

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.

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.

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.

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 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.

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.

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.

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)."

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?

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.

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.

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