

4 Revisions to the Draft EIR

This chapter contains changes to the text of the Draft Environmental Impact Report (Draft EIR) in response to certain comments. These changes are generally referenced in the responses to comments in Chapter 2, *Responses to Comments*, or are provided to be consistent with changes referenced in Chapter 2 of this Final EIR. The changes are presented in the order in which they appear in the Draft EIR and are identified by Draft EIR page number. Text deletions are shown in ~~strikeout~~ and additions are shown in underline. The changes identified below do not alter the conclusions of the EIR with respect to any of the significant impacts of the project and do not necessitate recirculation of the Draft EIR.

The information contained within this chapter clarifies and expands on information in the Draft EIR and does not constitute “significant new information” requiring recirculation. (See Public Resources Code Section 21092.1; CEQA Guidelines Section 15088.5.)

Table of Contents

No changes to the Table of Contents of the Draft EIR are necessary. All pages referenced in the sections below reflect those of the Draft EIR.

Executive Summary

The fourth paragraph under “Project Characteristics” on page ES-3 of the Draft EIR is revised as follows:

UCR is considering the long-term (through 2035) demolition and potential redevelopment opportunities on-campus. For purposes of the EIR analysis, the areas of campus that UCR considers for demolition and potential redevelopment include, but are not limited to, the following: Boyden Labs; Fawcett Laboratory, Stored Product Insecticide Building; Lathhouses #1, #4, and #8; campus facilities along South Campus Drive (e.g., Genomics shed, Bio Control Building, Plant Drying Building, Herbarium, Botany Screenhouse, Storage Shed #6, Headhouse Storage Building, Growth Chamber Building, Glasshouse #51, Facilities Services Annex A, and College Building North and South), campus facilities east/west of East Campus Drive (e.g., Fawcett Laboratory, University Office Building, Campbell Hall, Facilities Services Annex B, Greenhouses #7-14, Greenhouses #18-21, Computing & Communications Center, and associated accessory structures), the Health Services Building; Bannockburn Village, the Plaza Apartments, Oban Apartments, Falkirk Apartments, the Corporation Yard, the softball and soccer fields, Advanced Neuroimaging Building (formerly FMRI), Costo Hall, and the Police Facility; and the University Extension. Programs in these buildings would need to be relocated before any building is repurposed or demolished. The specific locations of these buildings within the UCR campus can be seen in Figure 3-4 and reviewed through the UCR Campus Map available at: <https://campusmap.ucr.edu/>.

Mitigation Measure MM HAZ-1, as presented in Table ES-2 and beginning on page ES-41 of the Draft EIR, is amended to state:

MM HAZ-1 Property Assessment – Phase I and II ESAs

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

Mitigation Measure MM N-1, as presented in Table ES-2 and beginning on page ES-48 of the Draft EIR, is amended to state:

MM N-1 Construction Noise Reduction Measures

To reduce construction noise levels to on-campus and off-campus noise sensitive receivers, UCR shall implement the following measures:

- Hours of exterior construction activities shall be limited to 7:00 a.m. to 9:00 p.m. Monday through Friday and 8:00 a.m. to 6:00 p.m. on Saturday, as feasible, except under circumstances where such time limits are infeasible (e.g., for time sensitive construction work such as concrete pouring, excessive heat warnings/temperatures during the summer, operational emergencies). No exterior construction activities shall occur on federal holidays.
- Construction traffic shall follow routes so as to minimize the noise impact of this traffic on the surrounding community, to the greatest extent feasible.
- Contract specifications shall require that construction equipment be muffled or otherwise shielded, in accordance with manufacturers' recommendations. Contracts shall specify that engine-driven equipment be fitted with appropriate noise mufflers.
- Where available and feasible, construction equipment with back-up alarms shall be equipped with either audible self-adjusting backup alarms or alarms that only sound when an object is detected. Self-adjusting backup alarms shall automatically adjust to 10 dBA over the surrounding background levels. All non-self-adjusting backup alarms shall be set to the lowest setting required to be audible above the surrounding noise levels.

- Stationary construction equipment material and vehicle staging shall be placed to direct noise away from sensitive receivers to the greatest extent feasible.
- Meetings shall be conducted, as needed, with on-campus constituents to provide advance notice of construction activities to coordinate these activities with the academic calendar, scheduled events, and other situations, as appropriate.
- Communication would be provided, as needed, with constituents that are affected by campus construction to provide advance notice of construction activities and ensure that the mutual needs of the particular construction project and of those impacted by construction noise are met, to the extent feasible.
- A sign shall be provided at the construction site entrance, or other conspicuous location, that includes a 24-hour telephone number for project information, and to report complaints. An inquiry and corrective action will be taken if necessary, in a timely manner.
- ~~Where deemed necessary and feasible, installation of temporary sound barriers/blankets of sufficient height to break the line-of-sight between the construction equipment and within proximity to exterior use areas of noise-sensitive receivers shall be required. The temporary barriers/blankets shall be of sufficient height to break the line-of-sight between the construction equipment and noise-sensitive receivers.~~ Temporary sound barriers shall consist of either sound blankets or other sound barriers/techniques such as acoustic padding or acoustic walls placed near adjacent noise-sensitive receivers that have been manufactured to reduce noise by at least 10 dBA at ground level or meets ASTM E90 & E413 standards/ASTM C423 (or similar standards with equivalent 10 dBA noise reduction).

Mitigation Measure MM N-1, as presented in Table ES-2 and beginning on page ES-51 of the Draft EIR, is amended to state:

MM N-5 Construction Vibration Reduction Measures

If construction equipment were to be operated within the specified distances listed in Table 4.11-13 of the Draft EIR, the campus shall reduce construction vibration levels through the following noise control measures:

- All academic and residential facilities within the listed distances shall be notified if the listed equipment is to be used during construction activities so that the occupants and/or researchers can take necessary precautionary measures to avoid negative effects to their activities and/or research.
- In addition, one of the following measures shall be implemented:
 - Use of the equipment shall not occur within the specified distances in Table 4.11-13 or
 - A project-specific vibration impact analysis shall be conducted that shall consider the type of equipment used and potential vibration levels at structures within the specified distances. If, after consideration of the type of equipment used and other factors of the environment, vibration levels do not exceed the applicable criteria (listed in the second column of Table 4.11-13), construction may proceed without additional measures. If, after consideration of the type of equipment used and other factors of the environment, vibration levels exceed the applicable criteria, additional measures shall be implemented to reduce vibration levels below threshold, if feasible. These measures may include, but not be limited to, use of different equipment that results in an acceptable vibration level as listed in the second column of Table 4.11-13.

Section 1 Introduction

No changes to Section 1, *Introduction*, of the Draft EIR are necessary.

Section 2 Project Description

The first paragraph on page 2-6 of the Draft EIR, is amended as follows:

UCR is considering the long-term (through 2035) demolition and potential redevelopment opportunities on-campus. For purposes of the EIR analysis, the areas of campus that UCR considers for demolition and potential redevelopment include, but are not limited to, the following: Boyden Labs; Fawcett Laboratory, Stored Product Insecticide Building; Lathhouses #1, #4, and #8; campus facilities along South Campus Drive (e.g., Genomics shed, Bio Control Building, Plant Drying Building, Herbarium, Botany Screenhouse, Storage Shed #6, Headhouse Storage Building, Growth Chamber Building, Glasshouse #51, Facilities Services Annex A, and College Building North and South), campus facilities east/west of East Campus Drive (e.g., Fawcett Laboratory, University Office Building, Campbell Hall, Facilities Services Annex B, Greenhouses #7-14, Greenhouses #18-21, Computing & Communications Center, and associated accessory structures), the Health Services Building; Bannockburn Village, the Plaza Apartments, Oban Apartments, Falkirk Apartments, the Corporation Yard, the softball and soccer fields, Advanced Neuroimaging Building (formerly FMRI), Costo Hall, ~~and the Police Facility;~~ and the University Extension.

Section 3 Environmental Setting

No changes to Section 3, *Environmental Setting*, of the Draft EIR are necessary.

Section 4 Environmental Impact Analysis

No changes to Section 4, *Environmental Impact Analysis*, of the Draft EIR are necessary.

Section 4.1 Aesthetics

The first paragraph under Environmental Setting “Off-Campus Light and Glare” on page 4.1-39 of the Draft EIR, is amended as follows:

Off-campus lighting sources include overhead street lighting on local streets, headlights and taillights from vehicles traveling along the I-215/SR 60 freeway and streets, headlights from the train, as well as traffic lights....These all contribute to the artificial nighttime light levels.”

The first paragraph under Impact AES-2 on page 4.1-48 of the Draft EIR, is amended as follows:

Construction

Potential visual impacts would arise from intermittent construction activities (i.e., barricade installation, construction staging, and grading). During construction, areas would be graded and excavated, which would include the removal of existing structures, and the temporary removal of some of the existing ground cover and vegetation. The types and number of equipment would vary throughout the construction period, depending on the types of activities occurring, but the presence of trucks with building materials and equipment would result in short-term visual degradation. These would occur on construction sites and in nearby staging areas, as

appropriate for each project. Visual degradation would be limited to the duration of construction and to specific project sites. From public roadways and nearby public places, such as shopping centers, residential areas, the visibility of construction staging would vary, depending on project location. While construction sites could be unsightly, it would be temporary, phased over time, and screened to an extent with construction fencing as noted in the Campus Construction and Design Standards. While this would temporarily change the visual character and quality of the site, construction activities and equipment are common features in the area, and would not result in permanent visual degradation and would not substantially degrade the existing visual character or quality of the site and its surroundings. Therefore, impacts during construction would be **less than significant**.

The second paragraph under “Operation” under Impact AES-3 on page 4.1-50 of the Draft EIR, is amended as follows:

Implementation of the proposed 2021 LRDP would create new light sources associated with new or remodeled residential and academic buildings, parking structures, recreational uses, and lighting for pathways, signs, transit hubs, security, and pedestrian crossings. These would include building safety lighting, parking lot lights, street/pathway lighting, lighting from recreational related uses, architectural lighting, signage, lights that could emanate from windows at night, and cars entering and exiting parking lots and parking structures at night, and cars driving on local roadways and highways.

Section 4.2 Agricultural Resources

No changes to Section 4.2, *Agricultural Resources*, of the Draft EIR are necessary.

Section 4.3 Air Quality

The Regional and Local (Non-Binding) Regulatory Setting information under “SCAQMD Rules and Regulations”, beginning on page 4.3-16 of the Draft EIR, is amended to include:

RULE 431.2 - SULFUR CONTENT OF LIQUID FUELS

The purpose of this rule is to limit the sulfur content in diesel and other liquid fuels for the purpose both of reducing the formation of SOx and particulates during combustion and of enabling the use of add-on control devices for diesel-fueled internal combustion engines. The rule applies to all refiners, importers, and other fuel suppliers such as distributors, marketers, and retailers, as well as to users of diesel, low-sulfur diesel, and other liquid fuels for stationary-source applications in the SCAQMD. The rule also affects diesel fuel supplied for mobile source applications.

RULE 1110.2 - EMISSIONS FROM GASEOUS- AND LIQUID-FUELED ENGINES

Emissions from Gaseous- and Liquid-Fueled Engines: This rule applies to stationary and portable engines rated at greater than 50 horsepower. The purpose of Rule 1110.2 is to reduce NOx, VOC, and CO emissions from engines. Emergency engines, including those powering standby generators, are generally exempt from the emissions and monitoring requirements of this rule as they have permit conditions that limit operation to 200 hours or less per year as determined by an elapsed operating time meter.

RULE 1166 - VOLATILE ORGANIC COMPOUND EMISSIONS FROM DECONTAMINATION OF SOIL

This rule requires that an approved mitigation plan be obtained from the SCAQMD prior to the handling or storage of VOC-contaminated soil at or from an excavation or grading site.

RULE 1466 - CONTROL OF PARTICULATE EMISSIONS FROM SOILS WITH TOXIC AIR CONTAMINANTS

This rule requires any owner or operator conducting earth-moving activities with soil containing applicable TACs to perform real-time particulate matter monitoring and suppression.

The first and second paragraphs under Impact AQ-1 beginning on page 4.3-29 of the Draft EIR, are amended as follows:

A project may be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding forecasts used in the development of the AQMP and would obstruct attainment of the overall goals of the AQMP. The 2016 AQMP, the most recent AQMP adopted by the SCAQMD, incorporates local city general plans and SCAG’s 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) socioeconomic forecast projections of regional population, housing, and employment growth.

Pursuant to Section 4.12, *Population and Housing*, the proposed 2021 LRDP would incrementally accommodate an additional 7,419 undergraduate students and 3,659 graduate students plus 2,806 faculty and staff, resulting in a net increase to the campus population of approximately 13,884 people by the 2035 horizon year. The net increase of 13,884 people by academic year 2035/2036 is within the total regional population projections for 2035 of 356,839 net increase in regional population. It can be assumed logically that many students, faculty, and staff would be from the region.⁶ In fact, according to available zip code information for UCR students, faculty, and staff, approximately 85 percent of the campus population currently resides in a “reasonable” commute radius (approximately 1 hour each way). It is reasonable to assume that these trends will continue and that ~~much of~~ the campus population projected in the proposed 2021 LRDP will have already been accounted for in existing and/or projected population growth in the Inland Southern California region.

Footnote 6 has been added as follows:

⁶ As further explained in revisions to the Population and Housing Chapter, approximately 28 percent of the 3,589 new students living off-campus would reside in an existing home (1,005 students), and approximately 81.3 percent of UCR Staff maintained their current residence upon taking a new position at UCR.

Section 4.4 Biological Resources

The fourth paragraph on page 4.4-13 of the Draft EIR, is amended to be consistent with page 4.4-15 as follows:

The literature search identified ~~seven~~⁴¹ special-status plant species, 56 special-status wildlife species, and three special-status plant communities as having potential to occur in the vicinity of the UCR campus. Special-status plant and wildlife species were evaluated for their potential to occur within the LRDP boundaries based on habitat requirements, availability and quality of suitable habitat, and known distributions.

Section 4.5 Cultural Resources

The Regional and Local (Non-Binding) Regulatory Setting information under “City of Riverside General Plan”, on page 4.5-42 of the Draft EIR, is amended as follows:

Regional and Local (Non-Binding)

As noted in Section 4, “University of California Autonomy,” UCR, a constitutionally-created State entity, is not subject to municipal regulations of surrounding local governments for uses on property owned or controlled by UCR that are in furtherance of the university’s educational purposes.

City of Riverside General Plan

The City of Riverside General Plan contains the following policies:

~~Policy LU 4.6: Ensure protection of prehistoric resources through consultations with the Native American tribe(s) identified by the Native American Heritage Commission pursuant to Government Code Section 65352.3 and as required by CEQA.~~

Policy HP-1.1: The City shall promote the preservation of cultural resources to ensure that citizens of Riverside have the opportunity to understand and appreciate the City's unique heritage.

Policy HP-1.2: The City shall assume its direct responsibility for historic preservation by protecting and maintaining its publicly owned cultural resources. Such resources may include, but are not limited to, buildings, monuments, landscapes, and right-of-way improvements, such as retaining walls, granite curbs, entry monuments, light standards, street trees, and the scoring, dimensions, and patterns of sidewalks, driveways, curbs and gutters.

Policy HP-1.3: The City shall protect sites of archaeological and paleontological significance and ensure compliance with all applicable State and federal cultural resources protection and management laws in its planning and project review process.

Policy HP-1.4: The City shall protect natural resources such as geological features, heritage trees, and landscapes in the planning and development review process and in park and open space planning.

Policy HP-1.5: The City shall promote neighborhood/city identity and the role of historic preservation in community enhancement.

Policy HP-1.6: The City shall use historic preservation as a tool for "smart growth" and mixed use development.

Policy HP-1.7: The City shall ensure consistency between this Historic Preservation Element and all other General Plan elements, including subsequent updates of the General Plan.

Policy HP-2.1: The City shall actively pursue a comprehensive program to document and preserve historic buildings, structures, districts, sites (including archaeological sites), objects, landscapes, and natural resources.

Policy HP-2.2: The City shall continually update its identification and designation of cultural resources that are eligible for listing in local, state and national registers based upon the 50 year age guideline for potential historic designation eligibility.

Policy HP-2.3: The City shall provide information to citizens, and the building community about what to do upon the discovery of archaeological resources and burial sites, as well as, the treatment, preservation, and repatriation of such resources.

Policy HP-3.1: The City shall conduct educational programs to promote an understanding of the significance of the City's cultural resources, the criteria for historic designation, historic design review processes, building permit requirements, and methods for rehabilitating and preserving historic buildings, sites, and landscapes.

Policy HP-3.2: The Planning Division shall promote an understanding and appreciation of the importance of historic preservation by the City's departments, boards, commissions, and elected officials.

Policy HP-4.1: The City shall maintain an up-to-date database of cultural resources and use that database as a primary informational resource for protecting those resources.

Policy HP-4.2: The City shall apply the California State Historical Building Code to ensure that City building code requirements do not compromise the integrity of significant cultural resources, at the property owner's request.

Policy HP-4.3: The City shall work with the appropriate tribe to identify and address, in a culturally appropriate manner, cultural resources and tribal sacred sites through the development review process.

Policy HP-5.1: The City shall use its design and plot plan review processes to encourage new construction to be compatible in scale and character with cultural resources and historic districts.

Policy HP-5.2: The City shall use its design and plot plan review processes to encourage the compatibility of street design, public improvements, and utility infrastructure with cultural resources and historic districts.

Policy HP-6.1: The City shall provide financial incentives to promote the restoration, rehabilitation, and adaptive reuse of cultural resources.

Policy HP-6.2: The City shall use financial resources from state, federal and private programs that assist in the identification, designation and preservation of cultural resources.

Policy HP-6.3: The City shall ensure adequate funds in its budget for the staffing and maintenance of a historic preservation program in compliance with the California State Office of Historic Preservation's Certified Local Government program.

Policy HP-7.1: The City shall apply code enforcement, zoning actions, and building safety/construction regulations as tools for helping to protect cultural resources.

Policy HP-7.2: The City shall incorporate preservation as an integral part of its specific plans, general plan, and environmental processes.

Policy HP-7.3: The City shall coordinate historic preservation with other activities within its government structure.

Policy HP-7.4: The City shall promote the preservation of cultural resources controlled by other governmental agencies, including those related to federal, state, county, school district, and other agencies.

The first paragraph under Impact CUL-1 beginning on page 4.5-43 of the Draft EIR, is amended as follows:

UCR is considering the long-term (through 2035) demolition and potential redevelopment opportunities on-campus. For purposes of the EIR analysis, the areas of campus that UCR considers for demolition and potential redevelopment include, but are not limited to, the following: Boyden Labs; Fawcett Laboratory, Stored Product Insecticide Building; Lathhouses #1, #4, and #8; campus facilities along South Campus Drive (e.g., Genomics shed, Bio Control Building, Plant Drying Building, Herbarium, Botany Screenhouse, Storage Shed #6, Headhouse Storage Building, Growth Chamber Building, Glasshouse #51, Facilities Services Annex A, and College Building North and South), campus facilities east/west of East Campus Drive (e.g., Fawcett Laboratory, University Office Building, Campbell Hall, Facilities Services Annex B, Greenhouses #7-14, Greenhouses #18-21, Computing & Communications Center, and associated accessory structures), the Health Services Building; Bannockburn Village, the Plaza Apartments, Oban Apartments, Falkirk Apartments, the Corporation Yard, the softball and soccer fields, Advanced Neuroimaging Building (formerly FMRI), Costo Hall, ~~and the Police Facility;~~ and the University Extension.

Section 4.6 Energy

No changes to Section 4.6, *Energy*, of the Draft EIR are necessary.

Section 4.7 Geology and Soils

No changes to Section 4.7, *Geology and Soils*, of the Draft EIR are necessary.

Section 4.8 Greenhouse Gas Emissions

No changes to Section 4.8, *Greenhouse Gas Emissions*, of the Draft EIR are necessary.

Section 4.9 Hazards and Hazardous Materials

Mitigation Measure MM HAZ-1 on page 4.9-36 of the Draft EIR, is amended as follows:

MM HAZ-1 Property Assessment – Phase I and II ESAs

During the pre-planning stage of campus projects on previously developed sites or on agricultural lands (current or historic), and in coordination with EH&S, UCR shall obtain documentation from EH&S or prepare a Phase I Environmental Site Assessment (ESA) assessing the land use history of the proposed project site and identify potential hazardous materials concerns, including, but not limited to, fuel tanks, chemical storage, elevator pistons and associated hydraulic oil reservoirs and piping, heating-oil USTs, or agricultural uses. If the Phase I ESAs, or similar documentation, identify recognized environmental conditions or potential concern areas, a Phase II ESA would be conducted in coordination with EH&S to determine whether the soil, groundwater, and/or soil vapor has been impacted at concentrations exceeding regulatory screening levels for residential or commercial/industrial type land uses (as applicable). If the Phase II ESA concludes that the site is or may be impacted and could affect the planned development, assessment, remediation, or corrective action (e.g., removal of contaminated soil, in-situ treatment, capping, engineering controls) would be conducted prior to or during construction under the oversight of federal, State, and/or local agencies (e.g., US

EPA, DTSC, RWQCB, RFD, RCDEH) and in full compliance with current and applicable federal and State laws and regulations, including but are not limited to the California Environmental Quality Act (CEQA). Assessment, remediation, or corrective action must be evaluated under CEQA prior to commencing the assessment, remediation, or corrective action. Additionally, Voluntary Cleanup Agreements may be used for parcels where remediation or long-term monitoring is necessary.

Section 4.10 Hydrology and Water Quality

No changes to Section 4.10, *Hydrology and Water Quality*, of the Draft EIR are necessary.

Section 4.11 Noise

The Regional and Local (Non-Binding) Regulatory Setting information, beginning on page 4.11-13 of the Draft EIR, is amended to include:

City of Riverside Municipal Code - Title 7 (Noise Control)

It shall be the policy of the City to maintain and preserve the quiet atmosphere of the City, to implement programs aimed at retaining ambient noise levels throughout the City, and to mitigate noise conflicts.

It is determined that certain noise levels are detrimental to the public health, safety and welfare and are contrary to the public interest. Therefore, the City Council declares that creating, maintaining, causing or allowing to create, maintain or cause any noise in a manner not in conformity with the provisions of this title, is a public nuisance and shall be punishable as such.

In order to control unnecessary, excessive and/or annoying noise in the City, it is declared to be the policy of the City to prohibit such noise generated by the sources specified in this title. It shall be the goal of the City to minimize noise levels and mitigate the effects of noise to provide a safe and healthy living environment.

Sections 7.15.005 and 17.15.010 provide for enforcement actions and fines for individuals who violate these regulations. While such regulations are not applicable to the University, they are applicable to all individuals, including students, located off-campus.

Mitigation Measure MM N-1 on page 4.11-28 of the Draft EIR, is amended as follows:

MM N-1 Construction Noise Reduction Measures

To reduce construction noise levels to on-campus and off-campus noise sensitive receivers, UCR shall implement the following measures:

- Hours of exterior construction activities shall be limited to 7:00 a.m. to 9:00 p.m. Monday through Friday and 8:00 a.m. to 6:00 p.m. on Saturday, as feasible, except under circumstances where such time limits are infeasible (e.g., for time sensitive construction work such as concrete pouring, excessive heat warnings/temperatures during the summer, operational emergencies). No exterior construction activities shall occur on federal holidays.
- Construction traffic shall follow routes so as to minimize the noise impact of this traffic on the surrounding community, to the greatest extent feasible.

- Contract specifications shall require that construction equipment be muffled or otherwise shielded, in accordance with manufacturers' recommendations. Contracts shall specify that engine-driven equipment be fitted with appropriate noise mufflers.
- Where available and feasible, construction equipment with back-up alarms shall be equipped with either audible self-adjusting backup alarms or alarms that only sound when an object is detected. Self-adjusting backup alarms shall automatically adjust to 10 dBA over the surrounding background levels. All non-self-adjusting backup alarms shall be set to the lowest setting required to be audible above the surrounding noise levels.
- Stationary construction equipment material and vehicle staging shall be placed to direct noise away from sensitive receivers to the greatest extent feasible.
- Meetings shall be conducted, as needed, with on-campus constituents to provide advance notice of construction activities to coordinate these activities with the academic calendar, scheduled events, and other situations, as appropriate.
- Communication would be provided, as needed, with constituents that are affected by campus construction to provide advance notice of construction activities and ensure that the mutual needs of the particular construction project and of those impacted by construction noise are met, to the extent feasible.
- A sign shall be provided at the construction site entrance, or other conspicuous location, that includes a 24-hour telephone number for project information, and to report complaints. An inquiry and corrective action will be taken if necessary, in a timely manner.
- ~~Where deemed necessary and feasible, installation of temporary sound barriers/blankets of sufficient height to break the line-of-sight between the construction equipment and within proximity to exterior use areas of noise-sensitive receivers shall be required. The temporary barriers/blankets shall be of sufficient height to break the line of sight between the construction equipment and noise-sensitive receivers.~~ Temporary sound barriers shall consist of either sound blankets or other sound barriers/techniques such as acoustic padding or acoustic walls placed near adjacent noise-sensitive receivers that have been manufactured to reduce noise by least 10 dBA at ground level or meets ASTM E90 & E413 standards/ASTM C423 (or similar standards with equivalent 10 dBA noise reduction).

Mitigation Measure MM N-5 on page 4.11-31 of the Draft EIR, is amended as follows:

MM N-5 Construction Vibration Reduction Measures

If construction equipment were to be operated within the specified distances listed in Table 4.11-13 of the Draft EIR, the campus shall reduce construction vibration levels through the following noise control measures:

- All academic and residential facilities within the listed distances shall be notified if the listed equipment is to be used during construction activities so that the occupants and/or researchers can take necessary precautionary measures to avoid negative effects to their activities and/or research.
- In addition, one of the following measures shall be implemented:
 - Use of the equipment shall not occur within the specified distances in Table 4.11-13 or
 - A project-specific vibration impact analysis shall be conducted that shall consider the type of equipment used and potential vibration levels at structures within the specified distances. If, after consideration of the type of equipment used and other factors of the

environment, vibration levels do not exceed the applicable criteria (listed in the second column of Table 4.11-13), construction may proceed without additional measures. If, after consideration of the type of equipment used and other factors of the environment, vibration levels exceed the applicable criteria, additional measures shall be implemented to reduce vibration levels below threshold, if feasible. These measures may include, but not be limited to, use of different equipment that results in an acceptable vibration level as listed in the second column of Table 4.11-13.

Section 4.12 Population and Housing

The text revisions to Section 4.12 *Population and Housing* of the Draft EIR are annotated below. For a full, revised version of Section 4.12, please refer to Final EIR Appendix B.

The "Local" Environmental Setting information related to City of Riverside Housing, and beginning in the first paragraph on page 4.12-6 of the Draft EIR, is amended as follows:

In 2018, the City re-designated 57 sites, comprising 308 acres, to either mixed-use or multiple-family zones to allow for residential development at a density sufficient to accommodate its housing needs. The City has a surplus in its Regional Housing Needs Assessment (RHNA) allocation of 1,831 potential units that could be affordable to lower-income households under its older 5th Housing Cycle (City of Riverside 2018b). See Regulatory Setting discussion below for more detailed information on the City of Riverside's current RHNA allocation and Housing Element. As of January 2020, the City had a vacancy rate of 4.9 percent, lower than the state average of 8.7 percent². The City also has an average of 3.28 persons per household, higher than the state average of 2.93 (DOF 2020).

UNIVERSITY NEIGHBORHOOD PLAN

The City's University Neighborhood Plan (a component of its General Plan Land Use Element) was adopted in 2008, pursuant to a CEQA Negative Declaration (Case No. P060401) and covers the area north and east of the UCR campus, generally bordered by Chicago Avenue to the west, Spruce Street to the north, and Box Springs Mountain Reserve to the east and northeast. The University Neighborhood Plan designated most of the area west of UCR and Watkins Drive as medium or hillside residential and the area north of the I-215/SR 60 freeway, east of Iowa Avenue, and west of Watkins Drive as primarily high-density residential with pockets of medium and medium-high residential and mixed-use urban. The blocks immediately surrounding University Avenue north of West Campus were designated mixed-use urban, with business/office park, commercial, and public facilities in the area south of the I-215/SR 60 freeway. Densities are permitted up to 60 dwelling units per acre, depending upon location and proximity to transit (City of Riverside 2008).

The "Local" Environmental Setting information related to City of Riverside Housing, on page 4.12-7 of the Draft EIR, is amended to include:

UNIVERSITY AVENUE SPECIFIC PLAN

The University Avenue Specific Plan was originally adopted by the City of Riverside in 1994, but has been updated several times, with current amendments approved by City Council as part of the 2021 Housing Element amendments (City of Riverside 1992).³ This Specific Plan provides development standards along University Avenue from Highway 60 to Park Avenue. The Specific Plan itself "is envisioned as primarily a multi-family housing area catering to the University

populace.” (City of Riverside 1992: 4-15.) The Specific Plan further notes that “Multi-family residential-rental housing is recommended as the dominant land use...and primarily serving local student and community needs.” (City of Riverside 1992: 8-38.) This includes mixed use/residential development up to Floor Area Ratios of 2.0, and up to 60 dwelling units per acre. Buildout under the Specific Plan has already been subject to CEQA review associated with Resolution Nos 18587, 19686, 19715, 21054, and most recently in the City’s Housing Element Update SCH# 2021040089.

The City of Riverside Housing Element identifies a number of development opportunity sites within the University Avenue Specific Plan on 26.58 acres, which provide up to 1,774 dwelling units, with an estimated “realistic” development of 1,315 dwelling units (up to 3,813 students). This includes Parcel IDs 164, 165, 166, 167, 168, 171, 177, 178, 179, 180, 181, 183, 186, 187, 192, 193, 195, 196, 201, 204, 205, 206, 207, 209, 210, 211, 212, 214, 216, 217, 219, 220, 225, 227, 230, 234, 235, 242, 243, 244, 250, 251, 253, 254, 258, 259, totaling 26.58 acres. (City of Riverside 2021a; pdf page 379 through 408.)

Footnote 3 has been added to page 4.12-7, as follows:

³ The University Avenue Specific Plan is available at: <https://riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/2020/University%20Avenue%20SP%20%28With%20Figures%29.pdf>, and the October 2021 amendments thereto are available at: <https://riversideca.legistar.com/View.ashx?M=F&ID=9837982&GUID=294E3A09-A502-4222-980C-6B360D34F8DD>

The second paragraph under “UCR-Affiliated Campus Housing” on page 4.12-8 of the Draft EIR, is amended as follows:

Nearly 15 percent of housed freshman in academic year 2018/2019 were a third person in a two-person room (512 doubles converted to triples residents in 2,943 rooms) (see page 6 of Appendix B LRDP Supporting Information). UCR-affiliated housing includes four residence halls and apartment complexes, the locations of which are shown on Figure 4.12-1. One residence hall (Dundee) and two apartment complexes (International Village and Stonehaven) are available to students but not owned or managed by UCR. All residence halls and apartment complexes are located on East Campus except for the International Village.

Table 4.12-8 on page 4.12-10 of the Draft EIR is revised as follows:

Table 4.12-1 Baseline (2018/2019) and Interim/Future UCR Student Housing Facilities

Housing Facility	Type of Housing					Approximate Number of Student Beds
	Incoming Freshmen	Continuing Students	Transfer Students	Graduate Students	Students with Family	
Residence Halls						
Aberdeen-Inverness Residence Hall	X	X	X			<u>792,892</u>
Lothian Residence Hall	X	X	X			<u>1,019,035</u>
Pentland Hills Residence Hall	X	X	X			<u>1,132,228</u>
<u>Added Triples²</u>	<u>X</u>	<u>X</u>	<u>X</u>			<u>512</u>
Total Residence Halls						<u>3,453,155</u>
Apartments						
Bannockburn Village Apartments		X	X	X		420
Falkirk Apartments		X	X	X		565
Glen Mor Apartments		X	X	X		1,300
The Plaza Apartments		X	X	X		180
Stonehaven Apartments		X	X	X		455
Oban Family Housing Apartments					X	136
Total Apartments						3,056
Interim/Future Housing						
Dundee Residence Hall	X	X	X	X		820
North District (Full Build-out) ¹	X	X	X	X		4,000-6,000
Total Interim/Future Housing						4,820-6,820
Total Housing						<u>11,331,031-13,331,031</u>

Note: International Village is a P3 property that is programmed to serve International Student affiliate with University Extension. The campus has periodically housed regularly enrolled students at International Village when there is available space and the campus has a need for that space. However, the campus does not include the International Village housing in its demand review and considers this temporary lease of beds.

¹North District Phase 1 is currently underway with the construction of 1,500 apartment-style beds; anticipated construction completion Summer/Fall 2021.

²Third person in a two-person room in UCR Residence Halls (512 residents)

Source: UCR 2019b

A third and fourth paragraph has been added under “Non-UCR-Affiliated Campus Housing” on page 4.12-11 of the Draft EIR, as follows:

Non-UCR-Affiliated Campus Housing

UCR provided the most recent zip code information available for UCR students, faculty, and staff for use in this Draft EIR analysis. See Appendix J for more information. Zip code data was analyzed to determine how many average miles from campus the campus population is reasonably assumed to reside. Approximately 15 percent of the total provided zip codes were outside of an assumed “reasonable” commute radius (approximately 1 hour each way) and likely represent home (i.e., parent) addresses of students rather than campus population residences. These zip codes were not included in this analysis.

As shown in Table 4.12-9, approximately 23 percent of the analyzed campus population resides in UCR-affiliated housing, approximately 10 percent reside in other housing within the City limits, approximately 22 percent reside outside of the City but within 20 miles of the UCR campus, and approximately 45 percent reside in locations greater than 20 miles from the UCR campus. The 20-mile distance was chosen as it is approximately the average vehicle miles traveled for the campus population, as discussed in Section 4.15, *Transportation*. Figure 4.12-2 illustrates the campus population residence distribution.

In 2018, UCR performed a Student Housing Market Study, which shows that approximately 23 percent of students live at home with their parents or relatives and approximately 5 percent own a home. (UCR 2018; Attachment 2: Student Survey Tabulation, p. 2) Survey response data from this study also shows that about 48 percent of renters in conventional apartments have their own bedroom, 18 percent share with a spouse and/or children, 13 percent share with a partner or significant other, and 20 percent share with a roommate. (UCR 2018)

In 2021, UCR prepared a questionnaire to 43 UCR Staff members to determine the number of individuals who relocated upon taking a position at UCR. Only eight out of 43 individuals changed residences, meaning that 81.3 percent of UCR Staff maintained their current residence. (UCR 2021.)

The Regional and Local (Non-Binding) Regulatory Setting information under “Southern California Association of Governments Regional Housing Needs Assessment”, beginning on page 4.12-15 of the Draft EIR, is revised as follows:

Southern California Association of Governments Regional Housing Needs Assessment

The RHNA is mandated by State Housing law as part of the periodic process of updating local housing elements. RHNA quantifies the need for housing in each jurisdiction during specified planning periods. SCAG is in the process of developing the 6th cycle RHNA allocation plan, which will cover the planning period October 2021 through October 2029. Communities use the RHNA in land use planning, to prioritize local resource allocation, and in deciding how to address identified existing and future housing needs resulting from population, employment, and household growth. The RHNA does not necessarily encourage or promote growth but rather requires communities to anticipate growth, so that collectively the region and subregion can grow in ways that enhances quality of life, improves access to jobs, promotes transportation mobility, and addresses social equity and fair share housing needs. However, as acknowledged in the City of Riverside’s Comment letter to SCAG, “in the past, the region was only obligated to accommodate housing; now the region is essentially obligated to construct housing.” (City of

Riverside 2019). All cities and counties located in SCAG’s jurisdiction are subject to the SCAG RHNA requirements. SCAG has proposed updated RHNA numbers for all Riverside County’s 167,351,477 units. The RHNA factors in the housing needs generated by universities in the region, including UCR. The RHNA is based upon projections from SCAG. As part of SCAG’s Demographics and Growth Forecast, the following variables are used related to universities:

- One of the six variables used for the population variable is “Group Quarters Population living in student dormitories (1 variable): Population living in college dormitories (includes college quarters off campus).”
- One of the 26 variables used for households is “Households by Number of College Students (3 variables): the number of households with no college student, with one college student, with two college students or more.”
- One of the two variables used for school enrollment is “College/University Enrollment (1 variable): the total number of students enrolled in any public or private post-secondary school (college or university) that grant an associate degree or higher, located within a zone. This variable also represents “students by place of attendance.” (SCAG 2016b; Demographics and Growth Forecast Appendix).

Therefore, as indicated by SCAG’s Demographics and Growth Forecast, the agency that develops the growth forecasts considers universities and college students within their forecasts. UCR student enrollment growth is also linked to population growth, as discussed above under the Regulatory Setting discussion of the “California Education Code.”

The Regional and Local (Non-Binding) Regulatory Setting information under “City of Riverside General Plan”, beginning on page 4.12-16 of the Draft EIR, is revised as follows:

City of Riverside General Plan

The Housing Element of the City’s General Plan was last updated in 2018 to respond to the 2014-2021 housing element cycle (5th cycle RHNA allocation). The City of Riverside most recently received its RHNA allocation of 18,458 housing units for the 2021-2029 Housing Element Cycle. As part of this process the City has provided a buffer of approximately 5,500 dwelling units (approximately 30 percent over and above the RHNA allocation), and the City will identify space for up to 24,000 new homes for the 2021–2029 RHNA cycle.⁵ As part of this process, the City of Riverside assumed 2.90 persons per household (PPH).⁶ (City of Riverside 2021b: Table 3.16-1.) UCR and adjacent areas fall within Ward 2 of the City’s planning documents. The City has initiated an update to the its Housing Element to accommodate and address the upcoming RHNA cycle. The City of Riverside prepared a Draft and Final Environmental Impact Report for the Housing Element update and rezoning. The rezoning includes land use map changes in Ward 2⁷ and amendments to the University Avenue Specific Plan.⁸ This includes identification of a number of opportunity sites within this Ward.⁹ The Riverside Planning Commission recommended approval of the Housing Element materials, including the General Plan, Zoning, and Specific Plan amendments, on September 9, 2021 (City of Riverside 2021c) with approval by City Council occurring on October 5, 2021 and October 19, 2021. (City of Riverside 2021d and 2021e, respectively) As part of these amendments, development capacity in Ward 2 was proposed to increase to 3,770 dwelling units (10,993 persons assuming 2.90 PPH; or 12,347 assuming 3.28 PPH). The Housing Element contains the housing needs assessment based on demographic characteristics and anticipated changes, a constraints analysis for the development of housing by income groups and special needs, an inventory of housing

resources, and objectives, policies, and implementation programs to address the development, improvement, and conservation of housing in Riverside.

City of Riverside Municipal Code - Title 7 (Noise Control)

It shall be the policy of the City to maintain and preserve the quiet atmosphere of the City, to implement programs aimed at retaining ambient noise levels throughout the City, and to mitigate noise conflicts.

It is determined that certain noise levels are detrimental to the public health, safety and welfare and are contrary to the public interest. Therefore, the City Council declares that creating, maintaining, causing or allowing to create, maintain or cause any noise in a manner not in conformity with the provisions of this title, is a public nuisance and shall be punishable as such.

In order to control unnecessary, excessive and/or annoying noise in the City, it is declared to be the policy of the City to prohibit such noise generated by the sources specified in this title. It shall be the goal of the City to minimize noise levels and mitigate the effects of noise to provide a safe and healthy living environment.

Sections 7.15.005 and 17.15.010 provide for enforcement actions and fines for individuals who violate these regulations. While such regulations are not applicable to the University, they are applicable to all individuals, including students, located off-campus.

Footnotes 5 through 9 have been added as follows:

⁵ The City of Riverside Housing Element update actually contemplates zoning for 31,564 dwelling units, but the Housing Element only assumed a 75% development rate (City of Riverside Housing Element DEIR p. 2-1).

⁶ City of Riverside currently has an average Household size of 3.28 PPH but assumed a lesser number in their current Housing Element EIR based upon SCAG projections. (Housing Element Draft EIR Table 3.9-6.)

⁷ City of Riverside General Plan Proposed Land Use Plan amendments:
<https://riversideca.legistar.com/View.ashx?M=F&ID=9770221&GUID=91D98DD7-2BEA-4A38-856A-9523C46CF186>

⁸ City of Riverside University Avenue Specific Plan Amendments:
<https://riversideca.legistar.com/View.ashx?M=F&ID=9770226&GUID=4566A64B-8D04-4BFC-8081-4F376AD67F62>

⁹ Riverside Housing 6th Cycle Housing Element Ward 2 Opportunity Sites:
<https://riversideca.legistar.com/View.ashx?M=F&ID=9770213&GUID=3D41EE0A-EFE7-4144-A7EA-79E66A66B857>

The second paragraph under “Analysis Methodology” on page 4.12-17 of the Draft EIR, is amended as follows:

For purposes of this analysis, “substantial” unplanned population growth is defined as growth from construction of new homes, businesses, roads, or other infrastructure that would result in population growth that significantly exceeds planned growth in the SCAG projections. For impacts to be considered significant under the thresholds above, the project would also have to result in a significant environmental impact not already disclosed. As noted on page 69 of OPR’s November 2018 Statement of Reasons for Regulatory Action for amending the CEQA Guidelines

Appendix G, “The Agency clarified that the question should focus on whether such growth is unplanned. Growth that is planned, and the environmental effects of which have been analyzed in connection with a land use plan or a regional plan, should not by itself be considered an impact.”

The first paragraph under “Student Housing” on page 4.12-17 of the Draft EIR, is amended as follows:

Student Housing

A primary goal of the proposed 2021 LRDP is to expand on-campus residential facilities to include approximately 14,000 beds (40 percent of the student population) in University-managed or controlled housing in proximity to the Academic Center (an increase from the current 27 percent currently housed on campus). This equates to housing approximately 68 percent of the increase in student population in UCR controlled housing (i.e. 7,489 new beds / 11,078 increased student population). Which results in 3,589 new students looking for off-campus housing. The proposed 2021 LRDP contains the following objectives and policies supportive of the increased enrollment and housing goals and directly relevant to population growth and student housing:

Impact PH-1, beginning on page 4.12-19 of the Draft EIR, is amended as follows:

PH-1 INDUCE SUBSTANTIAL UNPLANNED POPULATION GROWTH.

THE PROPOSED 2021 LRDP WOULD ACCOMMODATE THE ANTICIPATED REGIONAL POPULATION FORECASTS. FURTHERMORE, THE PROPOSED 2021 LRDP DOES NOT INCLUDE INSTALLATION OR EXTENSION OF SIGNIFICANT ROADS OR INFRASTRUCTURE THAT WOULD RESULT IN FURTHER POPULATION GROWTH OR HOUSING NEEDS. DIRECT AND INDIRECT IMPACTS RELATED TO UNPLANNED POPULATION GROWTH WOULD BE LESS THAN SIGNIFICANT. NO MITIGATION MEASURES ARE REQUIRED.

Construction – Direct and Indirect Impacts

The proposed 2021 LRDP envisions new and renovated structures and facilities on the UCR campus which would require construction. While the development accommodated under the proposed 2021 LRDP would result in limited short-term construction employment opportunities, the City had an unemployment rate of 3.6 percent in 2019 and the county had an unemployment rate of 4.2 percent (California Employment Development Department 2020). Additionally, regional construction jobs occur on a temporary basis, which allows construction workers to move onto new jobs in the region. Given these factors, it is anticipated that there is a sufficient construction work force within the City and surrounding county area to meet the proposed 2021 LRDP needs. While some construction workers may choose to temporarily stay in the City or nearby areas in the county, it is assumed that the majority of workers would remain in their current residences in the local area, and few would require the accommodations of hotels and motels in the City or near UCR campus. Therefore, construction of the proposed 2021 LRDP would not result in substantial unplanned population growth. Construction impacts related to substantial unplanned population growth under the proposed 2021 LRDP would be **less than significant.**

Operation – Direct Impacts

The proposed 2021 LRDP plans for the development of on-campus housing, academic/administrative space, and supporting uses to accommodate the undergraduate student, graduate student, and faculty/staff populations through the 2035/2036 academic year. The faculty and academic staff population would increase to fulfill UCR’s educational goals. New housing, facilities, and related support services on campus would develop incrementally to serve the increasing campus population.

UCR projects student enrollment will grow to 35,000 students (Fall quarter headcount) by the 2035/2036 academic year (42,545 total campus population). As shown in Table 4.12-10, the proposed 2021 LRDP would incrementally accommodate an additional 7,419 undergraduate students and 3,659 graduate students, plus 2,806 faculty and staff, resulting in a net increase to the campus population of approximately 13,884 people by the 2035 horizon year. However, approximately 68 percent of the increase in student population would be housed in new UCR-affiliated housing.

Table 4.12-10 Campus Population Growth

Category ¹	Baseline (2018/2019)	2021 LRDP (2035/2036)	Net 2021 LRDP Increase from Baseline	Percent Increase from Baseline
Undergraduate Student Population	20,581	28,000	7,419	36.1
Graduate Student Population	3,341	7,000	3,659	109.5
Total Student Population	23,922	35,000	11,078	46.3
Academic Faculty and Staff	1,702	2,545	843	49.5
Non-Academic Staff	3,037	5,000	1,963	64.6
Total Faculty/Staff Population	4,739	7,545	2,806	59.2
Total Population	28,661	42,545	13,884	48.4

¹Fall quarter headcount

Source: UCR 2021 LRDP

The proposed 2021 LRDP establishes a goal of housing 40 percent of total enrolled students (14,000 beds) to live in University-managed or controlled housing, equal to approximately 7,489 net new beds. The 40 percent benchmark is based on several factors including:

- University’s previously observed absorption rates for student beds
- Local students’ preference to live with family to save on housing costs
- Available land area
- Financial capacity and ability to build new housing supply
- Privately-owned housing options in the neighboring community
- Projected new supply created by private developers
- Future expansion of transit options that will expand the campus’ physical reach farther into the community

Table 4.12-11 shows the approximate number of current and proposed on-campus beds for students. The 2021 LRDP would more than double the number of on-campus beds for students over 2018 conditions.

Table 4.12-11 Proposed 2021 LRDP UCR-Affiliated Housing

Housing Type	Baseline (2018/2019)	2021 LRDP (2035/2036)	Net 2021 LRDP Increase from Baseline	Percent Increase from Baseline
UCR-Affiliated Residential (beds) (includes Freshman, Triples, Continuing students, and Family housing)	6,511	14,000	7,489	115.0

UCR = University of California, Riverside
 Source: UCR 2021 LRDP

Some of the student housing capacity accommodated under the proposed 2021 LRDP would occur through strategic infill and selective replacement of existing housing facilities in the northern half of East Campus. One of the objectives of the proposed 2021 LRDP is to replace aging, low-density student housing units while considering affordability, financial feasibility, and physical site constraints. Over 1,100 existing beds are located in three apartment complexes: Bannockburn, Falkirk, and Oban. These structures are in relatively poor condition. The planned transformation of Canyon Crest Drive into a higher density, mixed-use student neighborhood assumes that the buildings in these complexes would be redeveloped at a greater density, as described in Section 2, *Project Description*.

The proposed 2021 LRDP assumes approximately 6,395 new students and faculty/staff (3,589 of which are new students) would require non-UCR-affiliated, off-campus housing (13,884 net increase to the campus population – 7,489 new on-campus beds) between the baseline (2018/2019) and buildout (2035/2036) years. Using a conservative estimate of even population growth each year, approximately 380 new-residents would live off-campus each year (239 students and 141 faculty/staff) between could move to the region each year and need housing between the baseline (2018/2019) and buildout (2035/2036) years.¹¹ ~~The estimate of average increased housing needs each year is highly conservative and does not factor in the existing population that may happen to attend UCR or get a job at UCR in the future.~~ In 2018, approximately 59 percent of new California freshmen enrollees and 64 percent of new California transfer enrollees at UCR previously resided in a home within a 50-mile radius of the campus (UC 2019).

As discussed in the environmental setting, UCR performed a Student Housing Market Study in 2018 which shows that approximately 23 percent of students live at home with their parents or relatives and approximately 5 percent own a home. Survey response data from this study also shows that about 48 percent of renters in conventional apartments have their own bedroom, 18 percent share with a spouse and/or children, 13 percent share with a partner or significant other, and 20 percent share with a roommate. (UCR 2018.) It is reasonable to assume that a portion of the new undergraduate and graduate student population would continue to reside in the same household during their studies and not occupy a new residence. It is also unlikely that every student would occupy a single housing unit; the region ~~has on~~ is projected to have an average 3.28 persons per household (or 2.90 based upon future SCAG projections) (City of

Riverside 2021f). It can also be assumed that some new faculty and staff would already reside in the region prior to working at UCR. In 2021, UCR prepared a questionnaire to 43 UCR Staff members to determine the number of individuals who relocated upon taking a position at UCR. Only eight out of 43 individuals changed residences, meaning that 81.3 percent of UCR Staff maintained their current residence. (UCR 2021).

As discussed above, approximately 85 percent of the entire campus population currently lists an address within a “reasonable” commute radius (approximately 1 hour each way). It is reasonable to assume that these trends will continue through academic year 2035/2036. Therefore, much of the off-campus housing needs projected in the proposed 2021 LRDP would be in the Inland Southern California region. However, as noted above, not all of these students would be new to the region. Approximately 28 percent of the 3,589 new students would reside in an existing home (1,005 students), and 52 percent of the remaining new students (2,584) would share a dwelling unit. Consequently, it is reasonable to assume that new UCR students would need approximately 1,704 off-campus units¹² or less (or 114 dwelling units per year). As discussed above on page 4.12-12, 10 percent of students in non-UCR affiliated off-campus housing reside in the City of Riverside (approximately 170 dwelling units under the 2021 LRDP population projections), with the remainder dispersed throughout the region.

Even if every new student, faculty, and staff person required a new dwelling unit, the net increase of 6,395 housing units by academic year 2035/2036 represents 5.6 percent of the net increase of total regional housing unit projections for 2035 (6,395 net increase in off-campus housing units/113,401 net increase in regional housing units). In reality, new students would need only 1,704 dwelling units over the next 15 years, and faculty/staff would need 2,806 or less residential units (not considering those new faculty and staff which already reside in the area, and not considering PPH),¹³ for a total of 4,510 regional residential units (301 units per year). This represents 3.97 percent of the net increase of total regional housing unit projections for 2035 (4,510 off-campus housing units/113,401).

The City of Riverside most recently received its RHNA allocation of 18,458 housing units for the 2021-2029 Housing Element Cycle. As part of this process the City has provided a buffer of approximately 5,500 dwelling units (approximately 30 percent over and above the RHNA allocation), and the City will identify space for up to 24,000 new homes [31,564 dwelling units with 75 percent development rate] for the 2021–2029 RHNA cycle. To implement the SCAG RHNA allocations over the next eight years, the City of Riverside has already proposed development capacity in Ward 2 (which contains UCR) of 3,770 dwelling units (10,993 persons, assuming 2.90 PPH, or 12,347 persons assuming 3.28 PPH). Furthermore, if the vacancy rate for the region remains in line with 2020 at 4.8 percent, then approximately 37,080 available housing units would be available (772,500 regional housing units/4.8 percent) in the region in 2035. Therefore, the new campus population residing in non-UCR-affiliated housing could be absorbed into the existing housing stock, and there would be no need to construct new housing or infrastructure as a direct result of the proposed 2021 LRDP.

The net increase of 13,884 people by academic year 2035/2036 would be accommodated by the 356,839 net increase in regional population. According to data from UC, approximately 82 percent of UCR students are in-state residents, meaning that they resided in California prior to attending UCR. More precisely, approximately 60 percent of the undergraduate student population lived within a 50-mile radius of the UCR campus prior to enrolling at the University (UC 2019). Furthermore, according to available zip code information for UCR students, faculty, and staff, approximately 85 percent of the campus population currently resides within a

“reasonable” commute radius (approximately 1 hour each way). Approximately 28 percent of new students would reside in an existing home, and 52 percent of the remaining new students living would share a dwelling unit. It is reasonable to assume that these trends will continue, and that much of the campus population projected in the proposed 2021 LRDP ~~has~~ will have already been accounted for in existing and/or projected population growth in the Inland Empire region.

UCR anticipates off-campus living to continue to be dispersed throughout the region, with the only new location of potentially increased student density occurring within the University Avenue Specific Plan area (approximately 10 percent of the increased student population, i.e. 170 dwelling units). The Specific Plan itself “is envisioned as primarily a multi-family housing area catering to the University populace.” (City of Riverside 1992: 4-15.) The Specific Plan further notes that “Multi-family residential rental housing is recommended as the dominant land use...and primarily serving local student and community needs.” (City of Riverside 1992: 8-38.) This Specific Plan focuses mixed use residential development along University Avenue, which is currently commercial in nature, and separated from adjacent single-family homes. Buildout under the Specific Plan has already been subject to CEQA review. This Specific Plan was further amended in 2021 as part of the City’s RHNA allocation process and is the focus of the 2021 Housing Element opportunity sites, and adds “Student Housing” to subdistricts 2, 3, 4a, and 4b. The Housing Element adopted by the City on October 5, 2021 and October 19, 2021, estimates a “realistic” development total of 1,315 dwelling units during the current Housing Cycle (up to 3,813 individuals).

UCR student enrollment growth is linked to population growth, as discussed above under the Regulatory Setting discussion of the "California Education Code." Furthermore, as discussed above, the City has planned for growth which exceeds its RHNA allocation by 5,500 dwelling units (15,590 persons, assuming 2.90 PPH), and development capacity in Ward 2 provides for 3,770 dwelling units (10,993 persons, assuming 2.90 PPH, or 12,347 persons assuming 3.28 PPH). Additionally, the City and other municipalities within the region will also go through a second RHNA process halfway through the LRDP’s 2035 horizon year, which will make additional housing available.

Population growth under the 2021 LRDP was included as part of SCAG’s planned growth, and the City of Riverside’s and related municipal/county implementing actions. There would be no additional environmental impacts beyond those already analyzed in the other resource section of this EIR. As such, the student population growth assumed for the proposed 2021 LRDP is not considered unplanned, and direct impacts related to this growth are **less than significant**.

Footnotes 12 and 13 have been added as follows:

¹² $((0.52 \times 2,584 \text{ students}) / 2.90 \text{ PPH}) + (0.48 \times 2,584 \text{ students}) = 1,663 \text{ dwelling units for off-campus students through 2035}$

¹³ At UCR, approximately 82 percent of the non-student population is comprised of staff, and approximately 18 percent are academic faculty (850 faculty). As noted above in the environmental setting, approximately 81.3 percent of UCR Staff maintained their current residence and approximately 18.7 percent moved upon taking a new position at UCR. Taking this survey into account, would yield a non-student dwelling unit demand of 935 dwelling units for all UCR Faculty and Staff (and not considering the fact that riverside homes average 2.9 PPH). $([\text{UCR Staff}] 2,806 \times 0.82 \times 0.187 \text{ (percent living off-campus)} + [\text{Academic Faculty}] 2,806 \times$

0.18). When accounting for all off-campus student housing demand (1,704), this would result in a total demand of 2,639 off-campus dwelling units (or 176 per year).

The second and third paragraph under “Cumulative Unplanned Population Growth” subsection “Direct”, beginning on page 4.12-24 of the Draft EIR, are amended as follows:

The proposed 2021 LRDP would incrementally accommodate a net increase to the campus population of approximately 13,884 people by the 2035/2036 horizon year. It can logically be assumed that many students, faculty, and staff would be from the region, as described under Impact PH-1 above; ~~however, for purposes of this analysis, it is conservatively assumed the entire new campus population would be from outside the region, necessitating relocation upon enrollment or employment with UCR.~~

The proposed 2021 LRDP establishes a goal of housing 40 percent of eligible students in University-managed or controlled housing, equal to approximately 7,489 net new beds (approximately 68 percent of the increase in total student population). The increase in University-managed or controlled housing is anticipated to accommodate 14,000 eligible students. Furthermore, the proposed 2021 LRDP would result in approximately 6,395 new students and faculty/staff who would require non-UCR-affiliated, off-campus housing between baseline (2018/2019) and buildout (2035/2036) years. As discussed in the analysis above, the off-campus housing needs projected in the proposed 2021 LRDP will be accommodated in the Inland Empire region. Therefore, the direct cumulative impacts related to unplanned population growth (Impact PH-1) would be **less than significant (not cumulatively considerable)**.

The reference for “SCAG 2016b” in the first paragraph under “Cumulative Unplanned Population Growth” subsection “Indirect”, on page 4.12-24 of the Draft EIR, is amended as follows:

INDIRECT

The Riverside County Transportation Commission (RCTC) continues to work on traffic management plans that include projects to expand highways near the campus (I-215/SR 60 and SR 90). A recent long-range transportation study states that “while recent improvements to I-215 have been made, it is likely that there will be a need for continued investment in ground transportation systems to accommodate increasing volumes at March [Air Reserve Base]” (RCTC 2019). Furthermore, the study considers mobility innovations that will expand types of transportation and the way those systems are managed to accommodate future need. These projects are included in the SCAG 2016-2040 RTP/SCS Plan and its updates. These projects are included as part of regional transportation planning (SCAG 2016**bc**) and is accounted for in this analysis.

The second paragraph under “Cumulatively Displace Substantial Numbers of Existing People of Housing” on page 4.12-25 of the Draft EIR, is amended as follows:

The City has a median household income of \$65,000, commensurate with the rest of the county, but is characterized by a widely diverse income range, such that housing prices and rental costs also span a range (City of Riverside 2018a). The City’s Housing Element notes that while costs are more affordable in Riverside than other areas, there are still problems of overcrowding, overpayment, and housing in need of rehabilitation or replacement. As such, the RHNA numbers for Riverside for the period 2014 to 2021 are 8,283 units, which includes units for very low- and low- income households. SCAG has proposed updated RHNA numbers for Riverside County as a whole of 167,~~351~~¹⁷⁷ units. The RHNA factors in the housing needs generated by

universities in the region, including UCR. The City of Riverside most recently received its RHNA allocation of 18,458 housing units for the 2021-2029 Housing Element Cycle. As part of this process the City has provided a buffer of approximately 5,500 dwelling units (approximately 30 percent over and above the RHNA allocation), and the City will identify space for up to 24,000 new homes for the 2021–2029 RHNA cycle. The City has initiated an update to the its Housing Element to accommodate and address the upcoming RHNA cycle, certified the Final EIR and approved the Housing Element and related planning amendments on October 5, 2021.

The following references have been added to Section 4.12.5 References, beginning on page 4.12-26, of the Draft EIR as a result of the changes detailed above, as follows:

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Section 4.13 Public Services

No changes to Section 4.13, *Public Services*, of the Draft EIR are necessary.

Section 4.14 Recreation

The first paragraph under Impact REC-1, subsection “Operation – Off-Campus”, on page 4.14-17 of the Draft EIR, is revised as follows:

Operation – Off-Campus

The campus population would continue to have full access to on-campus parks and recreational facilities, which would reduce the need for new students/faculty/staff to use off-campus community facilities. However, the proposed 2021 LRDP would incrementally result in an increase in off-campus residents of approximately 3,589 new students and 2,806 faculty and staff 6,395 people (13,884 net increase to the campus population – 7,489 new on-campus beds) by academic year 2035/2036. There are four State parks and two State Recreation Areas near the UCR campus that the campus population may utilize. Additionally, there are five off-campus parks near the UCR campus that the campus population may utilize. ~~The closest~~ Nearby off-campus parks to the UCR campus are include Andulka Park, approximately 0.1 mile southwest of West Campus (approximately 1 mile from International Village and more than 2 miles from the center of East Campus), Islander Park, approximately 0.3 mile east of East Campus at the base of the Box Springs Mountains (approximately 0.3 mile from Glen Mor and 0.8 mile from the center of East Campus), the Box Springs Mountain Reserve (approximately 1 mile east of the center of East Campus), Two Trees Trail (approximately 1.5 miles east of the center of East Campus), and Bordwell Park, approximately 0.3 mile west of the West Campus (approximately 0.9 mile from International Village and nearly 2 miles from the center of East Campus). Other parks near the UCR campus include Highlander Park, approximately 0.2 mile northeast of East Campus (approximately 0.2 mile from Falkirk Apartments and 0.8 mile from the center of East Campus) and Mt. Vernon Park, approximately 0.7 mile from East Campus (approximately 0.2 mile northeast of Glen Mor and 1.2 miles from the center of East Campus). ~~However, because~~ Since these facilities are not in the immediate vicinity of UCR, they are unlikely to be used by campus population on a regular basis, especially when considering UCR provides more, as well as a variety of different recreational facilities than is accessible at these regional and community parks. As described above, students are primarily expected to use on-campus recreational facilities, including but not limited to the 155,000-square-foot UCR Student Recreation Center, a Baseball Complex, Soccer fields, Harrison Field (Softball), the UCR Track Facility, a long distance cross country course, Johnson Family Practice Center, the Botanic Gardens, pedestrian and bike paths, and numerous outdoor malls, courtyards and open spaces. As discussed in the regulatory setting discussion under “Student Recreation Center,” memberships are included in tuition fees, and included 28,375 individuals. Consequently, many students, faculty, and staff would have easy on-site access to existing and improved UCR recreational facilities which will be substantially more convenient and accessible than off-site locations. The closest off-campus parks to campus, such as Andulka Park and Bordwell Park have facilities such as basketball courts, tennis courts, and baseball fields. If certain facilities are being used (i.e., turf area, tennis

courts), individuals may elect to participate in ongoing activities or choose alternate activities in the area. The impacts of increased use of parks would not result in substantial deterioration.

Section 4.15 Transportation

No changes to Section 4.15, *Transportation*, of the Draft EIR are necessary.

Section 4.16 Tribal Cultural Resources

No changes to Section 4.16, *Tribal Cultural Resources*, of the Draft EIR are necessary.

Section 4.17 Utilities and Service Systems

No changes to Section 4.17, *Utilities and Service Systems*, of the Draft EIR are necessary.

Section 4.18 Wildfire

No changes to Section 4.18, *Wildfire*, of the Draft EIR are necessary.

Section 5 Other CEQA

No changes to Section 5, *Other CEQA*, of the Draft EIR are necessary.

Section 6 Alternatives

No changes to Section 6, *Alternatives*, of the Draft EIR are necessary.

Section 7 References

All new references as a result of changes detailed herein are reflected in Chapter 5 *References* of the Final EIR. No changes to Section 7 *References* of the Draft EIR are necessary.

Appendices

No changes to the appendices of the Draft EIR are necessary as a result of the revisions detailed herein. No new appendices have been added to the Draft EIR. No changes are necessary.