

*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 12<sup>th</sup> 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.

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."

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).)

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>.

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.

#### **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.

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.

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.

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.



### **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.

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.

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.

[https://riversideca.gov/cedd/sites/riversideca.gov.icedd/files/pdf/planning/general-plan/16\\_Historic\\_Preservation\\_Element.pdf](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.

*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.

### **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

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

#### **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.

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.

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

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.

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)

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

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)

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.

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.

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)

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

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.

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.

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)

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.

#### **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

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.

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

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

#### **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.

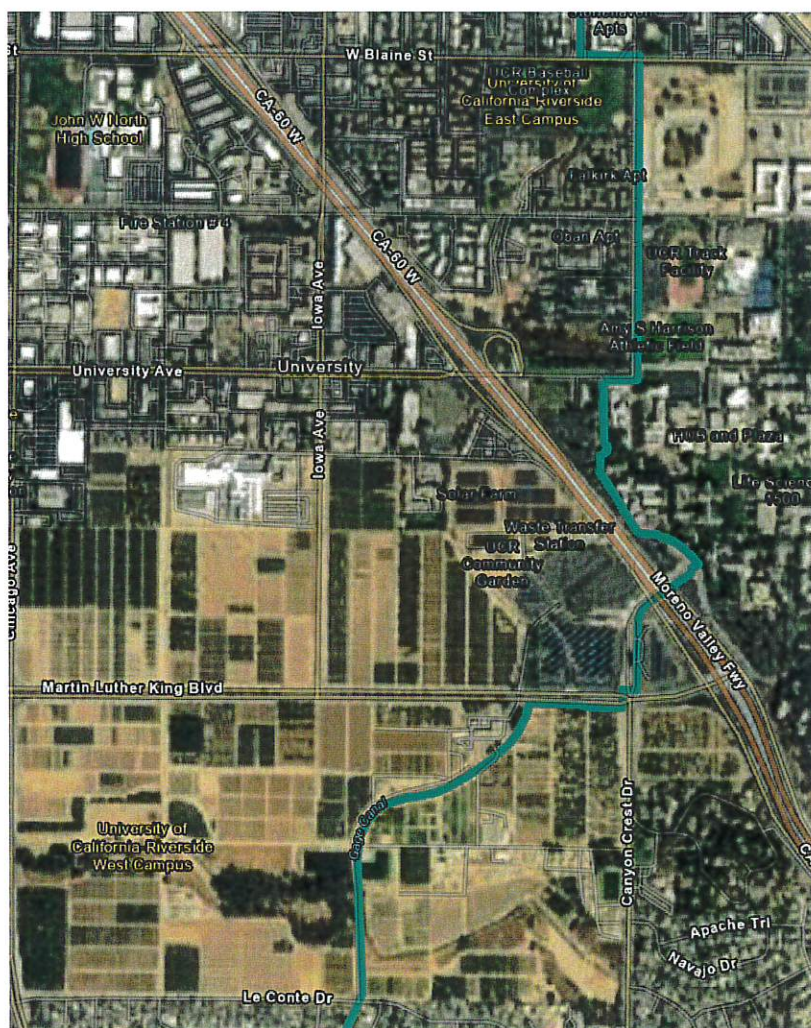
The Operation – Off-Campus discussion on page 4.14-17 states that “The campus population would continue to have full access to on-campus parks and recreational facilities, which would reduce the need to use off-campus community facilities,” which is internally inconsistent and thus erroneous. “Continuing” 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.

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

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.

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.





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.

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:

<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.

#### **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

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.

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.

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.

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.

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

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.

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.

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.

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

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.



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.

#### **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.

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.

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.

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

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.

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.

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.

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.

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.

### **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.

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.

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.

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](mailto: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.

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