University of California Riverside
Glen Mor 2 Student Apartments Project
Final Environmental Impact Report
Volume 1 of 4 Responses to Comments, 
Draft EIR Text Changes, and Mitigation Monitoring Program
SCH#2010081020

Prepared for:
UCR
Office of Design & Construction

Prepared by:
ICF
INTERNATIONAL

UNIVERSITY OF CALIFORNIA
UCR RIVERSIDE
UNIVERSITY OF CALIFORNIA, RIVERSIDE
GLEN MOR 2 STUDENT APARTMENTS PROJECT
FINAL ENVIRONMENTAL IMPACT REPORT

SCH #2010081020

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Office of Design and Construction
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April 2011


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1.1 Purpose

The University of California, Riverside (UCR) has prepared this final environmental impact report (Final EIR) for the proposed Glen Mor 2 Student Apartments Project (project or proposed project). This EIR has been prepared by UCR in compliance with the California Environmental Quality Act (CEQA), the State CEQA Guidelines (14 California Code of Regulations [CCR] 15000 et seq.), and the UC CEQA Handbook for consideration by the Board of Regents of the University of California (The Regents), which has discretionary authority to approve the project design and authorize construction of the project.

The Final EIR is intended to be used alongside the Draft EIR, which is incorporated by reference and bound as separate volumes. The Final EIR presents all of the required contents as set forth in Section 15132 of the State CEQA Guidelines, including:

- errata pages identifying where the Draft EIR text has been revised since publication of the Draft EIR;
- comment letters received during the Draft EIR public review period;
- a list of persons, organizations, and public agencies commenting on the Draft EIR;
- the responses of the lead agency to comments submitted during the Draft EIR public review process; and
- any other information added by the lead agency.

The intent of the Final EIR is to present comments pertaining to the analysis contained in the Draft EIR and to provide an opportunity for clarification, corrections, or minor revisions to the Draft EIR, as needed to address those comments. The Regents will consider this Final EIR and the Draft EIR in their decision-making process regarding approval of project design and construction.

1.2 Draft EIR Public Review Process

UCR prepared a Draft EIR for the project and circulated the document for a 45-day public review period commencing February 16, 2011, and ending April 1, 2011. Notification included circulation through the Governor’s Office of Planning and Research State Clearinghouse, posting with the Riverside County Clerk, and direct mailing to fifteen responsible and trustee agencies, two individuals, and one native American tribe. Written and oral comments were received during the public review period. Pursuant to Section 15088 of the State CEQA Guidelines, UCR has reviewed all comments received on the Draft EIR, and has prepared responses to these comments that are contained within Chapter 2, “Comments Received and Responses to Comments,” of this Final EIR.

UCR used several methods to elicit comments on the Draft EIR from agencies, organization, and members of the public. The Draft EIR was submitted to the State Clearinghouse for distribution to state agencies. A notice of availability for the Draft EIR was mailed directly to various agencies and
organizations and to individuals that had previously requested such notice, was published in the Press-Enterprise on February 16, 2011, and was posted at the Riverside County Clerk’s office on February 16, 2011. The Draft EIR was made available for review on the UCR Office of Design and Construction (ODC) website (http://pdc.ucr.edu) and at the ODC offices (3615-A Canyon Crest Drive, Riverside, CA 92507).

UCR held a public hearing on the Draft EIR on March 15, 2011, at which a brief presentation was given on the project and verbal comment was received from members of the public. A copy of the transcript for the public hearing is presented in Chapter 2 of this Final EIR.
Chapter 2
Comments Received and Responses to Comments

2.1 Introduction

In accordance with Section 15088 of Title 14 of the California Code of Regulation (the “State CEQA Guidelines”), UCR has reviewed and evaluated the comments received on the Draft EIR for the Glen Mor 2 Student Apartments Project and has prepared written responses to these comments. This chapter contains copies of the comments received during the public review process and provides an evaluation and written response for each of these comments.

2.2 Comments Received

During the public review period for the Draft EIR, which occurred between February 16, 2011, and April 1, 2011, UCR received six comment letters from agencies, organizations, and individuals. Additional verbal comments were received from members of the public at the public hearing held on March 15, 2011.

The commenting parties are listed below, along with a corresponding letter for organizational purposes of identifying comments and responses, which are provided in this Chapter.

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2.3 Comments and Responses to Comments

This section presents all written comments on the Draft EIR received by UCR and the responses to those comments, in accordance with Section 15088 of the State CEQA Guidelines. In accordance with the CEQA Guidelines, responses are prepared for those comments that address the sufficiency of the environmental document regarding the adequate disclosure of environmental impacts and methods to avoid or mitigate those impacts. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by
reviewers, as long as a good faith effort at full disclosure is made in the Draft EIR. Additionally, it should be noted that comments by public agencies should be limited to those aspects of a project that are within its area of expertise or which are required to be carried out or approved by the agency, and such comments must be supported by substantial evidence. (CEQA Guidelines Section 15204[a])
March 28, 2011

Ms. Tricia Thrasher
University of California, Riverside
Office of Design and Construction
3615-A Canyon Crest Drive
Riverside, CA 92507

NOTICE OF COMPLETION & ENVIRONMENTAL IMPACT REPORT (EIR) FOR GLEN MOR 2 STUDENT APARTMENTS PROJECT (SCH # 2010081020)

Dear Ms. Thrasher:

The Department of Toxic Substances Control (DTSC) has received your submitted Notice of Availability of the Environmental Impact Report for the above-mentioned project. The following project description is stated in your document: "The Glen Mor 2 Student Apartments project entails construction and long-term operation of a new apartment-style student housing complex on 21 acres in the northeastern portion of the UCR campus, providing a total of 810 student beds in 232 apartment-style units, which are intended to house graduate students and upper-class undergraduates. The proposed building program would provide five residential buildings, a café and food/retail facility, a resident services office, a community building, and an executive retreat center. Associated improvements include a 597-space multi-level parking structure for campus residents, circulation improvements, and indoor and outdoor commons facilities. The project also entails restoration of a 0.4-mile stretch of the arroyo that runs through the northern part of the site".

Based on the review of the submitted document DTSC has the following comments:

1) The EIR should evaluate whether conditions within the project area may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies:

- National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).
- Envirositor (formerly CalSites): A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC’s website (see below).

- Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.

- Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S. EPA.

- Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.

- GeoTracker: A List that is maintained by Regional Water Quality Control Boards.

- Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.

- The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).

2) The EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents.

3) Any environmental investigations, sampling and/or remediation for a site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found above regulatory standards should be clearly summarized in a table. All closure, certification or remediation approval reports by regulatory agencies should be included in the EIR.

4) If buildings, other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should also be conducted for the
presence of other hazardous chemicals, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints (LPB) or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.

5) Future project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination.

6) Human health and the environment of sensitive receptors should be protected during any construction or demolition activities. If necessary, a health risk assessment overseen and approved by the appropriate government agency should be conducted by a qualified health risk assessor to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.

7) If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If it is determined that hazardous wastes will be generated, the facility should also obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942. Certain hazardous waste treatment processes or hazardous materials, handling, storage or uses may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.

8) DTSC can provide cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies that are not responsible parties, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA or VCA, please see www.dtsc.ca.gov/SiteCleanup/Brownfields, or contact Ms. Maryam Tasnif-Abbasi, DTSC’s Voluntary Cleanup Coordinator, at (714) 484-5489.
Ms. Tricia Thrasher  
March 28, 2011  
Page 4  

If you have any questions regarding this letter, please contact me at ashami@dtsc.ca.gov, or by phone at (714) 484-5472.

Sincerely,

[Signature]

Al Shami  
Project Manager  
Brownfields and Environmental Restoration Program

cc: Governor’s Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044  
Sacramento, California 95812-3044  
state.clearinghouse@opr.ca.gov

CEQA Tracking Center  
Department of Toxic Substances Control  
Office of Environmental Planning and Analysis  
P.O. Box 806  
Sacramento, California 95812  
ADelacr1@dtsc.ca.gov

CEQA # 3160
2.3.1 Comment Letter A: California Department of Toxic Substances Control

Response to Comment A-1 (Search databases to identify potential hazardous sites)

Section 3.7 of the Draft EIR presents analysis of the project’s impacts with respect to hazards and hazardous materials, including whether the project would pose a threat to human health or the environment. As stated on page 3.7-1 of the Draft EIR, this section incorporates the findings of a Phase I Environmental Site Assessment and Limited Subsurface Investigation (Phase I), which was included as Appendix M of the Draft EIR. The Phase I ESA presented the findings of a database query that addressed the databases listed in this comment. As stated on page 3.7-4 of the Draft EIR, the database query identified no active, listed hazards sites that would affect the project.

Response to Comment A-2 (Identify mechanism to initiate investigation/mediation)

As discussed on pages 3.7-5 through 3.7-6 of the Draft EIR, soil sampling conducted during the Phase I indicated soil on the project site does not contain contaminants at concentrations that would warrant further investigation and remediation.

As discussed on pages 3.7-6 through 3.7-7 of the Draft EIR, the existing on-site residence is known to contain asbestos-containing materials (ACM) and lead-based paint, and asbestos- and lead-remediation specifications were prepared for the project to ensure safe handling and remediation of these hazardous materials. The ACM remediation will comply with SCAQMD Rule 1403 and the lead remediation will comply with Title 17 CCR Division 1, Chapter 8, and Title 8 CCR Section 1532.1. The established Mitigation Monitoring Program for the LRDP EIR provides a mechanism to monitor and document implementation of the remediation plans (see EIR Appendix F, items PP4.3-2(c), PP 4.7-2 and PP 4.7-4).

Response to Comment A-3 (State Phase I methods and results)

Please see the response to Comment A-1 regarding incorporation of the Phase I ESA findings into Section 3.7 of the Draft EIR. Soil remediation was deemed unnecessary. The Phase I ESA was prepared pursuant to American Society of Testing and Materials standards.

Response to Comment A-4 (Survey demolition areas for hazards and remediation)

Please see the response to Comment A-2.

Response to Comment A-5 (Conduct soil sampling)

Please see the response to Comment A-2.
Response to Comment A-6 (Prepare health risk assessment)

Section 3.7 of the Draft EIR addresses the project's potential to result in impacts on human health and determined that all impacts would be less than significant with incorporation of LRDP EIR Measures. Additionally, as stated on page 3.2-19 of the Draft EIR, a health risk assessment pursuant to SCAQMD guidelines was deemed unnecessary because the project's long-term source of diesel emissions—two on-site generators—would operate only on an emergency basis and would not be regular emitters of hazardous emissions.

Response to Comment A-7 (Manage hazardous wastes)

Please see the response to Comment A-2 regarding procedures for handling ACM and lead-based paint that will be removed during demolition of the on-site structure. The proposed residential use entails limited use of hazardous materials and associated limited generation of hazardous wastes, which are managed under established campus-wide programs administered by qualified Environmental Health and Safety (EH&S) staff. Ongoing oversight of campus EH&S programs is conducted under the LRDP EIR MMRP (see Appendix F, item 4.7-1)

Response to Comment A-8 (DTSC oversight)

The project site does not feature any conditions that would require cleanup oversight or a Voluntary Cleanup Agreement.
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-Mailed: April 1, 2011
tricia.thrasher@ucr.edu

Ms. Tricia D. Thrasher
Attn: Glen Mor 2 Student Apartments Project
UCR Office of Design and Construction
Riverside, CA 92507

Review of the Draft Environmental Impact Report (Draft EIR)
for the Proposed UC Riverside Glen Mor 2 Student Apartments Project

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into the final Environmental Impact Report (final EIR) as appropriate.

The AQMD staff is concerned about the significant localized air quality impacts from the proposed project; therefore, the lead agency should include additional mitigation measures in the final EIR that minimize the project’s localized air quality impacts. Further, AQMD staff requests that the lead agency revise mitigation measures AQ-1 and AQ-2 (page 3.2-12 of the draft EIR) for the final EIR to ensure that the proposed measures will achieve the required emission reductions. Details regarding these comments are attached to this letter.

Pursuant to Public Resources Code Section 21092.5, AQMD staff requests that the lead agency provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency
to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review Planning, Rule Development & Area Sources

Attachment

IM:DG

RVC110218-05
Control Number
Mitigation Measures for Regional Construction Air Quality Impacts

1. The lead agency relies on mitigation measures AQ-1 and AQ-2 to demonstrate that the proposed project will impose less than significant air quality impacts on the environment. Specifically, the lead agency’s air quality analysis accounts for a 73% reduction in PM10 emissions from off-road construction equipment and a 40% reduction in NOX emissions from on-road heavy-duty trucks from AQ-1 and AQ-2. However, AQMD staff is concerned about the stated effectiveness of these mitigation measures given the lack of specificity in each measure. For example, implementing the mitigation measures as stated could potentially yield reductions that are less than required to achieve a less than significant impact. Therefore, the AQMD staff recommends that the lead agency revise AQ-1 and AQ-2 to ensure less than significant air quality impacts as follows:

AQ 1: Construction-Period Engine/Equipment Emissions
The UCR Office of Design and Construction will ensure that all construction contracts specify that all internal combustion engines/construction equipment operating on the project site:

- Meet EPA-certified Tier 2 emissions standards or higher, and
- At a minimum, achieve an overall 73% control efficiency of PM10 emissions.

AQ 2: Construction-Period Engine/Equipment Oxides Catalyst
The UCR Office of Design and Construction will ensure that all construction contracts specify that all off-road equipment operating on the project site, as well as all on-road heavy-duty vehicles (including hauling and material delivery trucks) traveling to and from the site, will be fitted with oxides catalyst that at minimum achieve a 40% reduction in NOX emissions.

Mitigation Measures for Significant Localized Construction Air Quality Impacts

2. Given that the lead agency concluded that the proposed project will have significant localized and cumulative construction air quality impacts the AQMD staff recommends that the lead agency provide additional mitigation pursuant to CEQA Guidelines §15126.4. Specifically, AQMD staff recommends that the lead agency minimize or eliminate significant adverse air quality impacts by adding the mitigation measures provided below.

- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow,
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site,
- Reroute construction trucks away from congested streets or sensitive receptor areas,
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation,
- Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers’ specifications,
- Use coatings and solvents with a VOC content lower than that required under AQMD Rule 1113,
- Construct or build with materials that do not require painting,
- Require the use of pre-painted construction materials,
- During project construction, all internal combustion engines/construction equipment operating on the project site shall meet EPA-Certified Tier 2 emissions standards, or higher according to the following:

  ✓ Project Start, to December 31, 2011: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 2 offroad emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

  ✓ January 1, 2012, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

  ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations (i.e., if project construction goes beyond anticipated schedule).

  ✓ A copy of each unit’s certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

  ✓ Encourage construction contractors to apply for AQMD “SOON” funds. Incentives could be provided for those construction contractors who apply for AQMD “SOON” funds. The “SOON” program provides funds to accelerate
clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: http://www.aqmd.gov/tao/Implementation/SOONProgram.htm

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.
2.3.2 Comment Letter B: South Coast Air Quality Management District

Response to Comment B-1 (Introduction)

SCAQMD’s concern for the project’s localized air quality impacts is noted. UCR will comply with all distribution and notification requirements related to CEQA documentation for the project. Detailed responses to SCAQMD’s comments are provided below.

Response to Comment B-2 (Add emission reduction percentages to Mitigation Measures AQ 1 and AQ2)

This comment does not accurately represent information provided in the Draft EIR. The comment suggests that Section 3.2 of the Draft EIR states Mitigation Measures AQ 1 and AQ 2 would result in a 73% reduction in PM10 emissions from off-road construction equipment and a 40% reduction in NOx emissions from on-road heavy duty trucks. As stated on page 3.2-12 of the Draft EIR, the referenced mitigation measures would reduce NOx emissions from off-road equipment by 73% percent and on-road trucks by 40%, making no mention of PM10. The referenced mitigation measures are both intended to reduce NOx emissions; therefore, the reference to PM10 in AQ 1 is not appropriate. The overall reductions to NOx achieved by these measures are evident in comparing Table 3.2-6 to Table 3.2-7. Pre-mitigation NOx emissions of 305.5 lbs per day are reduced to 98.6 lbs per day with the mitigation, a reduction of approximately 67.7%. Though these measures are directed at mitigating regional construction-period emissions of NOx, they also result in reductions in emissions of other pollutants including PM10 (78.7 lbs per day without mitigation and 70.2 lbs per day with mitigation, or a reduction of approximately 10.8%).

Regardless of this issue, UCR does not believe that adding specific percentages to AQ 1 and AQ 2 would provide any meaningful enhancement of the measures that were presented in Section 3.2 of the Draft EIR. Measure AQ 1 commits project contractors to meet or exceed EPA-certified Tier 2 emissions standards, and AQ 2 commits project contractors to install oxides catalysts. Reduction percentages were calculated based on SCAQMD’s Off-Road Engines Mitigation Measure Tables, in accordance with SCAQMD recommendations. The recommended specific percentages of control efficiency for these measures would be unenforceable additions to these commitments as they are implemented in the field.

Response to Comment B-3 (Include additional Mitigation Measures)

Impact 3.2-5, as discussed on page 3.2-15 through 3.2-16 of the Draft EIR, identifies a significant and unavoidable impact due to localized emissions of particulate matter, primarily because of the project’s large quantity of grading. Due to the volume of earthwork involved, the Glen Mor 2 project will fall under the “large operation” provisions of SCAQMD Rule 403, which require posting of contact information for concerns with dust emanating from the project site.

While the traffic control measures recommended in this comment would not result in appreciable decreases in the project’s dust generation, please note that the traffic-related measures (traffic controls to maintain smooth traffic flow, dedicated turn lanes for truck/equipment movement, and rerouting construction away from congested areas) are very likely to be components of the project-
specific traffic control plan that will be prepared pursuant to mitigation measure TR 2 (see page 3.13-14 of the Draft EIR).

As with the traffic control measures, the suggested low emission building material measures would not contribute to a reduction in the particulate matter emissions that are at issue with the Glen Mor 2 project. However, it is noted that the proposed buildings are designed to achieve a LEED Gold rating, including extensive use of building materials that do not required painting and use of low VOC materials where paints and coatings are applied. Project specifications for interior finishes call for conformance with SCAQMD Rule 1113, Green Seal Standard GS-11, and Green Seal Standard GS-03. For building exteriors, pre-finished materials represent approximately 60 to 65 percent of the building surface area. The remaining site-finished exterior surfaces (primarily stucco), will comply with the low-VOC requirements of SCAQMD Rule 1113 (Personal communication, e-mail dated April 18, 2011 from Vitas Viskanta, Sasaki Associates, to Tricia D. Thrasher, UCR Office of Design and Construction).

Response to Comment B-4 (Add mitigation language identifying changing EPA emission standards)

Please see the response to Comment B-2 regarding project compliance with EPA Tier 2 emission standards. The mitigated scenario modeling conducted for the Glen Mor 2 project (output sheets are provided in Appendix A of the Air Quality Technical Report in Appendix H of the Draft EIR) demonstrates construction-period NOx emissions can be reduced below applicable SCAQMD significance thresholds with application of current EPA Tier 2 emissions standards and CARB Level 3 controls (oxides catalyst). On this basis, addition of the suggested language regarding changing EPA emission control standards is not warranted. Please note project construction is anticipated to be completed in fall 2013, and the project would not need to incorporate standards beyond that date.

Response to Comment B-5 (Document construction equipment conformance to emission standards)

Documentation of equipment conformance to the emission control standards specified in Mitigation Measures AQ 1 and AQ 2 is included in the Mitigation Monitoring and Reporting Program provisions (Chapter 4 of the Final EIR).

Response to Comment B-6 (Promote participation in SOON program)

Comment noted. UCR will advise contractors of availability of this AQMD program.

Response to Comment B-7 (Website link to additional mitigation measures)

Comment noted. The air quality analysis that was incorporated into Section 3.2 of the Draft EIR gave strong consideration to all SCAQMD mitigation guidance and the feasible measures from that guidance have been incorporated into the project.
April 1, 2011

Tricia D. Thrasher, ASLA, LEED AP, Principal Environmental Project Manager
Attn: Glen Mor 2 Student Apartments Project
UCR Office of Design and Construction
3615-A Canyon Crest Drive
Riverside, CA 92507

SUBJECT: GLEN MOR 2 STUDENT APARTMENTS PROJECT: NOTICE OF AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)

Dear Ms. Thrasher:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the University of California – Riverside’s (UCR) proposed Glen Mor 2 Student Apartments Project. Located on the northwest corner of Valencia Hill Drive and Big Springs Road within the UCR campus, the project includes the construction of five, five-story residential buildings, a food emporium, a resident services office, a community building, a three-level parking structure, and an executive retreat center. The project will provide 810 student beds in 232 apartment style units.

Given the location of the proposed project – adjacent to an established residential neighborhood – City staff has reviewed the DEIR and offers the following comments for your review and consideration:

- The project site plan included in the EIR indicates that the proposed parking structure will be situated near the intersection of Big Springs Road and Valencia Hill Drive, with most of the remaining residential buildings located in the interior of the project site. To minimize and appropriately mitigate the aesthetic impact of a large parking structure lacking a human scale and devoid of any special architectural treatment or character along the street frontages, UCR should consider an alternative plan that locates the parking structure at a less obtrusive location toward the interior of the project site with residential buildings situated where the parking structure is currently proposed. If this alternative is not feasible, the façades of the parking structure facing the street frontages need to be further enhanced architecturally and substantially enhanced landscaping must be provided in the landscape setbacks adjacent to the parking structure. To adequately mitigate the visual impact of a large parking structure across the street from residences, landscaping needs to include extensive planting of large sized box and specimen sized trees, in combination with extensive layered shrub planting, and vines along structure walls, to achieve a mature landscape quality that effectively screens and minimizes the visual impact of the structure from public view.

- To alleviate and mitigate potential traffic hazards associated with students parking along Watkins Drive, the DEIR needs to include a mitigation measure requiring a decorative fencing (e.g. tube steel) along the 100-foot landscape setback line for the entire frontage along Valencia Avenue from Big Springs Road extending north to connect with the existing campus fencing at the ball fields to the north, thereby encouraging the use of the parking structure and discouraging residents of the Glen Mor...
2 housing project from parking along Watkins Drive.

- Traffic Mitigation Measure TR 1, as noted on page 3.13-11 of the report, recommends a fair-share contribution from the University to the City equal to 6.6% of the cost to install a future traffic signal at the intersection of Big Springs Road and Watkins Drive. However, installation of the traffic signal is not anticipated in the foreseeable future and ultimately may conflict with existing traffic calming measures on Watkins Drive. As an alternative, City staff requests that a mitigation measure be included stating that the University seek approval of a traffic pattern modification measure and, if approved, construct the permanent closure of Valencia Hill Drive between Watkins Drive and Big Springs Road. This approach is consistent not only with the City’s General Plan 2025 and the University Neighborhood Plan (UNP) but also with UCR’s Long Range Development Plan (LRDP). A statement of overriding considerations and findings were adopted under the LRDP EIR relative to impacts on the Watkins Drive/Big Springs Road intersection. These remain valid for the current EIR as the traffic impact analysis for the proposed project determined that impacts to this intersection would not be more severe than those identified in the LRDP EIR.

The closure of Valencia Hill Drive is recommended in the Circulation and Community Mobility Element of the UNP. Considering the proposed project is immediately adjacent to Valencia Hill Drive, the vast majority of existing cut-through traffic on this street is generated by the University and the proposed project will further increase traffic in this area, it is appropriate that the project include design and construction of full street improvements to provide the permanent closure of Valencia Hill Drive northerly of Big Springs Road. The work needs to include curb, gutter, roadway paving, drainage facilities and landscaping as well as dedication of additional street right-of-way from the University to accommodate an offset cul-de-sac bulb.

- City staff commends UCR for providing for the installation of a sidewalk (as depicted in the project cross-sections within the EIR) along the westerly side of Valencia Hill Drive between Big Springs Road and Watkins Drive. To further enhance the walkability and the aesthetic quality along Valencia Hill Drive, the proposed sidewalk needs to be designed to include a landscaped pathway with street trees within the public right-of-way located between the curb and the sidewalk consistent with Citywide Design and Sign Guidelines.

- City staff is unable to adequately evaluate Utilities and Service Systems Impact 3.14-2, related to the capacity of the on-campus sewer main intended to serve this project. The EIR lacks sufficient data to support the peak flow rates listed for the 21 existing connections. Also, the method used to determine the anticipated flows from the project is not provided. The relative flow rates appear questionable. The 21 existing connections, which include residence halls totaling approximately 2,800 beds, are stated to discharge a peak flow rate of 2.5 cubic feet per second (cfs). Yet the proposed 810-bed project is expected to discharge a peak flow rate of 1.25 cfs.

To compound this matter, the University does not have full capacity rights to the 15-inch sewer main. In accordance with a 1961 agreement between the University and the City, the University has capacity rights equal to an 8-inch line. The EIR fails to evaluate whether the capacity rights have already been exceeded or will be exceeded with this project. As such, the Utilities and Service Systems analysis of the EIR is inadequate and significant impacts could result if sewer capacity cannot adequately serve the proposed project. Further evaluation of the current and proposed wastewater discharges from the University must be performed to determine the cumulative flows. If the capacity rights in the 15-inch main will be exceeded by this project, the University is required to pay the appropriate Capacity Charges to the City based on the fee schedule in effect at time of payment.
• Hydrology and Water Quality Impact 3.8-4 needs to be revised to acknowledge the University’s obligation to pay the City’s required Storm Drain Fees to mitigate impacts to the public storm drain system from increased runoff due to the proposed project.

• Implementation Tool UNP 7.5.2 of the University Neighborhood Plan (UNP) encourages new development projects to participate in the Crime Prevention Through Environmental Design (CPTED) program offered by the Riverside Police Department (RPD). Additionally, the UCR Long Range Development Plan (LRDP) EIR mitigation program includes mitigation measures to incorporate public safety considerations in the design and construction of proposed project within the campus. Consistent with the City’s UNP and UCR’s LRDP, UCR needs to collaborate with RPD to incorporate this program into the proposed project.

• Utilities and Service Systems, Section 3.14.2 of the EIR states that water for the campus is pumped to a campus pump station through a 15-inch City main transmission line. The subject water transmission line is a 16-inch diameter line and, therefore, stated incorrectly in the EIR. The EIR needs to be corrected to reflect the true size of the transmission line.

Your continued cooperation with the City of Riverside is greatly appreciated. City staff strongly encourages UCR to submit any future building design and landscaping plans to the City for review and comment. Should you have any questions regarding this letter, please contact Gus Gonzalez, Associate Planner, at (951) 826-5277 or by email at ggonzalez@riversideca.gov.

Sincerely,

Ken Gutierrez, AICP
Planning Director

cc: Ronald O. Loveridge, Mayor
Riverside City Council Members
Bradley J. Hudson, City Manager
Belinda Graham, Assistant City Manager
Kristi Smith, Supervising Deputy City Attorney
Scott Barber, Community Development Director
Siobhan Foster, Public Works Director
Tom Boyd, Deputy Public Works Director/City Engineer
Steve Libring, City Traffic Engineer
Rob Van Zanten, Principal Engineer
David Wright, Public Utilities General Manager
Kevin Milligan, Public Utilities Assistant General Manager/Water
Gary Kolff, Public Utilities Assistant General Manager/Resources
Matthew Bates, Utilities Senior Water Engineer
Tim Ralston, Associate Vice Chancellor, UCR, Capital and Physical Planning, 170 Surge Building, 900 University Avenue, Riverside, CA 92521
Juanita Bullock, Director of Physical Planning/Campus, UCR, Capital and Physical Planning, 170 Surge Building, 900 University Avenue, Riverside, CA 92521
2.3.3 Comment Letter C: City of Riverside Community Development Department

Response to Comment C-1 (Introduction)

UCR appreciates the City’s participation in the comment period for the Draft EIR. This introduction to the City’s comments presents an accurate summary of the project.

Response to Comment C-2 (Relocate parking structure to interior of site)

This comment suggests an alternative that would relocate the parking structure to the interior of the site, with residential buildings instead near the corner of Big Springs Road and Valencia Hill Drive. Analysis of impacts for aesthetics, air quality, land use, noise, and traffic as presented in the Draft EIR do not identify any significant impacts associated with the parking structure at the proposed location. With no significant impacts, there is no requirement under CEQA to consider such an alternative.

Response to Comment C-3 (Enhanced architectural and landscape treatments for parking structure)

UCR believes that the parking structure design incorporates the enhanced architectural design elements the City suggests – including grade variation along the east elevation, a primarily below grade situation along the north elevation, an array of building materials including concrete with reveals, brick (over concrete), and aluminum bar grating on the exposed elevations.

As depicted in Figure 2-3 and Figure 2-7 of the Draft EIR, the project entails maintaining 12 mature trees located east and southeast of the parking structure and augmenting this existing landscaping with 13 new trees (see discussion on page 3.1-9 of the Draft EIR) to provide ample screening of the proposed parking structure. The landscaping plans that are currently in preparation provide for 36-inch box container stock of Southern Magnolia, Afghan Pine, and Italian Stone Pine. These are all evergreen species that attain substantial height and breadth at maturity.

The turf ground cover in the area immediately east of the parking structure is being maintained at the request of the neighboring residents, who view this area as a neighborhood park. The suggested vine and shrub plantings are contrary to campus policy for safety and building maintenance and are not necessary for screening in consideration of the architectural design elements noted above.

Response to Comment C-4 (Valencia Hill Drive fencing)

As discussed on page 2-9 of the Draft EIR, the project entails extension of the tubular steel fence recently constructed on the east side of the Glen Mor 1 athletic fields. As discussed with City representative Gustavo Gonzalez (Personal communication, telephone conversation between Kathleen Dale, ICF International, and Gustavo Gonzalez, City of Riverside Planning, April 11, 2011), the proposed fencing extends along the Valencia Hill Drive frontage and then turns to connect to the northeast corner of the parking garage. This configuration is designed to establish a boundary between the campus and the neighborhood while retaining public access to the turf area at the Valencia Hill/Big Springs Road intersection. Based upon our discussion with City staff, we understand this addresses the concern expressed in the comment.
Response to Comment C-5 (Watkins/Big Springs Signal and Valencia Hill Drive Closure)

This comment correctly describes Mitigation Measure TR 1. UCR acknowledges the City’s statement that the City does not anticipate installing a signal at Big Springs Road and Watkins Drive in the foreseeable future. Page 3.13-11 of the Draft EIR states that this signal is under the control of the City and, accordingly, notes the project would result in a significant and unavoidable impact at this location due to the addition of project-related traffic at a congested intersection.

Based upon discussion with City staff representatives Gustavo Gonzalez and Rob Van Zanten (Personal communications, telephone conversation between Kathleen Dale, ICF International, and Gustavo Gonzalez, City of Riverside Planning, April 11, 2011 and telephone conversation between Kathleen Dale, ICF International and Rob Van Zanten, City of Riverside Public Works, April 13, 2011), it is understood that the reference to an alternate measure for permanent closure of Valencia Hill Drive is not intended to suggest that closure of Valencia Hill Drive would improve operation of the Watkins Road/Big Springs Drive intersection, but to suggest that campus funding of the Valencia Hill Drive closure would be a more effective use of campus funds for local circulation improvements. While the campus supports the permanent closure of Valencia Hill Drive, in the context of this environmental analysis, the existing temporary closure creates an existing setting for the local circulation network within which the Glen Mor 2 project would not directly increase the number of trips on Valencia Hill Drive and would not alter traffic patterns involving Valencia Hill Drive. On this basis, there is no nexus for project improvements or mitigation involving the permanent closure of Valencia Hill Drive. The Draft EIR (page 3.9-10) acknowledges University Neighborhood Plan provisions related to both Valencia Hill Drive and Watkins Drive and notes that the proposed Glen Mor 2 project would not preclude future implementation of improvements to these City streets in accordance with the City plan.

Response to Comment C-6 (Valencia Hill Drive sidewalk design)

This comment includes a recommendation for design features of the sidewalk along the west side of Valencia Hill Drive that will be constructed by the project (see page 2-9 of the Draft EIR). The proposed sidewalk placement is consistent with the existing curb-adjacent configuration at the Big Springs Road intersection, as well as along the east side of Valencia Hill Drive. The site design includes an extensive landscape buffer along the Valencia Hill Drive frontage to the campus side of the new sidewalk that will achieve the noted aesthetic quality. This comment and response do not raise any new or altered environmental impacts.

Response to Comment C-7 (Projected sewer flows)

The campus has conducted an updated evaluation of existing and projected wastewater flows; the results are provided in the Final EIR as Appendix T. Flows in the existing 15-inch sewer pipeline were monitored immediately upstream of the campus (at the manhole in the vicinity of the Big Springs Road/Valencia Hill Drive intersection) to determine off-campus tributary flows. Flows were also monitored at the manhole near the intersection of University Avenue and Canyon Crest Drive to provide information necessary to determine existing campus discharges and City staff were
consulted to determine anticipated future flows from undeveloped land within the off-campus tributary area. The flow monitoring determined that existing peak discharges from the off-campus area are 0.32 million gallons per day (mgd), existing peak discharge from the campus is 0.457 mgd, and future off-campus peak discharges are 0.027 mgd (based upon 73 single-family residences). Accounting for variations in the time of peak flows, a combined peak daily flow of 0.706 mgd was derived for existing discharges.

Projected wastewater flows for the Glen Mor 2 project were calculated based upon a typical rate of 100 gallons per student per day and also accounted for flows from the non-residential uses (Food Emporium, Conference Facility, and pool and community space). The result is an estimated average daily flow of 0.127 mgd and a peak flow of 0.231 mgd (considering a peaking factor of 1.82).

Based upon the pipeline diameter and slope condition (determined through current field measurements at all manholes), the capacity of the existing 15-inch sewer pipeline between Valencia Hill Drive and Canyon Crest Drive is between 1.45 mgd (50% full) and 2.61 mgd (75% full). Combining peak flows for existing discharges, future off-campus discharges, and projected Glen Mor 2 discharges, the peak daily flow demand for the pipeline in question is 0.94 mgd. Compared to a conservative capacity of 1.45 mgd, the existing system is more than adequate to serve existing demands, demand for the Glen Mor 2 project, and future off-campus demands.

Response to Comment C-8 (Sewer capacity rights and fees)

As stated on page 3.14-1 of the Draft EIR, the capacity rights and Capacity Charge issues noted in this comment are administrative matters that are the subject of ongoing negotiations between the campus and the University in accordance with Government Code Section 54999. Environmental impact issues related to sewer flow rates and sewer capacity are addressed in the response to Comment C-7 above.

Response to Comment C-9 (Storm drain fees)

As noted above with respect to sewer facilities, the matter of Storm Drain Fees is an administrative issue that does not pertain to an environmental impact of the project, and UCR will negotiate with the City regarding this matter, in accordance with Government Code Section 54999. This comment and response do not raise any new or altered environmental impacts.

Response to Comment C-10 (Crime Prevention Through Environmental Design)

The campus architectural design development incorporates Crime Prevention Through Environmental Design concepts in the design of buildings, lighting, and landscaping. The UCR Police Department is represented on campus project design teams. The campus also participates in ongoing coordination with the City through UNET and the joint City/University Coordinating Committee, providing opportunities for City input regarding relevant design features. This comment and response do not raise any new or altered environmental impacts.

Response to Comment C-11 (Water main size correction)

Page 3.14-1 of the Draft EIR has been revised to correct the reference to the 16-inch City water main. This correction does not raise any new or altered environmental impacts.
Response to Comment C-12 (Conclusion)

UCR appreciates the City's participation in the Draft EIR public review process.
April 1, 2011

Tricia D. Thrasher
Attn: Glen Mor 2 Student Apartments Project
UCR Office of Design and Construction
3615-A Canyon Crest Drive
Riverside CA 92507

Comments for DEIR for UCR Glen Mor 2 Student Apartments

Noise

Mitigation measure NOI 7 is flawed as it excludes safety alarms. Analysis should be made of the impact of “reverse gear” safety alarms. The construction of Glen Mor I consisted of in the use of construction equipment which used safety alarms which would sound each time the equipment was put in reverse gear. This would be the Beep-beep-beep sound. These alarms are extremely piercing in db sound and is a noise that exceeds acceptable limits. As the construction is to occur over many hours, days, and months (actually over 1 ½ years for Glen Mor II), this sound can impose an incredible amount of stress and announce upon the surrounding community.

There should be analysis of the noise generated by these safety devices. Such analysis should include amount of noise, duration, consideration of impacts, alternatives and any mitigation.

Landscaping

Consideration should be given to relocating the existing trees, marked for removal. It is proposed that 121 trees are to be removed from the project site. Many of the trees are mature and it should be possibility should be considered to relocate trees to new locations, as opposed to later filling in the landscaping with extremely young trees.

Traffic

-The DEIR fails to consider impacts of installing a light controlled intersection at Big Springs Rd. and Watkins Dr. Just prior to the adoption of UCR LRDP 2005 by the Regents of California, the city of Riverside had installed a series of stop signs at various intersections along Watkins Dr. Also, Watkins Dr. was re-striped to two lanes, with segregated bicycle lanes.
These changes were made at the urging of the University Neighborhood as a method of calming traffic, encouraging bicycle use as a form of alternative transportation, increasing safety to homeowners living along Watkins Dr. and various side streets.

The 2005 LRDP suggested re-striping Watkins to four lanes, installing a light controlled intersection at Big Springs Rd. and Watkins, which in turn would necessitate the removal of the stop signs along Watkins Dr. The LRDP reasoned stop sign removal was required so traffic would not back up behind the lighted intersection or immediate adjacent stop sign and cause interference between the two. Removing the stop signs will result in higher traffic speeds as posted traffic speeds have to be calculated based on a percentage of actual traffic speed.

Higher traffic speed would be a hazard for local residents as Watkins has a sharp curve and steep grade between Valencia Hill Dr. and Big Springs Rd. The combination of curve and grade make this section of road a blind curve. Residents already have great difficulty safely exiting or entering their driveways due to the current speed of traffic. Faster traffic will exacerbate this problem. As speeds increase, there will be less reaction time for drivers, increasing the blind curve situation.

On the section of Watkins Dr. between Big Springs Rd. and Mt. Vernon, this is a steep grade and motorists have a tendency to drive significantly faster on the downhill grade. At the urging of adjacent residents, the city of Riverside installed a series of three stop signs (at Broadbent, Knox, and Mt. Vernon) in an attempt to calm traffic and reduce traffic speeds. Even with these measures in place, there is a tendency for motorists to exceed speed limits, run stop signs, and recklessly cross double yellow or bicycle lane lines to pass legal traffic.

While it may be tempting to suggest that any increase in speed should be become a policing issue for local law enforcement, because it is a result of changes brought about by this project, it must be analyzed and mitigated.

Since the development of the 2005 LRDP, the city of Riverside developed and approved, with the co-operation of UCR, the University Neighborhood specific plan. The UN specific plan retained the current configuration of Watkins Dr. as a 2 lane w/ segregated bicycle lane, shady boulevard.

The DEIR needs to consider:

-Affects of changing traffic patterns will have, not just for volume, but for speed and safety of pedestrians, bicyclists, and homeowners.

-How does this the Glen Mor II project and traffic mitigation adhere to the UCR approved University Neighborhood specific plan?
Parking

Parking has always been an issue at UCR. The DEIR tries to lump all housing parking together as a “precinct,” without regard to parking lots proximity to the related dormitories. The general area being considered is divided by a natural arroyo. The Lothian (& parking lot 14) and Glenn Mor II (with new parking structure) on the south side of the arroyo and the other Dorm housing and parking on the north side of the arroyo. It should be assumed that residents will want to park adjacent to the Housing in which they reside. It is unreasonable to plan that residents who live on the south side of the arroyo would be willing to park in lots on the north side of the arroyo, especially since those lots are further separated by additional buildings.

Parking calculations should only consider parking capacity of the facilities on the south side of the arroyo. Mixing in parking facilities located, at great distances and past barriers such as the arroyo and other buildings, is disingenuous and misleading.

The current capacity of Lot 14 is 482 slots but that will be reduced to 62 by the new construction. The new parking structure will provide 579 slots, bringing the total slots available to the Lothian and Glen Mor II residents to 641. Given the current number of slots is 482; the new configuration only adds 159 slots to the total capacity. Glen Mor II will be adding 810 beds to the mix. Using table 3.13.9 and the LRDP ratios for parking to beds, parking demand for Lothian is listed as 272 and Glenn Mor II as 405, for a total of 677. Subtracting the projected supply of 641, there is a deficiency of 36 parking slots.

Over 100% of the available parking supply is accounted for and there is no planning for changing future circumstances. There have been situations in past years where UCR has had to increase the number of beds per room.

The parking analysis is flawed and needs to be reconsidered. The concept of a “parking precinct”, which includes parking that is in accessible to the Glenn Mor II project needs to be dropped. The current analysis includes inaccessible parking which leads to erroneous and flawed calculations.

There is a lack of planning for worse case scenario. What if the parking calculations are wrong? What if there is a changing need for more parking? Addressing the issues by using parking that is located at great distance and past many barriers, is inadequate.

Alternative proposal

The DEIR should consider as an alternative the construction of single family residences for short term visiting faculty family housing. There is a need for such housing on campus that within walking distance. Such facilities could serve as a transitional use between the high impact Dorm housing of Lothian or Glen Mor 1, and the off campus single family housing. Such
housing would be in keeping with sustainability goals. Such family housing could be very attractive to faculty, as it would be within walking distance of campus, the CDC, local bus service, and other community resources.

Sincerely,

Kevin Dawson

269 Goins Ct.
Riverside Ca 92507

951-781-0386 h
2.3.4 Comment Letter D: Kevin Dawson

Response to Comment D-1 (Noise analysis should consider back-up safety alarms)

The campus understands the annoyance associated with the reverse-gear safety alarms, which also present a disturbance to on-campus residential, academic, and administrative uses. Mitigation Measure NOI 7 states that construction contracts will prohibit the use of noise-producing signals, except for safety purposes only. The campus has investigated alternatives to the widely used reverse-gear alarms, including use of observers and other audible alarm systems. The logistics of use of observers and availability of alternate devices make use of alternate safety mechanisms infeasible.

While the noise generated by back-up safety alarms is an annoyance, it is required under worker safety regulations governing activity on construction sites (OSHA Regulations 29 CFR 1926.601(b)(4) and 1926.602(a)(9). Mitigation Measure NOI 2 restricts the hours during which construction may occur; thereby also limiting the hours during which such alarms may be in use. The noise impact analysis for the Glen Mor 2 project concludes that construction-period noise is significant and unavoidable. While the noise from back-up safety alarms is not separately quantified, the significant and unavoidable determination includes noise from the back-up safety alarms that must be used to meet applicable worker safety regulations. This comment and response do not raise any new or altered environmental impacts.

Response to Comment D-2 (Relocate mature trees)

The campus routinely considers preservation and relocation of trees in accordance with LRDP Planning Strategies Conservation 1 and 2 and Plan and Program 4.1-2(b). As noted on page 3.10-1 of the Draft EIR, the campus Landscape Architect evaluated the trees on the Glen Mor 2 site and the proposed removal plan and determined that none of the trees proposed for removal constitute specimen trees. Considering the species involved and the condition of the trees proposed for removal, the campus Landscape Architect has determined that relocation is not feasible (see Draft EIR References, Personal Communication, Bullock 2010). Please note that many of the existing trees on the site will remain, as shown in Draft EIR Figure 2-7. This comment and response do not raise any new or altered environmental impacts.

Response to Comment D-3 (Impact of Watkins/Big Springs signal)

The campus understands the community concern is that installation of a signal at the Watkins Drive/Big Springs Road intersection may be contrary to traffic calming measures the City has established at the community's request.

The analysis of traffic impacts for the Glen Mor 2 project identifies a service level impact at the intersection of Watkins Drive and Big Springs Road for which signal warrants are met. The certified 2005 LRDP EIR and the Glen Mor 2 EIR both acknowledge that installation of the signal is beyond the University's control. In the absence of any assurance that the measure would be implemented, the impact on traffic operations at this intersection is deemed significant and unavoidable. The campus has been in contact with City representatives who acknowledge that the signal warrant is
met, but also acknowledge that there is no foreseeable timeframe for installation of a signal at this intersection.

If the City eventually decides to install a signal at this location, there are multiple means available to further the traffic calming effect provided by the existing all-way stop. Signal timing and the speed limit designation on Watkins Drive may be utilized to control traffic speeds, and provide breaks in traffic for pedestrian and cyclist movements. Crosswalks, bicycle lanes, and sidewalks are already in place and could be adjusted as necessary for a signalized intersection. As with the signal installation, implementation and enforcement of such measures is under the City's jurisdiction and is beyond the University's control.

Response to Comment D-4 (Parking analysis should not be based on entire housing precinct)

The description of existing parking conditions and analysis of project-related parking impacts presented in Section 3.13 of the Draft EIR treats the Lothian, Aberdeen/Inverness, Pentland Hills, Glen Mor 1 and Glen Mor 2 area as a housing precinct with shared access to the various parking facilities located within the precinct (Parking Lots 14, 21 and 22, and proposed parking structure). The Glen Mor 2 project will provide food service and general student services (such as mail service) for the benefit of the described precinct. The Glen Mor 2 project includes two pedestrian bridges over the arroyo, to facilitate movement throughout the precinct. The various parking facilities will all be within a few minutes' walk of each of the residential buildings within the precinct, and, on this basis, consideration of the housing area on a precinct basis is considered reasonable.

Response to Comment D-5 (Parking analysis flaws and flexibility for future)

This comment accurately describes the project-related changes in available parking for the housing precinct, as described in Table 3.13-7 of the Draft EIR (please note that this table has a typographical error that has been corrected in the Final EIR where a footnote number errantly appeared as regular text). The project-related housing precinct includes Aberdeen-Inverness, Lothian, Pentland Hills, Glen Mor 1, and Glen Mor 2, not just Lothian and Glen Mor 2, as this comment suggests. Table 3.13-9 of the Draft EIR shows that with addition of the Glen Mor 2 project to the baseline Fall 2010 occupancy, the project results in a deficit of 92 spaces. To address this impact, Mitigation Measure TR 4 establishes an ongoing annual reporting requirement for occupancy and parking within the housing precinct and establishes a commitment that UCR will not issue parking permits beyond the number of available parking spaces. This reporting program will ensure that the number of resident student vehicles does not exceed the number of parking spaces available.

Response to Comment D-6 (Single-family housing alternative)

Residential housing of the type proposed is not envisioned as part of the adopted LRDP and the campus does not foresee demand for such facilities. As stated on page 2-5 of the Draft EIR, the primary objective of this project is to provide additional on-campus housing for students, consistent with the 2005 LRDP goal of housing 50 percent of students on campus. The alternative suggested in this comment would conflict with this basic project objective and with this important goal of the LRDP. Therefore, revision of the Draft EIR to incorporate this alternative is not warranted.
Dear Chancellor White, dear UC Regents,

The designs for the Glen Mor 2 dormitories at UC Riverside, a group of five-story dormitories on a hill immediately adjacent to a residential neighborhood along Valencia Hill Drive, and close to one of the entrances to the campus, have raised concerns for residents and campus neighbors.

The planned dormitories may be significantly higher than the existing dormitories further inside the campus. It is unclear if and to what extent the foundations are planned to be sunken within the natural hill on the site or placed behind it.

We, members of the community, hope that these designs can be adjusted so that buildings at the very edge of the campus are tapered to a lower height, to avoid blocking sunlight or views into the campus.

It is in the campus’ interest cultivate a pleasant and amenable aspect for the only residential area within walking distance of UCR libraries, theaters and concert halls. As budget issues become increasingly difficult for the University, alumni and community relations become ever more important. The residents of this neighborhood are largely alumni who are regularly approached for donations. We are important stakeholders in the campus and we would like to see a successful and aesthetically appealing design for the new dormitories and for the entrance to the campus overall.

Sincerely yours,
Karl Johns

BA 1976, Phi Beta Kappa etc.
2.3.5 Comment Letter E: Karl Johns

Response to Comment E-1 (Building heights, grading design and shadows)

Chapter 2 of the Draft EIR acknowledges that the project would construct multi-level structures near the campus edge and Section 3.1 of the Draft EIR analyzes the aesthetic impacts of those structures. As shown in Table 2-1 of the Draft EIR, each of the residential buildings would be five stories in height. This table also identifies proposed building pad elevations, roof height elevations and numerous other detailed aspects of the site design, while the cut and fill diagram included as Appendix C of the Noise Study (Appendix Q) depicts the proposed grade adjustments on the site. The relationship of the project buildings to the terrain is also depicted in the oblique views presented in Figure 2-4 and in the drawings presented in Appendix B of the Draft EIR. These figures show that several of the proposed structures, including Building D, Building E, Building G, Building H, and the parking structure, would stand on partially sunken foundations, and that portions of the residential buildings would be limited to four stories (east end of Building D and north side of Building G). The visibility of the proposed buildings from the off-campus residential area east of the project site is depicted in the visual simulations shown in Figures 3.1-4 and 3.1-5, and from the campus entrance referenced in this comment in Figure 3.1-3 of the Draft EIR. The project incorporates a minimum 100-foot landscaped buffer to provide screening of proposed structures from off-campus views. As stated on page 3.1-10 of the Draft EIR, the project the project-related residential building nearest to the eastern campus edge is approximately 200 feet from Valencia Hill Drive, and the narrow ends of the eastern buildings have been oriented toward the off-campus areas to reduce the perceived building mass. This response directs the commenter to existing information in the EIR. This comment does not raise any new or altered environmental impacts.

The comment suggests that tapering of building heights may avoid blocking of sunlight or views into the campus. The photosimulation provided as Figures 3.1-5 in Draft EIR Section 3.1 illustrates the substantial existing campus view from Valencia Hill Drive that will remain upon implementation of the Glen Mor 2 project. Mitigation Measure AES 1 ensures that landscaping along the south arroyo edge maintains a vista along this feature into the campus core, including the iconic Carillon Tower. Considering the existing impediments to views into the campus from the east (topographic features and built conditions depicted in the existing condition insets in Draft EIR Figures 3.1-3, 4 and 5), reduced building heights would not substantially alter the post-project condition with respect to views into the campus.

The project architect has prepared a series of diagrams that depict shadow conditions created by the proposed buildings for the extreme circumstances associated with winter solstice and summer solstice. These diagrams have been added to the EIR as part of the Final EIR errata (Appendix B.1). The diagrams illustrate comparatively limited effects to shadowing of off-campus areas. Due to the relative position of the buildings and the movement of the sun, the area of concern is east of the campus, generally south of Goins Court. For the Winter solstice, shadows extend in a northeast direction and may be cast upon three single-family residential parcels east of Valencia Hill Drive for a period of less than 30 minutes immediately before sunset. For Summer solstice, shadows are cast in a southeast direction, and may be cast upon three single-family residential parcels and the University Village Apartments along Big Springs Road, east of Valencia Hill Drive. For summer, shadow effects on off-campus properties would be perceived for approximately 90 minutes prior to sunset. Furthermore, please note that most of the existing structures that would be affected by
project-related changes in shadow conditions are already affected by shadow conditions due to the nature of the existing urban environment in which they are situated. Due to the time of day and limited duration\(^1\) of shadows that may affect the off-campus area as a result of this project, this impact is considered less than significant. This information does not identify a new significant effect or a substantial increase in the severity of a previously identified effect.

Response to Comment E-2 (Neighbors as stakeholders)

UCR acknowledges their neighbors as important stakeholders in the community and in UCR affairs, and values neighbor input in their projects. This comment does not address the adequacy of the EIR or an environmental impact of the proposed project, and warrants no changes to the environmental analysis.

\(^1\) For comparison, the City of Los Angeles has established a threshold for significance of shading impacts (Los Angeles CEQA Thresholds Guide, available at http://www.ci.la.ca.us/ead/programs/thresholdsguide.htm). Impacts due to shading are considered significant if a project would cast shade upon a sensitive use for more than three hours between the hours of 9:00 AM and 3:00 PM between later October and early April, or for more than four hours between the hours of 9:00 AM and 5:00 PM between early April and late October.
April 1, 2011

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

Tricia D. Thrasher
UCR Office of Design and Construction
3615-A Canyon Crest Dr.
Riverside, CA  92507

Re:  Glen Mor 2 Student Apartments Project

Dear Ms. Thrasher:

The following are my comments regarding the Environmental Impact Report for the Glen Mor 2 Student Apartments Project.

2.4.1 Project Features

**Residential Buildings:** “The buildings would be five stories tall, with an average height of 55 feet.” The project is located across Valencia Hill Drive from one-story, single-family residences and a two-story apartment complex. The placement of huge, five-story buildings across the street from one- and two-story structures is inappropriate. In addition, the ground on which some of the 55-foot Glen Mor 2 apartments would be constructed is as much as 20 feet above the elevation of the nearby private residences, meaning that the effective height of the buildings would be as much as 75 feet. These apartments would overwhelm the immediate off-campus neighborhood and drastically denigrate its character. If UCR needs to construct huge apartment buildings, it should place them away from established single-family residential neighborhoods.

**Parking Structure:** “The finished surface of the second deck would be 21 feet above ground level. . . . Pole-mounted light fixtures (18 feet tall) would be provided along the center bay on the roof of the structure.” The light fixtures would be 39 feet above the ground and would create a significant source of glare for residents on the east side of Valencia Hill Drive. The lights would be clearly visible through the landscape buffer. All of the mature trees currently planted along Valencia Hill Drive at the proposed site of the parking garage are deciduous, and none of them even approaches a height of 39 feet. They would provide no screening for several months of the year. All trees planted in the proposed 100-foot “buffer” would have to be very tall and completely evergreen and very close together to screen the lights atop the parking garage from nearby residences. “A 200-kilowatt photovoltaic system is being considered for the roof of the parking structure. The proposed design would require multiple [20 in the illustrations] photovoltaic panels on 25-by 48-foot carport-like structures that would be supported on a single 14-foot-tall steel post. The stationary panels would be angled toward the
southern exposure. With the photovoltaic system, the pole-mounted roof lights, discussed above, would be replaced with the integrated lighting on the underside of the panel structures.” If the lights on the back of the tilted photovoltaic panels, at least 35 feet above the ground, were bright enough to provide useful illumination on the upper deck of the parking garage, they would be bright enough to be annoying to residents on the west side of Valencia Hill Drive, east and north of the garage. Again, the existing deciduous trees would provide no screening, and the trees in the landscape buffer would provide no screening for many years, depending on the species planted. (Note: The print in the photometric evaluation by Sasaki is too small to be legible. Such plans often bear little resemblance to reality. I recall examining the lighting evaluation for the athletic fields built in conjunction with Glen Mor 1. That diagram indicated that the allegedly state-of-the-art fixtures would generate no light spillage beyond a few feet from the edge of the fields. Instead, they provide near-daytime illumination on my property, and they are extremely annoying to people who live as far away as Campus View Drive.)

Landscaping: “The streetscape along the Valencia Hill Drive frontage would include a 100-foot (minimum) landscape buffer with tree plantings of mixed species.” To be helpful as a screen, all trees in the buffer should be evergreen and tall enough to block the structures behind them, especially the parking garage with its rooftop lights.

3.0.4 Cumulative Impact Analysis Introduction

Construction of Glen Mor 2 is expected to last from summer 2011 to fall 2013. Construction of the Environmental Health and Safety facility is anticipated to last from December 2012 to June 2014. Construction of the Perris Valley Line is expected to occur from January 2012 to June 2013. According to these estimates, from December 2012 to June 2013, all three projects will be simultaneously under construction. The continuous noise (particularly the heavy equipment and backup alarms), pollution (particularly the dust and diesel exhaust), and traffic disruption will make the immediate off-campus neighborhood unlivable during this period. UCR has an obligation to alter its construction schedule if multiple projects generate intolerable conditions in the adjacent neighborhood.

3.1.2 Aesthetics—Environmental Setting

Scenic Vistas: “Recognition of scenic vistas in the LRDP EIR was limited to panoramic views of the Box Springs Mountains from publicly accessible viewpoints. For purposes of this EIR, scenic vistas also include focal views of the Carillon Tower from publicly accessible viewpoints because the Carillon Tower was identified in the LRDP as a visual landmark.” Generally, this section of the EIR asserts that scenic vistas are being preserved if the project allows people at a few very specific locations along Valencia Hill Drive to peek between the Glen Mor 2 buildings and see a portion of the Carillon Tower in the distance. This approach sidesteps the fact that Glen Mor 2 will destroy residents’ views of many features of the landscape, including Mount Rubidoux. Glen Mor 1 resulted in substantial denigration of the view from points east
of the campus, and Glen Mor 2 will ruin it altogether, hemming in residents with a claustrophobic array of enormous buildings.

3.1.4 Aesthetics—Impact Analysis

Methodology: “Degradation of the visual character of the campus and its surroundings is evaluated by determining if a substantial adverse change would occur. . . Visual change that is compatible with existing patterns of development would not constitute a significant impact.” This statement constitutes an invalid methodology because it assumes that the “existing patterns of development” are compatible with their surroundings. The dormitory buildings in Glen Mor 1 are on a much larger scale than the homes in the surrounding residential neighborhood. The apartment buildings in Glen Mor 2, being larger than Glen Mor 1, would be even more incompatible with the surrounding neighborhood. Their similarity to Glen Mor 1 guarantees that their impact on the visual character of the area adjacent to the campus will be substantial.

Impact 3.1-3: “The proposed parking structure and photovoltaic system would be almost completely blocked from view by the existing mature trees in the immediate foreground of the view, which are being retained in furtherance of LRDP Planning Strategy Conservation 1.” That statement is false. As I write this, those trees are bare. Even when fully “leafed out,” they would be too small and widely spaced to shield the parking structure and photovoltaic system “almost completely.” “. . . the proposed landscape design would provide a 100-foot landscaped buffer (minimum) along the Valencia Hill Drive frontage and include enhanced screening through the planting of additional trees in the retained turf areas south and east of the parking structure.” Again, to be effective, this planting would need to consist entirely of evergreen trees of substantial size. “Although the easternmost portion of the photovoltaic system may be visible through the landscaping, it would be compatible in scale and design with the new built environment proposed by the project.” It would not, however, be compatible with the low-scale neighborhood across the street. “The new residential apartment buildings present the potential for a more prominent visual intrusion than the parking structure. . . . The project would preserve mature trees along the Big Springs Road and Valencia Hill frontages. . . . As such, the remaining mature trees would continue to be the most dominant features in the view, and the view would maintain its existing heavily landscaped visual character.” The trees, particularly those along Valencia Hill Drive, do not constitute “heavy” landscaping. They would be dwarfed by five-story apartment buildings, which would certainly be the dominant feature in the view.

3.2.2 Air Quality—Environmental Setting

Sensitive Receptors and Locations: The list of “sensitive receptors within the project vicinity” omits UCR’s Child Development Center. The center is not within 25 meters of the project site, but it is certainly close enough to be affected by the “significant and unavoidable” impacts on air quality from dust during construction. The EIR should include an evaluation of the effects of dust pollution on children at the facility and
should indicate what measures will be undertaken to protect the children from exposure to the dust.

### 3.5.2 Geology and Soils—Environmental Setting

**Regional Setting:** “It is noted that the LRDP EIR (page 4.6-5) mentions the inactive Box Springs fault as being located near the northeast corner of campus. The project-specific investigation completed for the Glen Mor 2 project revealed no evidence of on-site faulting.” . . . **Faulting:** “The closest known active fault to the project site is the San Jacinto fault. . . . There is no evidence of active or potentially active faults on or in the immediate vicinity of the project site, as determined through a review of geological maps, aerial photographs, and on-site observation.” . . . **3.5.4—Impact Analysis**

**Significance Criteria:** “An updated review of geologic maps and aerial photographs, as well as the site investigation conducted by CHJ (Appendix L, page 8), confirms the lack of published information regarding active faulting on the project site and the lack of evidence in photographic records or on the ground pertaining to active faulting.” Appendix L, page 8, does not describe how the earthquake-fault evaluation was conducted “during the geological field reconnaissance,” other than to imply that only a visual examination was performed. A visual examination would reveal nothing, because the fault is no longer visible. It lies beneath the intramural fields at the northeast corner of the campus. The land has been graded level and is completely covered by vegetation. I have seen the Box Springs fault in action. When the Big Bear Earthquake occurred at 8:05 a.m. on June 28, 1992, I heard an extremely loud noise like a rifle shot from the formerly vacant lot that is now covered by the intramural fields. When I looked in that direction, I saw a wall of dust rising along a clearly defined line. It was obvious that the ground had broken and shifted along a linear path. Although the Box Springs fault may not be classified as “active,” it can move in response to earthquakes on other faults. It is irresponsible of UCR’s consultant, CHJ, to deny the fault’s existence on the basis of a merely visual examination. Interestingly, UCR’s “Initial Study/Mitigated Negative Declaration, East Campus Infrastructure Improvements, Phase 2” includes the following: “One inactive fault, known as the Box Springs Fault, is buried underneath Pleistocene-age alluvium near the northeast corner of the campus. This fault is associated with springs found along the southwest margin of the Box Springs Mountains.” The fault is also recognized in the City of Riverside Planning Department’s “Specific Plan Amendment, Rezoning and Parcel Map, Planning Case P03-0500.1, P03-0500.2—Canyon Springs Business Park”: “The closest previously mapped fault to the site is the Box Springs Fault and another unnamed fault, both within the Box Springs Mountains. These faults are probably not active as determined through trenching in alluvial materials.” This information is from a geotechnical investigation conducted by Rasmussen and Associates in 1980.

### 3.10.2 Noise—Environmental Setting

**Noise:** Once again, the list of sensitive receptors fails to include UCR’s Child Development Center. This facility will be affected by noise from multiple construction
projects (Glen Mor 2, the EHS facility, and the Perris Valley Line), as well as freight trains on the BNSF tracks.

Traffic Noise: There appears to be an error in Table 3.10-2. The existing noise level for ST-4, an apartment at 277 West Big Springs Drive that is actually along Valencia Hill Drive, is 55 dBA CNEL, while the existing noise level for MR-1, a home at 3653 Watkins Drive, is 52 dBA CNEL. MR-1 is subject to greater traffic, including noisy buses and trucks, than ST-4 and should have a much higher level of traffic noise.

3.10.4 Noise—Impact Analysis

Impact 3.10-4: “The project would generate increased local traffic volumes, but would not cause a substantial permanent increase in noise received at on- and off-campus locations. . . . Because project-related traffic noise is not anticipated to increase ambient noise levels by 5 dB CNEL or greater, impacts associated with increased traffic from the proposed project would be less than significant, and no mitigation is warranted.” As UCR grows, it considers only the impacts of each specific project, rather than the overall impacts of its growth on the surrounding area over time. Each new growth spurt increases local traffic, but not enough to achieve significance by established standards; however, the cumulative effect of project after project is extremely deleterious to the UCR neighborhood. The environmental analysis should address the combined effects of UCR’s recent projects along with the current one to produce a valid result.

Impact 3.10-7: “Project construction would result in a substantial temporary increase in on- and off-campus ambient noise.” This analysis fails to take into account one of the most thoroughly annoying sources of construction noise: backup alarms. During the construction of Glen Mor 1, the piercing screech of multiple backup alarms was relentless throughout the day (and sometimes throughout the night). The alarms were clearly audible inside my house, with all the windows and doors shut. UCR needs to minimize the noise from backup alarms during the construction of Glen Mor 2.

3.10.5 Noise—Cumulative Impacts

Cumulative Permanent Noise Impacts: “Increased train noise attributable to the Perris Valley Line project was analyzed in the Draft EIR for that project.” That Draft EIR was riddled with false data, as the responses from interested parties and litigants have revealed. It is unwise for UCR to base an impact analysis on the falsehoods in the PVL’s document. “Sound barriers near the affected residential areas are proposed as mitigation for the Perris Valley Line project impacts. The impact at residences east of the Glen Mor 2 project site was identified as less than significant because of the ample distance between the tracks and residences and because, with no roadway/railway crossings in this area, train horns do not sound.” The proposed sound barriers are not continuous. For instance, there are no barriers between the tracks and UCR’s property for a substantial distance along Watkins Drive. The train horns do sound in areas where there are no crossings. You can trust me on that one—I hear them every night.” Noise
generated by the Glen Mor 2 parking structure would not be heard at the same receptors as would be affected by the train noise, so this aspect of the project would not contribute to the cumulative impact.” That statement is utterly false. The train noise permeates the entire neighborhood and is extremely loud along Valencia Hill Drive.

3.13.2 Transportation and Traffic—Environmental Setting

Local Roadway Network: The analysis by Kunzman fails to include the intersection of Watkins Drive and Valencia Hill Drive. A large number of project-related vehicles that left or entered the campus on Big Springs Road would also travel through the intersection of Watkins Drive and Valencia Hill Drive, where there are often substantial delays during peak hours.

Existing Traffic Conditions: “Future conditions were estimated by adding traffic trips, assuming a 1.7-percent annual growth rate, based on the rate used in the LRDP EIR, and calculating the resultant intersection delay at this project’s studied intersections.” In an analysis of UCR-related traffic, the figure of 1.7-percent growth is far too low. According to Page 2-11, “The 2005 LRDP projects an enrollment of 25,000 students for the 2015/2016 academic year. . . . The latest student population is approximately 20,750 (according to fall 2010 statistics).” This represents a 20.5% increase, or about 4.1% per year. Using the region’s “ambient growth rate” for the roadways around the campus is inadequate.

Parking Supply and Demand: The LRDP’s parking ratios are far too low to be realistic. The paragraph following Table 3.13-4 indicates, “With the existing surplus of parking spaces, the campus has been able to issue parking permits to more resident students than it would have been able to issue if the facilities had only met LRDP parking ratios.” In other words, the demand for parking spaces exceeds the supply. The EIR provides no actual data regarding how many students on campus have cars.

3.14.4 Transportation and Traffic—Impact Analysis

Impacts and Mitigation Measures: “TR 1: Contribute a proportional share of funds to the City of Riverside to install a traffic signal at the intersection of Watkins Drive and Big Springs Road. . . . The University’s proportional share will be based on the Glen Mor 2 project’s total traffic contribution to the intersection of Watkins Drive and Big Springs Road, which is currently anticipated to be 6.6 percent, as determined by the Traffic Impact Analysis prepared for the project.” This analysis is disingenuous. The current level of service at that intersection results, in part, from UCR’s growth over recent years, and UCR should base its “proportional share” on the total amount of UCR-related traffic at the intersection. This amount can be calculated (for peak hours, at least) by using the figures in Kunzman’s traffic study. One can determine the number of vehicles entering and leaving UCR on Big Springs Road and divide that figure into the total number of vehicles using the intersection of Big Springs Road and Watkins Drive. The results range from 23.2% on Figure 4 to 36.2% on Figure 14. UCR should contribute at least 30% to the cost of the traffic signal.
On Figure 4, there is apparently an error in the calculations. The square for Intersection 7 indicates that 201 westbound vehicles enter the intersection. However, the square for Intersection 8 shows only 166 vehicles traveling west toward Intersection 7. There are no driveways along Big Springs Road between the two intersections, so what is the source of the 35 vehicles that appear at Intersection 7 without first having traversed Intersection 8? This error is carried forward into the projected traffic volumes in the other figures.

The analysis fails to consider what would occur if a traffic signal were installed at Watkins Drive and Big Springs Road. That installation would result in the removal of one or more stop signs on Watkins Drive, increasing the speed and decreasing the safety on that roadway.

Chapter 4—Alternatives Analysis

UCR should seriously consider whether the project is necessary, in light of the state’s financial crisis. UCR officials have stated publicly that layoffs of staff and decreases in enrollment are likely, depending on whether voters choose to extend certain taxes. In this environment, an expensive housing project may not be the best use of UCR’s money.

If the project must be built, I suggest the Environmentally Superior Alternative, because its scale is far more consistent with the surrounding neighborhood than the scale of the other alternatives. UCR has a lot of land, and it should build its huge housing complexes far away from the existing single-family neighborhood.
2.3.6 Comment Letter F: Robert A. Philips

Response to Comment F-1 (Project scale incompatible with adjacent neighborhood)

Please see the response to Comment E-1 regarding height and orientation of the buildings proposed on the eastern side of the site and nearest to the off-campus residential area and the analysis of the visual impact of these structures. The project's compatibility with the off-campus area in this regard is discussed on page 3.9-13 through 3.9-14 of the Draft EIR. As explained in that discussion, the residential building farthest east on the site is 200 feet from the curbline on the west side of Valencia Hill Drive, and Valencia Hill Drive and the setbacks to the existing houses provide an additional separation of at least 65 feet. This impact discussion also explains that the project incorporates ample setbacks and architectural design elements to reduce the mass and scale of project buildings as perceived from this off-campus area, and the Draft EIR concluded that this impact would be less than significant. The proposed site conditions characterized in the comment are consistent with the conditions considered in the Draft EIR analysis and conclusions. This comment does not provide new substantial evidence that would alter the impact analysis or conclusion.

Response to Comment F-2 (Parking structure lighting)

This comment accurately describes the height of the parking structure and light poles planned for the roof of that structure, and the height of the potential photovoltaic system also being considered for the roof. As discussed on page 2-7 of the Draft EIR, the lights would be limited to the center bay of the parking structure's roof, as depicted in the oblique views of the project shown on Figure 2-4 of the Draft EIR, and would not be placed at the edge of the structure. The height of these lights compared to the height of the existing and proposed trees in the landscaped buffer east of the parking structure is depicted in the Site Sections in Appendix B. For an example of how trees would screen views of these lights, please see the visual simulation presented in Figure 3.1-3 of the Draft EIR. As this simulation shows, the existing trees are of ample height to screen views of these lighting features. The new trees to be interspersed within the existing deciduous trees in the adjacent landscape buffer – Southern Magnolias, Afghan Pines and Italian Stone pines – are all evergreen species with substantial height (50 to 90 feet) and breadth (25 feet to 100 feet) at maturity.

The impact of this new light source is discussed on pages 3.1-12 through 3.1-13 of the Draft EIR, which concludes that the impact would be less than significant because lighting would be blocked from various off-campus areas by intervening topography, intervening structures, or existing and proposed screening vegetation. The proposed site conditions characterized in the comment are consistent with the conditions considered in the Draft EIR analysis and conclusions. This comment does not provide new substantial evidence that would alter the impact analysis or conclusion.

Response to Comment F-3 (Photometric analysis legibility an reliability)

Please note that the PDF electronic version of the photometric information provided in Draft EIR Appendix G can be zoomed in to a size that makes the print legible when viewed on a computer. (The Draft EIR is available in electronic format at odc.ucr.edu/legal.html.) This information provides specifications for lighting features planned for use on the site that was prepared by qualified professionals, and validly informs the analysis presented in the Draft EIR. This comment also states
opinions regarding a completely different type of lighting than will be provided on the Glen Mor 2 project.

**Response to Comment F-4 (Use tall evergreens for landscape screening)**

As noted in the response to Comment F-2, the new trees to be interspersed within the existing deciduous trees in the landscape buffer adjacent to the parking structure are all evergreen species with substantial height (50 to 90 feet) and breadth (25 feet to 100 feet) at maturity. The mature landscape will provide effective screening of both the structure and the lighting, as illustrated with the existing trees (of smaller height and breadth) in Draft EIR Figure 3.1-3.

**Response to Comment F-5 (Concurrent campus construction projects)**

Estimated construction timeframes for cumulative projects are stated in Section 3.0.4 of the Draft EIR. The potential for Glen Mor 2 construction to overlap with construction of the Environmental Health & Safety (EH&S) Expansion, the Student Recreation Center Expansion, the Health Sciences Teaching Center project, and the Perris Valley Line project is considered in the cumulative analyses presented in Section 3.2.5 (Air Quality), 3.10.5 (Noise), and 3.13.5 (Transportation and Traffic). The Draft EIR fully discloses these cumulative impacts, including identifying a significant and unavoidable impact due to cumulative emission of construction-related PM10 and PM2.5 (see Page 3.2-20 of the Draft EIR). As stated on page 3.10-21 and 3.13-18 of the Draft EIR, LRDP PP 4.14-2 requires the campus to assess construction schedules of major projects and adjust construction schedules, work hours, or access routes to the extent feasible to reduce construction-related traffic congestion. Appendix F of the Draft EIR establishes a mechanism to monitor and document campus compliance with this LRDP measure in the event construction schedules overlap. The proposed conditions characterized in the comment are consistent with the conditions considered in the Draft EIR analysis and conclusions. This comment does not provide new substantial evidence that would alter the impact analysis or conclusion.

**Response to Comment F-6 (Visual analysis methods and conclusions regarding views from east)**

The Draft EIR analyzed the potential project impacts to the vista identified in the LRDP EIR (views of the Box Springs Mountains), and also the vista that includes the Carillon Tower, acknowledging the importance of this landmark to views from the off-campus area east of the site. The Draft EIR analyzed project impacts on this view by creating a visual simulation for key observation point (KOP) 8 (see Figure 3.1-5), and concluded that the impact would be significant unless mitigation was incorporated to prevent project-related landscaping from blocking views of the tower (see Impact 3.1-1 and mitigation measure AES 1).

The KOP-based analysis presented in the Draft EIR is derived from a commonly used methodology that originates with the Bureau of Land Management's Visual Resource Contrast Rating system, which acknowledges that a project's change in the visual environment cannot be assessed from every vantage point and instead identifies the most representative viewpoints. It should also be noted that views of the Carillon Tower from off-campus areas along Valencia Hill Drive are intermittent under existing conditions, due to intervening topography, vegetation, or structures. This comment does not provide new substantial evidence that would alter the impact analysis or conclusions presented in Draft EIR Section 3.1 relative to project impacts upon views from points east of the campus. Revision of the Draft EIR is not necessary in order to address this comment.
The comment suggests that views of Mount Rubidoux would be diminished as a result of the proposed project. This locally prominent hill is located approximately four miles to the west. Under existing conditions, views of this feature from the campus boundary at Valencia Hill Drive are available only from the vicinity of the Watkins Drive intersection, looking west. The nearest proposed building on the Glen Mor 2 project site is more than 500 feet south of this viewpoint and would not alter existing views of Mount Rubidoux in this area. This comment does not provide new substantial evidence that would alter the impact analysis or conclusion.

Response to Comment F-7 (Visual analysis methods and conclusions regarding compatibility)

Because this is a tiered EIR, the approach to analyzing the project's impacts relies in part on the concept that this part of campus has been planned for development for several years, and was analyzed in the LRDP EIR. The project has been designed to consider the off-campus environment by incorporating landscaped setbacks and orienting buildings so as to reduce perceived building mass. Please see the response to Comment E-1 regarding the EIR's discussion of the project's compatibility with the surrounding environment.

Response to Comment F-8 (Landscape screening of parking structure lighting)

Please see the response to comment F-2. The photosimulation presented in EIR Figure 3.1-3 illustrates the screening effect provided by the existing trees (approximately 25 to 50 feet in height). Interspersing evergreens of comparable or larger growth characteristics within the existing landscape will provide equivalent screening when the deciduous trees are bare, and enhanced screening when the landscape is in full foliage. This comment does not provide new substantial evidence that would alter the impact analysis or conclusion.

Response to Comment F-9 (Use tall evergreens for landscape screening)

Please see the responses to Comments F-2 and F-8.

Response to Comment F-10 (Compatibility of parking structure photovoltaic system)

The statement quoted from page 3.1-9 the Draft EIR was intended to indicate that the visual character of the photovoltaic panels would not diverge significantly from that of the rest of the project, and that they should not be considered as a separate impact. Please see the response to Comment E-1 regarding the EIR's discussion of the project's compatibility with the surrounding environment. The opinion stated in this comment regarding the solar panels' incompatibility with the off-campus environment does not provide new substantial evidence that would alter the impact analysis or conclusion.

Response to Comment F-11 (Characterization of landscape screening)

Many of the existing trees along Valencia Hill Drive that are intended to be retained as part of the project (see Figures 2-3 and 2-7) are indeed mature and would continue to provide ample screening for project structures. Additional plantings of trees and other vegetation in the buffer area along Valencia Hill Drive, as depicted in the visual simulations provided in Figure 3.1-4 and 3.1-5, would combine with existing vegetation to provide a visual buffer to the proposed development, as viewed
Response to Comment F-12 (UCR Child Development Center as sensitive receptor for air quality analysis)

The SCAQMD analysis methodology requires analyzing impacts on sensitive receptors by considering emissions levels received by the sensitive receptor nearest to a project site. The UCR Child Development Center is located on Watkins Drive, between Blaine Street and Valencia Hill Drive, approximately 0.4 miles from the closest edge of the Glen Mor 2 site. The localized emissions analysis incorporated into Section 3.2 of the Draft EIR considered emissions estimates based on receptors located 25 meters from the project site. Table 3.2-9 of the Draft EIR shows that localized emissions at the nearest receptors would exceed SCAQMD thresholds for PM10 and PM2.5, but not for other pollutants. Table 3.2-11 of the Draft EIR shows that, with incorporation of project mitigation measures, PM10 and PM2.5 emissions would still exceed these thresholds. Calculations specific to more distant sensitive receptors were not provided because SCAQMD guidance suggests identifying worst-case emissions at the nearest receptors. However, please note that localized emissions reduce with distance from the emissions source as the pollutants disperse. The project does not present the potential for significant air emissions received by the UCR Child Development Center beyond those stated in the Draft EIR. This information does not identify a new significant effect or a substantial increase in the severity of a previously identified effect. This issue was adequately addressed in the Draft EIR, and revision of the Draft EIR is not necessary.

Response to Comment F-13 (Box Springs fault)

UCR contacted C.H.J., Inc. (CHJ) to provide clarification regarding the Box Springs fault. The CHJ letter of March 24, 2011, restates the lack of a fault trace for the Box Springs fault on the geologic mapping that was included in the technical evaluation presented as Appendix L of the Draft EIR and addresses updated geologic maps that similarly exclude a mapped trace for this feature. CHJ reiterates the finding that the subject fault is inactive and does not pose a seismic threat to the UCR campus or the Glen Mor 2 site. Section 3.5 of the Draft EIR has been revised to incorporate the findings of CHJ’s follow-up letter, which has been added as Appendix L.1 of the EIR. This information does not identify a new significant effect or a substantial increase in the severity of a previously identified effect. This issue was adequately addressed in the Draft EIR, and revision of the Draft EIR is not necessary.

Response to Comment F-14 (UCR Child Development Center as sensitive receptor for noise analysis)

Please see page 3.10-2 of the Draft EIR, which acknowledges the presence of the UCR Child Development Center approximately 0.4 mile from the project site. This receptor was not selected for individual analysis because of its distance from the project site, the presence of intervening campus buildings, and the minimal traffic the project would contribute to the adjacent segment of Watkins Drive. This issue was adequately addressed in the Draft EIR, and revision of the Draft EIR is not necessary.
Response to Comment F-15 (Apparent error in Table 3.10-2)

Table 3.10-2 of the Draft EIR has been revised to explain that modeling conducted at MR-1 assumes backyard of this residence is the sensitive receptor and considers acoustical shielding achieved by the residential structure at this location. This clarification does not present the potential for a new significant effect or a substantial increase in the severity of a previously identified effect. Revision of the Draft EIR beyond the noted clarification in Table 3.10-2 is not necessary.

Response to Comment F-16 (Noise analysis method – campus cumulative growth)

Contrary to the statements in this comment, the Draft EIR considers the project in the context of comprehensive campus growth by tiering off the LRDP EIR certified in 2005. As stated on page 1-1 of the Draft EIR, Section 15152 of the State CEQA Guidelines defines “tiering” as a process that uses “the analysis of general matters contained in a broader EIR (such as one prepared for a general plan...),” with later EIRs concentrating “solely on the issues specific to the later project.” Analysis of UCR’s LRDP, which would accommodate campus-wide growth projected through 2015, was properly presented in the LRDP EIR; project-specific impacts were properly analyzed in the Glen Mor 2 Draft EIR. Impact analysis presented in the Glen Mor 2 Draft EIR considers project-induced changes from existing conditions, which include past campus growth, and provides cumulative impact analysis that considers the effects of individually planned and reasonably foreseeable campus projects as well as regional growth, as explained in Section 3.0.4 of the Draft EIR. With respect to noise impacts, Section 3.10.5 of the Draft EIR discusses the cumulative noise impacts to which the project would contribute. This section does not identify any significant cumulative noise impacts and concludes that the project’s contribution to these impacts would not be considerable.

The opinion stated in this comment does not provide new substantial evidence that would alter the impact analysis or conclusion. This issue was adequately addressed in the Draft EIR, and revision of the Draft EIR is not necessary.

Response to Comment F-17 (Noise analysis should consider back-up safety alarms)

Please see the response to Comment D-1.

Response to Comment F-18 (Reliance on Perris Valley Line EIR)

This comment presents an opinion regarding the adequacy of the Perris Valley Line EIR. The campus is not aware of any adverse ruling regarding the validity of the Perris Valley Line EIR. In the absence of such a ruling, and based upon UCRs independent review of the information from the Perris Valley Line EIR, there is no basis in fact to deem the information drawn from the Perris Valley Line EIR as inaccurate. The opinion stated in this comment does not provide new substantial evidence that would alter the impact analysis or conclusion. Revision of the Draft EIR is not necessary.

Response to Comment F-19 (Characterization of rail line improvements and activity)

This comment takes issue with the Draft EIR’s characterization of noise impacts that were stated in the Perris Valley Line EIR. Please note that Section 3.10.5 of the Glen Mor 2 Draft EIR describes the
cumulative impact created by the noise generated by the Perris Valley Line’s operation, but does not identify this as a significant cumulative noise impact, and notes that the Glen Mor 2 project’s contribution to this noise is minor due to the Glen Mor 2 project’s limited operational features that would be audible in this area, as shown in Table 3.10-6. Accordingly, the Glen Mor 2 project’s contribution to the cumulative impact is not considerable. This comment does not provide new substantial evidence that would alter the impact analysis or conclusion. Revision of the Draft EIR is not necessary.

Response to Comment F-20 (Watkins Drive/Valencia Hill Drive intersection should be included in traffic study)

The intersections analyzed in the Traffic Impact Analysis for the Draft EIR (Appendix S) were selected in consultation with traffic engineers at the City of Riverside, who did not recommend addressing this intersection. Exclusion of this intersection from the analysis is based upon the City of Riverside’s traffic impact analysis criteria of evaluating intersections that are anticipated to receive 50 or more trips during peak hours. Considering the existing closure on Valencia Hill Drive, north of Big Springs Road, project-related trips affecting the subject intersection would originate from or be destined for Watkins Drive. As shown in Figures 7 and 8 of Appendix S, approximately 20 percent of project traffic is expected to move through this intersection. Figure 9 of Appendix S of the Draft EIR, indicates the project is anticipated to contribute 14 trips to Watkins Drive north of Big Springs Road in the morning peak and 36 trips in the evening peak. Therefore, the project would not generate more than 50 trips during either peak hour, and was omitted from the analysis. This comment does not provide new substantial evidence that would alter the impact analysis or conclusion. Revision of the Draft EIR is not necessary.

Response to Comment F-21 (Traffic ambient growth factor)

The 1.7% ambient growth factor for background regional growth (not specific to the campus) is a standard factor applied in regional traffic modeling to conservatively reflect background growth in future year modeling scenarios. Use of this standard rate was confirmed with City of Riverside traffic engineering staff prior to initiation of the traffic study. It is also noted, however, that the largely developed nature of the community surrounding the UCR campus is reasonably expected to be associated with a lower ambient growth rate, making the methodology applied for the EIR that much more conservative.

The assessment of opening year traffic in the Draft EIR (see analysis beginning on page 25 of Draft EIR Appendix S) considers traffic from existing campus and community sources based upon traffic counts conducted in May 2010, plus projected traffic from the Glen Mor 2 project, plus ambient growth based upon the 1.7% annual factor. The traffic study and EIR also assess an LRDP build-out scenario, which reflects campus growth to 25,000 students, plus an additional 1.7% ambient growth each year. In summary, the 1.7% growth factor is in addition to project-related growth and LRDP build-out growth.

---

2 8 eastbound trips on Big Springs Road turning north onto Watkins Drive and 6 southbound trips on Watkins Drive turning west onto Big Springs Road.
3 20 eastbound trips on Big Springs Road turning north onto Watkins Drive and 16 southbound trips on Watkins Drive turning west onto Big Springs Road.
The comment reflects a misunderstanding of the application of the 1.7% factor. Revision of the Draft EIR is not necessary.

**Response to Comment F-22 (Parking ratios)**

Please see the response to Comment D-5 regarding the adequacy of the parking analysis. The Draft EIR presents quantified analysis of existing student housing occupancy and parking supply (page 3.13-5) and addresses projected student housing occupancy and parking supply (page 3.13-6). The parking permit program administered by UCR provides a means to ensure that resident student parking is provided at levels commensurate with the number of resident students having vehicles. Mitigation Measure TR 4 establishes an annual reporting requirement to demonstrate that parking permit issuance remains in balance with the parking supply. This comment does not provide new substantial evidence that would alter the impact analysis or conclusion. Revision of the Draft EIR is not necessary.

**Response to Comment F-23 (Contribution to Watkins Drive/Big Springs Road signal)**

The mitigation stated in TR 1 is project-specific mitigation for the Glen Mor 2 project-specific impact identified for the subject intersection. Any additional contribution of funds to this physical improvement to address overall UCR-related traffic may be subject to additional discussion between UCR and the City, pursuant to commitments under the LRDP EIR. However, please note that, as stated in the response to Comment C-5, the City does not anticipate construction of this improvement in the foreseeable future. Whether or not the City plans to construct this, the Draft EIR’s conclusion that this impact is significant and unavoidable remains the same, as UCR has no discretion over implementing the physical improvement that drives the mitigation measure. This comment does not provide new substantial evidence that would alter the impact analysis or conclusion. Revision of the Draft EIR is not necessary.

**Response to Comment F-24 (Traffic Study Figure 4 – apparent error)**

The referenced figure presents the results of traffic counts conducted in the project area in May 2010. The difference between the 168 trips heading west on Big Springs Road from Watkins Drive and the 201 trips depicted at the Valencia Hill/Big Springs Road intersection relates to the traffic counts at these two intersections having been conducted on different days. This difference does not alter the validity of the traffic analysis or the conclusions in the Draft EIR.

**Response to Comment F-25 (Impact of Watkins/Big Springs signal)**

Please see the response to Comment D-3.

**Response to Comment F-26 (Need for project)**

This comment does not address the adequacy of the EIR or an environmental impact of the proposed project, and warrants no detailed response.

**Response to Comment F-27 (Support for Environmentally Superior Alternative)**

The support for Alternative 3 stated in this comment is noted. Further response is not warranted.
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CERTIFIED COPY OF THE PROCEEDINGS

March 15, 2011

Public Hearing re: UCR Glen Mor Two Student Apartments

Lynne Dalton, CSR 3544
Job #: 69894LD

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DRAFT EIR

UCR/GLEN MOR 2

STUDENT APARTMENTS

PO NO. SC10339432

REPORTER'S TRANSCRIPT OF PROCEEDINGS

LOCATION: UCR OFFICE OF DESIGN and CONSTRUCTION
3615 A Canyon Crest Drive
Room BB J-102
Riverside, California

DATE AND TIME: Tuesday, March 15, 2011
6:00 p.m. - 6:55 p.m.

REPORTED BY: LYNNE DALTON, CSR No. 3544

JOB NO. 69894LD
PRESENT:

KATHY DALE
EIR Consultant

TRICIA THRASHER

LAYNE ARTHUR
BARNHART BALFOUR BEATTY
Construction Manager

SPEAKERS:

KEVIN DAWSON
WILLIAM HAHN
ROBERT PHILLIPS
R. ALLEN BRUNLINGER
KARL JOHNS
GURUMANTRA KHALSA
Riverside, California

Tuesday, March 15, 2011

---00---

PROCEEDINGS

Ms. Dale: The meeting tonight is for a public hearing on the Draft EIR for the Glen Mor 2 student apartment project for the UCR campus, and this is part of the California Environmental Quality Act documentation process for the project. And I don't know, throughout the night you might hear people say "CEQA," and that's the short name for California Environmental Quality Act.

Tonight is an opportunity for interested parties to provide public comment on the Draft Environmental Impact Report that was released in February. As far as the meeting format, we have a sign-in sheet in the back, and it looks like everybody has been signing in as they came in. And then there are also speaker slips, if you wouldn't mind filling one of those out to speak so that our reporter has the correct spelling of your name. And we do have someone here to record the meeting, and the record of the meeting will be included in the final EIR, which will be the next document that we produce.

As I mentioned, the project is the Glen Mor 2 student apartment project, and that's an 800-bed student housing project on about a 20-acre site. The boundaries
of the site are identified here -- and I think everyone
who is here is familiar with the location -- at the
northwest corner of Big Springs and Valencia Hill. And
those 800 beds would be accommodated in 230 apartment-
style units in five residential buildings on the site and
some additional support buildings.

As I mentioned, the Draft EIR was released in
February, and it includes a detailed description of the
project. It also characterizes the environmental setting
with respect to an array of resources that CEQA requires
us to address. And then it also goes into detail
regarding impacts for 14 of those resource areas that CEQA
requires to be considered.

Just to very generally characterize the
Environmental Impact Report findings, aside from
construction period impacts related to the noise and air
quality, the environmental analysis to date concludes that
all of the identified impacts can be mitigated to less
than significant levels. Either they're less than
significant on their own or can be mitigated with
application of mitigation measures.

We'll be considering the input from tonight's
hearing and then also any written comments that are
received through the end of the formal Draft EIR public
review period, which ends on April 1. And following the
end of that review period, we'll be preparing a final
Environmental Impact Report which will include all of the
comments that we receive, responses to those comments, and
any adjustments to the Draft Environmental Impact Report
that are necessary to address the comments. And that
document is anticipated to be available in late April.
And then the next step in the process would be the Board
of Regents' consideration of the project, which is
currently scheduled for May 17.

Is there anything you want to add, Tricia?

MS. THRASHER: No. We have a reference copy of
the Draft EIR here. If you want to take a look at a hard
copy, we have it in our office that you can come in and
look at. If you want to purchase one, talk to me or email
me, and I can help get you to that. It's a considerable
document, so a hard copy would need to be purchased. It's
up on our website for access at any time. If you need
that address, we can -- we have that for you as well.

MS. DALE: By the order of the draw, we have
Mr. Dawson first.

MR. DAWSON: Okay. My name is Kevin Dawson, and
I live at 269 Goins Court. I live just off campus. I've
lived there for probably, you know, going on 15 or so
years.

I'm an alum of UCR. My wife is an alum too. I
might submit my comments in writing later, what I want to
to express to the housing people and others that are
university associated, your Heat event a couple of weeks
ago blasted my family out of our house. With all the
doors and windows shut, I couldn't even go in my master
bedroom and escape the noise from this event.

These events have been going on for the last five
years. And it just boggles the mind that, you know, with
all the problems it's caused and all the complaints that
we've made to the university, you continue to have them.

Jim Sandoval, I'm sorry, you know. He is not a good
representative for the campus.

I called Riverside PD, complained about this
event, and they said, "It's a UCR event. Call UCR."

Called UCR PD, and they said, We are very sorry.
We don't know what we can do about this event. It's
really not something we can control.

Later I got a phone call from Jim Sandoval.
Never once during the conversation did he apologize. How
can I support the university's growth and these projects
when you guys aren't good neighbors? You know, there's a
City noise ordinance that says that a police officer, if
he's standing outside and he can hear the noise from the
source within -- during certain time periods, 75 feet.
During later hours, it's 50 feet -- that he can cite them.
Fine them.

I know that you guys are saying, well, you're State property, and you're exempt and all that. But that's at least a guideline to gauge whether, you know -- how much of an impact your project -- your events are.

I'm three-quarters of a mile away from where the event is being held, and I could hear it in my bedroom. I tried putting headphones on to watch TV, and I could still hear it with headphones on.

I think it's rude and insensitive for Sandoval to make the argument that, well, you know, we're a campus of over 20,000 people now, and we have an obligation to those students to provide them with the college experience that these students demand.

You know what? There's three or four other universities in the city of Riverside. They don't hold these types of events, and the students, you know, seem to continue to enroll at those schools. Somebody has to be the parent here and say, Look. We have neighbors, and we need to be considerate of the neighbors.

Every year when we complain, apparently it comes down to, Well, we didn't have the speakers turned the right direction. We didn't have the stage oriented in the right direction.

Well, know what? There were neighbors
complaining that were 90 degrees in a different direction from my house. So I'd have to say it doesn't have to do with the orientation of the speakers. It has to do with it was just too damn loud.

I notice in your EIR, you're saying you want to put in a light at the intersection at Box Springs and Watkins and that you've done a traffic study that shows that, well, you know, only 6 percent of the increase in traffic is going to be because of your project. So, therefore, you might only owe the City 6 percent of the cost of it.

You know, when Valencia Hill Drive was opened, you know, probably about 90, 95 percent of the traffic going down that street was university related. We had lots of problems with that traffic. So much so that we petitioned the City to have speed bumps put in, and we, you know, paid our share of the cost of putting in speed bumps. When the speed bumps weren't sufficient to deal with issues of excessive speed, then we pursued having the street closed.

We'd like a permanent closure of that street.

You know, when the City came out and did a traffic study, preliminary traffic study, to closing the street, it found that the speeds were hitting like 80 and 90 miles an hour, that there was hundreds of cars per day measured. And
that's what tilted the scale -- tipped the scale in favor of closing the street, at least from the City's point of view, and that's why they were supportive of it.

If we were to look at again how much of that problem was UCR's problem, I mean, UCR -- caused by UCR people, then I would say that it was -- maybe the university ought to be up for, you know, supporting paying the cost of doing a more permanent closure of this street, maybe, you know, around 80 or 90 percent of the cost would be appropriate.

But as I said before, I will -- I'll make written comments to the EIR later. But how can we support it? I am so upset that I want to start lobbying the state legislature, the Senate, and the others. There are committees for higher education, and I want to complain because I figure, you know what? I've written letters to the local police chief, to the UCR police chief, to the chancellor's office, and get no response. It's gone on year after year.

Maybe the only way I can get some response or have some effect on the campus is to try to get you guys on the money end. And I hate to be like that. I want to be supportive of the school. But you know what? I think you should be good neighbors. And, you know, I see some efforts in some areas, but Mr. Sandoval, man, you know,
this is year after year after year after year. I can't support you guys a hundred percent. Sorry.

MS. DALE: Mr. Hahn.

MR. HAHN: I'm basically going to echo what Mr. Dawson said. I represent about 10 people, both on Blaine Street and Maravilla that we are casually called The Blaine Street Neighborhood Association. However, we only get together when there's a problem, such as the Heat Festival. That was outrageous. I agree with Kevin a hundred percent.

I've lived in this area, my wife and I, for 35 years in the same house, so we've been through all the growth of this university. We've also put up with all the negatives that the university brings, i.e., these people who buy their homes and rent them out to students. We have one person in our association had seven people live next door. Seven kids are living in one house.

Now, they're up on Maravilla. I'm on Blaine. I've got a four-lane -- three-and-a-half-lane street in front of me. So we're fairly apart from the other homes. But those people up in Maravilla, those houses are right next to each other. So we put up with that. All right? Begrudgingly, we put up with it.

I will give kudos to the university to a certain extent -- I'm not sure how much things have improved --
with regard to the people reporting problems with parties and things. I believe the Dean of Students has something to do with that. I think more in line is the police department giving a $1,200 ticket to these kids when they have their parties and stuff.

So, once again, I'm a little skeptical. I've glanced at this, and from what I've seen out of this university and their attitude toward the community, I'm skeptical about anything I read, you know. So I don't doubt the credibility of this document, but I -- you know, I'm lying. I do doubt the credibility of this document.

Okay?

I understand how to deal with kids. I teach junior college. That's what I do for a living. So -- I happen to work for a college that's south in San Jacinto that is -- actually, the campus is totally isolated. Obviously, we don't have the residents that you have.

So, once again, this thing that happened the other day, second or third or fourth year in a row, and the attitude that we're getting from the university, it's like you people don't care about us, you know. I mean, we certainly pay more taxes than your students do.

And, you know, I probably shouldn't say this, but it seems like this raise in tuition -- what? You guys raised your tuition 35, 40 percent? So now it cost an
incredible amount of money to go here. And now you're
having an event that obviously caters to the kids, and to
hell with the rest of us.

So my feeling is, you know, once again, I find --
I'm a little concerned about how credible -- creditable
that this report is based on my last 30 years' experience.
I'm done.

MS. DALE: Mr. Phillips.

MR. PHILLIPS: I would like to echo Mr. Dawson's
comments about the Heat concert. It was ridiculously
loud, and in addition to that, my wife had a migraine
headache that day, and she could get no comfort. There
was no place in our house she could go where she wasn't
subjected to that noise.

And it's utterly ridiculous for the campus to
hold events like that. There's no need for it. The
students will live if they don't have their little West
Coast Woodstock to go to.

Regarding the EIR, the parking issues. 408
current parking spaces that are used now will be
eliminated by the Glen Mor 2 project. The proposed
parking garage will include 597 spaces for a net gain of
189 spaces. Glen Mor 2 will add 810 beds. That's 189
spaces for 810 beds, means that the ratio of parking
spaces to Glen Mor 2 residents will be less than one to
four.

It's ridiculous to assume that fewer than one-quarter of the students will have a car. This will result in students parking in nearby residential neighborhoods. Students have demonstrated that they are willing to park a substantial distance from their dormitory to avoid the expense of a parking permit.

The Executive Retreat is planned to accommodate up to 102 people, but will have only four parking spaces. Where will the users of this facility park?

Regarding the parking structure. The top deck of the structure is described as being 21 feet above ground level. The EIR presents two separate -- I'm sorry -- two scenarios for the illumination to that deck. The first scenario includes an array of 18-foot-high light poles. These lights would therefore be 39 feet above the ground.

The second scenario includes approximately 20 photovoltaic panels, each measuring 25 by 48 feet mounted 14 feet above the deck. The panels would have lights on the bottom to illuminate the deck. The panels would be tilted to catch sunlight from the south. So the lights would be exposed to the north and would be visible through the trees along Valencia Hill Drive.

The illumination study in the Glen Mor 2 EIR indicates that the glare from the lights would not be
significant. A similar study was done for the lights on
the intramural field on the southwest corner of Watkins
Drive and Valencia Hill Drive indicating that there would
be virtually no light leakage into the surrounding
neighborhood. Once those lights came into use, it was
clear that that study was utterly invalid, and there's no
reason to believe that the illumination study in the Glen
Mor 2 EIR is any more accurate.

Regarding the scale of the project, the project
is located across Valencia Hill Drive from one-story,
single-family residences and a two-story apartment
complex. Placing five-story student apartments in that
setting is completely inappropriate. The proposed student
apartments are 55 feet tall and will tower over all
buildings in the immediate off-campus area.

According to page 3.10 of the EIR, The Glen Mor 2
project would incorporate scale massing architectural
style and a color pallet that would be compatible with
existing development in the campus housing precinct,
including the Glen Mor 1 student apartments, which are the
current dominant aspect of the built campus environment as
viewed from the off-campus area, which is Valencia Hill
Drive.

In other words, since the view has already been
ruined by one batch of oversized, unattractive buildings,
what's the harm in adding more?

Regarding the trees along Valencia Hill Drive, page 3.19 states the remaining mature trees would continue to be the most dominant feature in the view. Hmm. I thought the Glen Mor 1 student apartments were the current dominant aspect of the built campus environment as viewed from the off-campus area. The 55-foot-tall buildings and the 39-foot-tall parking garage and light array of Glen Mor 2 will join the buildings of Glen Mor 1 as the most dominant feature in the view.

I doubt that the proposed landscaping will provide enough shielding to make the Glen Mor 2 buildings anything less than obnoxiously overwhelming to those who live in the one- and two-story buildings across the street.

Regarding the timing of construction. The construction of Glen Mor 2 is expected to last from summer 2011 to sometime before fall 2013. Construction on the environmental health and safety facility is anticipated to last from December 2012 to June 2014. Construction on the Perris Valley line is expected to occur from January 2012 to June 2013. Therefore, from December 2012 to June 2013, all three projects will be simultaneously under construction. The noise pollution and traffic disruption during this period will make our neighborhood unlivable.
Regarding seismology. According to page 24 of the LRDP, there is a concealed fault that extends northwest near the intersection of Watkins Drive and Valencia Hill Drive. The LRDP states that there has been no recent activity on this fault. This is utterly false. During the Landers earthquake, that fault emitted a sound like a rifle shot, and a wall of dust arose along its length. The fact that someone with scientific credentials didn't document that activity does not mean that it didn't occur. This fault could present a danger to any structures built in its immediate vicinity.

Thank you.

MS. DALE: Mr. Brunlinger.

MR. BRUNLINGER: My name is Mr. Brunlinger. I live off of Knox Court off of Watkins.

The Heat event, as numerous others stated, was out of control. Coming here tonight, seeing the traffic, seeing the low cars with pumping stereos and car alarms and exhaust kits, looking at the difference 20 years plus --

MS. DALE: Sir, would you mind facing the court reporter.

MR. BRUNLINGER: Facing who? Why don't we have her -- never mind. Am I addressing her? If I don't address her --
MS. THRASHER: You're addressing here.

MR. BRUNLINGER: I oppose pretty much everything. With UCR's growth comes responsibility. All I get is lies, statistics, and more damn lies.

Putting in a stoplight would be insane. Too many elderly people, too many dogs, too many people using the crosswalk on a daily basis almost getting hit all the time. A stoplight isn't going to increase traffic. It's going to increase the chance of death. I'm not alone on this.

Putting in more student housing, irresponsibly 59-foot-tall lights, how can they say there's not going to be an impact with that? It's absurd. The solar panels, reflective light, affects you. Maybe not all day, but at times of day will be very annoying.

The traffic, the parking-versus-bed ratio is insane, as we've experienced. The students will, in fact, be parking in our backyard, front yard, wherever they can. I don't know -- like Kevin said, UCR is not a good neighbor.

MS. DALE: Mr. Johns.

MR. JOHNS: I'm going to say much the same things as Mr. Phillips. I suppose I might sympathize more with the functions of the campus than some of the others, being the only one in the family not to be or have been a
faculty member in the UC system. And my sisters and
brother all work at other campuses that don't seem to have
the same problems.

When I speak with Mr. Sandoval, he says, So they
got different students. They get better students at Davis
or Berkley or these places. We have to do this. People
here expect different things.

It's like -- I remembered your surprise that the
university could have prevented us from getting a sewer
connection. Ever since the mid-fifties, those of us who
live on this side of the campus -- and I've spent my
entire life as a resident at the campus. I live within a
hundred feet of it. And, now, I can't tell from the plans
exactly how high these buildings are predicted to be with
the hill there being what it is, but it will probably
block the sun out from our house, which is an element of
quality in the environmental impact that doesn't seem to
be taken account of ever.

And you should realize that it's, you know, an
asset to your campus to have a residential area within
walking distance. This is the only residential area
within a walking distance of the campus, and there are,
you know, faculty members who are only able to do their
research and work -- do their best work after they retire.
And because of the planning and the way things are planned
at this campus, there’s no parking space near a library
where an emeritus professor who can’t walk very easily can
reach the library.

You know, things like that. It's all bad
planning. And bad design is just a blot on the
institution that doesn’t go away. It just stays there.
You know, I'm also probably the only one here who has
lived in Eastern Europe, in Eastern Germany and Prague and
Budapest, and I haven’t seen worse -- I've lived in
dormitories in the past in Prague, and I've not seen worse
architecture than UCR.

It's not a -- when they come to film Genesis 2 or
something like that, this campus -- I think some of us saw
that.

MR. DAWSON: Yeah. Yeah.

MR. JOHNS: That was really a rotten film, but
they chose their backdrop. It was this architecture which
has been condemned and retrofitted since then because of
the bad design then.

So please, if it's possible to taper the height
of this so that it's a little bit lower toward the edge of
the campus. There are these elements -- quality of life
is something worthwhile, that we can see the sunset or,
let's say, the bell tower, which was another thing which
we will no longer be able to see from this part.
And so consider the possibility it might be an asset to have an attractive residential area within a walking distance of the campus. And this is -- you know, might be annihilated by this kind of buildings going up directly across the street from there. And so, as I said, it's been 50 years that I've lived there, and so my family and others in this neighborhood have more of a stake than any other people making these designs or the students living in them who are only spending one year or two.

They have -- you know, it doesn't matter the noise or whatever parties they have. They come and go. We are living here, you know, for generations and being approached for donations by the campus as alumni and ex-faculty.

So that's it. The rest of it, I'll have to write.

MS. THRASHER: Thank you.

MS. DALE: I have -- I'm not sure if it's Mr. or Mrs. Khalsa.

MR. KHALSA: That's me. Gurumantra Khalsa, 4108 Watkins Drive.

I understand that there's a proposal to put a stoplight at Big Springs and Watkins. Is that correct?

Is that part of the plan?

MS. THRASHER: The traffic impact indicates that
a traffic signal will be needed at some point.

MR. KHALSA: Okay. But not necessarily at this
project's point? Or, I mean, what's the purpose of it
being in this plan if it's at some point and not for this?

MS. THRASHER: What the EIR has to do is
identify -- we did a traffic study and identified an
impact. We, the university. It's a public street, so we
cannot put in the --

MR. KHALSA: I understand.

MS. THRASHER: So that -- the traffic study
looked at all the traffic, not just this, what this
contribution would be, and looked at the levels of service
change and said, this says it's going to need a light and
that this project will contribute this much to the
traffic. Because it's not just our project. But if you
read the analysis --

MR. KHALSA: Well, my issue is in opposition to
that light because years ago, when the campus was not
anywhere close to this size, the neighbors had to organize
to get the stop signs put in up Watkins to slow traffic
down. And so if you're going to put a dormitory in
there -- and most of us, you know, questioned your parking
calculations for slots and beds already, but we were
assured that the fact that these are on-site residents,
there won't be that much of an impact on traffic. So I
question your need for a stoplight down there. And we
definitely do not want the stop signs coming out, which
would have to happen if that light went in.

And to this day we've got people running those
lights, and it would be a huge safety issue on Watkins to
have a light and the next stop sign show up be at Knox
Court or something. They would just blow right down that
hill, and that's just something none of us are willing to
put up with. That's my main concern about the light.

And since they're all residents on campus 24/7
pretty much, there's really no need for them to be driving
anyway. Right? And until we do Santa Barbara here where
we tell them not to bring cars, the last thing you want to
do is increase public safety issues. You know, it may be
a pain in the ass for everybody to have to stop, but, you
know, that's true for us as well, and we've chosen that
rather than not have it there.

So that's the issue with the light from my point
of view. Thank you.

MS. THRASHER: Thank you. That's all the slips
we have, so . . .

MR. DAWSON: Pearson is out of town. Dover is
out of town. There's quite a few of the neighbors not
available.

MS. THRASHER: Again, we're accepting written
comments, and they can be written and mailed, or they can
be emailed, either way, up until April 1. I wrote my
e-mail address down and the document's.

Again, this is the website where you can find the
documents. And it's listed under Notices of Completion.
You have the notice, the document -- the EIR itself, which
is 366 pages, and then the appendices, which, when you add
that to the document, is 1,500 pages. The appendices are
in groups. And that's listed there.

If you want to look at a hard copy, we have one
in the office. You can come in and sit and take a look at
it. If you want your own CD, just email me or let me know
tonight, and we can make those arrangements. And, again,
if you want to purchase a hard copy, email me, and I'll
tell you how we can make that happen.

MR. CASKEY: Those are PDFs?

MS. THRASHER: Yeah.

MR. CASKEY: So you can just pull them up on your
computer, and they're right on your screen?

MS. THRASHER: Yes. You can print off sections,
if you want, or whatever. But it's a lot. So if you want
to, these are all -- any of these ways. And, again, you
can email me comments as well through April 1.

MR. BRUNLINGER: Is it okay to ask a question
here?
MS. THRASHER: You can ask a question, and we can see whether or not we can answer it.

MR. BRUNLINGER: Across from where the proposed Glen Mor 2 is, two and a half months ago we had a mini flash flood, if you will, which I saw the City trucks, dozers, scooping four and a half feet of sand out of the Big Springs/Valencia Hill corner. Have you guys took this into account? Someone mentioned an earthquake fault. I was wondering what about the floods and other --

MS. THRASHER: If you'll look in there, you'll have the floodplain. There's been a revision to the 100-year flood map. And there was some blockage in the City drop.

MR. KHALSA: Yeah. It went four foot over that thing.

MS. THRASHER: That caused part of that problem. Our facility is on campus except for the Botanic Gardens basin which we're in the process of fixing. Functions okay. But the drop structure in the city street, my understanding, there was some issues there.

MR. KHALSA: That's the only drop they've got from the park all the way down Big Springs. That's like a long block and a half.

MS. THRASHER: I can tell you what's been done to try to help that is on the campus, if you look on the
south side, we've -- the curb is like this for quite a
ways to try to let that get into the above -- the open
channel there. So that was something we did is we tilted
the road a little bit more, and we took that curb line
down to try to get some of that water that doesn't drop
into that drop structure into that -- into our
above-ground storm drain.

We redid -- the campus redid the 100-year storm
system through the campus from our edge. We tried to work
with -- working with the City, it didn't jive, so we did
some changes to the system, and we -- FEMA revised the
flood map as of August. We did all the calcs and looked
at it, and there's some changes.

It's in the EIR. If you look at the hydraulics,
it will show where that floodplain is in relationship to
this site. Overall, you can go to FEMA and pull up -- put
street names and the city and find the flood map.

MR. BRUNLINGER: You stated they
revised it since August?

MS. THRASHER: It was revised -- FEMA, the
federal agency --

MR. BRUNLINGER: I know who they are.
MS. THRASHER: -- approved the map change in
August. On August 27.
MR. CASKEY: How long did they study that
change --

MS. THRASHER: About two years. They went back
and forth. They did recalcs and recalcs. It was a
two-year process. They came back and asked questions, and
we answered them, and we went back and forth. It was a
give-and-take.

Working with that agency was very interesting.
And they don't just take what you give them.

MR. KHALSA: Given December's rain, is there
anything you would have adjusted from what they came up
with and you talked about after seeing what happened in
December?

MS. THRASHER: Our on-campus system works. There
needs --

MR. KHALSA: I thought all your tunnels filled up
with water because the City didn't have drainage.

MS. THRASHER: That's a different issue.

MR. KHALSA: That's a different issue. It wasn't
the rain?

MS. THRASHER: It wasn't the storm drain.

MR. KHALSA: It wasn't. Okay.

MS. THRASHER: If you go out to the Botanic
Gardens, you can see we do have a problem.

MR. KHALSA: I know.

MS. THRASHER: We've got -- the fix has all been
approved. And we've gone through all the permitting
agencies, and we're ready to go forward with fixing that,
because that didn't work. But the rest of it seems to be
working the way it's supposed to on campus. And, again,
there's some issues with the adequacy before you get to
campus.

MR. KHALSA: So the stuff you're doing for the
Botanic Gardens, is that scheduled to be started and
completed --

MS. THRASHER: I just talked to the project
manager. We have the environmental permits from Army
Corps and Department of Fish and Game and the water
quality folks. We've had those since like December. But
we've been fine-tuning what we're doing. My
understanding, he's just about ready to put that on the
street.

At this point we'll need to go back in and do
some nesting bird surveys to make sure we're not
disturbing any birds that come in during nesting season.

MR. KHALSA: You won't be doing anything before
May; right? Any construction.

MS. THRASHER: I don't know the answer to that
exactly. We're trying to get done before summer because
we want to get done before other stuff starts. It's
relatively short construction.
MR. KHALSA: There's a couple of events on campus at the Botanic Gardens that are big fundraisers for it, and I'm concerned about that.

MS. THRASHER: We're coordinating with that.

MR. KHALSA: Thank you, Trish.

MS. THRASHER: Primavera in the Garden. We know.

MR. KHALSA: Thank you. In spite of all of this stuff that you do wrong and we hate, there's some stuff that comes back out that we really love, and that's one of them.

MS. THRASHER: We're aware of Primavera in the Garden, and we're coordinating with that.

MR. KHALSA: Thank you.

MS. THRASHER: Anything else that we might be able to address or if anybody else has any other comments on the draft document?

Okay. Well, thank you very much. Be sure, and those of you who are going to write, get those to us so we can --

MR. KHALSA: Send notes.

MS. THRASHER: So we can -- I mean, there are some things that I heard tonight that I hadn't heard before. The stoplight/stop sign, that that was a request -- that that was something that came from the community and concerns about that situation. We hadn't
heard that before.

MR. DAWSON: We raised that during the 2005 LRDP, that it was there in that you were going to want to put a lighted intersection there and that you were going to want Watkins Drive restriped. And because it was going to be a lighted intersection, it would require all the stop signs that are, you know, within blocks of that intersection be taken out. And I made those objections then. So it's not new. It's there.

MS. THRASHER: Okay.

MR. DAWSON: It's tied into the fact that in the LRDP, you're stating that you want to eventually close all cross-campus traffic off. So that means that any traffic that used to go across campus will now have to come around through our neighborhood to get to this side.

MS. THRASHER: I'm aware that that's something that was put into the EIR. With traffic on public streets, what we can do in -- this document says here's what the traffic study says. Here's what the fix is. We don't do it because they're public streets. We're not going to put that --

MR. DAWSON: Yes, but I look at your --

MS. THRASHER: What we're saying is if the City decides to put one in, we will pay our proportional share. And if what the -- I mean, what that says is that here's
what it looks like, the impact.

Now, remember that one thing to note with the EIR is we go worst case. Somebody talked about this is residential. We shouldn't have that many cars coming back and forth. And that's an argument we had with the traffic engineer back and forth and back and forth.

The problem is there isn't a lot of data on that. So we have to take the accepted methodologies and put that in. So this is overstating -- we believe it's overstating the impacts in some ways. So we always go -- lean to the side of overstating rather than understating an impact.

And so if these are the standards, we have to say, based on these standards, this is the impact, and this would be the fix. We're not going to do that. I mean, we aren't going to put the light in. But what we have said is if the light -- if it meets the light warrants and the City decides to put it in, the campus will step up with their share.

And so whether that light goes in, it's not something that the campus is going to cause to happen. But our impacts may cause the City to say we might need that, and that's what we have to disclose in this document.

MR. KHALSA: Did you do a "No Project" alternative?
MS. THRASHER: Yes. There's a "No Project" alternative in the document.

The alternatives were No Project, Stripped-Down LRDP Interpretations. There is LRDP with this. This LRDP actually calls for a recreational field on that corner, and we're taking those out. And there's a Reduced Impact -- Reduced Project alternative. So those are the three alternatives that are discussed in the document.

Thank you for coming. We appreciate your input and look forward to getting your comments.

(Hearing closed at 6:55 p.m.)
REPORTER'S CERTIFICATE

I, LYNNE DALTON, a certified shorthand reporter, do hereby certify that the foregoing pages comprise a full, true, and correct transcription of the proceedings had and the public comments made at the hearing in the hereinbefore-entitled matter.

Dated this 28th day of March, 2011, at Riverside, California.

LYNNE DALTON, C.S.R. NO. 3544
2.3.7 Comment Document G: Draft EIR Hearing Transcript

Response to Comment G-1 (Introductory Presentation)

This discussion represents an introduction to the hearing and a presentation of the project and EIR by a UCR representative and the project’s environmental consultant. There are no comments contained in this material.

Response to Comment G-2 (Mr. Dawson – General noise issues)

This comment relates to a campus event that is unrelated to the proposed Glen Mor 2 project. The comment does not address the adequacy of the EIR or an environmental impact of the proposed project, and warrants no detailed response. However, these concerns have been communicated to campus executive management.

Response to Comment G-3 (Mr. Dawson – Watkins/Big Springs signal)

Mitigation Measure TR 1 states the campus would make a financial contribution toward the cost of installing a signal at Watkins Drive and Big Springs Road, not that the project would conduct the installation. As explained in the response to Comment C-5, the City does not anticipate construction of this improvement in the foreseeable future.

Response to Comment G-4 (Mr. Dawson – Valencia Hill Drive permanent closure)

Please see the response to Comment C-5.

Response to Comment G-5 (Mr. Dawson – Good neighbor concerns and statement of opposition)

This comment does not address the adequacy of the EIR or an environmental impact of the proposed project, and warrants no detailed response. However, these concerns have been communicated to campus executive management.

Response to Comment G-6 (Mr. Hahn – General neighborhood issues)

This comment relates to a campus event and general neighborhood situations that are unrelated to the proposed Glen Mor 2 project. The comment does not address the adequacy of the EIR or an environmental impact of the proposed project, and warrants no detailed response. However, these concerns have been communicated to campus executive management.

Response to Comment G-7 (Mr. Hahn – Doubts EIR credibility)

This comment states general skepticism for the adequacy of the Draft EIR without addressing specific issues. UCR ensures the reader that the Draft EIR properly discloses the components of the project and presents good faith, reasoned analysis of the project’s environmental impacts, in accordance with CEQA.
Response to Comment G-8 (Mr. Hahn – General community relations issues)

This comment addresses an opinion regarding general community relations that is not related to the Glen Mor 2 project. The comment does not address the adequacy of the EIR or an environmental impact of the proposed project, and warrants no detailed response. However, these concerns have been communicated to campus executive management.

Response to Comment G-9 (Mr. Hahn – Doubts EIR credibility)

This comment restates general skepticism regarding adequacy of the EIR. Please see the response to Comment G-7.

Response to Comment G-10 (Mr. Phillips – General noise issues)

This comment relates to a campus event that is unrelated to the proposed Glen Mor 2 project. The comment does not address the adequacy of the EIR or an environmental impact of the proposed project, and warrants no detailed response. However, these concerns have been communicated to campus executive management.

Response to Comment G-11 (Mr. Phillips – Parking ratios and supply)

Please see the response to Comment F-22.

Response to Comment G-12 (Mr. Phillips – Parking for Conference Facility)

The discussion of Impact 3.9-3 on page 3.9-13 of the Draft EIR explains that access and parking for group events at the Conference Facility (formerly known as the Executive Retreat) would entail parking at the proposed parking structure or nearby Parking Lot 13, with pedestrian or shuttle access along the service drive and pedestrian paths leading to the facility.

Response to Comment G-13 (Mr. Phillips – Parking structure lighting)

Please see the responses to Comments F-2 and F-3.

Response to Comment G-14 (Mr. Phillips – Project scale)

Please see the responses to Comments E-1 and F-1.

Response to Comment G-15 (Mr. Phillips – Existing view characterization and project compatibility)

The aspect of this comment regarding inconsistent characterization of dominant elements of the existing view refers to two separate impact discussions, one related to the analyzed viewpoint along the north portion of Valencia Hill Drive where the Glen Mor 1 buildings are the dominant feature and the second regarding the analyzed viewpoint at the Valencia Hill Drive/Big Springs Road intersection where the mature trees are the dominant feature. The balance of this comment relates to general architectural compatibility of the proposed project - please see the responses to Comments E-1 and F-1.
Response to Comment G-16 (Mr. Phillips – Concurrent construction projects)

Please see the response to Comment F-5.

Response to Comment G-17 (Mr. Phillips – Box Springs fault)

Please see the response to Comment F-13.

Response to Comment G-18 (Mr. Brunlinger – General issues)

This comment relates to a campus event and general community relations matters that are unrelated to the proposed Glen Mor 2 project. The comment does not address the adequacy of the EIR or an environmental impact of the proposed project, and warrants no detailed response. However, these concerns have been communicated to campus executive management.

Response to Comment G-19 (Mr. Brunlinger – Impact of Watkins/Big Springs signal)

Please see the response to Comment D-3.

Response to Comment G-20 (Mr. Brunlinger – Light and glare)

Please see the response to Comment F-2 regarding proposed lighting. The proposed solar panels would be fix-mounted panels oriented to the south – with the primarily-affected viewpoints being internal to the campus. These panels are designed to absorb light, rather than reflect it. Further, the existing and proposed trees along the south side of the parking structure, within the Big Springs Road median, and within Parking Lot 13 provide substantial screening from this direction (see EIR figures 2-3, 2-7 and 3.1-3). This comment and response do not raise any new or altered environmental impacts.

Response to Comment G-21 (Mr. Brunlinger – Parking)

Please see the response to Comment F-22. UCR is not aware of an issue with resident students parking off-campus; to date there has not been an issue with providing parking permits to all resident students requesting parking permits (Personal communication, e-mail from Andy Plumey, UCR Housing Services, to Tricia Thrasher, UCR Office of Design and Construction, April 12, 2011). In furtherance of LRDP MM4.14-10(b), the City has established resident parking permit programs throughout the neighborhoods east of the campus that severely limit the opportunity for off-campus parking. This comment and response do not raise any new or altered environmental impacts.

Response to Comment G-22 (Mr. Johns – Opening statement)

This comment is an opening statement regarding the speaker’s perspective and does not require a response. The campus is not aware of an issue with sewer service in the off-campus areas; even so, this matter is unrelated to the Glen Mor 2 project and its potential impacts.

Response to Comment G-23 (Mr. Johns – Building heights and shadows)

Please see response to Comment E-1.
Response to Comment G-24 (Mr. Johns – Campus architecture and planning; adjacent neighborhood as campus asset)

This comment expresses and opinion regarding the quality of architecture and planning on the campus and notes that a livable off-campus community is also an asset to the campus. UCR agrees with the statement that a livable off-campus community is an asset and believes that the project has been designed to a high aesthetic quality and to be compatible with the adjoining neighborhood (see responses to Comments C-3, E-1, F-1, F-2, and F-7). The comment does not address the adequacy of the EIR or an environmental impact of the proposed project, and warrants no detailed response.

Response to Comment G-25 (Mr. Johns – Building heights and views)

See response to Comment E-1.

Response to Comment G-26 (Mr. Johns – Neighbors as stakeholders; adjacent neighborhood as campus asset)

See response to Comments E-2 and G-24.

Response to Comment G-27 (Mr. Khalsa – Opposes Watkins/Big Springs signal)

Please see the response to Comment D-3.

Response to Comment G-28 (General discussion of EIR review process)

This is general discussion between UCR staff and the public about the EIR review process. There are no comments contained in this material related to the EIR analysis or conclusions.

Response to Comment G-29 (General discussion of recent storm-related events)

This discussion covers several issues that are unrelated to the Glen Mor 2 project, including a City storm drain inlet in Big Springs Road near Valencia Hill Drive, the general campus stormwater management system, a pending repair project near the Botanic Gardens, and a recent pipe break that flooded campus tunnels. This discussion does not raise any new or altered environmental impacts related to the project or the EIR analysis.

Response to Comment G-30 (Mr. Khalsa - Botanic Gardens)

This discussion relates to construction timing of a repair to the Botanic Garden flood control basin. This is unrelated to the Glen Mor 2 project.

Response to Comment G-31 (Mr. Dawson - Watkins/Big Springs Signal and cross-campus traffic)

This discussion includes reference to the community objection to signalization of the intersection of Watkins Drive and Big Springs Road and LRDP policies to eventually close cross-campus traffic. Aspects relevant to the Watkins/Big Springs Road signal are addressed in the response to Comment D-3.
The traffic analysis conducted for the Glen Mor 2 project considers the existing traffic network, which allows traffic movement through the campus core (e.g., Campus Drive, Aberdeen Drive and Linden Street). Although the LRDP includes concepts to ultimately eliminate cross-campus traffic, the campus has no foreseeable timeline for implementation of such restrictions. On this basis, the Glen Mor 2 EIR does not consider traffic patterns based on the street network that would exist once these future and as yet un-proposed nor approved changes to the local street network are in place. This circumstance would not alter the impact analysis or conclusion. Revision of the Draft EIR is not necessary.

**Response to Comment G-32 (Mr. Khalsa – No Project alternative)**

A "No Project" alternative is among the alternatives addressed in the Draft EIR, Chapter 4.
Chapter 3
Errata to the Draft EIR

3.1 Introduction

As provided in Section 15088(c) of the State CEQA Guidelines, responses to comments may take the form of a revision to a Draft EIR or may be a separate section in the Final EIR. This section complies with the latter and provides changes to the Draft EIR in revision-mode text (i.e., deletions are shown with strikethrough text (text) and additions are shown with underline text (text)). These notations are meant to provide clarification, corrections, or minor revisions as needed as a result of public comments or because of changes in the project since the release of the draft EIR as required by Section 15132 of the CEQA Guidelines. None of the corrections and additions constitutes significant new information or substantial project changes requiring recirculation as defined by Section 15088.5 of the CEQA Guidelines.

3.2 Changes to the Draft EIR

The following changes to the text are incorporated into the Final EIR as presented below. Page numbers reference the pages as they appeared in the Draft EIR.

Document-wide

The Draft EIR refers to the small building proposed as part of the project in the northeast corner of the project site as the "Executive Retreat". Subsequent to release of the draft EIR, this building was renamed the "Conference Facility". References using these terms throughout the record relate to the building identified as Building J in Draft EIR Table 2-1 (page 2-2) and Draft EIR Figure 2-3 (follows page 2-6). Because of this name change, all references to "Executive Retreat" in the Draft EIR are hereby revised to read "Conference Facility".¹

Section 3.5

Page 3.5-1

This section describes the affected environment and regulatory setting for geology and soils and describes the impacts on geology and soils that would result from implementation of the Glen Mor 2 Student Apartments Project. Where significant impacts are identified, this section also identifies mitigation measures that would reduce these impacts. This discussion and analysis incorporates existing conditions information, impact analysis, and mitigation measures from Section 4.6 of the LRDP EIR. The analysis and conclusions in this section are also based in part on the geotechnical investigation prepared for the project in June 2010 by C.H.J., Inc. (CHJ) (Appendix L) and a letter to UCR from CHJ on March 24, 2011 (Appendix L.1).

¹ Because of the high volume of revisions needed throughout the Draft EIR to address this name change, these revisions are not shown here in strikethrough and underline text.
Page 3.5-1

It is noted that the LRDP EIR (page 4.6-5) mentions the inactive Box Springs fault as being located near the northeast corner of campus. The project-specific investigation completed for the Glen Mor 2 project revealed no evidence of on-site faulting. Additional research into the Box Springs fault, including review of geologic index maps prepared in 1994 and 2001 and fault-hazard mapping by the California Geologic Survey in 2010, concluded that the fault is inactive and does not pose any seismic hazard to the project site.

Section 3.10

Page 3.10-3

Table 3.10-2. Modeled Traffic Noise Levels: Existing Conditions

<table>
<thead>
<tr>
<th>Receptor</th>
<th>Receptor Location</th>
<th>Existing Noise Level</th>
<th>Opening Year (2013) without Project</th>
<th>LRDP Build out Year (2015) without Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>ST-3</td>
<td>277 W Big Springs Drive (Pool)</td>
<td>55</td>
<td>55</td>
<td>57</td>
</tr>
<tr>
<td>ST-4</td>
<td>277 W Big Springs Drive (apt)</td>
<td>55</td>
<td>55</td>
<td>57</td>
</tr>
<tr>
<td>ST-7</td>
<td>Glen Mor 1 Student Apartments</td>
<td>36</td>
<td>36</td>
<td>38</td>
</tr>
<tr>
<td>MR-1</td>
<td>3653 Watkins Drive</td>
<td>52</td>
<td>52</td>
<td>54</td>
</tr>
<tr>
<td>MR-2</td>
<td>Lothian Residence Hall</td>
<td>41</td>
<td>41</td>
<td>43</td>
</tr>
</tbody>
</table>

Note: All noise levels in dBA CNEL.

1. Modeling conducted at MR-1 assumes this residence’s backyard is the sensitive receptor and factors in acoustical shielding achieved by the residential structure.

Section 3.13

Page 3.13-15

Table 3.13-7. On-Site Addition of Parking

<table>
<thead>
<tr>
<th></th>
<th>Upper Lot 14</th>
<th>Lower Lot 14</th>
<th>Parking Structure</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing Parking Spaces</td>
<td>78</td>
<td>404</td>
<td>--</td>
<td>482</td>
</tr>
<tr>
<td>Proposed Parking Spaces</td>
<td>62</td>
<td>--</td>
<td>579¹</td>
<td>641</td>
</tr>
<tr>
<td>Net Change</td>
<td>-16</td>
<td>-404</td>
<td>+579¹</td>
<td>+159</td>
</tr>
</tbody>
</table>

¹Eighteen spaces would be assigned for visitors, leaving 579 spaces available for residential permit holders

Section 3.14

Page 3.14-1

The City provides water and sewer service to the campus. Water service to the East Campus is provided by a City-operated 5-million-gallon reservoir located south of University Avenue, on the
east side of Interstate 215/State Route 60. Water is pumped through a 16-inch City main to a campus pump station, which pumps water through a 12-inch campus main to two storage tanks in the hills in the south part of the campus. These two tanks have a combined capacity of approximately 1.05 million gallons and provide storage for both domestic water and fire flows. Water stored in the tanks is delivered throughout the campus by a network of 6- and 8-inch pipelines. Existing service lines to the Lothian residence hall and the Glen Mor 1 student apartments provide proximate points of connection for the Glen Mor 2 project.

Pages 3.14-1 and 3.14-2

The connection to the City sewer collection system is provided by a 15-inch City-maintained trunk sewer that generally follows the alignment of Big Springs Road on the south side of the Glen Mor 2 site, then continues through the campus, generally along North Campus Drive, to University Avenue at Canyon Crest Drive. The City completed improvements to the trunk sewer system downstream of the campus after review of the Spruce Street Sewer Capacity Study (PB&J 2002). These off-campus improvements addressed wastewater conveyance requirements for projected buildout conditions, including a campus population of 40,000 (25,000 students [with 50 percent living on campus] and 15,000 faculty members and visitors), which is consistent with the 2005 LRDP. The Spruce Street Sewer Capacity Study also identified a future need for upgrades to the 15-inch line on campus to serve buildout development. The campus estimates that recent flow monitoring indicates existing campus discharges to this line are at a rate of approximately 0.457 million gallons per day (mgd) 2.5 cfs. Discharges from off-campus areas are at a rate of approximately 0.32 mgd 1.3 cfs. The existing 15-inch trunk sewer has a capacity of 1.45 to 2.62 mgd 8.9 cfs (Appendix T, TMAD, Taylor & Gaines Letter dated April 21, 2011 regarding Existing and Proposed Sanitary Sewer Flow Analysis).

Page 3.14-2

Impact 3.14-2: The existing on-campus sewer main has adequate conveyance capacity to serve the incremental demand of the Glen Mor 2 project. Impact Determination: Less than Significant.

The utility design plans for the Glen Mor 2 project include a new 8-inch sewer that would connect to the existing 15-inch line in Big Springs Road in the vicinity of the new entry court. On-site laterals would convey flow from each building to the new 8-inch line.

The campus has conducted an updated evaluation of existing and projected wastewater flows; the results are provided in the Final EIR as Appendix T. Flows in the existing 15-inch sewer pipeline were monitored immediately upstream of the campus (at the manhole in the vicinity of the Big Springs Road/Valencia Hill Drive intersection) to determine off-campus tributary flows. Flows were also monitored at the manhole near the intersection of University Avenue and Canyon Crest Drive to provide information necessary to determine existing campus discharges and City staff were consulted to determine anticipated future flows from undeveloped land within the off-campus...
tributary area. The flow monitoring determined that existing peak discharges from the off-campus area are 0.32 million gallons per day (mgd), existing peak discharge from the campus is 0.457 mgd, and future off-campus peak discharges are 0.027 mgd (based upon 73 single-family residences). Accounting for variations in the time of peak flows, a combined peak daily flow of 0.706 mgd was derived for existing discharges.

Projected wastewater flows for the Glen Mor 2 project were calculated based upon a typical rate of 100 gallons per student per day and also accounted for flows from the non-residential uses (Food Emporium, Conference Facility, pool and community space). The result is an estimated average daily flow of 0.127 mgd and a peak flow of 0.231 mgd (considering a peaking factor of 1.82).

Based upon the pipeline diameter and slope condition (determined through current field measurements at all manholes), the capacity of the existing 15-inch sewer pipeline between Valencia Hill Drive and Canyon Crest Drive is between 1.45 mgd (50% full) and 2.61 mgd (75% full). Combining peak flows for existing discharges, future off-campus discharges, and projected Glen Mor 2 discharges, the peak daily flow demand for the pipeline in question is 0.94 mgd. Compared to a conservative capacity of 1.45 mgd, the existing system is more than adequate to serve existing demands, demand for the Glen Mor 2 project, and future off-campus demands.

The design team has evaluated the existing campus sewer system and identified 21 existing campus buildings that discharge to the 15-inch sewer in Big Springs Road. These include 15 points associated with academic, research, administration, and physical plant functions and six points associated with housing (one for Lothian, two for Pentland Hills, and three for Glen Mor 1). The total peak flow to the 15-inch sewer from these existing facilities is estimated to be 2.5 cfs (Brown pers. comm.).

The existing City-maintained 15-inch sewer in Big Springs Road has a capacity of 8.9 cfs (Brown pers. comm.). In addition to the campus discharges noted above, this sewer also carries wastewater from the residential and limited commercial uses in the nearby off-campus area. Information in the City’s Spruce Street Sewer Capacity Study (PBS&J 2002, Table 5-2) suggests that the tributary off-site peak discharges to this line are at a rate of approximately 1.3 cfs.

Estimated peak sewer discharge for the Glen Mor 2 project is expected to be 1.25 cfs (Brown pers. comm.). When combined with off-campus (1.3 cfs) and existing on-campus peak discharges (2.5 cfs), the total peak discharge to the 15-inch line would be 5.05 cfs. This is less than the line’s capacity of 8.9 cfs. On that basis, the existing line would provide adequate capacity. This impact would be less than significant, and no mitigation is necessary.

Appendix B.1

This material consists of shading diagrams that are added to Appendix B as circulated with the Draft EIR.

Appendix L.1

This material consists of a March 24, 2011 letter from CHJ, Incorporated that is added to Appendix L as circulated with the Draft EIR.
Appendix T

This material consists of an April 21, 2011 letter from TMAD, Taylor & Gaines that is added as new Appendix T.
Modeled shadow patterns for December 21st at 4:10 PM. This diagram depicts the maximum extent of shading at this time of year. Sunset occurs at 4:38 PM.

Modeled shadow patterns for December 21st at 3:55 PM. Before this time shadows are confined to campus lands.
Modeled shadow patterns for June 21st at 6:54 PM. This diagram depicts the maximum extent of shading at this time of year. Sunset occurs at 8:04 PM.

Modeled shadow patterns for June 21st at 6:39 PM. Sunset occurs at 8:04 PM.
Modeled shadow patterns for June 21st at 6:24 PM. Sunset occurs at 8:04 PM.

Modeled shadow patterns for June 21st at 6:09 PM. Sunset occurs at 8:04 PM. At this time, and prior, shadows are confined to campus lands.
March 24, 2011

University of California, Riverside
Office of Design & Construction
3615A Canyon Crest Drive
Riverside, CA 92507
Attention: Ms. Tricia Thrasher

Job No. 10325-3

Subject: Geologic Update Regarding Box Springs Fault
Environmental Review of Glen Mor 2 Student Apartments
University of California, Riverside
Project No. 956334

Reference: Existing Conditions - Geology Technical Appendix
EIR for UCR Long-Range Development Plan
Riverside, California
Job No. 01335-3

Dear Ms. Thrasher:

In accordance with your request, we have prepared this update regarding the Box Springs fault in relation to the proposed Glen Mor 2 student housing project. We understand that questions have been received from the community regarding the status of this fault and its potential seismic hazard to the project. The referenced report by this firm, prepared in 2001, stated that the fault is shown by Rogers (1966) as a buried trace approximately coincident with the northeast corner of the UCR Campus (general area of the Glen Mor 2 site). We stated that the fault is not expressed in Pleistocene-age alluvium and is considered to be inactive.
The geologic index map included with our referenced report used a base map by Morton and Cox (1994). An updated version of this map by the same authors (Morton and Cox, 2001) is attached as Enclosure 1. Neither map shows a trace of the Box Springs fault.

More recent fault mapping by the California Geological Survey (Jennings and Bryant, 2010) does not show any faulting associated with the Box Springs fault or nearby faults. This map shows the recency of activity of faulting, such as Holocene (last 11,000 years), late Quaternary (700,000 years), Quaternary (last 1.6 million years) and pre-Quaternary, for each fault shown, and shows no trace for the Box Springs fault.

As we stated in the referenced report, the Box Springs fault is visible as a lineament in bedrock southeast of the site, but has no expression in Pleistocene-age alluvium near the UCR campus. Recent fault hazard mapping by the State does not show this fault at all. This fault is considered by this firm to be inactive. It is not considered to pose any seismic hazard to the UCR campus or the Glen Mor 2 project.

Please contact the undersigned should you have comments or questions.

Respectfully submitted,

C.H.J., INCORPORATED

Jay J. Martin, E.G., 1529 Vice President

JJM:nct

Enclosure: 1) Geologic Index Map

Distribution: Office of Design and Construction (6)
REFERENCES


GEOLOGIC UNITS:

Qaf - Artificial fill (late Holocene)
Qoyf - Young alluvial fan deposits (Holocene and late Pleistocene)
Qya - Young alluvial deposits (Holocene and late Pleistocene)
Qof - Old alluvial fan deposits (late to middle Pleistocene)
Qorf - Very old alluvial fan deposits (early Pleistocene)
Kbfg - Box Springs plutonic complex biotite, granodiorite and tonalite (Cretaceous)
Kbg - Box Springs plutonic complex porphyritic granodiorite (Cretaceous)
Kbft - Box Springs plutonic complex biotite-hornblende tonalite (Cretaceous)
Kvt - Val Verde tonalite (Cretaceous)
Kt - Tonalite, undifferentiated (Cretaceous)
Pzc - Calc-silicate rocks (Paleozoic?)

gologic contact

Unnamed fault

GEOLOGIC INDEX MAP

FOR: UNIVERSITY OF CALIFORNIA, RIVERSIDE
OFFICE OF DESIGN AND CONSTRUCTION
PROPOSED GLEN MOR 2 STUDENT APARTMENTS
UNIVERSITY OF CALIFORNIA
RIVERSIDE, CALIFORNIA

SCALE: 1" = 2,000'

MARCH 2011

C.H.J. incorporated
April 21, 2011

Mr. Timothy Brown  
University of California, Riverside  
3615-A Canyon Crest Drive  
Riverside, CA 92507  

Project: Glen Mor 2 Student Apartments  
UCR# 956334  
TTG# 6010.012.01  

Reference: Existing and Proposed Sanitary Sewer Flow Analysis

Dear Tim:

In accordance with your request, TMAD TAYLOR & GAINES (TTG) has prepared an analysis of the existing 15" sanitary sewer line that traverses the campus from the intersection of University Avenue and Canyon Crest Drive east to the intersection of Big Springs Road and Valencia Hill Drive. TTG has been retained to perform this analysis in response to questions raised in comments received regarding the Environmental Impact Report (EIR) for the Glen Mor 2 Student Apartments project. The University requested clarification on five (5) main points with regards to the sanitary sewer system. These items are listed below and will be addressed accordingly in this letter. Full calculations and all supporting information will be forthcoming in the coming weeks as the final Sanitary Sewer Analysis Report is prepared and issued to the University of California, Riverside (University).

1. What is the existing flow being contributed to the system from the non-University developments to the East? And, how much additional flow is anticipated in the ultimate build-out of this area?

2. What is the University currently contributing to the system? And, does this flow stay within the University's flow rights within the existing 15" sanitary sewer main?

3. What is the capacity of the existing 15" main at its most constricted (flattest) point as it traverses through the University?

4. What is the anticipated flow that will be introduced into the system from the construction of the Glen Mor 2 Student Apartments (GM2) project? And, will this increase in flow remain below the University's allotted flow within the existing 15" mainline?

5. Will the ultimate build-out of the non-University land to the east as well as the GM2 project exceed the maximum capacity of the system and require a system upgrade.

TTG in conjunction with Murrieta Development performed flow monitoring at two (2) locations within the system in question to obtain empirical data to help answer the above questions. Monitoring was performed from Tuesday April 12, 2011 through Monday April 18, 2011, however, a mechanical malfunction within the downstream monitor occurred on Thursday morning around 0600 hours and consequently data was lost between that time and Monday April 18th when the data was collected. As a result, TTG is still monitoring the system and will continue to do so for
another seven (7) days to verify the findings outlined in this technical letter. It is TTG’s opinion that the data obtained is sufficient to analyze the system’s capacity and existing flow, and that we are merely verifying this assumption with the flow monitoring that is still ongoing.

Upon review of the flow data obtained from our upstream monitor (close to the intersection of Big Springs Road and Valencia Hill Drive) it was derived that the existing flow entering the system had a peak daily flow of 0.320 mgd (million gallons per day) occurring on Friday April 15\(^{th}\) at 0650 hours. Average daily flows of 0.157 mgd were observed over the five (5) day monitoring period which resulted in a peaking factor of 2.04. In addition to the empirical data obtained, the undeveloped non-University land was analyzed to determine the future contributions to the sanitary sewer system. After conversations with the City of Riverside and more specifically Mr. Robert Van Zanten (Principal Engineer, City of Riverside), it was determined that the existing undeveloped 31-acres of land are anticipated to be developed into approximately seventy-three (73) single family dwelling units. Accordingly, a factor of 65 gpcd (gallons per capita per day) was applied to these units resulting in a future flow of approximately 13,000 gpd (gallons per day), or 0.013 mgd. After applying the peaking factor to this offsite flow, it is calculated that the total daily peak offsite flow will be 0.347 mgd.

As with the upstream monitor, the downstream monitor (near the intersection of University Avenue and Canyon Crest Drive) data was analyzed to determine the effects of the University’s contributions to the sanitary sewer system. As mentioned above, this monitor malfunctioned resulting in only one (1) true 24-hour period of flow monitoring. However, as mentioned before, this data combined with the partial data obtained from the other days produces results that TTG feels are consistent with the flows the system is seeing and are indicative of the current conditions. It was determined that a peak daily flow of 0.457 mgd was generated by the University at 0830 hours on Wednesday April 13\(^{th}\). An average daily flow of 0.251 mgd was observed which results in a peaking factor of 1.82 for the University’s portion of the sewer effluent. Additionally, it was determined that a combined peak daily flow of 0.706 mgd and average daily flow of 0.408 mgd with a peaking factor of 1.73 can be applied for the entire system in question.

With the data noted above, TTG was able to analyze the existing system to determine its current capacity and future flow capacity. As part of the analysis, TTG in conjunction with Hillwig-Goodrow performed a site survey in which all manholes located along the system where surveyed for accurate horizontal and vertical locations. In addition, all manholes where dipped to determine the invert of the system. This information allowed TTG to create a pipe network that accurately depicts the existing system horizontal and vertical alignment, thus, allowing TTG to accurately model the line. Upon completion of the data compilation, it was determined that the stretch of pipe between Canyon Crest Drive and North Campus Drive was laying at a 0.62% slope. With this information and the use of the Manning Equation, it was derived that a 15-inch clay pipe with a conservative N-value of 0.015 is capable of flowing 1.45 mgd at half-full and 2.61 mgd at three-quarters full. It is debated as to what the full capacity of a 15-inch sewer pipe should be calculated at. Some maintain that a half-full flow regime is the maximum design value while others uphold that a three-quarter full flow regime is the correct design method. Regardless of which method is technically correct, it will be demonstrated that the existing system is both adequate for the current developments as well as the future additions to the system that are proposed.

The proposed GM2 project was analyzed to determine both the average daily and peak daily flows that would be developed from the residents of the complex as well as the additional support staff and end users of the other amenities of the GM2 project. Appendix K of the 2010 California Plumbing Code was referenced for this calculation.
According to Table K-3 “Estimated Waste/Sewage Flow Rates” values for each identified use were derived and based upon the information that the GM2 project is an 810-unit complex with a food emporium with an estimated transaction rate of 4,800 transactions per day, a conference facility capable of seating 30 attendees, a pool with a maximum occupancy of 120 patrons, and a community space able to be occupied by approximately 46 people. It was derived that an average daily flow of 0.127 mgd and a peak daily flow of 0.231 mgd can be expected to be generated at the GM2 Apartments. This flow combined with the existing campus flow results in a peak daily flow of 0.688 mgd.

With all of the above information, TTG was finally able to analyze the existing and future systems to determine the adequacy of the pipe that is currently in the ground. After combining the offsite (non-University) and onsite (University) flows, it was determined that given the ultimate build-out of the non-University property to the east and the GM2 project, the peak daily flow that the system would be subjected to is 0.940 mgd. In comparison to the maximum flow rate of 1.45 mgd in a 15-inch clay pipe while flowing half-full, it has been determined that the existing system has adequate capacity to not only continue to effectively convey the existing flows, but, also function adequately after being subjected to the increase in effluent from the GM2 project.

Lastly, TTG analyzed the system to determine if the University was and/or will be exceeding their allotted capacity in the current system. It was determined through conversations with Mr. Robert Van Zanten that to determine the equivalent capacity of the 8-inch line that the University was originally scheduled to build in 1961, TTG needed to calculate the maximum flow an 8-inch clay pipe can convey while flowing half-full at 1.58% (estimated system slope from the top of the system at the intersection of Big Springs Road and Valencia Hill Drive to the bottom at the intersection of University Avenue and Canyon Crest Drive). This calculation resulted in a maximum flow rate of 0.498 mgd. When compared to the current and anticipated flow of 0.457 mgd and 0.688 mgd, respectively, it has been determined that the University is in compliance with the current agreement, however, will not be in compliance after the construction of GM2. As such, the University will need to negotiate the proper fee reimbursement, if any, with the City of Riverside for this deviation from the original agreement.

Should you have any additional questions or comments please do not hesitate to contact me at (909) 477-6915.

Sincerely,

TMAD TAYLOR & GAINES

David M. Beckwith, PE
Associate, Project Manager – Civil Ontario
Chapter 4
Mitigation Monitoring and Reporting Program

Introduction

State California Environmental Quality Act (CEQA) Guidelines Section 15097 requires that when a public agency completes an environmental document which includes measures to mitigate or avoid significant environmental effects, the public agency must adopt a reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program must be designed to ensure compliance during project implementation.

The Final Environmental Impact Report (FEIR) for the Glen Mor 2 Student Apartments Project (Glen Mor 2 project) (State Clearinghouse number 2010081020) includes twenty-two project-specific mitigations measures along with the applicable 2005 Long Range Development Plan (LRDP) Final EIR (SCH 2005041164) mitigation measures (MMs), as well as campus planning strategies (PSs) and programs and practices (PPs) that currently reduce environmental impacts.

The 2005 LRDP EIR PSs, PPs, and MMs incorporated by the Glen Mor 2 project will continue to be monitored under the existing 2005 LRDP Mitigation Monitoring and Reporting Program (MMRP). In addition, the University of California, Riverside (UCR) Office of Design & Construction (ODC) will coordinate monitoring the implementation of the twenty-two project-specific mitigation measures, and in conjunction with the 2005 LRDP MMRP, the applicable LRDP measures for the Glen Mor 2 project. Monitoring will include: (1) verification that each mitigation measure has been implemented; (2) recordation of the verification and any necessary notations regarding implementation of each mitigation measure; and (3) retention of records in the Glen Mor 2 project Mitigation Monitoring file.

Purpose

A listing of the twenty-two project-specific mitigation measures incorporated by the project is provided in this MMRP. All applicable 2005 LRDP PSs, PPs and MMs, to be monitored under the existing 2005 LRDP MMRP are listed in Appendix F of the Glen Mor 2 project FEIR.

The objectives of the MMRP for the Glen Mor 2 project include the following:

- To provide assurance and documentation that mitigation measures are implemented as planned;
- To provide information to assist the campus administration in understanding the effectiveness of the adopted mitigation measures;
- To maintain a campus record of compliance with project mitigation measures.

The implementation of the mitigation measures applicable to the project shall be performed and monitored by the campus staff, consultants and appropriate agencies in conjunction with project implementation and on-going implementation of the 2005 LRDP EIR MMRP as follows:

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

Project operation

By including both monitoring and reporting provisions, the campus has voluntarily exceeded the minimum requirements of the State CEQA Guideline Section 15097(c), which allows selection of monitoring or reporting, but does not require both.

Project Overview

The project site is located on the campus of the University of California, Riverside (UCR), in the northeastern portion of the City of Riverside. The City of Riverside is located in western Riverside County, approximately 20 miles east of Los Angeles. Regional access to the UCR campus is provided via Interstate 215/State Route 60, which bisect the Campus in a north-east orientation.

The project involves an approximately 21-acre site in UCR’s East Campus, which is located east of the Interstate 215/State Route 60 (I-215/SR60). The site is partially developed with an existing surface parking lot (Parking Lot 14) and a vacant single-family residence.

The proposed project is fully described in Chapter 2 of the FEIR. The proposed Glen Mor 2 project would support the 2005 LRDP goal of housing 50 percent of students in on-campus housing by:

- Constructing an apartment-style housing facility that would accommodate 810 students in 232 apartment-style units.
- Providing a café and food/retail facility, a resident services office, a community building, and a conference facility to support the new housing.
- Constructing a 597-space multi-level parking structure for campus residents, completing circulation improvements, and providing indoor and outdoor commons facilities to support the new housing.

Construction of the proposed project would occur over an approximately 23-month period and is expected to commence in Summer 2011.

Responsibilities and Duties

The Principal Environmental Project Manager from the UCR Office of Design and Construction would be responsible for coordinating the reporting of compliance with the mitigation measures listed in this MMRP. These responsibilities include:

- Coordination with the Project Manager to ensure that design and construction contracts contain the relevant mitigation measures adopted in the Final Environmental Impact Report, and that these mitigation measures are implemented during the design and construction phases of the project.
- Coordination with the Project Inspectors to assure compliance and reporting during the construction phase of the project.
- Coordination and assistance to other Campus units and/or Departments with monitoring and reporting responsibilities to ensure that they understand their charge and complete their reporting procedures accurately and on schedule, during construction and on-going project operations.
Implementation and Monitoring Procedures

In general, monitoring would consist of the responsible units verifying that the relevant mitigation measures were implemented.

Reporting consists of establishing a record that a mitigation measure is being implemented, and generally involves the following steps:

- ODC distributes reporting forms to the appropriate responsible entity or employs the entity’s existing reporting procedures for verification of compliance.
- Responsible entities verify compliance and document compliance by signing the monitoring form and/or documenting compliance using their own internal procedures when monitoring is triggered.
- Responsible entities provide ODC with verification that monitoring has been conducted and ensure, as applicable, that mitigation measures have been implemented.

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

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

List of Applicable Project and 2005 LRDP EIR Mitigation Measures

The following summary table lists the project-specific Mitigation Measures, as well as the timing and responsible entities for their implementation, monitoring, and reporting. A table listing 2005 LRDP EIR measures applicable to the Glen Mor 2 project, including the timing and responsible entities for their implementation, monitoring, and reporting is included in Appendix F of the DEIR. Appendix F provides a resource to ensure implementation of the applicable program-level provisions in detailed design and construction of the Glen Mor 2 project.
### Table 1. Glen Mor 2 Student Apartments Project Mitigation Monitoring and Reporting Summary

<table>
<thead>
<tr>
<th>Impact</th>
<th>Mitigation Measures</th>
<th>Responsible Entity</th>
<th>Monitoring Triggers</th>
<th>Frequency of Reporting</th>
<th>Verification of Compliance</th>
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</thead>
<tbody>
<tr>
<td>Monitoring Triggers</td>
<td>Responsible Entities</td>
<td>CPP – Capital and Physical Planning, ODC – Office of Design &amp; Construction, TAPS – Transportation and Parking Services</td>
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<td>1. Design stage</td>
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<td>2. Construction documents</td>
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<td>3. Construction</td>
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<td>4. Commencement of occupancy</td>
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<td>5. Post-construction</td>
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<td>6. On-going through Project operation</td>
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**AES 1: Design Detailed Planting Plan to Maintain Existing View Corridor:**

Detailed planting plans for Reach 1 of the Arroyo enhancement program and the planting areas north of the conference facility (Building J) and residential buildings D and H shall be designed to preserve the existing scenic focal views of the Carillon Tower and associated campus core from Valencia Hill Drive. Strategically placed trees that, at maturity, would not block the view corridor may be included. The Campus Landscape Architect shall be responsible for review and approval of the detailed plan prior to installation of the landscape treatments.

<table>
<thead>
<tr>
<th>Aesthetics</th>
<th>Monitoring Triggers</th>
<th>Frequency of Reporting</th>
<th>Verification of Compliance</th>
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<tbody>
<tr>
<td>AES 1-1:</td>
<td>ODC</td>
<td>Once to confirm inclusion in final bid specifications</td>
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<tr>
<td>Implementation of the proposed project would alter scenic focal views of the Carillon Tower from publicly accessible off-campus locations.</td>
<td>ODC, CPP</td>
<td>ODC, CPP</td>
<td>ODC, CPP</td>
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<td></td>
<td>2</td>
<td>Once prior to final landscape plan approval</td>
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<td>3</td>
<td>Once at pre-construction meeting to review requirements</td>
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<td></td>
<td>3</td>
<td>Once at final inspection to verify installation per plan</td>
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<tr>
<td>Impact</td>
<td>Mitigation Measures</td>
<td>Responsible Entity</td>
<td>Monitoring Triggers</td>
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<td><strong>Air Quality</strong></td>
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<td>Impact 3.2-2: Project construction activities would emit pollutants in an area with applicable standards.</td>
<td><strong>AQ 1: Construction-period Engine/Equipment Emissions.</strong> The UCR Office of Design and Construction will ensure that all construction contracts specify that all internal combustion engines/construction equipment operating on the project site will meet EPA-certified Tier 2 emissions standards or higher.</td>
<td>ODC</td>
<td>2</td>
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<td>ODC, Construction Manager</td>
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<td>ODC, Construction Manager</td>
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<td><strong>AQ 2: Construction-period Engine/Equipment Oxides Catalyst.</strong> The UCR Office of Design and Construction will ensure that all off-road equipment operating on the project site, as well as all on-road heavy-duty vehicles (including hauling and material delivery trucks) traveling to and from the site, will be fitted with an oxides catalyst.</td>
<td>ODC</td>
<td>2</td>
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<tr>
<td>Impact</td>
<td>Mitigation Measures</td>
<td>Responsible Entity</td>
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<td>ODC, Construction Manager</td>
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<td></td>
<td>ODC, Construction Manager</td>
<td>3</td>
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<tr>
<td>Biological Resources</td>
<td>BIO 1: Pre-Construction Surveys for Burrowing Owl.</td>
<td>ODC, Biologist</td>
<td>3</td>
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</table>

**BIO 1: Pre-Construction Surveys for Burrowing Owl.**
In compliance with LRDP mitigation measures 4.4-1(a) and 4.4-1(b), a burrowing owl preconstruction survey shall be performed by a qualified biologist not more than 30 days prior to ground disturbance and/or construction-related activities. The survey shall cover suitable habitat within the project footprint and a 300-foot buffer. The survey will include the peak activity.
<table>
<thead>
<tr>
<th>Impact</th>
<th>Mitigation Measures</th>
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<td>period for the species (1 hour before sunrise to 2 hours after, or 2 hours before sunset to 1 hour after). Burrowing owls will be sought visually and aurally, along with sign (i.e., pellets, tracks, feathers, and active burrows). If no burrowing owls are found during the preconstruction survey, no further actions are required. If burrowing owls are found outside the project footprint and it is outside the species nesting window of February 1 through August 31, no action is needed. If owls are present within the project footprint and thus direct removal of an occupied burrow would occur outside of February 1 through August 31, passive relocation by a qualified ornithologist shall be conducted. If an owl is found present during February 1 through August 31 and the occupied burrows are within 300 feet of project activities, a qualified ornithologist will assess whether the species is nesting or not. If burrowing owls are nesting within 300 feet of the limits of disturbance, a 300-foot avoidance buffer shall be flagged by the ornithologist and no construction will occur within the flagged off area until it has been determined by the ornithologist that the pair is no longer nesting and young (if present) have fledged.</td>
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<td>Impact</td>
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<td>Impact 3.3-7: Project construction may result in impacts on nesting birds, including loggerheaded shrike.</td>
<td><strong>BIO 2: Pre-Construction Nesting Bird Surveys.</strong> In compliance with LRDP Mitigation Measures 4.4-4 (a) and (b), when vegetation removal will occur between February 15 and September 15, nesting bird surveys shall be conducted by a qualified biologist a maximum of 7 days prior to initiation of ground disturbance activities. The survey area shall include the direct disturbance limits and a 250-foot buffer zone. Nesting bird surveys shall be conducted for all vegetation communities including annual grassland, ruderal, riparian, riparian-walnut woodland, landscape, and trees within developed portions of the site. If nesting birds are encountered within the survey area, the qualified biologist will flag an avoidance buffer zone around the nest. No ground disturbance activities shall occur within the avoidance buffer zone until the qualified biologist has determined that the nest is no longer active and the young are not dependent on the nest.</td>
<td>ODC, Biologist</td>
<td>3</td>
<td>One time, prior to start of construction. Biologist to provide written statement of survey and results to ODC.</td>
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<td>Impact 3.3-8: Proposed project improvements within the Arroyo would result in temporary and permanent impacts on riparian habitat.</td>
<td><strong>BIO 3: Minimize Temporary Impacts.</strong> Prior to initiation of ground disturbance activities, disturbance limits adjacent to or within the Arroyo shall be clearly staked, including disturbance limits associated with Arroyo improvements. Access to the Arroyo shall be limited to existing roads and shall be fenced to ensure unnecessary encroachment to the Arroyo does not occur.</td>
<td>ODC</td>
<td>2</td>
<td>Once to confirm inclusion in final bid specifications</td>
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<td>Impact</td>
<td>Mitigation Measures</td>
<td>Responsible Entity</td>
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|        | Prior to initiation of ground disturbance activities within the Arroyo (excluding Arroyo enhancement), a qualified biologist (defined as a biologist with demonstrated experience with the resources being avoided) will identify biological resources to be avoided during construction, including jurisdictional streambeds and riparian habitat. The qualified biologist should review the final design plan and conduct a site visit to all areas within and adjacent to the Arroyo where construction activities would take place. Silt fencing or similar avoidance fencing shall be placed around the disturbance limits required for each project component within or adjacent to the Arroyo. No impacts on the Arroyo shall occur outside of staked disturbance limits. CDFG jurisdictional streambed at the tree removal area for Bridge 1 shall be avoided if practicable. At a minimum, the following areas shall be avoided:  
  - riparian vegetation adjacent to the path/culvert removal;  
  - riparian vegetation located at the northwest side of the south abutment temporary work area for Bridge 2;  
  - CDFG jurisdictional streambed located on the south side of the bank recontouring area.  
  - The mature cottonwood tree near the Valencia Hill culvert extension work limit. | ODC                 | 3                   | One time, prior to start of construction to define disturbance limits |                                                                 |
<p>|        |                                                                                                                                                                                                                                                                                                                                                 | ODC, Construction Manager | 3                   | Once to review requirements at pre-construction meeting |                                                                 |
|        |                                                                                                                                                                                                                                                                                                                                                 | ODC, Construction Manager | 3                   | Daily during construction to confirm fencing remains intact and avoidance limits are observed |                                                                 |</p>
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<tr>
<th>Impact</th>
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<th>Responsible Entity</th>
<th>Monitoring Triggers</th>
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<tr>
<td>BIO 4: Prepare and Implement Revegetation Plan.</td>
<td>All areas identified as temporarily affected by construction activities shall be revegetated with native vegetation. All areas with riparian habitat shall be revegetated with similar riparian vegetation. Other vegetated areas (i.e., ruderal and annual grassland communities) that are temporarily affected shall be revegetated with native vegetation suitable to that location. If trees/riparian vegetation cannot be replanted within the disturbance limits of the respective project component, a suitable area within the Arroyo shall be selected for restoration. The restoration location will, at a minimum, provide replacement habitat of equal acreage as the affected location. Prior to removal of vegetation, a qualified biologist shall conduct an assessment of functions and values for the Arroyo, including all areas where vegetation removal will be conducted. Areas assessed will be of sufficient area and number to assess functions and values of the entire Arroyo to demonstrate success of the Arroyo enhancement program. The monitoring component of the revegetation plan shall include functions and values that are of equal or greater value than existing conditions as performance criteria.</td>
<td>ODC, Restoration Specialist</td>
<td>2</td>
<td>One time prior to disturbance of native vegetation to confirm completion of pre-disturbance assessment</td>
<td></td>
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</tbody>
</table>

<p>| BIO 4: Prepare and Implement Revegetation Plan. | All areas identified as temporarily affected by construction activities shall be revegetated with native vegetation. All areas with riparian habitat shall be revegetated with similar riparian vegetation. Other vegetated areas (i.e., ruderal and annual grassland communities) that are temporarily affected shall be revegetated with native vegetation suitable to that location. If trees/riparian vegetation cannot be replanted within the disturbance limits of the respective project component, a suitable area within the Arroyo shall be selected for restoration. The restoration location will, at a minimum, provide replacement habitat of equal acreage as the affected location. Prior to removal of vegetation, a qualified biologist shall conduct an assessment of functions and values for the Arroyo, including all areas where vegetation removal will be conducted. Areas assessed will be of sufficient area and number to assess functions and values of the entire Arroyo to demonstrate success of the Arroyo enhancement program. The monitoring component of the revegetation plan shall include functions and values that are of equal or greater value than existing conditions as performance criteria. | ODC, Restoration Specialist | 2 | Once prior to disturbance of native vegetation to confirm completion of plan consistent with measure, including any outside agency approvals | |</p>
<table>
<thead>
<tr>
<th>Impact</th>
<th>Mitigation Measures</th>
<th>Responsible Entity</th>
<th>Monitoring Triggers</th>
<th>Frequency of Reporting</th>
<th>Verification of Compliance</th>
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<tr>
<td></td>
<td>Prior to initiation of ground disturbance activities, a revegetation plan shall be prepared and submitted to the relevant agencies (i.e., USACE, CDFG). The revegetation plan should be sufficient to meet agency requirements and at a minimum shall include the following: • a map and acreage of vegetation to be temporarily affected, • location of revegetation area, • functions and values assessment of areas to be affected, • functions and values assessment of entire Arroyo within the project footprint, • plant palette, • performance criteria, and • monitoring guidelines.</td>
<td>ODC, Restoration Specialist</td>
<td>3</td>
<td>Once, prior to completion of construction to confirm planting in accordance with approved plan</td>
<td></td>
</tr>
<tr>
<td>Impact 3.3-9: The project would impact areas designated as Naturalistic Open Space under the LRDP.</td>
<td><strong>BIO 3: Minimize Temporary Impacts.</strong> (see above)</td>
<td>See above</td>
<td>See above</td>
<td>See above</td>
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<td></td>
<td><strong>BIO 4: Prepare and Implement Revegetation Plan.</strong> (see above)</td>
<td>See above</td>
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<td></td>
<td><strong>BIO 5: Conduct Worker Education Program.</strong> To ensure compliance with best management practices identified in LRDP Program and Practice 4.4-1(b), a biologist shall conduct a worker education program for all construction personnel prior to personnel initiating ground disturbance activities. The education program will include a discussion of the importance of the Arroyo and areas within the Arroyo to be avoided (including parking and staging of equipment), a discussion of native wildlife with the potential to occur, and education on not harassing native wildlife.</td>
<td>ODC</td>
<td>2</td>
<td>Once to confirm inclusion in final bid specifications</td>
<td>Signature</td>
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<td></td>
<td><strong>BIO 6: Conduct Biological Monitoring During Construction.</strong> A qualified biologist shall monitor the project for compliance with best management practices outlined in LRDP Program and Practice 4.4-1(b). Monitoring will occur as determined necessary by the biological monitor but will occur at a minimum of one time per 5 working days when work is located in or adjacent to the Arroyo. The limits of areas considered “adjacent to the Arroyo” will be determined by a qualified biologist in conjunction with the impact minimization planning under Mitigation Measure BIO 3.</td>
<td>ODC</td>
<td>2</td>
<td>Once to confirm inclusion in final bid specifications</td>
<td>Signature</td>
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<td>Impact</td>
<td>Mitigation Measures</td>
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<td></td>
<td></td>
<td>ODC, Biologist</td>
<td>3</td>
<td>One time to address requirement in pre-construction meeting</td>
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<td></td>
<td></td>
<td>ODC, Biologist</td>
<td>3</td>
<td>Weekly during construction to document need for, and nature of, monitoring</td>
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<td></td>
<td></td>
<td>ODC, Biologist</td>
<td>3</td>
<td>One time at completion of construction to document completion of work requiring monitoring</td>
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<td></td>
<td><strong>BIO 7: Remove Exotic Species.</strong> To minimize potential indirect impacts on Naturalistic Open Space, during vegetation removal during construction, any exotic species removed shall be properly handled to prevent sprouting or re-growth. Construction equipment shall be cleaned of mud or other debris that may contain invasive plants and/or seeds and inspected to reduce the potential of spreading noxious weeds before mobilizing to the work area and before leaving the work area during the course</td>
<td>ODC</td>
<td>2</td>
<td>Once to confirm inclusion in final bid specifications</td>
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<td>Impact</td>
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<td>of construction. Cleaning of any equipment shall occur at least 300 feet from the Arroyo.</td>
<td>ODC, Restoration Specialist</td>
<td>3</td>
<td>Once prior to construction to identify area of concern</td>
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<td></td>
<td>ODC, Restoration Specialist, Construction Manager</td>
<td>3</td>
<td>Once at pre-construction meeting to review requirements</td>
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<td></td>
<td>ODC, Construction Manager</td>
<td>3</td>
<td>Weekly construction inspection reports to document compliance</td>
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<td></td>
<td>ODC, Restoration Specialist, Construction Manager</td>
<td>3</td>
<td>Once at completion of vegetation removal to document completion of work in accordance with requirement</td>
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<tr>
<td>BIO 3: Minimize Temporary Impacts. (see above)</td>
<td>See above</td>
<td>See above</td>
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Impact 3.3-10: The proposed project would impact areas that meet the definition of "waters of the U.S." and jurisdictional "streambed".
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<th>Impact</th>
<th>Mitigation Measures</th>
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<th>Verification of Compliance</th>
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<tbody>
<tr>
<td></td>
<td><strong>BIO 4: Prepare and Implement Revegetation Plan.</strong> (see above)</td>
<td>See above</td>
<td>See above</td>
<td>See above</td>
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<tr>
<td></td>
<td><strong>BIO 5: Conduct Worker Education Program.</strong> (see above)</td>
<td>See above</td>
<td>See above</td>
<td>See above</td>
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<td></td>
<td><strong>BIO 6: Conduct Biological Monitoring During Construction.</strong> (see above)</td>
<td>See above</td>
<td>See above</td>
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<td></td>
<td><strong>BIO 7: Remove Exotic Species.</strong> (see above)</td>
<td>See above</td>
<td>See above</td>
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<tr>
<td>Impact 3.3-11: The project would not conflict with the Western Riverside County MSHCP.</td>
<td><strong>BIO 1: Pre-Construction Surveys for burrowing owl.</strong> (see above)</td>
<td>See above</td>
<td>See above</td>
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<td></td>
<td><strong>BIO 3: Minimize Temporary Impacts.</strong> (see above)</td>
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<td>See above</td>
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<td></td>
<td><strong>BIO 7: Remove Exotic Species.</strong> (see above)</td>
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### Cultural Resources

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<th>Impact</th>
<th>Mitigation Measures</th>
<th>Responsible Entity</th>
<th>Monitoring Triggers</th>
<th>Frequency of Reporting</th>
<th>Verification of Compliance</th>
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</thead>
<tbody>
<tr>
<td>Impact 3.4-2: Project earthwork would not cause a substantial adverse change in the significance of an archaeological resource.</td>
<td><strong>CULT 1: Protection and Recovery of Buried Artifacts.</strong> If an archaeological resource is discovered during construction, all soil-disturbing work within 100 feet of the find shall cease. The University shall contact a qualified archaeologist within 24 hours to inspect the site. If a resource within the project area of potential effect is determined to qualify as a unique archaeological resource (as defined by CEQA), the University shall devote adequate time and funding to salvage the material. Any archaeologically important artifacts recovered during monitoring shall be cleaned, catalogued, and analyzed, with the results presented in a report of finding that meets professional standards.</td>
<td>ODC</td>
<td>2</td>
<td>Once to confirm inclusion in final bid specifications</td>
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<td></td>
<td></td>
<td>ODC, Construction Manager</td>
<td>3</td>
<td>Once at pre-construction meeting to review requirements</td>
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<td></td>
<td></td>
<td>ODC, Construction Manager</td>
<td>3</td>
<td>Weekly inspection reports to document whether any discoveries for duration of ground disturbance activities</td>
<td></td>
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<td></td>
<td></td>
<td>ODC, Archaeologist</td>
<td>3</td>
<td>As needed during ground disturbance phases to document evaluation and disposition of any artifacts</td>
<td></td>
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<tr>
<td>Impact</td>
<td>Mitigation Measures</td>
<td>Responsible Entity</td>
<td>Monitoring Triggers</td>
<td>Frequency of Reporting</td>
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<tr>
<td><strong>Land Use and Planning</strong></td>
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<tr>
<td>Impact 3.9-2: The Glen Mor 2 project is consistent with the UCR Long Range Development Plan.</td>
<td>BIO 3: Minimize Temporary Impacts. (see above)</td>
<td>See above</td>
<td>See above</td>
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<td></td>
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<td>BIO 5: Conduct Worker Education Program. (see above)</td>
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<td></td>
<td>BIO 6: Conduct Biological Monitoring During Construction. (see above)</td>
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<td></td>
<td>BIO 7: Remove Exotic Species. (see above)</td>
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<td><strong>Noise</strong></td>
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<tr>
<td>Impact 3.10-2: Project construction would exceed LRDP standards for groundborne vibration as received by on-campus residences.</td>
<td>NOI 1: Use of High-Vibration Construction Equipment near Lothian Residence Hall. To the extent feasible, schedule construction activity entailing use of high-vibration generating equipment within 75 feet of Lothian Residence Hall during periods when students are not in residence.</td>
<td>ODC</td>
<td>2</td>
<td>Once to confirm inclusion in final bid specifications</td>
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<td></td>
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<td>ODC, Construction Manager</td>
<td>3</td>
<td>Weekly inspection reports to document use of target equipment contrary to measure when students are in residence</td>
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<td>Impact</td>
<td>Mitigation Measures</td>
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<td><strong>NOI 2: Restrict Construction Hours.</strong> The Office of Design and Construction will ensure that all construction contracts will limit exterior construction activities to occurring between 7:00 a.m. and 7:00 p.m. Monday through Friday, and 8 a.m. and 5 p.m. on Saturday. Construction will not be allowed on Sunday or federal holidays.</td>
<td>ODC</td>
<td>2</td>
<td>Once to confirm inclusion in final bid specifications</td>
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<td></td>
<td></td>
<td>ODC, Construction Manager</td>
<td>3</td>
<td>Once at pre-construction meeting to review requirements</td>
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<td></td>
<td></td>
<td>ODC, Construction Manager</td>
<td>3</td>
<td>Daily inspection reports to document adherence to indicate time limits</td>
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<td></td>
<td><strong>NOI 3: Appoint Construction Noise Liaison.</strong> The Office of Design and Construction will appoint a campus liaison for the project who will be available to respond to community concerns regarding construction noise, and will establish a clear appeal process to another designated campus representative that will allow resolution of noise problems that cannot be solved immediately by the appointed liaison.</td>
<td>ODC</td>
<td>3</td>
<td>Once to appoint liaison prior to start of construction</td>
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<td></td>
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<td>ODC, Appointed Noise Liaison, Construction Manager</td>
<td>3</td>
<td>Once to review requirements at pre-construction meeting</td>
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<td></td>
<td></td>
<td>ODC, Construction Manager</td>
<td>3</td>
<td>Once to post contact info on-site</td>
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<td>ODC, Appointed Noise Liaison</td>
<td>3</td>
<td>Ongoing during construction</td>
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<tr>
<td><strong>NOI 4: Require Mufflers and Other Noise Attenuators on Project Construction Equipment.</strong></td>
<td>The Office of Design and Construction will ensure all construction contracts specify that noise-producing construction equipment and vehicles using internal combustion engines will be equipped with mufflers; air-inlet silencers, where appropriate; and any other shrouds, shields, or other noise-reducing features in good operating condition that meet or exceed original factory specification. Mobile or fixed “package” equipment (e.g., arc-welders, air compressors) will be equipped with shrouds and noise-control features that are readily available for that type of equipment.</td>
<td>ODC</td>
<td>2</td>
<td>Once to confirm inclusion in final bid specifications</td>
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<td></td>
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<td>ODC, Construction Manager</td>
<td>3</td>
<td>Once to review requirements at pre-construction meeting</td>
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<td></td>
<td></td>
<td>ODC, Construction Manager</td>
<td>3</td>
<td>Ongoing verification of properly fitted equipment through inspection reports</td>
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<td><strong>NOI 5: Require Use of Electrically Powered Equipment.</strong></td>
<td>The Office of Design and Construction will ensure all construction contracts specify that work use electrically powered equipment instead of pneumatic or internal combustion–powered equipment, where feasible.</td>
<td>ODC</td>
<td>2</td>
<td>Once to confirm inclusion in final bid specifications</td>
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<td></td>
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<td>ODC, Construction Manager</td>
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<td>Once to review requirements at pre-construction meeting</td>
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<td></td>
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<td>ODC, Construction Manager</td>
<td>3</td>
<td>Ongoing verification of use of electrical equipment where feasible through inspection reports</td>
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<td></td>
<td><strong>NOI 6: Specify Construction Site Speed Limit.</strong></td>
<td>ODC</td>
<td>2</td>
<td>Once to confirm inclusion in final bid specifications</td>
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<td>The Office of Design and Construction will ensure all construction contracts specify that construction site and access road speed limits will be established and enforced during the construction period.</td>
<td>ODC, Construction Manager</td>
<td>3</td>
<td>Once to review requirements at pre-construction meeting</td>
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<td></td>
<td></td>
<td>ODC, Construction Manager</td>
<td>3</td>
<td>Ongoing verification of adherence to speed limits through inspection reports</td>
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<td></td>
<td><strong>NOI 7: Prohibit Noise-producing Signals.</strong></td>
<td>ODC</td>
<td>2</td>
<td>Once to confirm inclusion in final bid specifications</td>
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<td>The Office of Design and Construction will ensure all construction contracts prohibit the use of noise-producing signals, including horns, whistles, alarms,</td>
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<td>and bells, except for safety purposes only. Public address or music systems will also be prohibited.</td>
<td>ODC, Construction Manager</td>
<td>3</td>
<td>Once to review requirements at pre-construction meeting</td>
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<td></td>
<td></td>
<td>ODC, Construction Manager</td>
<td>3</td>
<td>Ongoing verification of adherence through inspection reports</td>
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**Transportation and Traffic**

**Impact 3.13-1: The project would contribute traffic to the intersection of Watkins Drive and Big Springs Road, which would degrade service at that intersection from an acceptable level to an unacceptable level.**

**TR 1: Contribute a Proportional Share of Funds to the City of Riverside to Install a Traffic Signal at the Intersection of Watkins Dr and Big Springs Rd**

The University will pay the City the proportional share of the actual cost of the traffic signal at the time that the implementation of the traffic signal is reasonably certain, and no later than the start of construction of the traffic signal. The University’s proportional share will be based on the Glen Mor 2 project’s total traffic contribution to the intersection of Watkins Drive and Big Springs Road, which is currently anticipated to be 6.6 percent, as determined by the traffic impact analysis prepared for the project (Kunzman 2010 [Table 9, Project Fair Share Traffic Calculations, page 40]).

ODC, City of Riverside | 6 | One time to verify payment to City if City proceeds with signal installation |
<table>
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<tr>
<th>Impact</th>
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<tbody>
<tr>
<td>Impact 3.13-4: Project construction would result in short-term hazards due to temporary lane closures on Big Springs Road and Valencia Hill Drive and the presence of construction vehicles and equipment on local roads.</td>
<td>TR 2: Prepare a Traffic Control Plan for Project Construction. Prior to commencement of construction, the project construction contractor will prepare a traffic control plan for the project and submit it to the UCR Office of Design and Construction for approval. As part of its review of the traffic control plan, the UCR Office of Design and Construction will consult with UCPD, EH&amp;S, RFD, and RPD to disclose roadway closures and identify alternative travel routes, if necessary. The UCR Office of Design and Construction will consult with the City Public Works Department for their concurrence regarding the adequacy of traffic control within off-campus roads. The traffic control plan will identify lane closures and show the limits of construction work, areas with temporary restriping of lanes and crosswalks, flagging operations, signage, alternate routes, and other actions necessary to maintain safe traffic conditions for vehicles, bicyclists, and pedestrians. The plan shall include consideration of emergency vehicle use of the paved drive along the north side of the Great Glen Arroyo, adjacent to the Pentland Hills and Glen Mor 1 complexes. Any lane closures specified in the traffic control plan will be announced on UCR's web site (<a href="http://www.community.ucr.edu">www.community.ucr.edu</a>).</td>
<td>ODC</td>
<td>2</td>
<td>Once to confirm inclusion in final bid specifications</td>
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<td></td>
<td></td>
<td>ODC, Construction Manager</td>
<td>3</td>
<td>Once prior to start of construction to verify plan preparation and required consultations</td>
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<td></td>
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<td>ODC, Construction Manager</td>
<td>3</td>
<td>Once to review requirements at pre-construction meeting</td>
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<td>ODC, Construction Manager</td>
<td>3</td>
<td>Ongoing verification of adherence through inspection reports</td>
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<td>Impact</td>
<td>Mitigation Measures</td>
<td>Responsible Entity</td>
<td>Monitoring Triggers</td>
<td>Frequency of Reporting</td>
<td>Verification of Compliance</td>
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<td><strong>Impact 3.13-5:</strong> Project construction would result in a short-term pedestrian hazard due to closure of pathways through the project site.</td>
<td>TR 2: Prepare a Traffic Control Plan for Project Construction, (see above)</td>
<td>See above</td>
<td>See above</td>
<td>See above</td>
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<td></td>
<td>TR 3: Prepare a Pedestrian Access Plan for Project Construction. Prior to commencement of construction, the project construction contractor will prepare a pedestrian access plan for pathways through and adjacent to the project site that are affected by project construction activities and submit it to the UCR Office of Design and Construction for review and approval. The pedestrian access plan will show alternate routes for all affected pathways and signage announcing closures and alternate routes to pedestrians.</td>
<td>ODC</td>
<td>2</td>
<td>Once to confirm inclusion in final bid specifications</td>
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<td>ODC, Construction Manager</td>
<td>3</td>
<td>Once prior to start of construction to verify plan preparation</td>
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<td>ODC, Construction Manager</td>
<td>3</td>
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<td>ODC, Construction Manager</td>
<td>3</td>
<td>Ongoing verification of adherence through inspection reports</td>
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<td><strong>Impact 3.13-6:</strong> Project construction may entail short-term use of emergency access routes.</td>
<td>TR 2: Prepare a Traffic Control Plan for Project Construction. (see above)</td>
<td>See above</td>
<td>See above</td>
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<td>Impact</td>
<td>Mitigation Measures</td>
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<td>Impact 3.13-7: The project would provide an adequate number of parking spaces to serve the proposed facilities.</td>
<td><strong>TR 4: Balance Housing Precinct Occupancy and Parking Supply.</strong> The UCR Office of Housing Services will establish a reporting program to document conformance to LRDP parking ratios for the housing precinct, including Aberdeen-Inverness, Lothian, Pentland Hills, Glen Mor 1, and Glen Mor 2. Compliance documentation shall disclose (1) bed counts for the fall quarter for residence halls and apartments, (2) the corresponding number of parking spaces required (at ratios of one for every four residence hall beds and one for every two apartment beds), and (3) the number of parking spaces provided. Compliance documentation shall be filed with the Office of Design and Construction on an annual basis, within two weeks of the fall quarter move-in. No parking permits will be issued beyond the number of spaces available.</td>
<td>ODC, Housing</td>
<td>4</td>
<td>Once prior to occupancy to verify creation of reporting program</td>
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