysis. *Id.* An agency may not simply require future study of mitigation but should “commit to mitigation and set out standards for a plan to follow.” *See supra, Endangered Habitats League*, 131 Cal.App.4th at 793. Thus, the EIR fails to adequately discuss noise impacts and mitigation from construction vibration.

O1-18

The EIR dismisses substantial construction noise impacts because they will be temporary. EIR at 4.11-21. But the temporary nature of a noise impact does not make it insignificant. *Berkeley Keep Jets Over the Bay Comm. v. Board of Port Commissioners* (2001) 91 Cal.App.4th 1344, 1380 – 81. The EIR acknowledges significant noise impacts from construction but provides vague mitigation measures which do not include any commitment to a particular noise level. The lack of details makes this analysis insufficient. *See Citizens for Responsible and Open Government v. City of Grand Terrace* (2008) 160 Cal.App.4th 1323, 1341 (“there is no evidence of any measures to be taken that would ensure that the noise standards would be effectively monitored and vigorously enforced”).

O1-19

The EIR’s discussion of permanent increase in ambient noise from the significant increase in student population is similarly deficient. EIR at 4.11-21. The analysis lacks specificity and relies on future analysis after construction is complete, despite the fact the proposed LRDP will have construction phases throughout the years into 2035, where construction and operation will occur simultaneously. The EIR also relies on future buildings acting as “acoustical barriers to existing noise sources” but provides no evidence of how the location of various buildings will act as barriers for noise impacts. *Id.*

O1-20

H. Traffic and Transportation

The EIR assumes that increased availability of student housing will lead to less vehicles commuting to campus and thus less traffic and transportation impacts to the environment. EIR at 4.15-29. However, 60% of students will be living either off-campus in neighboring communities or in other areas of the state, even with the attainment of student housing goals within the LRDP. EIR at 4.12-17. Thus, the assumption that an increase in student housing beds will aid in diminishing traffic and transportation impacts to the environment is incomplete as it does not consider the impacts of student population growth as a whole.

O1-21

Additionally, the EIR states the increased use of alternative modes of travel would result in lower vehicle miles traveled generated by campus overtime resulting in less than significant impacts with no mitigation measures required. EIR at 4.15-29. However, the exacerbated conditions of the roadways created by the significant population growth estimated by the LRDP must be mitigated in order to reduce impacts to the environment. The EIR fails to acknowledge the increase to parking structures on campus will itself leads to additional vehicle miles traveled to and from the UCR campus.

O1-22

III. The Draft EIR Fails to Adequately Consider Cumulative Impacts on Neighboring Communities

Cumulative impact analysis is essential to accomplishing the overall intent of CEQA of “preventing environmental damage, while providing a decent home and satisfying living environment for every Californian” Pub. Res. Code § 21002(g). By looking outside of a particular project site, a cumulative impact analysis allows decisionmakers to look at the impacts of a project within the greater context. Here, the EIR has failed to adequately consider the cumulative impacts the proposed LRDP will have in a greater context, and neglects to evaluate the areas surrounding UCR’s campus.

O1-23

A. Population and Housing

A primary goal of the proposed LRDP is to expand enrollment capacity up to 35,000 students through 2035, a 46% increase from the 2018/2019 academic year student population. EIR at 4.12-17. It is also anticipated that approximately 7,545 total faculty and staff will be needed to support the projected student enrollment in 2035, a 60% increase from the 2018/2019 academic year. *Id.* This substantial increase is certain to lead to significant impacts to the population and housing of the surrounding neighborhoods. The EIR fails to adequately consider these impacts by claiming direct and indirect impacts related to population growth would be less than significant and thus require no mitigation measures. EIR at 4.12-19.

O1-24

The EIR concedes that an average of 80,000 homes have been built in the state per year since 2007, which is far below the 180,0000 annually estimated to be demanded by California’s growing population from 2015 through 2025. EIR at 4.12-1. Despite this, the LRDP proposes an expansion of approximately 14,000 new beds, which will ensure housing for 40% of the student population. EIR at 4.12-17. And while this is an increase from the current 27% presently housed on campus, the LRDP still results in 60% of the student population leaning on the surrounding communities for housing options. This increase in student population will impact housing availability and population density in nearby areas, and the EIR fails to adequately address and evaluate these issues.

O1-25

UCR’s Housing Policy guarantees on-campus housing only to eligible freshman students. Many sophomores, juniors, and seniors are not guaranteed housing on campus and thus must look for other housing options within the neighboring communities if they wish to avoid long distance commutes to campus. EIR at 4.12-15. Also, freshman students are not required by UCR’s Housing Policy to live on campus, and thus could opt to live off-campus in neighboring

O1-26

communities as well. Finally, transfer students are not guaranteed on-campus housing and also often rely on off-campus housing options. *Id.*

An EIR must show a reasonable effort to substantively connect a project's impacts to likely consequences. *Sierra Club v. County of Fresno* (Dec. 24, 2018) 6 Cal.5th 502. Here the EIR assumes the increase in housing availability nullifies the need to properly analyze the impacts the increase in student population will have on housing availability and population density in neighboring communities. A reasonable effort would analyze the connection between the LRDP student population increase and the associated impacts. Therefore, the EIR cannot support its claim that the increase in student population will not have direct or indirect impacts to the neighboring communities.

O1-26
cont'd

B. Recreation

The substantial increase in student population proposed by the LRDP will contribute to the acceleration of physical deterioration and degradation of local parks, recreational trails for hiking, biking, and equestrian activities, archeological sites, wildlife reserves, and other natural areas within the community. The increase in population will reasonably lead to increase in use of these neighborhood open spaces. These additional uses may require the construction or expansion of recreational facilities which may have an adverse physical impact on the environment.

O1-27

The EIR assumes the existing and newly proposed recreational facilities on campus will adequately serve and accommodate the growing campus population such that impacts to the neighboring community would be less than significant. EIR at 4.14-14. To assume the student population would not use recreational facilities outside of campus is unreasonable and unfounded. The EIR concedes the proposed LRDP would incrementally result in an increase in off-campus residents of approximately 6,395 people by academic year 2035/2036 but states the campus population would continue to have full access to on-campus parks and recreational facilities which would reduce the need to use off-campus community facilities. *Id.* While students will have access to on-campus recreational facilities, they may still use off-campus facilities, particularly the students who live off campus. Thus, the likely significant impacts on community open spaces are not considered nor mitigated in the 2021 LRDP.

O1-28

Additionally, the EIR states the development of new on-campus recreational facilities and open spaces may have an adverse physical effect on the environment, but that environmental impacts would be less than significant without any additional mitigation. The EIR contradicts itself and states no additional impacts to the environment were found and therefore impacts are considered less than significant without additional mitigation. EIR at 4.14-19. The EIR does not expand or explain this conclusion, and thus improperly evaluated the cumulative impacts the increase in student population will have on recreational facilities.

O1-29

IV. The Draft EIR Fails to Adequately Consider Feasible Mitigation Measures

The California Supreme Court has recognized there is no "legally unsupportable distinction between environmental impacts occurring on the project site and those occurring off-

O1-30

site. CEQA draws no such distinction for purposes of mitigation. Instead, CEQA defines the “environment” as “the physical conditions which exist within the area which will be affected by a proposed project. (Pub. Resources Code, § 21060.5)” *City of San Diego v. Bd. of Trustees of California State Univ.*, (2015) 61 Cal. 4th 945, 961.

O1-30
cont'd

Thus, mitigation measures must be evaluated and considered whether the impacts fall within the project site or outside of it. Here, the EIR fails to adequately address and consider feasible mitigation measures for impacts that fall outside of the UCR campus.

A. Aesthetics

The 2021 LRDP contains Open Space objectives, some of which prioritize maintaining views to Box Spring Mountains at the terminus of view corridors and from primary campus open spaces. EIR at 4.1-45. However, the EIR states the proposed LRDP will block or impede views of scenic vistas, namely of the Box Spring Mountains, and determines these impacts will be significant but unavoidable. EIR at 4.1-46. The EIR does not recommend any mitigation measures for these impacts. *Id.* This is both inconsistent with the objectives of the LRDP and with the requirements under CEQA.

O1-31

B. Agricultural Lands

The UCR campus contains 21 different fields and many agricultural facilities such as greenhouses and services for research projects. EIR at 4.2-1. The proposed 2021 LRDP would impact fewer acres of agricultural lands than previous UCR LRDPs, but this reduction of loss of acreage does not offset the net reduction in agricultural lands in the region. The proposed LRDP would still reduce land available for agricultural uses and research in comparison to existing conditions. EIR at 4.2-8. The EIR refuses to adequately consider feasible mitigation measures to this impact, and simply states no new agricultural lands are being created in the vicinity of the campus, thus no feasible mitigation has been identified to reduce this significant impact. EIR at 4.2-5. The EIR states that no mitigation is sufficient to substantially reduce this impact, and therefore impacts would be significant and unavoidable. EIR at 4.2-7. The EIR makes no attempt at evaluating potential mitigation options or alternatives to diminish or avoid this impact and simply concedes the impacts are unavoidable.

O1-32

Additionally, UCR acquired the Coachella Valley Agricultural Research Station, a 540-acre facility, as a mitigation measure resulting from an earlier LRDP which called for the conversion of approximately 125 acres of agricultural land into non-agricultural uses as a means to “reduce the programmatic loss of the 125 acres of agricultural land on campus.” EIR at 4.2-5. This Research Station has been used as a mitigation measure since the 2005 LRDP and will now continue to be used as a mitigation measure for the 2021 LRDP. However, the EIR concedes this mitigation measure “does not fully offset the net reduction in farmland in the region...As such, impacts would be significant and unavoidable.” EIR at 4.2-10. Thus, the EIR did not consider feasible mitigation measures in relation to the loss of agricultural lands on campus.

O1-33

C. Biological Resources

The EIR has classified various vegetation types as existing or not existing within a Sensitive Natural Community. EIR Table 4.4-1 at 4.4-4. The EIR classifies the vegetation deemed to not be within a Sensitive Natural Community as not requiring additional mitigation efforts because the particular area has somehow been modified as mitigation for a previous project. EIR at 4.4-7-11. This conclusion is unreasonable and unfounded. Impacts to species must still be mitigated despite the fact their environments have been modified previously. The EIR demonstrates no applicable reasoning as to why a previously modified space does not warrant environmental protection. The mitigation measures identified in the EIR must apply to all plant and wildlife species that will be impacted by the proposed LRDP.

O1-34

Additionally, according to the applicable Biology Guidelines “it is highly recommended that field surveys be performed when the majority of critical resources can be best evaluated.” SD Mun. Code, Land Development Biology Guidelines, Sec. 1, at 78. However, plant and wildlife surveys for the EIR were conducted in December, when a large variety of plant and wildlife resources are dormant. EIR at 4.4-1. As a result, survey efforts completely missed the spring flowering period for plants and spring mating season for wild species. Biological surveys conducted for CEQA review must also include a spring survey in order to detect the proper existing biological resources. Without establishing which biological resources need protection the EIR cannot properly determine the necessary mitigation measures required to offset the impacts to these species. Thus, the EIR failed to adequately survey the areas potentially impacted by the LRDP, and therefore violated CEQA.

O1-35

D. Public Services

The City of Riverside Fire Prevention Division submitted comments in response to UCR’s Notice of Preparation stating the significant increase in student population proposed by the LRDP will increase density on campus and as a result will require additional public services in the form of police and fire safety for all students, faculty, staff, and citizens who live in surrounding neighborhoods. They recommended placing a new fire station on or near the UCR campus to ensure the local Fire Department can continue to protect the community. EIR ES-8.

Despite this, the EIR claims the LRDP will not increase demand to a level that will require a new fire protection facility or substantial alterations to existing facilities and claimed impacts would be less than significant requiring no mitigation measures. EIR at 4.13-15. The EIR states “it can be anticipated that RFD would potentially need to increase fire protection staff, and potentially additional equipment to accommodate an increased call volume...the proposed 2021 LRDP would not fundamentally change the nature of campus operations, and several older structures would be retrofitted or replaced with modern structures requiring compliance with current and more stringent fire code requirements, providing fire safety benefits in comparison to the baseline structures.” EIR at 4.13-16.

O1-36

The EIR’s reasoning as to why a new fire station is not needed is erroneous. Buildings that are in compliance with modern fire codes still may catch fire or require assistance from the

fire department. The EIR concedes the increase in campus population accommodated by the proposed 2021 LRDP may increase the fire department's call volume, but still neglects to consider feasible mitigation efforts for this impact.

O1-36
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E. Traffic and Transportation

The EIR also acknowledges the increase in campus population would result in impacts related to AM peak hour queueing at the I-215/SR-60 Freeway Southbound Ramps at Martin Luther King Boulevard. EIR at 4.15-31. However, the EIR concedes a mitigation measure has only been proposed but its implementation is uncertain at this time leading to impacts that would be significant and unavoidable. This analysis is insufficient because it does not demonstrate any evidence as to why the mitigation measures have not fully been adopted or approved and does not recommend other additional measures to prevent the significant impact to the environment.

O1-37

V. The EIR Fails to Adequately Consider Feasible Alternatives

CEQA requires that an EIR "produce information sufficient to permit a reasonable choice of alternatives so far as environmental aspects are concerned." *San Bernardino Valley Audubon Society v. County of San Bernardino* (1984) 155 Cal.App.3d 738, 750 – 751. To accomplish this, the EIR "must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation." CEQA Guidelines § 15126.6(a). "The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects." CEQA Guidelines § 15126.6(c).

O1-38

The EIR discusses what it calls the "Reduced Development Program" alternative. EIR at 6-5. According to the EIR this alternative, compared to the preferred 2021 LRDP, would lessen or avoid impacts to biological resources, energy consumption, greenhouse gas emissions, noise, transportation, and utility and service systems. This alternative would also accomplish many of the 2021 LRDP objectives by still allowing development of student housing and increase in student population. EIR at 6-20.

O1-39

CEQA contains a "substantive mandate" that agencies refrain from approving a project with significant environmental effects if "there are feasible alternatives or mitigation measures" that can substantially lessen or avoid those effects. *Mountain Lion Foundation v. Fish and Game Comm.* (1997) 16 Cal.4th 105, 134; Pub. Res. Code § 21002. Despite this alternative decreasing various environmental impacts it was not the preferred alternative seemingly because it limits expansion on one portion of the UCR campus.

The EIR identifies the "Increased Student Housing" alternative as the environmentally superior alternative. EIR at 6-42. It states this alternative would result in fewer impacts related to air quality, fuel consumption, greenhouse gas emissions, population and housing, and transportation. *Id.* However, this alternative simply allows UCR to develop more housing and expand its student population above what is currently proposed in the 2021 LRDP. The EIR fails to adequately analyze how this will decrease impacts on the areas discussed above and relies on

O1-40

the EIR's inadequate mitigation measures as reasoning for diminishing impacts on the environment.

O1-40
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“[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” CEQA Guidelines § 15126.6(b). Importantly: “An environmentally superior alternative cannot be deemed infeasible absent evidence the additional costs or lost profits are so severe the project would become impractical.” *See supra, Kings County Farm Bureau*, 221 Cal.App.3d at 736. The EIR fails to provide evidence of additional costs or lost profits that would make the environmentally superior alternative impractical. Thus, the Reduced Development Program alternative should be chosen as the feasible alternative capable of accomplishing the majority of the objectives while lessening the environmental impacts of the 2021 LRDP.

O1-41

VI. The EIR Must be Recirculated

The draft EIR claims to be a program EIR for the 2021 LRDP. “A program EIR will be most helpful in dealing with subsequent activities if it deals with the effects of the program as specifically and comprehensively as possible.” CEQA Guidelines § 15168(c)(5). Future projects and project EIR's within the 2021 LRDP would be tiered from the draft EIR. “Tiering does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects of the project and does not justify deferring such analysis to a later tier EIR or negative declaration.” *Id.* at § 15152(a).

O1-42

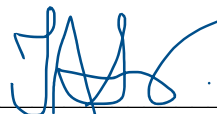
The draft EIR's discussions and analyses are sufficiently lacking as a program EIR and must be significantly revised and recirculated.

VII. Conclusion

Thank you for your consideration of these concerns.

O1-43

Sincerely,



Isabela Rodriguez, Esq.

DeLano & DeLano

Attorneys for University Neighborhood Association

Letter O2

From: [REDACTED]
To: ceqa@ucr.edu
Cc: [REDACTED]
Subject: LRDP 2021 Comment
Date: Friday, September 3, 2021 4:58:49 PM
Attachments: [UCR LRDP UNA Comment Letter.docx](#)

University of California, Riverside
Office of Planning, Design & Construction
1223 University Avenue, Suite 240
Riverside, California 92507

Attn: Stephanie Tang, Campus Environmental Planner
SUBMITTED via e-mail to CEQA@ucr.edu on September 3, 2021 before 5:00 pm

These comments are in response to UCR's 2021 Long Range Development Plan which addresses only the 1,108 acres of campus land on either side of the I-215/SR-60 freeway in the City of Riverside.

The projected student increase to 35,000 is in addition to City's projected population increase of approximately 56,000. This is in effect equivalent to putting a small city (with inadequate infrastructure to support itself) into the surrounding, already overburdened neighborhoods.

O2-1

The LRDP states a desire to "allow for the growth and expansion of the UCR while ensuring preservation and enhancement of surrounding residential neighborhoods". (4.12-6)

It further states a desire to "enhance the University Neighborhood's quality of life by protecting single family areas, providing quality, affordable housing and enhancing neighborhood shopping". (4.12-6) Yet it offers no definitive policy, practice, or strategy to ensure any meaningful result beyond the merely aspirational.

It further states that "approximately 77 percent of the total campus population requires non-UCR-affiliated housing under baseline conditions." (4.12-8) This need for housing will be met by the city of Riverside and surrounding cities in the region. No evidence is given to validate the claim that there will be no significant impacts to those cities or neighborhoods.

O2-2

The residents of the University Neighborhood are well aware of the impacts from the growth and success of UCR in becoming a campus of choice.

Back in 2013 the University Neighborhood Association (UNA) demanded and got a moratorium on all building permits precisely because the impacts from student housing demand were destroying the single-family character of our neighborhood.

O2-3

Our neighborhood went from over 65% owner occupancy to less than 35%. Long time residents, many with campus ties, sold and moved out of the neighborhood.

As a result of increased campus growth and demand for affordable housing, landlords began cutting up living and dining rooms and making them into bedrooms. It was not unusual to have eight or more students living in a single-family home.

The increase in students residing in these formerly single-family units led to a series of raging parties and disturbances of epic proportions. This further accelerated the exodus of owner-occupied units. Both housing and quality of life conditions were rapidly degrading. Affordability demanded more students crowd into unhealthy and unsafe conditions.

Our sewerage system was not designed for this increased capacity. The resulting pressure on street parking became problematic leading to a neighborhood wide permitted parking system. The LRDP offers no evidence to show that campus growth will not impact sanitary sewerage.

It took several years of close collaboration with the City, UCR and the UNA to bring things back to acceptable behaviors. This was due in large part to the efforts of the UNET Team. (University Neighborhood Enhancement Team). This was a joint UCR/City Police collaboration with each supplying five officers to the team.

Under the leadership of UCR Sgt. Anthony Zamora (retired) and Jeff Kraus in Campus Community Relations, several successful initiatives were instituted to teach students living off campus about community standards and expectations. It was so successful that Jeff Kraus and I presented a Town and Gown success story at a Neighborhoods USA Conference in Eugene, OR.

This promising and by all accounts successful collaboration has effectively evaporated in a matter of months.

This year UCR pulled out of UNET agreement stating that they were deploying their resources to on-campus activities. Jeff Kraus was recently let go due to budget constraints. Mr. Kraus was hired specifically because the 2005 LRDP had grossly underestimated the impacts to the University Neighborhood.

Without UCR's participation in UNET, we have two city officers on patrol for the entire East policing area. This includes several campus adjacent neighborhoods besides the University Neighborhood. Our response times for disruptive student parties is non-existent.

Without Jeff Kraus we have zero contact with campus officials to discuss or plan for solutions to behavior problems we all know will occur and lead to a further degradation of our quality of life. All of UCR's institutional memory and the successful remedies regarding off-campus student behavior are no longer

O2-3
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O2-4
O2-5

O2-6

O2-7

O2-8

in place leaving the UNA at great risk for an accelerated loss of neighborhood quality of life. It also portends great reputational harm to UCR.

02-8
cont'd

The LRDP offers no solution to policing or public safety concerns beyond campus borders. To say there will be no impacts is absurd given the history of campus growth.

02-9

The LRDP states “The nearest county park to the UCR campus is the Box Springs Mountain Reserve, located 0.6 mile east of the campus. The Reserve is on 3,400 acres of land east of Riverside with several miles of multi-use trails (Riverside County 2020a). The system includes a wide variety of formal and informal trails.”

The University Neighborhood borders the Box Springs Mountain Preserve. This is a wilderness preserve that includes a trail to the “C”, a student- built memorial to celebrate UCR. This trail and the entire Preserve has had **all recreational trail access cut**. This happened because a new Metrolink rail line began using the tracks running along the base of the mountain.

All recreational trail access was cut **at the request of UCR** for student safety concerns. Thus access for not only students, but for the thousands of residents who used these trails for decades has been terminated and remains so today.

02-10

At the time access was cut, anyone wishing to use the trails had to cross not only the tracks but also cross private property wilderness parcels. Since that time, those parcels were acquired by the Friends Of Riverside’s Hills and donated to Riverside County Parks with the intention that a bridge and/or tunnel be constructed to reopen safe access.

The LRDP states policies related to parks and recreation in The University Neighborhood Plan . One policy (4.14-10) is “Preservation of the Box Springs Mountain Reserve Park through access restrictions and prevention of off-road vehicles in the open spaces.” I don’t see any evidence to support the claim that access restrictions – zero access currently, will lead to no increases in student use at our other wilderness park sites. If anything, logic would argue for increased usage.

The University Neighborhood does not have any developed parks.

The LRDP states that “The closest City-run parks to the UCR campus are Abdula Park, approximately 0.1 mile southwest of West Campus (approximately 1 mile from International Village), Islander Park, approximately 0.3 mile east of East Campus at the base of the Box Springs Mountains (approximately 0.3 mile from Glen Mor), and Bordwell Park, approximately 0.3 mile west of the West Campus (approximately 0.9 mile from International Village). Other parks near the UCR campus include Highlander Park, approximately 0.2 mile northeast of East Campus (approximately 0.2 mile from Falkirk Apartments), and Mt. Vernon Park, approximately 0.7 mile northeast of East Campus (approximately 0.7 mile northeast of Glen Mor).”

02-11

Islander Park is the closest city park and it is a wilderness park – only trails. The swimming pool is closed most of the year. The city parks referenced in the LRDP are either not close enough for students to walk to or are wilderness parks under pressure from increased usage.

UCR uses the following significance criteria questions related to recreation. Would the proposed 2021 LRDP: Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

02-11
cont'd

The LRDP concludes . “THE PROPOSED 2021 LRDP WOULD NOT INCREASE THE USE OF EXISTING NEIGHBORHOOD AND REGIONAL PARKS OR OTHER RECREATIONAL FACILITIES SUCH THAT SUBSTANTIAL PHYSICAL DETERIORATION OF THOSE FACILITIES WOULD OCCUR OR BE ACCELERATED. IMPACTS RELATED TO INCREASED USE OF PARKS AND RECREATIONAL FACILITIES WOULD BE LESS THAN SIGNIFICANT. NO MITIGATION MEASURES ARE REQUIRED”.

The assumption that campus growth will have no impact on our parks has already been demonstrated to be false. We went from being under-parked per capita, to becoming even more under-parked with the elimination of the Box Springs Mountain Preserve.

I realize that open space parks and developed parks are two different categories. However, when a neighborhood has only undeveloped, open space parks, and while access to those parks are curtailed or eliminated, the claim of no significant increase in usage can certainly be made, but that goal has come at the expense of an entire community losing access to a singular, treasured neighborhood amenity.

02-12

To claim no deterioration at our other wilderness parks due to campus growth defies logic and is unsupported by any evidence. Sycamore Canyon Wilderness Park has massive trail degradation and erosion due to off trail bike riding. The fencing along the Metrolink line has been repeatedly cut to allow access to neighborhood trails. This is an unsafe condition and unlikely to keep everyone off the trails.

Thank you for your consideration of these comments on behalf of the entire University Neighborhood Association.

02-13

Gurumantra Khalsa

Co-Chair University Neighborhood Assn.

[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
To: [Stephanie Tang](#); [Jeff Kraus](#)
Cc: [REDACTED]
Subject: Re: Notice of Availability of a Draft EIR for the UCR 2021 Long Range Development Plan
Date: Thursday, July 15, 2021 2:55:17 AM

Dear Ms. Tang:

I have just been informed that UCR fired Jeff the week before last, only giving him to the end of the day to clear out his office.

UCR did not interview him on the way out, did not bother to get his contact list or find out what were the things he was working on.

The Vice Chancellor he was working for is supposed to take over his responsibilities, but she commutes from Indio. I do not know her name.

Since you work for UCR, please find out who is handling the community liaison now, so she can be copied with these e-mails. She probably doesn't know about the Settlement Agreement; that may be why UCR fired Jeff -- because he KNEW, and organized the two-pre-CEQA meetings.

Thank you,

Letitia E. Pepper, SBL 105277

On Thursday, July 15, 2021, 1:05:01 AM PDT, Letitia Pepper [REDACTED] wrote:

Dear Ms. Tang:

Well, Jeff Kraus's e-mail just bounced back, so maybe Jeff finally retired from UCR. That may explain why no one bothered to mention to you the Settlement Agreement and the

I1-5

I1-4

need for two pre-CEQA meetings with our neighborhood before any CEQA project can begin.

Has UCR abandoned have a Community Liason Officer? If not, wold you please give me the name and contact information for Jeff's successor?

11-4
cont'd

Again, please hit "reply all" when you respond, so the other interested parties -- who knew Jeff -- can have that information as well.

Thank you,

Letitia E. Pepper

On Thursday, July 15, 2021, 12:44:21 AM PDT, Letitia Pepper [REDACTED] wrote:

Ms. Tang and Jeff Kraus:

Re this announcement about the LRDP:

First, I believe that Newson's Executive Order re in-person meetings has expired. Therefore, UCR must hold in-person meetings about this plan.

11-1

Second, regardless of whether that order has expired, UCR signed a Settlement Agreement with Smart Neighbors for Smart Growth several years ago. That Settlement Agreement requires UCR to hold two meetings with the nearby residents

11-2

(who would include the members of Smart Neighbors and the University Neighborhood Association) BEFORE it engages in any CEQA-related project.

The LRDP is a CEQA-related project. Therefore, before UCR begins CEQ-required meetings on the LRDP, it first needs to fulfill the prerequisite two meetings with us, the nearby residents who obtained this contractual concession from UCR. With us, not with the City at large.

I've included Jeff Kraus in this email because he knows all about this. Don't you, Jeff?

Also, UCR cannot unilaterally decide to whom in our neighborhood to give emailed notice of those two neighborhood meetings. There is no way we can be sure that UCR's emails went to everyone in our area -- as opposed to the City at large.

So UCR is going to have to coordinate with us to send out notices to the nearby residents about the two pre-requisite meetings that must be held before anything on the LRDP can be held. Since there is not a master e-mail list for area residents, this is going to need to involve signage and notices taken door to door -- notices whose contents will need to be approved by Smart Neighbors for Samrt Growth and the UNA leadership.

We look forward to your response; please "reply all" to this e-mail.

11-2
cont'd

11-3

Sincerely,

Letitia E. Pepper, SBL 105277, UNA and Smart Neighbors
member and neighborhood resident since 1982

On Wednesday, July 14, 2021, 1:11:48 PM PDT, Stephanie Tang <stephanie.tang@ucr.edu> wrote:

Hi,

Pursuant to the State of California Public Resources Code 21091 (a) and Sections 15087 and 15085 of the Guidelines of the Implementation of the California Environmental Quality Act (CEQA Guidelines), the University of California, Riverside (UCR) has released for public review a Draft Environmental Impact Report (DEIR) on the 2021 Long Range Development Plan (2021 LRDP).

The proposed 2021 LRDP is intended to guide development on the main UCR campus (900 University Avenue Riverside, California 92521) for the next 15 years. Development under the proposed 2021 LRDP is designed to accommodate a total projected enrollment of approximately 35,000 students (Fall quarter headcount) by the academic year 2035/2036. The proposed 2021 LRDP would guide long-range land use development, open space preservation and improvements, multi-modal mobility planning, and infrastructure sustainability and resiliency efforts. Through gradual phased development, the goal of the proposed 2021 LRDP is to accommodate the enrollment growth and meet program needs in an efficient and sustainable manner.

To accommodate the anticipated increase of approximately 11,078 students (7,419 undergraduate and 3,659 graduate) and 2,806 faculty and staff by academic year 2035/2036, the proposed 2021 LRDP proposes a net increase in development of approximately 3.7 million assignable square feet (asf) (approximately 5.5 million gross square feet (gsf)) of additional academic buildings, support facilities, and student housing. The proposed 2021 LRDP would provide on-campus or campus-controlled student housing for approximately 40 percent of eligible students (or 68 percent of the increase in student population), equal to approximately 7,489 new on-campus beds. The proposed 2021 LRDP includes the following land use designations: Academics & Research, Campus Support, Land-based Research, Open Space Reserve, Recreation & Athletics, Student Neighborhood, Agricultural/Campus Research, UCR Botanic Gardens, Canyon Crest Gateway, and University Avenue Gateway.

The proposed 2021 LRDP is a plan to guide development, but it is not an implementation plan. Adoption of the proposed 2021 LRDP does not constitute a commitment to any specific project. Rather, development under the proposed 2021 LRDP would occur over time, based on campus needs and funding availability. The Regents and/or its delegated authorities must approve each development proposal, as appropriate. At the campus level, the review of campus development proposals is informed by a process that involves input from staff, faculty, and students (and the local community as appropriate).

Implementation of the 2021 LRDP would result in environmental impacts, on the following environmental resource areas: aesthetics, agricultural resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, noise, recreation, transportation, tribal cultural resources, and wildfire. The 2021 LRDP would also result in less than significant impacts, with no mitigation required, related to the following environmental issue areas: hydrology and water quality, population and housing, public services, and utilities and service systems. The 2021 LRDP would also result in no impacts related to the following environmental issue areas: land use and planning, and mineral resources.

A copy of the Draft EIR and the proposed 2021 LRDP are available for viewing at the UCR

Planning, Design & Construction (PD&C) office located at 1223 University Avenue Suite 240 Riverside, CA 92507, or for downloading on the UCR PD&C Environmental Planning website: <https://pdc.ucr.edu/environmental-planning-ceqa>.

The 45-day public review period for the Draft EIR begins on Wednesday, **July 14, 2021** and ends on Monday, **August 30, 2021**. Comments must be received in writing no later than **5:00 PM** on **August 30, 2021** to:

Stephanie Tang, Campus Environmental Planner

Planning, Design & Construction

1223 University Avenue, Suite 240

Riverside, CA 92507

Your name should be included with your comments. Please send your written comments to the attention of Stephanie Tang at the address noted above. Comments can also be submitted via email to the following address: CEQA@ucr.edu. **Comments must also be received no later than 5:00 PM on Monday, August 30, 2021.**

As a result of the ongoing outbreak of COVID-19, recommendations placed on in-person gatherings throughout California, and based on Governor Newsom's signed Executive Order N-29-20 allowing local and state agencies to hold virtual meetings via teleconference, UCR will host an online public session/hearing to receive verbal comments on the Draft EIR, rather than an in-person event. The University will hold a virtual public hearing **Wednesday, August 4, 2021 at 6:00 p.m. – 7:30 p.m. Please refer to the attached Notice of Availability for information on how to login/attend the 2021 LRDP Draft EIR virtual public hearing.** All other comments outside of this hearing must be submitted in writing, as outlined above.

Thank you,

Stephanie Tang

Campus Environmental Planner

UNIVERSITY OF CALIFORNIA, RIVERSIDE

PLANNING, DESIGN & CONSTRUCTION

1223 UNIVERSITY AVE | SUITE 240 | RIVERSIDE CA 92507

951.827.1484 | cpp.ucr.edu

Letter I2

From: [REDACTED]
To: CEQA@ucr.edu
Subject: LRDP comments
Date: Tuesday, August 17, 2021 3:06:52 PM
Attachments: [image003.png](#)

Hello,

Just a couple comments:

- The campus is moving away from using “freshmen” and now using “first-year student.”
- The Student Life section focuses primarily on Housing, Student Union, Recreation, Athletics, etc, but does not specifically mention other units within Student Affairs that need additional space and consideration (i.e. Costo Hall offices and other student support centers/departments). I did chat with Uma and he reassured me that these areas are being considered. It might be helpful to add a note about these areas.

I2-1

I2-2

Thank you

Ellen Whitehead (she/her), Ed.D.
Interim Associate Dean for Campus Life
Director of Student Life
University of California, Riverside



From: [REDACTED]
To: ceqa@ucr.edu
Subject: LRDP Draft EIR Comments
Date: Thursday, September 2, 2021 5:24:36 PM

Sept. 2, 2021

Please consider the comments in this letter on the DEIR for the new UCR LRDP. As an emeritus UCR faculty member, I generally approve of UCR’s initiatives, including much of the DEIR for this LRDP. However, I point out certain inadequacies in the DEIR’s analysis of impacts on off-campus sites. The necessity of adequate analysis of such off-campus impacts had been emphasized by the California Supreme Court, which in *City of San Diego et al. v. Board of Trustees of the California State University* (2015) stated

“...the Board's interpretation of the Marina dictum is mistaken because it depends on legally unsupportable distinction between environmental impacts occurring on the project site and those occurring off-site. CEQA draws no such distinction for purposes of mitigation. Instead, CEQA defines the “environment” as “the physical conditions which exist within the area which will be affected by a proposed project” (Pub. Resources Code, § 21060.5) and mandates that “[e]ach public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so” (id., 21002.1, subd. (b), italics added). Indeed, this point represents one of Marina's main holdings. (See Marina, supra, 39 Cal.4th at pp. 359–360, 367, 46 Cal.Rptr.3d 355, 138 P.3d 692.) In the 2007 EIR, the Board commits to undertake a wide variety of mitigation measures on the SDSU campus (e.g., constructing noise barriers, preserving on-site native plant habitats, creating wetlands, and incorporating flow control measures to prevent erosion). If these on-site mitigation measures can be properly funded through the project budget without an earmarked appropriation, then so too can off-site mitigation measures.”

13-1

I shall concentrate in the present comment letter on the potential physical impact on off-campus park facilities, especially on the hiking trails in the Box Springs Mountain Park/Reserve (BSMP/R).

As is obvious, and explicitly stated in the 2019 EIR for UCR’s North District Development (NDD) Plan, even though “the NDD Plan would not increase enrollment, and therefore would not have an effect on the demand for regional parks or recreational facilities”, nevertheless “unmet demand for recreational facilities could lead to use of off-campus facilities.” In contrast to the NDD, the LRDP calls for a huge increase in enrollment. However, at p. 67 (the DEIR page numbers in this letter are the pdf page numbers of the 900 page pdf), the present DEIR makes the conclusory statement

13-2

“Recreation

Impact REC-1. The proposed 2021 LRDP would include most of the recreational facilities and parkland on the UCR campus and incrementally develop new recreation facilities and open spaces that would adequately serve the campus population. The proposed 2021 LRDP would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of those facilities would occur or be accelerated. Impacts related to

increased use of parks and recreational facilities would be less than significant. No mitigation measures are required.”

13-2
cont'd

However, there is no evidence presented in the DEIR for these speculative claims regarding use and physical deterioration of nearby existing parks. I will provide evidence of potential impacts, in particular pertaining to hiking and biking in Riverside County’s nearby BSMP/R.

Hiking up and down a mountain, especially by young people, has become very popular in recent years. Indeed, regarding the City’s Mount Rubidoux (on the far side of downtown, and thus not close to UCR) as noted in

<https://www.pe.com/2016/07/13/riverside-city-to-track-number-of-mount-rubidoux-visitors/>

“It’s clear that Riverside’s Mount Rubidoux has become increasingly popular in recent years, but the city now has a way to measure the park’s visitors. Early last month the parks department installed automated counters that detect how many people, whether on foot or on bicycles, are coming into the park through its two official entrances. Statistics for cyclists aren’t yet available, but early numbers for walkers show an average of about 2,100 a day are using the mountain, though some days saw more than 3,000 visitors, according to a city report. Poles at the 9th Street and Glenwood Drive entrances contain infrared lights that track how many times their beam is broken. They don’t register people who enter on unofficial trails.”

13-3

That was in 2016, and more recent (pre-Covid) figures, as recounted by the City’s Parks Department, are often 5,000 hikers using Mt. Rubidoux on a weekend day. But Mt. Rubidoux is (DEIR p. 664) “about 5 miles west of campus”, and UCR students, faculty and staff who want to hike up and down a mountain, in expansive open space with wide vista views, use the trails on the near-campus BSMP/R. I happen to be personally knowledgeable about the BSMP/R and its use: I was the founder and President of the Box Springs Mountains Conservation Association which in the 1970s led the citizen impetus for the County to acquire 2,200 acres to establish the Park, and I was involved then in consideration of establishment of some of the Park trails (e.g., the “Skyline Trail”). A few years ago, as an officer of Friends of Riverside’s Hills (FRH) I helped negotiate an agreement with the Riverside County Transportation Commission (RCTC) that (as mitigation) provided funding that led to the conservation of an additional 900 acres on Box Springs Mountain. The BSMP/R now has 3,400 acres preserved as natural open space, with miles of hiking trails (not paved, unlike Mt. Rubidoux, and thus more natural).

For generations there have been two main trail accesses to Box Springs Mountain from the side close to the campus, the Park’s west side: the Big C trail and the Two Trees Trail. The one that was especially popular with UCR students (and faculty and staff) was the Big C trail that went from the east end Big Springs Rd, about 0.5 miles east of the UCR campus, across the rail tracks and up to UCR’s Big C. The Big C is a large concrete letter C (for Cal) constructed by UCR students in the 1950s, and is on the 160 acre UC Land Reserve on Box Springs Mountain (that reserve is now largely surrounded by the County’s BSMP/R). More on the UCR Reserve and the present condition of the Big C below, but for now I concentrate on the Big C trail. For generations of UCR students, it was a tradition to make hikes on that trail up to the Big C and back, and large numbers of UCR students (and staff and faculty) did so regularly – in fact such a hike was a feature event of each year’s UCR Homecoming event (UCR people, especially sports teams, are informally called Highlanders). That hike involved trespassing across the railroad tracks (and also across some private land since added to the

13-4

County and City parks). A few years ago, after several Metrolink passenger trains a day began running past there, RCTC, which owned the rail right-of-way, put up a fence (from Mt Vernon Ave to south of Big Springs Rd) to prevent such trespassing. Now significant numbers of UCR students still use that trail (one often sees their headlamps at night) by crawling through a culvert or going under or over the fence, or (a longer way) by using BSMP/R trails from near the end of Blaine St, but large numbers instead use the Two Trees Trail, which is farther north and starts at the end of Two Trees Rd and climbs about 1,000 feet (versus about 400 feet for Mt Rubidoux trails) to the Park ranger's house, from where other trails spread out.

For over 50 years I have lived at [REDACTED], which is at the start (bottom) of the Two Trees Trail, and have had a good view of the amount of people using that trail. I have talked with many of them (there is a small parking lot there) and a very large number of them are associated with UCR, most often students (sometimes partying in the parking lot with loud music). In recent years, particularly since the fence closed off easy student access to the Big C trail, I have personally observed that there has been a huge increase in the number of people, especially UCR students, using the trail. Of course the number of those users is a small fraction of that for Mt Rubidoux, consistent with the fact that the Two Trees trail is much steeper, much longer and much more rugged.

13-4
cont'd

Indeed, unlike the main Mt Rubidoux trails, which are paved, the Two Trees Trail (and the other BSMP/R trails) are unpaved, thus fragile and subject to deterioration from overuse. Such overuse has already resulted in negative impacts, and further increase in use will result in even more negative environmental impacts on the land which is after all part of a Multiple Species Habitat Conservation Plan (MSHCP) Reserve.

Such potential impacts from substantially increased use due to the increase in use by UCR people include (but are not limited to) uncontrolled widening of the trail, cut-troughs to shorten switchbacks, breaking down of water-bars, increases in erosion, graffiti, trash, human-caused wildland fires, sometimes from smokers (DEIR p. 785: "The Box Springs Mountains area has Very High risk fire susceptibility), and the need for emergency medical personnel (just a couple of weeks ago, a hiker collapsed and died on the trail, with fire engines with EMTs appearing at the end of Two Trees Rd to attend to him).

13-5

Many of the above factors resulting from overuse/abuse of the trails can lead to local slope failures/landslides, as the DEIR at p. 789 notes:

"Steep topography fractured and unconsolidated bedrock conditions, and expansive soils make hillside areas unstable, including those in the Box Springs Mountains area. Landsliding in these areas may result from heavy rain, erosion, removal of vegetation, seismic activity, wildfire, or combinations of these and other factors."

13-6

Thus the LRDP's large increase in the number of UCR people, with concomitant large increase in use of the BSMP/R trails, portends potential negative impacts.

The DEIR, at p. 679, states

"The campus population would continue to have full access to on-campus parks and recreational facilities, which would reduce the need to use off-campus community facilities. However, the proposed 2021 LRDP would incrementally result in an increase in off-campus residents of approximately 6,395 people (13,884 net increase to the campus population – 7,489 new on-campus beds) by academic year 2035/2036.

13-7

There are four State parks and two State Recreation Areas near the UCR campus that the campus population may utilize. Additionally, there are five off-campus parks near the UCR campus that the campus population may utilize.”

and then goes on to list those five City parks, but fails to even mention there the Box Springs Mountain Park/Reserve, which is a County facility (neither state nor city). The same paragraph then goes on to claim

“However, because these facilities are not in the immediate vicinity of UCR, they are unlikely to be used by campus population on a regular basis, especially when considering UCR provides more, as well as a variety of different recreational facilities than is accessible at these regional and community parks ... The impacts of increased use of parks would not result in substantial deterioration.”

But to the contrary, there is a facility near the campus, namely the BSMP/R, which offers hiking (and mountain biking) in an expansive open space wildland mountain-type experience that is simply unavailable on the UCR campus and is used by campus population on a regular basis. The relatively small and cultivated UCR Botanic Gardens (DEIR p. 166: “approximately 40 acres” “situated on a slight rise”) and nearby UCR open space are neither large enough, wild enough, nor high and steep enough to offer anything like a comparable experience. Recent years’ increases in UCR students, faculty and staff have already led to much higher use of the Two Trees Trail. It is evident that the LRDP’s large further increase in UCR people, 13,448 including 7,489 new on-campus beds, will include many who, like for the present UCR people, will avail themselves of the nearby mountain hiking or biking experience. This has the potential to sharply increase the use of the Two Trees Trail and thus the negative environmental impacts there, as noted above. The DEIR is inadequate in completely failing to consider any of this.

Aside from the impacts on the Box Springs Mountain Park/Reserve, the planned increase in UCR population has the potential to have similar impacts on the City’s 1,500 acre Sycamore Canyon Wilderness Park (SCWP). Although not offering the mountain experience of the BSMP/R, it too offers trails with an expansive open space experience that the very limited UCR campus open space area cannot offer. SCWP trails already suffer from many of the same impacts indicated above for the BSMP/R trails, and the huge increase in UCR people, many using the SCWP trails, will involve similar potential negative impacts to those in the BSMP/R. In this letter I am emphasizing the BSMP/R because I am more familiar with it.

Regarding the Big C Trail in the BSMP/R, where easy access from the UCR campus has been cut off by the fence along RCTC’s rail right-of-way, in order to make that access available again, there needs to be a tunnel under or bridge over RCTC’s single-track 100-foot wide right-of-way (no at-grade crossing would be allowed). As part of the settlement of litigation between FRH and RCTC a few years ago, RCTC agreed to allow licensing for a tunnel undercrossing – such a crossing would also serve as a wildlife crossing. FRH subsequently arranged for the engineering firm Hernandez, Kroone & Associates, Inc. to issue a report recommending locations and estimating the costs of such a crossing. The HKA engineering report showed two undercrossing sites (and one bridge crossing site) were feasible, Site 1 a bit north of the east end of Big Springs Rd, and the Site 2 several hundred feet farther north (with a bridge crossing site somewhat farther north). The engineering cost for either undercrossing site was estimated (at that time) to be a little under \$1 million. Subsequently, another FRH officer and I met with UCR Chancellor Kim Wilcox and then-newly-appointed Vice-Chancellor Gerry Bomotti to discuss the possibilities, and provided them a copy of the

13-7
cont'd

13-8

13-9

engineering report. The Chancellor was enthusiastic about having an undercrossing at Site 1, which would be the most convenient for UCR students. Access to any of the sites involved crossing over a 4.1 acre parcel of R-1 8500-zoned private land owned by my wife and me; we subsequently arranged to have that parcel gifted to the City to be added for open space and trails to the City's Islander Park (the DEIR, at p. 665, mentions "Islander Park, approximately 0.3 mile east of East Campus at the base of the Box Springs Mountains (approximately 0.3 mile from Glen Mor)") and its trail system, which did cross that 4.1 acre parcel. Access to any of the sites from the mountain (County) side involved crossing over parcels that had been privately owned but have since been added to the BSMP/R after being acquired several years ago with funds that FRH had obtained from the RCTC settlement agreement. FRH and I personally have done our part; now UCR needs to come up with its fair share for the funding of a crossing, as mitigation and for the benefit of its greatly increasing number of students. Also, it would be appropriate for the UCR Foundation to raise funds to enable restoration of the Highlander celebration of the Big C hike.

13-9
cont'd

The UCR Natural Reserve containing the Big C ("the Big C Reserve") was mentioned above. I note that the DEIR (p. 15, footnote) excludes consideration of any of the UC Natural Reserves. However, those Reserves are used for teaching and research by UCR faculty, staff and students (which is the Reserves' purpose), and the LRDP's large increase in planned number of UCR people will have potential negative impacts on the Reserves, including on the nearby wildlife. The DEIR fails to consider any of this.

13-10

One concern about the Big C Reserve that needs to be considered is the condition of the Big C concrete. We were informed by UCR, including at the meeting with the Chancellor discussed above, that the concrete of the Big C is in places crumbling or undermined, so is in danger of falling apart, potentially injuring or killing students or others visiting the site and having significant potential impacts on wildlife and on the BSMP/R land below, meaning that major repairs to the Big C are needed. The LRDP's increase in students, staff and faculty will result in more people visiting the site and thus more people being put in danger. Again, the DEIR is inadequate in failing to consider the Big C Reserve and the condition of the Big C, where repair is needed.

13-11

Thanks for consideration of these comments.

Richard Block, [REDACTED]

From: [REDACTED]
To: [Stephanie Tang](#)
Subject: UCR master plan
Date: Friday, September 10, 2021 1:06:47 AM

Dear Ms. Tang,

I am a neighbor of UCR and a UCR graduate. My dad was a founding faculty member and there is a chair endowed in his memory along with George Helmkap, his old lab partner and best friend, and Hart Schmidt, a friend of our family. I am providing that history because I want to make it clear I am a UCR supporter from before birth.

I just received the UCR LRDP response from the City. I am not in favor of UCR growing in yet more out of control ways. We do not have enough police to contain the behavior of today's students (I feel old saying that- but it is true). We have had 18 months of peace and quiet. Now we have stop signs once again being treated as raceways. We have trash being tossed from cars with UCR stickers. We have 8 cars to a house- which is illegal. We are most certainly going to have Covid breakouts with frat parties that are already occurring. At some point UCR must take responsibility for importing 35,000 students without housing, parking, utilities, water, drainage, activities, or a respect for what adults expect in a neighborhood. I am hopeful we are not going to have another year of used condoms on our driveways after drunken boys pee there in the night. I hope nobody else's children see couples having sex by their parents' cars (both true stories).

14-1

That being said, the City is not being d=fair in their response, and I would ask you to consider attending the hearing coming up for the hotel being proposed and railroaded into downtown Riverside. If you are not aware of it, the City is advocating for an 8 story hotel on one acre with almost no parking next to a historic church (First Congregational Church, founded by our city's founders and more than 110 years old) and the Life Arts building, alos 100 years old and fragile). The City planners and politicians are wanting to shove this through. In fact Erin Edwards met with the builders to try to "mitigate" the impact of going from a flat parking lot to 8 stories blocking all light and creating traffic with literally no place to go by adding an extra few feet to an observation deck.

14-2

The City is trying to do this with no EIR whatsoever by hiding behind preserving fifty year old fire station. That station is known to have toxic

waste under it. Because of that they are allowing 226 rooms and 140 parking places- including staff parking. There is no inclusion of extra policing, no word on the demand for utilities- even with the downtown going without power for 36 hours this week. No traffic study, No addressing the added pollution of 226 rooms of guests and staff fighting over 140 parking places - in addition to meetings they plan to hold there. No mitigation for surrounding areas for 6 days a week construction for two full years. No word on water- which we do not have enough of as it is. Nothing about the impact on the downtown neighbors.

And importantly there is zero on the impact on historic sites. They are holding you accountable for the UCR women's center (which I was part of) and the LGBTQ center. For the city sponsored project? Not one word about the impact on two 100 plus year old buildings; a church literally tied to the Mission Inn underground; the same church which was the home for the Harada family and supported their fight to ensure the rights of Japanese immigrants to own property all the way to the Supreme Court (note the city staff are currently doing photo ops in front of Harada House after not funding it for decades). That church sponsored speaking trips for Booker T Washington and had him speak from the pulpit. It is a National Historic landmark. The City does not mention any of that history in its planning report. Not anywhere. How does that even begin to compare to the Women's Center? Barbara Gardner would laugh if she did not have Alzheimer's. She was a friend of mine. I rented a room from her. Historic belongs to the historic sites downtown, and Cahuilla sites in our hillsides above UCR. The trails taken by Spanish explorers and early Mexican communities. The City does not even touch on it in the defense of the hotel project for Marriott. They are using a fifty year old fire station that is attached to leaking oil and fuel lines tied to the old filling station on Lime and Mission Inn. (That is why that site has not been redeveloped. It is toxic. And the fire station likely has plenty of toxic construction materials as well as soil and fuel in the ground under it.)

The City's plan for Marriottit takes no measures to ensure the church has natural light, nor protection from the impact of construction. No seismic study. It also includes a building that will literally hang over the sidewalk and eat all street parking. It will remove parking from the church, and downtown.

It appears from reading their response to UCR that they are demanding all of the things that they either ignored or decided did not need mitigation for the hotel. The parking is noted as being so short downtown that it really did not matter and not having enough is to be expected. They gave UCR none of those breaks.

I fully admit I am doing this to try to stop the hotel and get it back to manageable. But I am also incensed that my city would be so blatantly demanding from UCR while giving the keys to the city to a hotel chain. There is no mention of police or fire needs by adding a high rise hotel. It is mentioned in the UCR response. No mention of pollution from cars. That's all over the UCR response from the City. No mention of too much construction. UCR is called out for that. No mention of utilities. UCR- all over it. I personally cannot wait to see how many Marriott customers have their cars broken into when they have to be left three blocks away for lack of parking. The City makes no mention of police shortages nor need for funding more. Not so for UCR. It sounds and feels like somehow Marriott is getting favored status over one of the oldest establishments and employers in the city- UCR.

I hope UCR will download the plans for the hotel and the City planner information and use it to counter their response. I also hope you will attend the hearing about the hotel and call them out on their treating a private company as a favored customer and not UCR. That has to be unethical. They need to treat all projects equally- and they said so in the planning document for the hotel. Hold them to it and call them out.

Finally, as a UCR child who grew up as UCR did, I have some concerns about the safety of Pierce Hall and the rest of the original science buildings- Chem, Physics, Geology. My dad was part of Pierce coming into being. He described walking on old construction materials for sidewalks. But my mom, Margaret, and Libby Helmkamp, and other wives (who were all college educated but did not work except to support UCR) described driving our family station wagons into the LA area and going to old military surplus depots. They would load up used military lab gear- beakers, hot plates, glass, centrifuges, and on and on. Those went into the labs. The glassblower would reuse them to create what they needed for experiments. (Yes, UCR had a glassblower. We kids loved watching him). Since that time of growing up all over the campus and in and out of those buildings, and in our cars that

14-2
cont'd

14-3

transported that stuff, my generation has faced illness. Lots of it. Lupus. Cancer. Leukemia. MS. Asthma. We lost Lee, a former Graduate Dean (as was my dad). My dad developed polymyositis. Jennifer Nickel was an attorney and is now disabled by MS. Claudia Schmidt died of leukemia while teaching at a university in Wisconsin. Her mom died of cancer. The Helmkamp's faced lupus that killed one daughter and cancer in others. Libby had dementia and so did George. There were far too many miscarriages amongst the wives. Those are but a few of us. In the new construction please be cautious- we were told during construction debris was simply tossed under the site. My dad said they were told to go to the basement in nuclear drills- and he would not do so. He never allowed us in the basement of Pierce Hall.

I4-3
cont'd

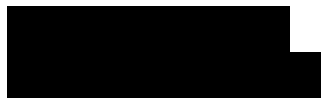
Those depots were WWII and Korean era extras. There was no respect for the power of nuclear dangers at that time. In his last days my dad and I talked about some of this, and he said he would not be surprised if there was danger present. His disease is one that has no genetic origin. He participated in clinical studies to try to help the next generation. UCSD has his tissue samples. I hope UCR will consider a study on the families who grew up in that part of the campus, especially during the 50's, 60's and 70's.

Thanks for taking time to read this. I would like to see UCR grow responsibly (with UNET back) and the City being equally responsible. I hope to see you at the hearing for the Marriott. The city is not treating UCR fairly according to the standards they set for others.

I4-4

Sincerely

Jill Johnson-Young, LCSW
UCR Class of 1987



Jill A. Johnson-Young, LCSW

Local, state, national and international speaker on grief and loss and dementia

Online training for therapists & telehealth clinician

CEO/Co-Owner Central Counseling Services

6840 Indiana Ave Suite 275 Riverside CA 92506

29970 Technology Drive Suite 116 Murrieta CA

(951)778-0230

www.centralcounselingservices.com

<http://jilljohnsonyoung.com/>

www.therebelliouswidow.com

<http://www.linkedin.com/in/jilljohnsonyoung>

Author: Your Own Path Through Grief; Someone I love just died, what happens now?; Someone I love is sick- what happens now?; My pet is sick- it's time to say goodbye; The Rebellious Widow: A practical guide to love and life after loss.

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