

Final Environmental Impact Report  
for the Crystal View Terrace/Green Orchard Place/  
Overlook Parkway Project  
(P11-0050 – EIR & P12-0220 – GP)  
City of Riverside  
SCH No. 2011021028

Prepared for

City of Riverside  
Community Development Department  
Planning Division  
3900 Main Street, Third Floor  
Riverside, CA 92522

Prepared by

RECON Environmental, Inc.  
1927 Fifth Avenue  
San Diego, CA 92101-2358  
P 619.308.9333 F 619.308.9334  
RECON Number 6103  
November 2015

***THIS PAGE IS INTENTIONALLY BLANK.***

## TABLE OF CONTENTS

<b>1.0</b>	<b>Introduction</b>	<b>1</b>
1.1	Purpose	1
1.2	Process	1
<b>2.0</b>	<b>Comments Received and Responses to Comments</b>	<b>3</b>
2.1	Introduction	3
2.2	Comments Received	3
2.3	Comments and Responses to Comments	4
2.3.1	Master Responses to Comments	4
2.3.2	Responses to Comments	26
<b>3.0</b>	<b>Errata to DEIR</b>	<b>30</b>
3.1	Clarification and Revisions as a Result of Comments Regarding the Proposed “C” Street Under Scenario 4	30
3.2	Clarification and Revisions as a Result of Comments, Clarification of Terms and Formatting & Additional Corrections and Clarifications	45

## FIGURES

R-1:	Neighborhood Traffic Management Program	27
R-2:	Overlook Vicinity Map	28
R-3:	Reported Crime Summary 2009-2012	29
R-4:	Proposed C Street	32

## ATTACHMENTS

A:	Public Notices	
B:	Community and Planning Commission Meeting Materials	
C:	Comment Letters and Responses	
D:	BNSF At-grade Railroad Crossing Queue Study at Madison Street and Washington Street	

***THIS PAGE IS INTENTIONALLY BLANK.***

# 1.0 Introduction

## 1.1 Purpose

The City of Riverside (City), as the lead agency under the California Environmental Quality Act (CEQA), has prepared this Final Environmental Impact Report (Final EIR) for the proposed Crystal View Terrace/Green Orchard Place/Overlook Parkway Project (Project). This Final EIR is intended to be used along with the Draft EIR (DEIR), which is incorporated by reference and bound separately. This Final EIR contains all of the required contents as outlined in Section 15132 of the CEQA Guidelines, including:

- Revisions to the DEIR;
- Comments and recommendations received on the DEIR;
- A list of persons, organizations, and public agencies commenting on the DEIR;
- The responses of the lead agency to significant environmental points raised in the review and consultation process; and
- Any other information added by the lead agency.

This Final EIR assembles all the environmental data and analyses that have been prepared for the Project. It also includes public and agency comments on the DEIR and responses by the City to those comments. The intent of the Final EIR is to provide a forum to air and address comments pertaining to the analysis contained in the DEIR and to provide an opportunity for clarification, corrections, or minor revisions to the DEIR as needed.

The evaluation and responses to comments are an important part of the CEQA process because it allows the following:

- The opportunity to review and comment on the methods of analysis contained in the DEIR,
- The ability to detect any omissions that may have occurred during the preparation of the DEIR,
- The ability to check for accuracy of the analysis contained within the DEIR,
- The ability to share expertise, and
- The ability to discover public concerns.

## 1.2 Process

A DEIR was prepared for the Project and circulated for public review from December 4, 2012, through March 1, 2013, through the Governor's Office of Planning and Research, the State Clearinghouse, and the Riverside County Clerk. The public review period for the DEIR was December 4, 2012 to February 1, 2013. After the public made several requests to extend the public review period, the City extended the public review period to March 1, 2013.

The City published public notices announcing the availability of the DEIR and the public review period in The Press-Enterprise on December 4, 2012 and January 8, 2013. These notices are included as Attachment A. Copies of the DEIR and all documents referenced in the DEIR were

made available at the City of Riverside, Community Development Department, Planning Division (3900 Main Street, 3rd Floor, Riverside, California 92522), as well as at City libraries: (1) Main (Downtown) Library, 3581 Mission Inn Avenue, Riverside, California 92501; (2) Casa Blanca Branch Library, 2985 Madison Street, Riverside, California 92504; and (3) Orange Terrace Branch Library, 20010-A Orange Terrace Parkway, Riverside, California 92508. Finally, an electronic version of this DEIR and the technical appendices was posted on the City of Riverside's Crystal View Terrace/Green Orchard/Overlook Parkway Project website at <http://www.riversideca.gov/planning/eir.asp>. The City used several methods to elicit comments on the DEIR. The notice of availability (NOA) was mailed to various agencies and organizations and to individuals that had previously requested such notice.

Written and oral comments were received during the public review period. Pursuant to Section 15088 of the CEQA Guidelines, the City, as the lead agency for the Project, has reviewed all comments received on the DEIR. Responses to these comments are contained within Section 2.0, Comments Received and Responses to Comments, of this Final EIR.

## **2.0 Comments Received and Responses to Comments**

### **2.1 Introduction**

In accordance with Section 15088 of Title 14 of the California Code of Regulations (the “CEQA Guidelines”), the City has evaluated the comments received on the DEIR for the 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 of and written responses to each of these comments.

### **2.2 Comments Received**

During the public review period for this Project, comment letters were received from agencies, organizations, and individuals. A list of commenting parties is provided in Attachment C, along with a corresponding letter, which relates to the comment letters and the responses to comments.

Oral comments were received from organizations and members of the public during two community meetings: Casa Blanca Community Group (December 12, 2012) and the Orange Terrace Community Group (December 13, 2012). In addition, the City of Riverside Transportation Board and Planning Commission held a joint workshop on January 9, 2013. The verbal testimony given at these three meetings generally duplicated written comments received on the DEIR. The Planning Commission also held a meeting on June 6, 2013, following their regularly scheduled meeting, in order to discuss the project. Attachment B includes copies of meeting materials, including meeting transcripts, notes, and the Planning Commission staff report. Comments from the public meetings and workshop related to CEQA have been fully responded to in the responses in this chapter. As they represent duplicate issues and comments as those raised during the public review period, the comments in Attachment B have been cross referenced with the relevant responses to comments in Attachment C. In addition, public concerns and issues not related to the DEIR have been included in some Master Responses to Comments and/or addressed in the City’s staff report prepared for the Planning Commission and City Council hearings. For example, discussion/analysis of the following common topics can be found as follows:

1. Agricultural/Citrus Groves West of Washington Street are addressed in Master Response #12;
2. Artifacts related to Chinese workers and Native Americans are addressed in Master Response #12;
3. Madison Avenue railroad queue and crossing is addressed in Master Response #11 and Appendix D – BNSF At-Grade Railroad Crossing Queue Study at Madison Street and Washington Street;
4. Crime is addressed by Master Response #13 and Figure R-3; and

5. The analysis of a new design for “C” Street – Design B is discussed in the Errata under 3.1 – Clarification and Revisions as a Result of Comments Regarding the Proposed “C” Street under Scenario 4.

## **2.3 Comments and Responses to Comments**

All the written comments on the DEIR received by the City and the responses to those comments have been included in accordance with Section 15088 of the CEQA guidelines. Comment letters and responses have been compiled as Attachment C. In accordance with the CEQA Guidelines, responses are prepared for those comments raising environmental issues. When responding to comments, CEQA provides that lead agencies should focus on significant environmental issues and do not need to provide all information requested by reviewers, as long as a “good faith, reasoned analysis is provided” (CEQA Guidelines, Section 15088(c), 15204). In addition, 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 that are required to be carried out or approved by the agency, and such comments must be supported by substantial evidence (CEQA Guidelines Section 15204).

### **2.3.1 Master Responses to Comments**

The City is providing master responses to address certain issues that were raised in multiple comment letters. Those master responses are numbered and provided below, and they are referred to throughout the comment-specific responses.

#### **#1: Opinion of Project / Comments on Non-Environmental Issues**

While all comments received have become part of the public record, certain comments received during the public review period do not address the adequacy of the DEIR or raise any environmental issues. Section 15088 of the CEQA Guidelines states, “the lead agency shall evaluate comments on environmental issues received from persons who reviewed the DEIR and shall prepare a written response.” (Emphasis added.) Where a commenter submits comments that do not raise environmental issues, there is no requirement under CEQA that the City respond (*Ibid.*; see also *Cleary v. County of Stanislaus* [1981] 118 Cal.App.3d.348 360 [holding that a Final EIR was adequate under CEQA where it did not respond to comments raising non-environmental issues]). The public will have an opportunity to comment on the merits of the Project itself at a City Council hearing. Notice of this hearing on this Project will be published at least 10 days prior to the hearing date. The agenda for City Planning Commission and City Council hearings can be found at: <http://riversideca.legistar.com/Calendar.aspx>

#### **#2: Vague or Conclusory Statements**

The City has reviewed all comments received, and, as stated above, all comments are a part of the public record. Some comments state that the DEIR is inadequate, but do not provide any explanation, information, specific examples, or other support for the comment. A comment which draws a conclusion without elaborating on the reasoning behind, or the factual support for, those conclusions does not require a response. Under CEQA, the lead agency is obligated

to respond to timely comments with “good faith, reasoned analysis” (CEQA Guidelines 15088(c)). These responses “shall describe the disposition of the significant environmental issues raised . . . [and] giv[e] reasons why specific comments and suggestions were not accepted (CEQA Guidelines, 15088(c)). To the extent that specific comments and suggestions are not made, specific responses cannot be provided and, indeed, are not required (*Browning-Ferris Industries of California, Inc. v. City Council of the City of San Jose* [1986] 181 Cal.App.3d 852 [Where a general comment is made, a general response is sufficient]).

The DEIR fully addresses and compares the impacts associated with each scenario. The impact analysis and significance conclusions presented in the DEIR are based upon and supported by substantial evidence, including the technical analyses (i.e., traffic, noise, air quality, greenhouse gas emissions, biology, hydrology, land use consistency, and cultural resources) provided as appendices to the DEIR (DEIR Appendices C-J). The technical information is summarized and presented in the body of the DEIR, thus providing in full the factual basis for the conclusions.

### **#3: Late Comments Received Outside the Comment Period**

The City has received comment letters outside the comment period for the public review of the DEIR. Section 15088(a) of the CEQA Guidelines states, “the lead agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments.” (Originally the comment period was from December 4, 2012, to February 1, 2013; however, it was then extended to March 1, 2013, per the public’s request.) Accordingly, nothing in CEQA “requires the lead agency to respond to comments not received within the comment periods” (Pub. Res. Code, § 21092.5(c); see also *Gray v. County of Madera* (2008) 167 Cal.App.4th 1099, 1111). Comments received by the City outside the comment period have been included within this Final EIR. Although not required by CEQA, the City has included these letters in Attachment C and reviewed the letters to verify that they do not raise new environmental issues related to the DEIR.

### **#4: Economic and Social Impacts**

Several commenters alleged that the proposed Project may cause economic hardship or social impacts by adversely impacting property values. According to CEQA Guidelines Section 15358(b), impacts to be analyzed in the EIR must be “related to physical changes” in the environment, not economic conditions. CEQA Guidelines Section 15131(a) does not require an analysis of a project’s social or economic effect because such impacts are not, in and of themselves, considered significant effects on the environment. Section 15131(a) states:

*Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes.*

The CEQA Guidelines also provide that physical effects on the environment related to changes in land use, population, and growth rate induced by a project may be indirect or secondary impacts of the project and should be analyzed in the EIR only if the physical effects would be significant (CEQA Guidelines Section 15358(a)(2)). Indeed, “evidence of economic and social impacts that do not contribute to or are not caused by physical changes in the environment is not substantial evidence that the project may have a significant effect on the environment” (CEQA Guidelines, § 15064(f)(6)). The California Supreme Court has explained that “[a]n EIR is to disclose and analyze the direct and the reasonably foreseeable indirect environmental impacts of a proposed project if they are significant. . . . Economic and social impacts of proposed projects, therefore, are outside CEQA’s purview” (*Anderson First Coalition v. City of Anderson* [2005] 130 Cal.App.4th 1173, 1182 [citing CEQA Guidelines, §§ 15126.2, 15064(d)(3)]). For Scenarios 1 and 2, there would be no construction and the continued use of a traffic control device (e.g., gates) or the removal of a traffic control device would be similar to the existing condition and/or the legal requirements per Project approvals for this area; therefore, these scenarios would not result in financially-related environmental impacts. The proposed improvements to Overlook Parkway and Proposed Street C and the corresponding redistribution of traffic would not result in economic or social effects that would result in significant environmental impacts under Scenarios 3 and 4; however, the likelihood that Scenarios 3 and 4 would cause a financial condition resulting significant environmental effects would be highly speculative (per State CEQA Guidelines § 15145 [speculation not required]).

As stated above in this response, CEQA does not require social justice or environmental justice impacts to be evaluated and therefore there are no thresholds established. The City did look at social and environmental justice issues using the General Plan 2025 Air Quality Element as guidance. Some of the conclusions, summarized from the staff report prepared for the City’s Planning Commission, include: the traffic impacts are not concentrated within any one particular community; the DEIR discusses Casa Blanca Neighborhood and the Project is consistent with General Plan 2025 policies about equitable decision-making related to socioeconomic status or geographic location, from the health effects of air pollution. With respect to traffic, analysis included intersections throughout the Project vicinity, including within the Casa Blanca Neighborhood. The traffic impacts to intersections and links would occur in multiple neighborhoods within the Project vicinity and are not concentrated within any one particular community. Nonetheless, Casa Blanca Neighborhood is discussed in Section 3.9 – Land Use and Aesthetics of the DEIR, including reference to historic uses and consistency with General Plan 2025 Policies AQ-1.1 (equitable decision-making related to socioeconomic status or geographic location, from the health effects of air pollution) and AQ-1.2 (potential environmental justice issues in reviewing impacts) (see DEIR pages 3.9-11 through -12). Ultimately, the DEIR found no disproportionate impacts to land use, traffic, or air quality would occur within the Casa Blanca Neighborhood. Specifically, please see the discussion of Casa Blanca Neighborhood on DEIR pages 3.9-39 (addressing environmental justice issues in Casa Blanca Neighborhood as to Scenario 1); 3.9-41 (addressing environmental justice issues in Casa Blanca Neighborhood as to Scenario 2); 3.9-42 through -43 (addressing environmental justice issues in Casa Blanca Neighborhood as to Scenario 3); and 3.9-44 (addressing environmental justice issues in Casa Blanca Neighborhood as to Scenario 4).

Several commenters stated that increases in traffic on roadways near their residences would decrease property values, and therefore, would cause economic hardship. Property values are outside the requirements of CEQA which considers the physical impacts of a project; however, as noted throughout the DEIR, the connection of Overlook Parkway and the Proposed “C” Street are planned roadways in the General Plan 2025, and traffic volumes on those roadways would be within the design capacity and acceptable level of service for that roadway. Neither the redistribution of traffic under all four scenarios, nor the construction of roadways under Scenarios 3 and 4, would result in a reasonably foreseeable indirect environmental impact, such as urban decay or deterioration. The Project does not introduce a new freeway corridor or new circulation element arterials. Physical decay and deterioration would be unlikely given the City neighborhoods immediately surrounding the proposed connection of Overlook Parkway under Scenarios 3 and 4 and the extension of a roadway for the Proposed “C” Street under Scenario 4. The Project involves implementing the General Plan 2025 Master Plan of Roadways in the approved Community Mobility and Circulation Element and does not involve an increase in vehicle trips.

## **#5: Regionally Diverted Traffic**

Several commenters claim that Scenarios 3 and 4—which involve the connection and/or extension of Overlook Parkway—would “attract” vehicles from outside of the Project vicinity. Section 3.11.4.1c – Circulation System – Impact Analysis – Potential Cut-through Traffic (pages 3.11-96 – 3.11-104) of the DEIR analyzes the potential for these scenarios to attract trips from outside of the Project vicinity. The FEIR has been revised to differentiate between two terms: “regionally diverted traffic” and “local cut-through traffic”. Regionally diverted traffic, analyzed in Section 3.11.4.1c – Circulation System – Impact Analysis – Potential Cut-through Traffic (pages 3.11-96 – 3.11-104) of the DEIR, refers to new vehicles coming into the Project vicinity that would use arterial roadways within the City instead of highways to arrive at their ultimate destination, but does not include residents within the Project vicinity. The term “local cut-through traffic” refers to vehicles that would use local roads within neighborhoods instead of arterial roadways (see Master Response #8 below). These clarifications do not change the conclusions of the analysis, nor do they represent significant new information in the DEIR because – even with these clarifications – the ultimate number of trips remain unchanged from those set forth in the DEIR.

The City of Riverside uses Appendix G of the CEQA Guidelines for thresholds of significance to determine environmental impacts. Appendix G of the CEQA Guidelines does not have adopted thresholds governing potential regionally diverted traffic (see Section 3.11.3 – Significance Determination Thresholds (page 3.11-40) of the DEIR). Nevertheless, Section 3.11.4.1c – Circulation System – Impact Analysis – Potential Cut-through Traffic (pages 3.11-96 – 3.11-104) of the DEIR analyzes if any of the scenarios which comprise the Project have the potential to “attract” trips from outside of the Project vicinity. The revisions to the FEIR are shown in ~~strikeout~~/underline.

As noted in the Errata, Section 3.11.4.1c – Circulation System – Impact Analysis – Potential Cut-through Traffic (pages 3.11-96 – 3.11-104) the DEIR has been edited to clarify terms:

The City does not have adopted thresholds governing potential regionally diverted traffic ~~cut-through traffic~~ and evaluates traffic impacts based on LOS standards; however, each scenario was evaluated in the TIA (Appendix J of the DEIR) for the potential to cause an increase in regionally diverted traffic ~~cut-through traffic~~ in the Project vicinity in order to provide the most complete information disclosure possible. Regionally diverted traffic refers to new vehicles coming into the Project vicinity that would use arterial roadways within the City instead of highways to arrive at their ultimate destination, but does not include residents within the Project vicinity.

Since Scenarios 3 and 4 would add new arterial east-west roadway(s) not currently available to drivers, the potential for regionally diverted ~~cut-through~~ traffic exists. This analysis looks at the numbers of new vehicles coming into the Project vicinity that can be attributed to changes in the circulation network (traffic that comes into the area that did not come to this area before).

Since the difference in volumes is negligible when comparing Scenarios 1 and 2 (Gates Closed and Gates Open), this evaluation looks at daily traffic volume changes between Scenarios 3 and 4 against the Gates Open baseline, for both Year 2011 and Year 2035 conditions. These scenarios are not evaluated against the Gates Closed baseline in this section, as motorists would be unable to cut through under that condition. Any new regionally diverted traffic ~~cut-through traffic~~ would eventually enter or leave the area via roads on the east of the study area; this analysis focuses on east-west facilities that are generally parallel to Overlook Parkway.

The analysis shows that for both 2011 and 2035 conditions, the projected regionally diverted traffic ~~cut-through~~ volumes are low. As explained below, new potential regionally diverted traffic ~~cut-through traffic~~ entering the Project vicinity area is low overall; however, Scenario 3 would have less regionally diverted ~~cut-through~~ traffic compared to Scenario 4.

Additionally, for commenters who expressed concern about potential diverted traffic from opening the gates under Scenario 2, the discussion of Scenarios 3 and 4, which include this Project component, fully address this issue. Thus, the DEIR fully analyzed the potential for new roadways to “attract” trips regionally, and the traffic analysis fully accounts for local cut-through traffic in the predicted future traffic counts. It examines where traffic would increase and decrease with the different scenarios. As an example, the Traffic Impact Analysis (TIA) (Appendix J of the DEIR) analysis considered how traffic gets from Alessandro Boulevard to Washington Street or Madison Street (even if circuitous) and the changes that would occur.

## **#6: Alternatives Not Considered**

As required under CEQA Guidelines Section 15126.6, the DEIR considers and discusses a range of reasonable alternatives, each of which was analyzed at an equal level of detail throughout the DEIR. As required pursuant to CEQA Guidelines Section 15126.6(a) these

alternatives were selected to provide a reasonable range of possible Project designs, which could potentially attain most of the basic objectives of the Project, but potentially avoid or substantially lessen any significant effects of the Project. Specifically, the factors considered in the selection of the alternatives included whether the alternative would (a) avoid or substantially lessen or significant impacts of the Project, (b) address solutions that are not addressed by other alternatives, and/or (c) feasibly attain most of the basic objectives of the Project.

For a thorough analysis of alternatives considered but rejected please see the DEIR Section 8.0 – Project Alternatives which addresses the following: *Overlook Parkway - Stripe to Four Lanes Alternative*, *Proposed C Street - Madison Street Extension Alternative*, *Proposed C Street– Victoria Underpass Alternative*, and *Washington Street and Lincoln Street Improvements Alternative*. Each of these alternatives were considered but rejected. As explained in Section 8.1.3 of the DEIR (pages 8-2 to 8-11), among the factors used to eliminate alternatives from detailed consideration in the EIR are: failure to meet most of the basic Project objectives, or inability to avoid or lessen significant environmental effects. Of particular importance was that these improvements did not reduce traffic impacts, and one or more has increased engineering and construction costs and right-of-way requirements.

One alternative that was raised in the public comments related to removing Overlook Parkway from the Master Plan of Roadways. As noted in the DEIR, all four scenarios proposed under this DEIR retain Overlook Parkway on the Master Plan of Roadways. In doing so, the Project would not preclude implementation of General Plan 2025, as the connection of Overlook Parkway is considered an important parkway connection between the Alessandro Heights and Canyon Crest neighborhoods. In analyzing Scenarios 1 and 2, the DEIR does discuss the changes *within the project vicinity* that would occur if Overlook Parkway is not connected. However an alternative that would formally remove Overlook Parkway from the Master Plan of Roadways was not considered in the EIR as it would not achieve the objectives of the Project. Specifically, this alternative would not address the traffic patterns related to the Overlook Parkway *connection* and the *connection* westerly of Washington Avenue consistent with the General Plan 2025. The objectives of the Project were developed in accordance with the General Plan 2025, which does not state to remove the connection of Overlook Parkway. Rather, the General Plan 2025 (Pages CCM-14 and CCM-15) identifies the connection as potentially being important:

These few changes [including the connection of Overlook Parkway] are not anticipated to induce significant additional regional traffic in the City. They are, however, critically important to serving local traffic demand. In particular, a 2004 preliminary study indicated the proposed two-lane road (120-feet of right-of-way built with only two travel lanes) that would connect the western end of Overlook Parkway to SR-91 would be primarily local serving, provided the width of any new Overlook Parkway bridge over the arroyo is limited to two travel lanes total.

As discussed above, the removal of Overlook Parkway is not consistent with the General Plan and would not meet the Project objectives. The staff report included in Appendix B also provides background on the scope of the Project analyzed and the history of previous

decisions to maintain Overlook Parkway on the Master Plan of Roadways. Should the City Council consider removal of the connection of Overlook Parkway from the General Plan Master Plan of Roadways, a new Traffic Impact Analysis (TIA) for the entire City would need to be performed in order to understand the complete impacts of such a decision on the *City-wide* network.

Other alternative scenarios addressed in individual comment letters were reviewed by the City. With the exception of Proposed “C” Street which has been modified in one section in response to public concern about avoiding citrus groves, none of the alternate scenarios suggested in the comments received during public review would avoid or substantially lessen a significant environmental impact of the Project and meet Project objectives. The Project alternatives raised in the individual comment letters are summarized below:

*Active Transportation* - One of the commenters suggested that the EIR should include a separate alternative of connecting the two gaps in Overlook Parkway with an exclusive bike trail and walking path, consistent with the Bike Plan. The suggested alternative provided in this comment letter would not further reduce the Project’s significant environmental impacts because construction impacts would remain (as with Scenarios 3 and 4), and traffic/transportation impacts would remain significant (same as Scenarios 1 and 2). The commenter’s proposed alternative would not meet the Project’s overall objective which is to evaluate and resolve the General Plan 2025 goals and policies relative to Overlook Parkway and a connection from Washington Street to the SR-91 freeway. The General Plan 2025 does not include any goals or policies related to connecting the gaps of Overlook Parkway with an exclusive bike trail and walking path. Because this alternative would not meet the objectives of the Project, it was not incorporated into the FEIR.

*Connecting Overlook Parkway to Auto Center* – Another commenter noted the importance of having an additional crosstown arterial to help distribute traffic more evenly and suggested providing an Overlook Parkway extension to Auto Center. As noted in the EIR, multiple routes were considered for connecting Overlook Parkway westerly to provide a connection to the 91 freeway and the Proposed Street C was the most feasible route. Given the density of development in the vicinity of Auto Center Drive, the feasibility of this option is considered limited.

*Improvements to Existing Roadways* – Other comments included providing additional improvements on existing roadways as an alternative to Scenarios 1-4 in the EIR. Suggestions included widening Van Buren Boulevard to three lanes and synchronizing the traffic signals from the 215 to the 91. The City is already planning to synchronize the signals on Van Buren Boulevard and a new interchange is under construction at the I-215. In addition, this alternative would not achieve the objectives of the Project and as such was not incorporated into the EIR.

## **#7: Inconsistent with Prop R and Measure C**

Many commenters allege that the Scenarios are violation of Proposition R (passed in 1979) and Measure C (passed in 1987). In fact, none of the Scenarios analyzed violate any provision of Proposition R or Measure C. All Scenarios are consistent with the provisions, purpose and

intent of the measures. Commenters have also stated that the Proposed “C” Street violates the intent of the measures. Again, from a strict reading of the measures, Proposed “C” Street actually follows the measures.

Specifically, as set forth in Section 3(a) of the Proposition R, the “Greenbelt” includes “all property lying in the Riverside Arlington Heights Greenbelt within the area enclosed by a line beginning on the centerline of Washington Street 712 feet northwesterly of its intersection with the centerline of Victoria Avenue, then proceeding southwesterly parallel to and 712 feet northwesterly of the centerline of Victoria Avenue to the centerline of Harrison Street, along the centerline of Harrison Street northwesterly to the southeasterly property line of the Riverside Canal, along the property line of the Riverside Canal southwesterly to the City Limits, along the City Limits in a generally easterly direction to the centerline of Washington Street, then northerly along the centerline of Washington Street to the point of beginning.” As noted in the Errata, DEIR Figures 3.1-1 and 3.1-2 show the portion of the Arlington Heights Greenbelt within the Project vicinity. (See also Measure C, § 3(d) [defining the “Greenbelt” as the area defined Section 3(a) of Proposition R].)

As enacted, Proposition R imposed Residential Agricultural (RA) zoning on properties within the Greenbelt and other areas; imposed Residential Conservation (RC) zoning on certain properties with natural slopes; and imposed restrictions on the type and density of residential development within those areas. The Project analyzed in the DEIR, however, does not propose any residential development. Thus the original requirements of Proposition R are largely inapplicable to the Project.

Measure C then amended Proposition R to impose additional requirements on the Greenbelt area. Specifically, the relevant portions of Measure C state as follows:

*Policy to Promote and Encourage Agriculture. It is hereby declared to be the policy of the City of Riverside to promote and encourage agriculture as an essential industry and a desirable open space use. The Greenbelt ... Lands are important agricultural lands because of their high soil quality, favorable climate, and low water costs. It is further declared to be the policy of the City to retain, wherever feasible, agricultural lands in private ownership and to encourage and assist the maintenance and formation of family farms, especially for farmers who live on their land. The City shall forthwith adopt such policies, ordinances, and resolutions as may be necessary to implement these policies.*

(Measure C, § 5(a).)

*Additional Agricultural/ and Open Space Policies. To further promote and preserve agricultural uses and agricultural lands in the City of Riverside, the City shall forthwith take any and all appropriate actions to carry out this measure, including but not limited to the following....*

2. *Protect Greenbelt streets from heavy traffic;*
3. *Minimize the extension of City services and urban infrastructure into agricultural land areas; except as needed for agricultural purposes;*

4. *Develop and implement public service and infrastructure standards compatible with and appropriate for agricultural lands;*

(Measure C, § 5(c).)

As shown by the DEIR, the proposed Project is consistent with Proposition R, as amended by Measure C. Specifically, the DEIR explains that the Project will not result in any potentially significant impacts to agricultural resources. (DEIR Section 3.1.) The Project will have “no impact” on agricultural resources under Scenarios 1, 2, or 3, and will have a “less than significant impact” under Scenario 4. This has also been reiterated in the Master Response #12. The DEIR specifically confirms that – consistent with Proposition R and Measure C – no impacts to Williamson Act contract lands and no rezoning would occur. Likewise, the Project will not take agricultural lands out of private ownership. Further, “some of the existing street right-of-way would be vacated, and thus could revert to neighboring parcels, allowing approximately 1.1 acres of land to return to agricultural uses.” (DEIR p. 3.1-18.) Accordingly, the Project is consistent with the policies expressed in Measure C.

Moreover, Measure C in directing the City to protect the Greenbelt from “heavy traffic,” never provided a definition of what “heavy traffic” conditions actually were. Thus, while the completion of Overlook Parkway may increase traffic volumes on selected streets within the Greenbelt, the majority of the circulation system within the Greenbelt will be unaffected. As shown on DEIR Figure 3.11-26a, in the Year 2035 analysis, Scenario 4 would not result in significant impacts to Intersection 22 (Victoria Avenue and Mary Avenue) or Intersection 7 (Washington Street and Lincoln Avenue). Other impacts to intersections such as Intersection 8 (Victoria Avenue and Washington Street) would occur under all scenarios, but to other scenarios do not reduce impacts elsewhere in the Greenbelt, such as to Intersections 7 and 22. Accordingly, again, the Project is consistent with Proposition R and Measure C.

Furthermore, the only potential part of the Project that may actually be built in the Greenbelt is the extension of Proposed “C” Street proposed as part of Scenario 4. The Proposed “C” Street is considered infrastructure and it has been designed to minimize its impacts on the Greenbelt. Infrastructure as defined by the General Plan 2025 is “*The physical systems and services which support development and population, such as roadways, railroads, water, sewer, natural gas, electrical generation and transmission, telephone, cable television, storm drainage, and others.*” The design of the Proposed “C” Street has also been reduced to an 88-foot ROW and features such as a median, sidewalks, etc. have been modified to match existing roadways in this area. As well, its design reduces the amount of traffic flow into the Greenbelt by routing traffic back to the State Route 91. The traffic analysis and modeling indicates that at buildout in 2035 Scenario 4 with Proposed “C” Street has the least amount of traffic impact to the Greenbelt in 2035.

At the joint workshop for the Transportation Board and Planning Commission, the following summary of traffic impacts within the study area to both intersections and links after mitigation was presented:

	2011	2035
Scenario 1	0	4
Scenario 2	0	6
Scenario 3	0	5
Scenario 4	0	4

Scenario 4 has the least traffic impacts in the future, when mitigation is taken into consideration. This would ensure that intersections operate at a more efficient level of service, and would reduce the potential for cars to cut through on local streets along Overlook Parkway. When looking at the larger streets for buildout of the City, such as Alessandro Boulevard, Arlington Avenue, and Victoria Avenue, this scenario has the least amount of impacts on intersections along those streets. This scenario also would provide a designated route to accommodate traffic volumes in the Greenbelt. The Proposed “C” Street would reduce traffic volumes on roadways such as Madison Street south of Victoria Avenue and Washington Street north of Dufferin Avenue.

The results of the traffic impact analysis confirm previous studies and information presented in the City’s General Plan 2025: that the Overlook Parkway extension is critically important to serve local traffic demand and would not induce significant additional regional traffic in the City. Therefore, Scenario 4 with C Street *protects the greenbelt streets from heavy traffic, and minimizes the extension of City services and urban infrastructure in agricultural land areas*, by designing a route that addresses circulation and traffic flow in this area.

Further, at the time the Measures were passed, 1979 and 1987, the City’s General Plan clearly reflected that Madison Street would connect through the greenbelt by going southerly past Victoria Avenue, turn easterly past Washington Street and then connect to a roadway between Washington Street and Alessandro Boulevard (see Attachment B: Exhibit 4 in the Staff Report prepared for the Planning Commission). Thus, Proposed “C” Street, or a vision of “C” Street had been contemplated and on the City’s General Plan prior to either Measure. As such, had there been a concern that this General Plan street would cause excessive traffic through the greenbelt, it is conceivable that the proponents of the Measures would have dealt with this street. In fact, Measure C actually dealt with specific issues that had arisen between it and Proposition R, such as Sycamore Canyon Park, a specific plan for La Sierra Lands, and annexation areas. Therefore, Proposed “C” Street – Designs A and B are consistent and in compliance with both Measures and as such, does not violate either Measure.

In addition to the information above, an analysis of each Scenario’s consistency with both Proposition R and Measure C is provided in Chapter 3.9 – Land Use and Aesthetics of the DEIR, along with Appendix H – Land Use Consistency. As indicated in Appendix H, it is the City’s objective to enforce and adhere to the protections for agricultural areas. The road improvements proposed through the Greenbelt would not result in the rezoning of any land within the Project vicinity, and land within the Greenbelt would retain its RA-5 zoning,

consistent with the agricultural preservation provisions established by Proposition R and Measure C. Scenario 4 would be consistent with the General Plan and Proposition R and Measure C because roadway development within the protected area would be limited to Proposed “C” Street, which was already contemplated within the currently adopted General Plan 2025. Prop R and Measure C doesn’t necessarily impose a 100% moratorium on agricultural losses. The Project’s consistency with Proposition R and Measure C ultimately will rely on the discretion of the decision-makers (City Council).

## **#8: Local Cut-through Traffic / Traffic Impact Analysis (TIA) Study Area**

Numerous commenters allege that one (or more) of the four scenarios which comprise the Project would increase local cut-through traffic within their respective neighborhoods, or that certain local roadways were not analyzed within the DEIR. As previously discussed in Master Response #5, the FEIR has been revised to differentiate between two terms: “regionally diverted traffic” and “local cut-through traffic”. The term “local cut-through traffic” addresses vehicles that would use local roads within neighborhoods instead of arterial roadways.

It should be noted that, generally, when arterial roadways have a better LOS, the potential for motorists to “cut through” neighborhoods is less likely. Mitigation measures are thus proscribed in order to improve LOS at high-capacity intersections throughout the Project vicinity. For example, several mitigation measures within Section 3.11 – Transportation/Traffic, identify intersections along arterial roadways to be converted from all-way stop controlled to signalized. These measures improve LOS, reduce delay, and further the likelihood that motorists will remain on arterial roadways that can handle the capacity, instead of “cutting through” local streets that have lower speed limits, narrower widths, and more traffic calming measures such as stop signs.

Thus, when evaluating the addition of a completed arterial roadway (Overlook Parkway) to the circulation system, as Scenarios 3 and 4 entail, or leaving the arterial roadway incomplete (as Scenarios 1 and 2 entail), one of the many purposes of the TIA is to analyze how larger-capacity streets would function.

The study locations were selected through a variety of methods which are commonly applied for CEQA traffic studies. Work which was previously conducted for the approved General Plan update, specifically the analysis of the completion and extension of Overlook Parkway, provided an initial set of study locations to match those in the General Plan 2025. The General Plan 2025 study location list was expanded using direction and guidance contained within the City’s traffic study guidelines, along with discussion and input with City staff. The study locations were based on the Project’s potential to cause a significant impact by increasing traffic in relation to the existing traffic load and capacity of the street system, and City staff concurred with the selected study locations. Comments were received from the public during the Notice of Preparation comment period, some of which related to the Project study area. Based on these comments, additional study locations were included for analysis.

Local streets were, however, evaluated if they were located in proximity to the gates on Crystal View Terrace and Green Orchard Place. This is not to say that other local streets are not as

important as these; the gates are in place due to other mitigation measures in association with prior approved Projects. However, it is not feasible for the TIA and DEIR to fully detail the traffic counts and modeling results for every local street within the approximately 7,500-acre Project vicinity. The City also distinguishes from planning-level forecasts for roadway classification and capacity that relate to how the overall network will function and operational adjustments that can be made to individual streets (e.g., signalization, traffic calming measures).

Based on professional experience and the expert opinion of the City's traffic consultants and staff, the study locations and the study area are appropriate to determine the Project's potential significant traffic impacts. There are many local streets in the vicinity of the Project. Not all of them would reasonably be considered as possible or reasonable cut through routes or routes which would be likely to receive traffic as a result of the Project. Since not every single local street can be included in the study, only those streets which have a reasonable expectation of significant added traffic were included in the study.

The TIA and DEIR fully analyzed 28 intersections and 39 roadway links to determine traffic volumes on roads leading up to intersections. The selection of intersections and links was based on input received from the public and discussion with City staff, professional judgment for locations deemed most likely to be affected by any scenario, as well as a review of previous studies.

The TIA included intersections and roadways that could be used by locals thereby increasing local cut through traffic. Given the distribution of traffic on links and intersections studied in the TIA, the results of the traffic analysis also allow the City decision-makers to understand how any changes in the traffic distribution and volumes affect specific areas (including Overlook Parkway, Hawarden, Canyon Crest, Greenbelt, and Madison). As an example, Flemington is not a route that would be expected to receive added traffic due to its location and the fact that any traffic to or from Overlook Parkway via Fleming would be forced to travel an extremely circuitous route and thus we can reasonably conclude that there would be no significant Project traffic impacts on Flemington.

The TIA prepared for the Project is in accordance with requirements set forth in the "City of Riverside Traffic Impact Analysis Preparation Guide" (2012), which in turn ensures that all traffic studies in the City fully captures traffic impacts to comply with CEQA. As part of those requirements, the traffic consultant worked with the City's traffic engineering division to determine the study area, including the intersections and roadway links to be analyzed. As required by the City's TIA Preparation Guide:

At a minimum, the area to be studied shall generally include any intersection of "Collector" or higher classification streets on which the proposed Project will add 50 or more peak hour trips up to a 5 mile radius of the Project location. The study area may be extended if the Project has a regional impact on the regional transportation system.

The traffic modeling conducted for the DEIR found that the scenarios redistributed existing traffic. Changes in traffic volumes were looked at on a daily basis. The study shows minimal increase in volumes from outside of the City with the completion of Overlook Parkway or C

Street. A qualitative and quantitative discussion of traffic is included in the DEIR on pages 3.11-96 through 3.11-104. Some areas will experience an increase in traffic within their localized area, while others will experience a decrease in their localized area. The model accounts for different routes for the same trip to account for driver behavior, but does consider efficiency of the trip. The same person with the same destination could select a different route. As an example, a vehicle trip originating from the eastern portion of Overlook Parkway may use Alessandro Boulevard and Arlington Avenue to access SR-91, while with implementation of either Scenarios 3 or 4 they would have the ability to access SR-91 via Overlook Parkway and Madison Street. The local traffic would shift to Overlook Parkway and Madison Street.

The effect of building C Street (i.e., Scenario 4) on 2011 (near-term) traffic is discussed on page 3.11-99. The effect of building C Street (i.e., Scenario 4) on 2035 (buildout) traffic is discussed on pages 3.11-102 through 3.11-103. The discussion does not specifically use the terminology “Greenbelt” in this section; though the Greenbelt is depicted elsewhere in the DEIR and is within the project vicinity considered for the traffic study area (see Figures 3.1-1 and 3.1-2).

Scenario 4, with the implementation of C Street, benefits the Greenbelt by focusing/directing traffic on the new route to minimize traffic impacts to other streets in the Greenbelt when buildout of the City under General Plan 2025 is considered. With the implementation of C Street, there is a more direct route to SR-91 for freeway access. Additionally, the analysis shows lower volumes on many streets in the Greenbelt, including portions of Victoria Avenue, Lincoln Avenue, Bradley Street, and Mary Street. (See discussion of cut-through traffic in the DEIR pages 3.11-96 through 3.11-104.) Scenarios 1 and 2 assume Overlook Parkway is not built by 2035 and therefore, traffic continues to find its way into the Greenbelt. Scenario 3 does assume Overlook Parkway is built by 2035 but does not provide a way for traffic to get to the SR-91 so traffic will disperse using all routes including the Greenbelt routes.

Some commenters address the traffic volumes on Overlook Parkway. Based on its roadway classification, the maximum capacity for Overlook Parkway is 36,000 vehicles per day. The TIA prepared for this DEIR, Appendix J, found the following traffic volumes for Overlook Parkway for 2035 (buildout): Scenario 1: 1,400 to 3,900 daily vehicles; Scenario 2: 6,200 to 7,300 daily vehicles; Scenario 3: 16,600 to 16,900 daily vehicles; and Scenario 4: 20,100 to 21,900 daily vehicles. Based on this summary, all scenarios would be at a Level of Service A or B which is considered an acceptable operation and provides very good flow for vehicles. In response to concerns about traffic volumes and speeds on Overlook Parkway, it should be noted that the General Plan 2025 has the following policy:

*Policy CCM-4.1 – Limit the Overlook Parkway completion over the arroyo to a two-lane roadway within a one-hundred-ten-foot right-of-way.*

Overlook Parkway is designed to function as an arterial; however, the City has a toolbox of traffic calming measures that could be implemented to slow down motorists. For example, the General Plan 2025 Master Plan of Trails and Bikeways identifies Class II Bikeways along Overlook Parkway. Class II bikeways provide a restricted right-of-way on a roadway's shoulder designated for the exclusive or semi-exclusive use of bicycles. These connections would be

completed if either Scenario 3 or 4 is selected (see DEIR pages 3.11-172 through -173). Additionally, the design of the bridge and a narrowing of lanes in the near-term would help to slow vehicle speeds in this area (see Section 2.6.3b, page 2-26 of the DEIR).

The analysis evaluates traffic volume changes (increases and decreases) on other surrounding roadways for each scenario in both the Traffic Impact Assessment (TIA) – Appendix J in the Appendices and the DEIR. Refer to Figures 3.11-25a through 3.11-26b for a visual representation of the intersections that were quantitatively analyzed. This is also discussed qualitatively throughout the Section 3.11 – Transportation/Traffic of the DEIR. Several intersections along (and near) Hawarden Drive were analyzed as part of the study, and changes in traffic volumes can be compared for the different Scenarios in particular, intersections #23 (Mary Street and Hawarden Drive), and #24 (Hawarden Drive and Overlook Parkway). These intersections have of maximum LOS C and D respectively in the General Plan 2025. Under Scenarios 3 and 4, intersection #24 would have an LOS of E and F respectively in 2035 and would exceed its maximum LOS standard per the General Plan. Under the other scenarios, these intersections do not exceed acceptable LOS.

Currently at the intersection of Canyon Crest Drive and Alessandro Boulevard, there are a large number of vehicles that turn left from Canyon Crest Drive onto southbound Alessandro Boulevard; and conversely a large number of vehicles that turn right from northbound Alessandro Boulevard onto Canyon Crest Drive. Once Overlook Parkway is extended, many of these turning vehicles will utilize Overlook Parkway instead of turning. The analyses show that overall, there is projected to be little change in volumes on Canyon Crest Drive with the implementation of any of the 4 scenarios. The TIA (Appendix J of the DEIR) and the DEIR assumed that Madison Street would be 4 lanes north of Victoria Avenue at buildout, consistent with General Plan 2025. The DEIR does not provide an analysis of what the LOS would be if Madison Street were altered from its General Plan 2025 design. Currently, Madison Street is altered from that buildout design, with bulb outs and other temporary traffic calming measures under EP-007-967 approved by City Council on June 26, 2001. This was the Project to modify Madison Street between Lincoln and Victoria Avenues and between Evans Street and Indiana Avenue from a four lane street to a three lane street (one travel lane in each direction with a continuous center turn lane) for a distance of approximately 2,400 feet. Improvements included the construction of intermittent landscaped center medians and parkway planters. Since the improvements were designed to be temporary in nature no change to the Circulation and Community Mobility Element was required.

As noted in the DEIR (page 3.11-54 and Table 3.11-13), if Scenario 4 (2011) is implemented, intersections #5A (Madison Street at Victoria Avenue-North) and #5B (Madison Street at Victoria Avenue-South) would have an LOS of F and exceed the acceptable LOS of D under the General Plan 2025. In 2035, intersections #3 (Madison Street at Indiana Avenue), #5A (Madison Street at Victoria Avenue - north), and #5B (Madison Street at Victoria Avenue – south) would have an LOS F, F, and E respectively under Scenarios 1, 2, and 3 (pages 3.11-65, 3.11-69, and 3.11-73 and Tables 3.11-21, 3.11-23, and 3.11-25). Under Scenario 4 (2035), these three intersections would exceed the acceptable LOS as well intersection #4 (Madison at Lincoln Avenue). Intersection #4 would have an LOS of E under Scenario 4 (2035) (page 3.11-79 and Table 3.11-27). Mitigation measures include signaling intersections, split phasing,

modifying lane configurations, and adding turn lanes (Section 3.11.4.3 pages 3.11-108 through 3.11-140).

One of the Project objectives is to resolve “public safety concerns related to both emergency vehicle access and increased traffic volumes within residential neighborhoods associated with the gates on Green Orchard Place and Crystal View Terrace.” As previously detailed, the City aims to protect local roadways from vehicles that “cut through”. The City does value the safety of residents within all neighborhoods and maintains an active Neighborhood Traffic Management Program (detailed below).

The City, through the Department of Public Works, has an active Neighborhood Traffic Management Program to minimize and/or prevent intrusion of local cut-through traffic into residential neighborhoods, through traffic management and traffic calming strategies; and to improve the livability of neighborhoods through controlling the impacts of outside traffic. The strategies include speed control methods, parking restrictions, speed humps, pedestrian safety improvements, and sight obstruction elimination. This program would be used for any local street experiencing an increase in cut-through traffic, no matter the reason for the increase in traffic. Public safety is the utmost concern and serves as a primary factor in the application of traffic calming measures and traffic control devices. A description of the program has been included in Section 2.6, “Proposed Project,” as noted in the Errata. In addition, the City’s description of the Neighborhood Traffic Management Program has been included as Figure R-1 at the end of this section.

Requests from neighborhood residents are reviewed and evaluated, and data is collected. An analysis is conducted within 30 days of receipt of a request and an “Initial Options” category item is implemented. If the solution is not effective in resolving neighborhood traffic concerns, a traffic calming tool from the Secondary Options is implemented. Factors such as road width, alignment, and configuration may prevent the use of Secondary Solutions. Additionally, some of the solutions within this category may require consensus by a majority of neighborhood residents. There may also be a cost to residents.

Thus, while it was neither practical nor economically feasible to analyze every local street within the 7,500-acre Project vicinity, the DEIR fully analyzes potential traffic impacts to the most likely affected roadways, and the City reviews and implemented additional measures for local streets through the Neighborhood Traffic Management Program.

## **#9: Traffic Model / Growth Assumptions**

Several commenters allege that the traffic model is incorrect or did not accurately capture the growth of the region in the future. However, the DEIR fully analyzed traffic impacts and growth assumptions, for the reasons detailed below.

As described in Section 3.11 – Transportation/Traffic of the DEIR (see Section 3.11.4a, Page 3.11-41) and the Traffic Impact Analysis (TIA) – Appendix J upon which it was based, results for the traffic analysis are based on traffic counts that are then validated by a computer model that was specifically developed for the Project.

The model is validated for the base year to determine its predictive ability to replicate observed (existing) traffic counts using the trip rates, speeds, roadway capacities, and other variables. If the model cannot produce traffic volumes similar to what is observed in the base year, then appropriate adjustments are made until the model is able to reasonably replicate current travel conditions in the area. A model that replicates existing conditions accurately is then assumed to be well able to assess future conditions. The model for this Project was validated to replicate existing, real world traffic counts that were conducted in 2011 for the Project, and therefore accurately assesses future conditions

The travel demand model was based upon the Riverside Countywide model (RivTAM); which in turn is based upon the Southern California Association of Governments (SCAG) travel demand model. These regional computer travel models always serve as the “parent” models for City level or sub-area level models because they contain the official growth forecasts for the County of Riverside and the southern California region. The future forecast year of the regional models is 2035. All travel demand models contain an “existing” scenario which replicates current conditions, and a future year scenario that is used for planning the future transportation system.

For 2035, the model contains the land uses, trip generation, mode split (auto, transit, bike, and walk trip types), and future roadway network as adopted within the SCAG (and RivTAM) model, and within the City the model was further refined to reflect a finer disaggregation of land uses as well as buildout of the Master Plan of Roadways, as shown in Figure CCM-4 in the City’s General Plan 2025.

CEQA does not require “crystal ball” prediction of future conditions. It requires that the Lead Agency engage in good faith analysis based upon substantial evidence and disclose that information, which is what the City has done in preparation of this DEIR. As detailed in Section 15144 of the CEQA Guidelines: “Drafting an EIR...necessarily involves some degree of forecasting. While foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can.”

## **#10: Policy Consistency**

Appendix H (Land Use Consistency Table) of the DEIR provides a consistency analysis of the proposed Project with relevant policies and objectives in the General Plan 2025 and neighborhood plans. An EIR is an informational document and the policy consistency analysis is provided to inform the public of a Project’s environmental impacts where *potential* policy inconsistencies are identified. General Plan policies, unlike municipal ordinances, are subjective, and therefore, subject to interpretation. The ultimate determination of whether a scenario is consistent with policy direction found in the City’s General Plan 2025 lies within the discretion of the decision-making body (City of Riverside City Council) for this Project.

## **#11: Grade Separation on Madison Street**

Several commenters requested additional information in the DEIR about delays on Madison Street due to the trains. As stated in the staff report prepared for the City Planning Commission meeting (see Attachment C), the model runs and TIA (Appendix J) prepared for the DEIR did

not assume separated grade crossings at railroads as it took a more conservative approach to the analysis. Travel demand models, as used in the DEIR analysis are not sensitive to grade separations, and thus were not considered in the TIA. Stated another way, the TIA prepared for the Project provides an analysis of how specific intersections and links in the network perform in the near-term and buildout under the scenarios. Similar to comments about traffic calming measures (which are addressed through the City's Neighborhood Traffic Management Program discussed in #8 above), any analysis or changes related an at-grade crossing are operational issues that are addressed by the Department of Public Works in their ongoing process to improve the system. Therefore, to address questions raised about operational issues related to a grade crossing on Madison Street, the City's Public Works Department prepared a report in July 2013 titled "BNSF At-Grade Railroad Crossing Queue Study at Madison Street and Washington Street" which is included as Attachment D.

The "BNSF At-Grade Railroad Crossing Queue Study at Madison Street and Washington Street" used the TIA and another report titled "Grade Separation Priority Update Study for Alameda Corridor East (Riverside County)" to determine morning and evening peak hour queues at the railroad crossings for the existing and 2035 build-out conditions. This report can be accessed online at: [http://rctc.org/uploads/media\\_items/rctc-gradecrossingpriorityreport-final-withappendix-040612.original.pdf](http://rctc.org/uploads/media_items/rctc-gradecrossingpriorityreport-final-withappendix-040612.original.pdf) and is available for review at the City of Riverside. As discussed in this study, the queuing conditions are the result of buildout of the City and are not dependent on the roadway connections analyzed in the DEIR. At the both the Madison Street and Washington Street railroad crossing, the number of trains is expected to double by Year 2035 and thus the daily gate down time will more than double.

At the Madison Street crossing, vehicle queues are projected to exceed the roadway capacity in the existing PM peak hours under Scenarios 1 and 4; in the Year 2035 PM peak hours under all scenarios; and in the Year 2035 AM peak hours under Scenario 4. Scenario 4 is projected to generate the longest queues and would exceed queuing capacity in the southbound direction under Scenarios 1 and 4 in the PM peak hour if multiple freight trains arrive under existing conditions. In the Year 2035, the queuing capacity in the southbound direction is projected to exceed under all scenarios in the PM peak hour if multiple freight trains arrive. The traffic would queue on Indiana Avenue and/or Madison Street north of Indiana Avenue.

At the Washington Street railroad crossing, vehicle queues exceed the roadway capacity in the existing and Year 2035 AM and PM peak hours under all scenarios, mainly due to the shorter storage length. The number of trains and gate down time is the same as at Madison Street. Scenario 3 is projected to generate longest queues under the year 2035 conditions. Northbound queues under all scenarios could be accommodated for existing and Year 2035 conditions. The queuing capacity in the southbound direction is projected to exceed the available storage length under all scenarios for both the existing and Year 2035 conditions. The traffic would queue on the westbound dedicated left turn and two-way left turn lane and/or the #2 eastbound through lane on Indiana Avenue. No new significant and unavoidable impacts were identified, nor would there be a substantial increase in impacts from those identified in the DEIR. As stated in the conclusion of this report (see page 12 of Appendix D), because the delays caused by queuing are intermittent and short-term in nature, and exist regardless of the Project under both current and buildout conditions, and because the

likelihood of multiple trains arriving concurrently is variable and low, queuing impacts are considered less than significant. For a complete description of the conditions for each scenario, please refer to Appendix D.

Adams Street/Auto Center Drive would be an extremely expensive grade separation project due to right-of-way acquisition and the ensuing impacts to the Auto Center businesses.

## **#12: Agricultural/Citrus Groves West of Washington Street**

Scenario 4 includes Proposed “C” Street which would be located in the northeastern portion of the Greenbelt. A comment has been raised about the City’s citrus groves within the proposed alignment for Proposed “C” Street, specifically an orange grove at the corner of Washington Street and Victoria Avenue. The relation of the Greenbelt to protections in Measure R and Proposition C is discussed above in Response #7. The DEIR discusses the potential impacts to agriculture from the proposed project due to the location of farmland in the alignment for the Proposed “C” Street. Consistent with CEQA, the DEIR evaluated impacts based on the state Farmland Mapping and Monitoring Program categories and definitions of ‘agricultural land’. In accordance with the CEQA thresholds, the DEIR concludes that Proposed “C” Street would not directly or indirectly convert the surrounding agricultural operations to a non-agricultural use. The basis for this conclusion was impacts to farmland, when compared to the total acres within the Greenbelt, would be less than one percent. This response is intended to further explain the historic nature of the citrus grove in this agricultural area in response to public concern.

Available records and public archives including historical aerials were reviewed by the City. The books and materials reviewed (with the exception of the Brandon manuscript which is at UC Riverside Rivera Library) are on file at the City of Riverside Community Development Department. The Arlington Heights citrus groves within the project area have been previously well documented by the California Citrus Heritage Recording Project survey, HAER CA-118, which included the Arlington Heights Citrus Landscape survey (HAER CA-119) and the Gage Irrigation Canal Survey (HAER CA-120). The groves that would be affected by the proposed alignment are part of the old Arlington Heights citrus groves. They are shown to be extant within the Western Survey Area in historic aerial photographs dating to 1938, 1948 and 1967, and so are at least 75 years old. In the proposed alignment there are several areas that are either bare or have very small trees in one or more of the photographs, apparently indicating replacement of old trees. Also, by 1967 a small portion of the groves were either fallow or had been allowed to die. The following provides a summary for the groves and their potential for listing on the California Register of Historical Resources.

The citrus groves within the proposed alignment are representative of the development of the citrus industry in Riverside are eligible for inclusion in the California Register of Historical Resources CEQA Criterion 1: They are associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage, in this case the development of Riverside as a major agricultural producer in the late 1800s and 1900s, as discussed in the DEIR, Section 3.4.2, Environmental Setting and the Cultural Resources Report (Appendix E to the DEIR).The citrus industry was very important in the development of Riverside. The first orange trees were planted in 1871, and by 1882 a quarter of a million orange trees had been planted in the area. To supply water to the citrus groves, several canal

systems, such as the Gage and Riverside canals, were built. In 1895, the City was the wealthiest city per capita in the United States due to the citrus industry, which expanded rapidly due to the development of refrigerated railroad cars and innovative irrigation systems. Their eligibility for inclusion in the CRHR makes them significant historical resources under CEQA.

However, the groves are not eligible for listing under Criteria 2 through 4. The groves could not be associated with a specific person important to our past, and so are not eligible under Criterion 2. The groves do not embody the distinctive characteristics of a type, period, construction, and it does not represent the work of an important creative individual, possesses high artistic values, thus are not eligible under Criterion 3. The groves are not eligible under Criterion 4; they have not yielded, and are not likely to yield, information important in prehistory or history.

The groves are also eligible for City of Riverside Landmark designation under criterion A, as they exemplify a special element of the City's cultural, social, and economic history: in this case the development of an important citrus industry in Riverside. They are also eligible under criterion B in that they are identified with events significant to local history, in this case the rise of the citrus industry and associated economic development of Riverside.

However, the groves are not eligible under Criteria C through H for these reasons. The groves are not eligible under criterion C, as they do not embody distinctive characteristics of a style, type, period, or method of construction, and are not a valuable example of the use of indigenous material or craftsmanship. The groves are not eligible under criterion D as they do not represent the work of a notable builder, designer, architect, or important creative individual. The groves are not eligible under criterion E. Not being a built structure, they do not embody elements that possess high artistic values or represent significant structural or architectural achievement or innovation. The groves are eligible under criterion F, They do represent a significant geographical associated with a different era of settlement and growth, in this case the development and growth of the citrus industry in Riverside. The groves are not eligible under criterion G. They do not represent one of the few remaining examples in the City, region, state, or nation possessing distinguishing characteristics of an architectural or historical type or specimen. The groves are not eligible under Criterion H; they have not yielded, and are not likely to yield, information important in prehistory or history.

Given the eligibility for listing of the groves for their role in the citrus industry (California Register of Historical Resources CEQA Criterion 1 and City of Riverside Landmark designation under criterion A), it is recommended that any changes to the groves be avoided if feasible. In response to concern expressed by members of the public, City engineers reviewed the alignment for the Proposed "C" Street and determined that the proposed alignment can be adjusted in the area of the citrus groves (Proposed "C" Street – Design B). An alternate route in this area would avoid the citrus groves as discussed in Section 3.1 of the Errata to the Final EIR, which states: "City engineers reviewed the alignment for the Proposed "C" Street and determined that the proposed alignment could be adjusted in the area of the citrus groves."

A public concern was also raised about the potential for artifacts related to Chinese workers in the area of the Madison Avenue and Victoria Avenue. Again, available records and public archives including historical aerials were reviewed by the City and are on file at the City of

Riverside Community Development Department. In this area, a packing house and support buildings existed, including the Prenda Packing House. It was determined that the structures likely housed Chinese laborers given the presence of Chinese laborers in the late 1800s; however, no definitive references have been uncovered regarding Chinese labor for the Gage Canal near the project area. Both the Prenda site and the hill above Madison Avenue, except for the very lowest slope area, are outside the proposed alignment and therefore no artifacts related to Chinese workers are expected. If, however, they are inadvertently discovered during construction, implementation of MM-CUL-2 would reduce the impact to these finds.

#### REFERENCE:

Brandon, Pauline Mazzetti

1962 "The History of the Gage Canal Company of Riverside: A Story of the Development of Arid Land in California." Unpublished MS.

City of Riverside Community Development Department

2013 Citrus Groves, personal communication with Teri Delcamp, Historic Preservation Senior Planner, July 31, 2013.

Keller, Jean

1999 "A Phase I Cultural Resources Assessment of Tentative Parcel Map 29477: 20.5 Acres of Land in the City of Riverside, Riverside County, California, USGS Riverside West, California Quadrangle 7.5' Series." Unpublished MS,

Lawton, Harry W.

1987a "Selected Newspaper Accounts of Riverside's Chinese Settlers." In Wong Ho Leun: An American Chinatown, vol. 1. Edited by Great Basin Foundation. San Diego, CA: Great Basin Foundation, pp. 267-285.

1987b "A Selected Chronological History of Chinese Pioneers in Riverside and the Southern California Citrus Belt." In Wong Ho Leun: An American Chinatown, vol. 1. Edited by Great Basin Foundation. San Diego, CA: Great Basin Foundation, pp. 53-140.

Patterson, Tom.

1996 A Colony for Riverside: Second Edition 1996. Riverside, CA: the Museum Press of the Riverside Museum Associates.

Wormser, Paul.

1987 "Chinese Agricultural Labor in the Citrus Belt of inland Southern California." In Wong Ho Leun: An American Chinatown, vol. 1. Edited by Great Basin Foundation. San Diego, CA: Great Basin Foundation, pp. 173-191.

### **#13: Emergency Access and Response Times and Concerns about Crime and Safety**

Emergency service providers were contacted as part of the DEIR process. Section 3.11 – Transportation/Traffic of the DEIR includes a discussion about changes in response times based on the roadway connections under the scenarios. To summarize, the emergency service providers stated that with Overlook Parkway completed, first responders would have a shorter, more direct route. In addition, depending on location of the call, responders would be traveling on an arterial street which would also decrease response time (see DEIR pages 3.11-163 through 3.11-167).

Under Scenario 1, although both the police and fire departments have keys to unlock the gates on Crystal View Terrace and Green Orchard Place, this process has added a 30–60 seconds to their response times. In addition, unauthorized use, tampering with, or vandalizing of the gates has the potential to further impede the ability of police and fire personnel to efficiently unlock and proceed through the gates.

If the gates at these roads were to permanently remain in place, physical barriers would remain in place that could contribute to the higher response times for emergency responders. The DEIR concludes that because Scenario 1 would keep the gates closed, thus adding a physical barrier to emergency access, impacts would be considered significant and would require mitigation.

Under Scenario 2, the Police and Fire Department response times to the Project vicinity would not be adversely affected if there is no physical barrier in place. Because physical barriers such as the gates on Crystal View Terrace and Green Orchard Place increase response times for fire personnel by 30–60 seconds, permanent removal of the gates could improve response times. Impacts to emergency response times would be less than significant.

Under Scenario 3, the improved response times from removal of the gates would also occur. Additionally, If Overlook Parkway were connected easterly (between Alessandro Boulevard and Washington Street), one of the primary responders to the Project vicinity (Mission Grove Fire Station 9), located at 6674 Alessandro Boulevard, would be able to respond more quickly to emergencies near the eastern portion of the City. Similarly, on-duty police officers traveling to their areas of responsibility would also have a more efficient alternative route to use in responding to calls. Impacts would therefore be less than significant.

Implementation of Scenario 4 would improve the response times as it would increase road access to and within the Project vicinity. For the reasons discussed above under Scenario 3, impacts associated with Scenario 4 would be less than significant.

Several commenters expressed concern about increases in crime, gang activity, vandalism, and litter related to opening the gates or connecting planned roadways. Although not an environmental issue under CEQA, the Riverside Police Department reviewed crime statistics in the vicinity of Overlook Parkway in response to this concern. A four year comparison of Part I and Part II Crimes in the Overlook Parkway area revealed that overall crime was reduced with the gates opened. According to the Riverside Police Department, the ability for police to patrol the area more freely with the gates opened may be one reason for the reduced crime. Another reason for the reduced crime is the ability for the neighbors to move about more freely within the neighborhood.

The specific area reviewed and a summary report for reported crime for the calendar years 2009, 2010, 2011 and 2012 is provided as Figures R-2 and R-3 at the end of this section. In December 2010 the gates remained open on Green Orchard Place and Crystal View Terrace. Therefore, the summary shows any crime changes from the two years before and two years after this event. The information provided by the Police Department is classified crime only, which means a report had to be written and processed for these incidents to appear in this

summary. This information does not include all police calls for service or other police activity. According to the Riverside Police Department: “the City of Riverside (overall) saw a decrease in crime in 2011 and then an increase in 2012, just as this data for the requested area shows.” Therefore, based on these results and a review of the Project by the Riverside Police Department, it is expected that if Overlook Parkway is connected between Alessandro Boulevard and Washington Street that crime would be reduced much in the same way that it was reduced when the gates were opened on Crystal View Terrace and Green Orchard Place.

At some locations in the vicinity of the proposed project, there are projected increases in vehicular volumes. Where there are more vehicles, there is the potential for more conflicts between vehicles and other travel modes such as pedestrians, equestrians and bicyclists. There are also projected decreases in vehicular volumes that could reduce conflicts. Although comments were received that indicate roadway connections could increase safety risks to children, pedestrians, cyclists, equestrians, and other drivers, all improvements are proposed in accordance with existing design standards and would not introduce hazardous design elements, such as sharp curves, or increase safety hazards. Sight-lines along the roadway connections are not impeded, and the City traffic engineers did not identify problems with visibility in the area. Speed limits are planned in accordance with standard street design criteria, and no new significant impacts would occur. Any project-related improvements or mitigations would be designed to current standards. In addition, the City has the ability to add or widen sidewalks, crosswalks (at stop-controlled and signalized intersections), and bicycle lanes to accommodate the other travel modes in a safe manner and also responds to design elements and circulation conditions through the Neighborhood Traffic Management Program.

In regards to any potential increases in litter as a result of new roadways or planned connections, there is no evidence about the volume of littering and it is speculative to assume that instances of littering would increase. The Project is not proposing new uses that would introduce new sources of litter under any of the scenarios. Traffic volumes would be within the design capacity and acceptable level of service for Overlook Parkway. Because there would not be new sources of trash, it is expected that there would not be an increase over existing conditions. In addition, as noted above, the connection of roadways under Scenarios 3 and 4 provides access and facilitates more efficient response routes that could contribute to a reduced response time and an overall reduction in criminal activity.

#### REFERENCE:

Riverside Police Department

2013 2009-2012 Comparison, personal communication with Traci Dosé, Supervising Crime Analyst, June 20, 2013.

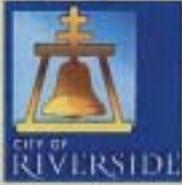
### **#14: Traffic Signal Design along Victoria Avenue**

Several commenters indicated that signaling Victoria Avenue would affect the historic character of the street. The DEIR, pages 3.4-10 and 3.4-15, discusses and acknowledges the historical importance of Victoria Avenue. The potential impacts at the intersection of Victoria

Avenue and Washington Street and at the intersection of Victoria Avenue and Madison Street are discussed in the DEIR pages 3.4-18 and -19. The improvements, including installation of traffic lights at all four corners, required for the implementation of Scenario 4 would constitute a substantial adverse change to the intersection of Victoria Avenue and Washington Street. Page 3.4-19 of the DEIR discusses off-site improvements, including those at the intersection of Victoria Avenue and Washington Street, and concludes that such impacts would be significant. The Traffic Impact Analysis prepared for the Project indicates that improvements such as signalizing intersections or adding turn lanes are needed at key intersections to accommodate flows. Accordingly, the DEIR states that mitigation measure CUL-1 would be imposed to help mitigate for those off-site improvements if implemented. CUL-1 includes sensitive design measures such as low profile signals or signals suspended on wires, low asphalt curbs, and salvaging plants to be impacted. However, that mitigation would not reduce the impact to below a level of significance. The DEIR acknowledges that the impacts to Victoria Avenue are significant and unavoidable (see DEIR page 3.4-21).

### **2.3.2 Responses to Comments**

Attachment C provides comment letters and responses. Letters received during the public review period are arranged by commenter type, with agency comments first, organization comments second, and individual comments third. Each comment letter is assigned an alphabetic letter and each comment is assigned a number. Letters are generally listed in alphabetical order, except where letters were received later. In some cases, similar or duplicate letters from the same author are grouped together.



City of Arts & Innovation

**PUBLIC WORKS DEPARTMENT**

**NEIGHBORHOOD TRAFFIC MANAGEMENT PROGRAM**  
**Public Works Department**  
**Traffic Engineering Section**

**Purpose:**

The City strives to improve the livability of neighborhoods by controlling the impacts of outside traffic influences on residential streets. Working in partnership with residents, the City aims to enhance safety in neighborhoods by determining and implementing the most appropriate traffic calming measures. This process involves a comprehensive evaluation of entire neighborhoods to assess the situation, determine the right solution and ensure traffic problems are not moved from one street onto another. Impacts to public safety are of the utmost concern and will serve as a primary factor in the application of traffic calming measures and traffic control devices.

**Process:**

Requests will be reviewed and evaluated to assess the situation and develop solutions to address the concern. To assist in this process, data will be collected to ensure the most appropriate measures and devices are utilized and to determine the resulting effectiveness.

Within thirty (30) days of receipt of a request, an analysis will be conducted. The most advantageous solution will be implemented from the *Initial Options* category.

Should further analysis show the solution is not effective in resolving neighborhood traffic concerns, an additional traffic calming tool from the *Initial* or *Secondary Options* may be considered. Factors such as road width, alignment, and configuration may prevent the use of *Secondary Solutions*. Additionally, some of the solutions within this category may require consensus by a majority of neighborhood residents.



**FIGURE R-1**  
Neighborhood Traffic Management Program

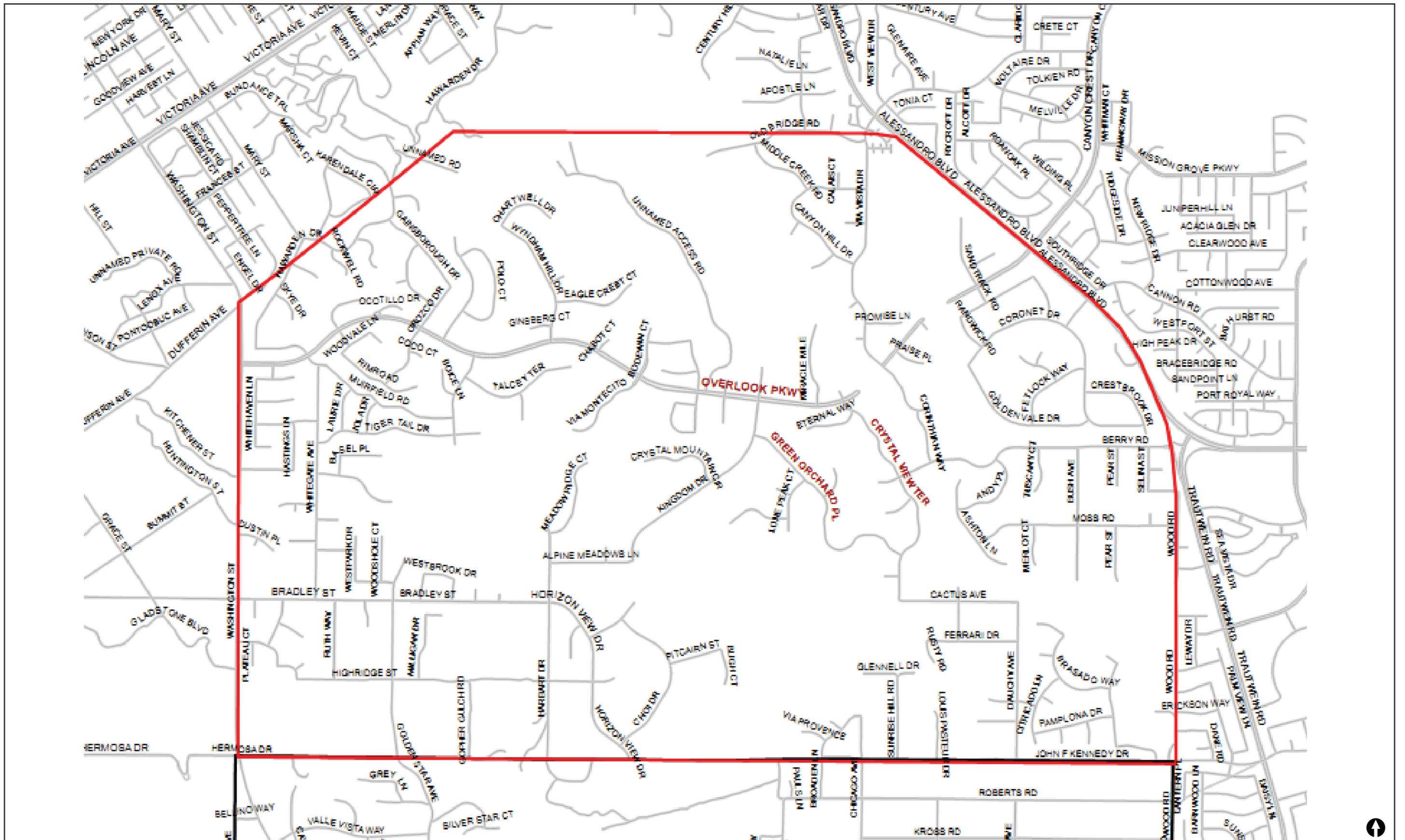


FIGURE R-2  
Overlook Vicinity

**REPORTED CRIME SUMMARY**  
**Overlook Vicinity** (see map for boundaries)  
**Grouped by Year: 2009 - 2012**

PART I CRIMES		UCR Code	2009	2010	2011	2012
CRIMINAL HOMICIDE		01				
FORCIBLE RAPE		02			1	2
ROBBERY		03	2			1
AGGRAVATED ASSAULT		04	1	3	1	2
BURGLARY		05	23	34	23	26
LARCENY-THEFT		06	69	54	29	43
MOTOR VEHICLE THEFT		07	13	7	4	4
ARSON		08				
<b>PART I CRIMES TOTAL</b>			<b>108</b>	<b>98</b>	<b>58</b>	<b>78</b>
PART II CRIMES		UCR Code	2009	2010	2011	2012
OTHER ASSAULTS (Simple Assaults; Assault & Battery)		09	16	18	4	8
FORGERY/COUNTERFEITING		10	3	6	1	8
FRAUD		11	7	11	7	6
EMBEZZLEMENT		12			1	
STOLEN PROPERTY (Possession/Buy/Receiving)		13			1	
VANDALISM		14	11	17	16	12
WEAPONS (Carrying/Possessing)		15	1	2	1	1
PROSTITUTION AND COMMERCIALIZED VICE		16				
SEX OFFENSES (Indecent Exposure; etc.)		17	1			1
DRUG ABUSE VIOLATIONS		18	1	5	5	3
GAMBLING		19				
OFFENSES AGAINST THE FAMILY/CHILDREN		20	5	6	6	3
DRIVING UNDER THE INFLUENCE		21	5	10	12	10
LIQUOR LAWS		22	1			
DRUNKENNESS		23	1			
DISORDERLY CONDUCT		24	6	9	1	1
VAGRANCY		25				
ALL OTHER OFFENSES (Trespass/Municipal Code Violation/etc.)		26	3	11	10	8
SUSPICION		27				3
CURFEW/LOITERING LAWS		28				
RUNAWAYS (Persons under 18)		29	44	5	1	
<b>PART II CRIMES TOTAL</b>			<b>105</b>	<b>100</b>	<b>66</b>	<b>64</b>
"OTHER" CRIME ACTIVITY		UCR Code	2009	2010	2011	2012
MISC. CLASSIFIED CFS: Ex: Found Property, GTA Recovery, Missing Person, Misc Inc.		00	99	81	40	74
MOTOR VEHICLE CODES		99	1	2	14	26
<b>"OTHER" CRIME TOTAL</b>			<b>100</b>	<b>83</b>	<b>54</b>	<b>100</b>
REPORTED CRIME SUMMARIZATION			2009	2010	2011	2012
<b>TOTAL PART I CRIMES</b>			<b>108</b>	<b>98</b>	<b>58</b>	<b>78</b>
<b>TOTAL PART II CRIMES</b>			<b>105</b>	<b>100</b>	<b>66</b>	<b>64</b>
<b>TOTAL "OTHER" CRIME</b>			<b>100</b>	<b>83</b>	<b>54</b>	<b>100</b>
<b>GRAND TOTAL OF REPORTED CRIME</b>			<b>313</b>	<b>281</b>	<b>178</b>	<b>242</b>

Source database is being continuously updated. Data represents what is available at date/time of publication  
Page 1 of 1

RPD/CAU/CL; 06/20/2013  
DataSource: Arcmap

Spec Req  
Planning: D. Jenkins

FIGURE R-3  
Reported Crime Summary 2009-2013

## 3.0 Errata to DEIR

This FEIR contains corrections, errata, and additions to the information contained in the DEIR. These changes do not constitute “significant new information” pursuant to State CEQA Guidelines Section 15088.5 because they do not change the Project impacts and/or mitigation measures such that new or more severe environmental impacts result from the Project. Such items are sometimes added as a result of comments received from responsible agencies or other commenters, changes in the existing conditions at the site, revised public policies since the DEIR was written, and/or minor corrections or clarifications. The additional information merely “clarifies or amplifies or makes insignificant modifications” in the already adequate DEIR, as is permitted by State CEQA Guidelines Section 15088.5(b). In one case, impacts have been reduced in response to public concern. As provided in State CEQA Guidelines Section 15088(c), responses to comments may take the form of a revision to a DEIR or may be a separate section in the FEIR. This section complies with the latter and provides changes to the DEIR in revision-mode text, i.e., deletions are shown with strikethrough text (~~example text~~) and additions are shown with underline text (example 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 DEIR as required by State CEQA Guidelines Section 15132. None of the corrections and additions constitute significant new information or substantial Project changes requiring recirculation, as defined by State CEQA Guidelines Section 15088.5. The following summary will present the location and types of additions and changes or corrections made within each section of the FEIR since the DEIR was published which the City, as lead agency, has considered.

### 3.1 Clarification and Revisions as a Result of Comments Regarding the Proposed “C” Street Under Scenario 4

As a result of comments received concerning the Proposed “C” Street, additional analysis has been prepared for an alternate alignment called Proposed “C” Street – Design B edits and additions are presented for specific issues and project components as described below for the new design. No new significant environmental effects have been identified for the Project, and the severity of environmental impacts would not be increased. Revisions are intended to provide additional clarification and more stringent measures to avoid and reduce impacts, and do not constitute significant changes to the project or environmental setting.

Public comments were received during the public review period expressing concern about the alignment of Proposed “C” Street in relation to the City’s citrus groves, specifically an orange grove at the corner of Washington Street and Victoria Avenue. In response to the concern expressed by members of the public, City engineers reviewed an alternate alignment (Proposed “C” Street – Design B) for the Proposed “C” Street and determined that the proposed alignment can be adjusted in the area of the citrus groves. Adjusting the route in this select area would avoid the citrus groves. As discussed in Master Response #12, the groves in question are a portion of the old Arlington Heights citrus groves shown extant with the Western Survey Area in historic aerial photographs. In response to this concern, City

engineers reviewed the alignment for the Proposed “C” Street and determined that the proposed alignment could be adjusted in the area of the citrus groves.

As shown in Figure R-4, the Proposed “C” Street – Design B has been modified along an approximately 300-foot segment such that would no longer cut through a portion of the citrus groves, and would instead pass to the south. As re-designed, the new “C” Street would have an 88-foot right of way instead of 100-feet. The proposed improvements would include two 12-foot travel lanes as well as an 8-foot shoulder in each direction, for a total of 64 feet of paving at ultimate build-out within the 88-foot ROW. The retaining wall required for construction of the new alignment would be 16 feet in height at the highest point and approximately 550 feet in length. Similar to the proposed Project, the proposed improvements for the modified alignment would not change the City’s standards related to design and safety standards, and would also not affect implementation of the Neighborhood Traffic Management Program. The modification of the alignment of Proposed “C” Street – Design B and corresponding environmental issues are discussed below.

The Project Description was also modified relative to roadway design and transportation-related items for Proposed “C” Street – Design B. A description of the City’s Neighborhood Traffic Management Program was added. Although the project would not change or affect implementation of this program, information was added in order to address comments on specific operational concerns and traffic calming improvements. Certain improvements would be considered and implemented on a case by case basis and are not a part of the proposed Project. The second addresses the City’s “Interim Street Improvement Policy.” As discussed above, the design of Proposed “C” Street – Design B has been revised to minimize the area of pavement, ROW, and other features similar to the design of other roadways in the Greenbelt. The third provides for additional flexibility in implementing low-impact design in and near Victoria Avenue and where possible, to maintain existing conditions and where changes are proposed, to use treatments and materials similar to those in place. The final modification clarifies that the timing and phasing of roadway construction would be included in contract documents for construction contractors.



- Proposed "C" Street – Design B
- Proposed "C" Street – Design A
- Proposed "C" Street
- Roadways
- ROW
- Vacated Roads



FIGURE R-4

Proposed "C" Street – Design B

The following proposed changes to the DEIR are only needed should the City Council choose Scenario 4 and Proposed “C” Street – Design B.

### **Entire DEIR**

Throughout the entire DEIR references to the proposed “C” Street are in regard to Proposed “C” Street – Design A where the analysis provided here refers to Proposed “C” Street – Design B.

### **Project Description**

- Section 2.1 “Project Overview,” page 2-2 — The following sentence would be added to the description of Scenario 4: The proposed alignment would include four lanes of travel, within an 88-foot right-of-way.
- Section 2.6 “Proposed Project,” page 2-18 — In some cases, new or widened roadways divert traffic from Local Streets to Arterial Streets that are designed for a high capacity of vehicles during peak operating hours. Therefore, even though none of the scenarios associated with the Project would generate trips in the sense that typical residential/commercial projects do, they do have the potential to redistribute and attract trips. Although the proposed Project involves the redistribution of traffic, the proposed scenarios would also not affect implementation of the City’s Neighborhood Traffic Management Program. The City, through the Department of Public Works, has an active Neighborhood Traffic Management Program to minimize and/or prevent intrusion of local cut-through traffic into residential neighborhoods, through traffic management and traffic calming strategies; and to improve the livability of neighborhoods through controlling the impacts of outside traffic. Public safety is the utmost concern and serves as a primary factor in the application of traffic calming measures and traffic control devices.
- Section 2.6.4 Scenario 4 “Overview,” page 2-36 – The design and location of this scenario is intended to redirect some vehicles trips from Washington Street and Dufferin Avenue to a new roadway. In addition, the revised Proposed “C” Street – Design B has been designed to reflect the City’s 1980 “Interim Street Improvement Policy.” This policy is primarily applied to private development for areas zoned RA-Residential Agricultural, but is being considered in the revised design for Proposed “C” Street – Design B. Consistent with this policy, the roadway would be 24 feet of paving plus an eight-foot graded shoulder with street trees and street lights at intersections that would be of a similar type, spacing, and design as those in the Greenbelt. Minimizing the area of pavement, right-of-way, and installing features similar in design to other roadways within the Greenbelt is proposed in order to maintain the character of roadways in the Greenbelt.
- Section 2.6.4, Scenario 4 “Project Components,” page 2-36 - The ultimate design for Proposed “C” Street – Design B includes four 12-foot lanes of travel, and therefore, would necessitate the following improvements to the existing intersection: the existing four-way stop controlled intersection would be signalized, and crosswalks would be

added on the western segment of Victoria Avenue. The existing median would be extended to allow for a trail that would be placed within the median as a crosswalk. ~~The trail would be constructed of color-matched concrete, paver stones, or flat rocks embedded in concrete mortar.~~ The final design of all improvements would comply with American with Disability Act standards. No curbs or turn pockets are proposed.

- Section 2.6.4, Scenario 4 “Project Components,” page 2-41 - ~~Landscaping in the median of the Proposed C Street would be done with drought-tolerant native plant or tree species. A water-efficient irrigation system would be installed within the median of the Proposed C Street.~~ The City would vacate the existing right-of-way in select sections where cul-de-sacs and other improvements are proposed. Vacating the right-of-way involves removing pavement and all traffic devices within developed, paved areas.
- Section 2.6.4, Scenario 4 “Project Components,” page 2-41 - Due to the reduced ROW, ~~the~~ total area of permanent and temporary impacts for the Proposed “C” Street – Design B is 13.21~~19.54~~ acres (Western PIA).
- Section 2.6.4, Scenario 4 “Construction Schedule and Equipment,” page 2-45 – The process to remove the gates would be conducted as part of routine City maintenance procedures. The gates would be removed upon completion of Overlook Parkway. Construction of Proposed “C” Street – Design B west of Washington Street would not be permitted to occur until the fill crossing and bridge construction is complete. The timing and phasing of roadway improvements, and the requirement for the fill crossing and bridge construction to be completed prior to Proposed “C” Street – Design B implementation, would be included as a requirement in the contract documents for the construction contractors.

## **Air Quality**

Based on the clarification to the construction schedule, corresponding edits were made to the Air Quality section as follows:

Section 3.2.5.1(a) Scenario 3, page 3.2-21 – “Construction activities would also occur west of Washington Street. This construction ~~is not anticipated~~ would not be permitted to occur at the same time as the fill crossing and bridge construction.”

## **Environmental Analysis**

Below is a brief summary of any revised impacts that would occur due to the realignment of the Proposed “C” Street – Design B and reduced roadway width and components. As detailed, impacts would be similar to those for the Proposed “C” Street – Design A.

## ***Agricultural Resources***

### *Issues 1 and 3: Farmland Conversion*

The revised alignment would impact approximately the same total amount of Farmland Mapping and Monitoring Program (FMMP) Important Farmland. However, as shown in the

table below, the revised alignment would not impact any Prime Farmland and no mitigation would be required; thus, direct impacts to agricultural resources would be **reduced** compared to the original alignment.

<b>REVISIONS TO TABLE 3.1-2 IMPACTS TO FMMP DESIGNATED FARMLAND &amp; FARMLAND OF LOCAL IMPORTANCE UNDER SCENARIO 4</b>		
<b>FMMP Category</b>	<b>Original Alignment (acre)</b>	<b>Revised Alignment (acre)</b>
Prime	1.72	0
Statewide Importance	0	0
Unique	2.11	4.14
Local Importance	7.90	6.60
Other	0	0.33
Urban and Built Up Land	0	0.60
<b>Total</b>	<b>11.73</b>	<b>11.67</b>

With respect to indirect (secondary) impacts, as analyzed in the DEIR, the Proposed “C” Street – Design B would not add trips but would redistribute traffic (and its associated secondary impacts) that already occur on the existing roadways in this area. The revised alignment avoids the citrus groves as discussed above relative to direct impacts; but the revised alignment would not introduce new sensitive uses or preclude or conflict with the agricultural operations in this area. Nor would the existing agricultural operations cause public safety impacts for future motorists/cyclists/pedestrians that use the Proposed “C” Street – Design B. Overall, indirect (secondary) impacts associated with the revised alignment would be **similar** to those previously analyzed.

*Issue 2: Conflict with Zoning or Williamson Act Contract*

Implementation of Proposed “C” Street – Design B would not indirectly result in the rezoning of any land within the Project vicinity. With respect to Williamson Act Contract lands, there are four parcels under Williamson Act Contract within the Project vicinity. The Proposed “C” Street – Design B would be located north and northeast of the parcels under contract. None of the existing contracts would be affected with the implementation of this design, either directly due to roadway alignment, or indirectly due to an increase in traffic that has been estimated for those roadways adjacent to the contracted parcels. Overall, impacts associated with the revised alignment would be **similar** to those previously analyzed.

**Air Quality**

*Issue 1: Air Quality Plan Implementation*

Similar to the Proposed “C” Street – Design A, the Design B would not alter land use designations or affect SCAG growth assumptions. Therefore, Scenario 4 would not interfere with the 2007 AQMP, and no impact would result. Therefore, impacts associated with the revised alignment would be **similar** to those previously analyzed.

*Issues 2 and 3: Air Quality Violations/Pollutant Emissions*

## Construction Emissions

The revised alignment for the Proposed “C” Street – Design B would reduce the roadway width but would involve construction of a retaining wall along a limited segment; different grading quantities and would alter the construction emissions that were previously analyzed. Emissions were remodeled using the updated CalEEMod computer program (Version 2013.2.1) which contains updated construction equipment emissions factors. (As a note: emissions for the revised alignment were calculated with the updated version of CalEEMod; therefore, emissions for other scenarios were also recalculated for consistency, and it was determined that emissions would be the same or lower than those previously analyzed.) It is anticipated that these construction activities would last up to three months and would require the grading of a maximum of 13.21 acres for the Proposed “C” Street – Design B. The table below summarizes the phases of construction, the equipment required for each task, and the default horsepower and load factor for each piece of equipment. It was assumed that each piece of equipment would operate eight hours per day and for five days per week.

<b>REVISIONS TO TABLE 3.2-6 CONSTRUCTION EQUIPMENT PARAMETERS FOR THE PROPOSED C STREET – DESIGN B</b>			
Phase and Length (days)	Equipment	Horsepower	Load Factor
Grading (60)	2 Excavators	162	0.38
	1 Grader	174	0.41
	1 Rubber Tired Dozer	255	0.40
	2 Scrapers	361	0.48
	2 Tractors/Loaders/Backhoes	97	0.37
Paving (30)	1 Paver	125	0.42
	1 Paving Equipment	130	0.36
	1 Roller	80	0.38

It was also assumed that hauling would be required to remove the existing asphalt from the vacated roads. Assuming a worst-case maximum of 1.54 acres of pavement, a pavement thickness of 6 inches, and a truck capacity of 15 cubic yards, it was calculated that a total of 83 hauling trips would be required. These trips were distributed over one work week period. Below is a summary of worst-case construction emissions for the revised alignment, including total projected construction maximum daily emission levels for each criteria pollutant.

**REVISIONS TO TABLE 3.2-7  
SUMMARY OF WORST-CASE CONSTRUCTION EMISSIONS  
FOR THE PROPOSED C STREET  
(pounds/day)**

Pollutant	Year 2013 (pounds/day)	SCAQMD Significance Threshold (pounds/day)
ROG	7.32	75
NO <sub>x</sub>	80.93	100
CO	53.05	550
SO <sub>x</sub> <sup>1</sup>	0.06	150
PM <sub>10</sub> Dust	8.90	--
PM <sub>10</sub> Exhaust	3.88	--
PM <sub>10</sub>	12.78	150
PM <sub>2.5</sub> Dust	3.66	--
PM <sub>2.5</sub> Exhaust	3.57	--
PM <sub>2.5</sub>	7.23	55

<sup>1</sup>Emissions calculated by CalEEMod are for SO<sub>2</sub>.

The level of maximum daily construction emissions is projected to be less than the applicable thresholds for all criteria pollutants. Direct construction air emission impacts for the revised alignment (under Scenario 4) would be less than significant and **similar** to those of the original alignment.

#### Operational Emissions

The operational emissions associated with Proposed “C” Street – Design A at buildout were less than the SCAQMD significance thresholds and were determined to be less than significant. The operational emissions associated with revised alignment for the Proposed “C” Street – Design B would be similar as it would carry the same amount of vehicles, which are the only source of operational emissions. Therefore, impacts would be less than significant and **similar** to those of the original alignment.

#### *Issue 4: Sensitive Receptors*

The modified alignment could potentially move emission sources closer to some existing receptors and further from others (temporary construction equipment and vehicles using the roadway would be located closer to residences near Greylock Avenue and Lenox Avenue but further from residences on Washington Street). The localized air pollutants of concern during construction are PM<sub>10</sub> and PM<sub>2.5</sub>. The project is required to implement dust control measures in compliance with SCAQMD’s Rule 403, such as pre-applying water to depth of proposed cuts, re-applying water as necessary to maintain soils in a damp condition and to ensure that visible emissions do not exceed 100 feet in any direction, and stabilizing the site after grading with chemical stabilizers or planting. Thus, PM<sub>10</sub> and PM<sub>2.5</sub> from construction activities would be controlled on-site and would not result in off-site impacts.

The primary pollutant of localized concern is carbon monoxide (CO) from vehicle operation. Based on guidance from Caltrans and the SCAQMD, localized “hotspots,” or pockets, where the CO concentration may exceed the national or state AAQS, have been found to occur only at signalized intersections that operate at or below level of service (LOS) E. Local CO

emissions near roadway intersections are a direct function of meteorology, traffic volume, speed, and delay.

The realignment of Proposed “C” Street – Design B under Scenario 4 would occur between the Overlook Parkway and Washington Street or the Proposed “C” Street – Design B and Victoria Avenue intersections. However, the realignment of the roadway would not create additional traffic, change the level of service of the intersections, or change the location of the intersections. As the realignment of Proposed “C” Street – Design B would alter these conditions, the potential CO impacts would be the same as described in the DEIR.

As the location of the roadway would have a minor effect on regional pollution, and the project would not result in any change in localized air quality impacts, impacts would be less than significant and **similar** to those of the original alignment.

#### *Issue 5: Odors*

Operation of Proposed “C” Street – Design B would not generate objectionable odors, similar to Proposed “C” Street – Design A. Odors generated from vehicles and/or equipment exhaust during construction would be temporary and localized at the construction site and would not create a significant level of objectionable odors. As detailed above, the modified alignment would be slightly closer to residences near Greylock Avenue and Lenox Avenue but further from residences on Washington Street. However, potential odor impacts to Proposed “C” Street – Design B would be less than significant and **similar** to those of the original alignment.

### **Biological Resources**

#### *Issue 1: Special Status Species*

The revised alignment would not impact any sensitive vegetation communities or special status plant species, similar to the original alignment. Total areas that would be disturbed with the revised alignment would be generally reduced due to the reduced ROW. Impacts associated with the Proposed “C” Street – Design B would be similar to the original design, although there would be no impacts to orchard and slightly reduced impacts to non-native grassland. As noted in the DEIR, under the guidelines of the MSHCP, impacts to non-native grassland, disturbed land, active agricultural land, ornamental vegetation, and developed land in the Western Survey Area would be less than significant and would not require mitigation.

Impacts to Lincoln’s sparrow, raptors, and migratory birds during construction of the Proposed “C” Street – Design B would be the **same** as for the previous alignment (significant). However, as with the original alignment, the revised alignment would implement mitigation measure **S4-BIO-1** which would reduce impacts to **less than significant**.

#### *Issue 2: Riparian/Wetland Communities*

The original alignment resulted in a no-net loss of the functions and values the Gage Canal, an ACOE non-wetland water and a CDFW/RWQCB streambed, and no impacts would result. While the revised alignment is southerly compared to the previous alignment (south of the orchards); within the area of the Gage Canal, the alignment is the same as previously

discussed. As the alignment is the same, impacts would also be the **same**, assuming the culvert and daylighting would still be features of Scenario 4. **No significant impact** would result and no mitigation would be required.

### *Issue 3: Wildlife Corridors*

The alignment for both the original and revised alignments of the Proposed “C” Street are within an urban setting with agricultural and residential uses and are not located within an identified wildlife corridor or linkage area (i.e., not in the Criteria Area) for the Western Riverside County MSHCP. Impacts were found to be **less than significant** for the original alignment and this would be the **same** for the revised alignment as well.

### *Issue 4: Local Policies and Ordinances & Issue 5: Conservation Plans*

The alignment for the revised Proposed “C” Street – Design B does not change the analysis for Local Policies and Ordinances which will remain **less than significant**. Nor will the revised alignment change the analysis for Conservation Plans which will also remain **less than significant**.

## **Cultural/Paleontological Resources**

### *Issue 1: Historical Resources*

The original alignment would alter the existing intersection with Victoria Avenue, which would result in changes to Victoria Avenue that would be significant and require the implementation of **S4-CUL-1**. The revised alignment would also consist of slight modifications to the intersection with Victoria Avenue. Under the original and revised alignment, the intersection would nonetheless be impacted, causing significant impacts. However, the significance of the impact would be the **same** as previously and the same mitigation measure (**S4-CUL-1**) would apply. Impacts **would remain significant and unavoidable**.

### *Issue 2: Archaeological Resources*

There is a house foundation located in close proximity to both the revised and original alignments for the Proposed “C” Street. Thus, there is a possibility of subsurface prehistoric or historic deposits to be present that could be uncovered during construction activities. This potentially **significant impact** would be the **same** for both the original and revised alignments and would be mitigated similarly, through the implementation of **S4-CUL-2**.

Additionally, a portion of the alignment for the Proposed “C” Street could not be accessed during the cultural resources survey. As discussed in Section 4.2 of the Cultural Resources Report (Appendix E of the DEIR), permission to access five of the parcels which cross the Proposed “C” Street could not be obtained prior to the survey. Therefore, the presence or absence of cultural resources on parcels 237-100-002, 237-100-006, 237-100-007, 237-100-008, and 237-11-009 could not be determined, and impacts to unknown archaeological resources are **potentially significant**. This would remain the case for the revised alignment; thus, impacts would be **similar** and would be mitigated similarly (mitigation measure **S4-CUL-3**).

### *Issue 3: Paleontological Resources*

Both the original and revised alignments for the Proposed “C” Street would be located in an area with high paleontological sensitivity. Ground-disturbing activities in fossil-bearing soils and rock formations for either of the alignments have the potential to damage or destroy paleontological resources that may be present below the ground surface. Consequently, damage or destruction to these resources would be **similar** as previously discussed and could result in **significant impacts** requiring the implementation of mitigation measure (**S4-CUL-4**).

### *Issue 4: Religious/Sacred Uses and Human Remains*

The alignment for the revised Proposed “C” Street – Design B does not change the analysis for Religious/Sacred Uses and Human Remains and the impacts remain **less than significant**.

## ***Drainage/Hydrology/Water Quality***

### *Issue 1: Water Quality Standards/Runoff*

As detailed in Section 3.5.1 – Regulatory Setting, the project would be obtaining a Construction General Permit through the State Water Resources Control Board (SWRCB) for the construction of the Proposed “C” Street – Design B, and subsequently implementing a project-level Storm Water Pollution Prevention Plan (SWPPP) and Construction Site Monitoring Program (CSMP); thereby ensuring that construction-related water quality impacts would be **less than significant**. The revised alignment would be subject to the same requirements; therefore, impacts would be the **same** as those of the original alignment and would similarly be reduced to **less than significant**.

### *Issue 2: Groundwater*

The original alignment was found to have less than significant impacts with respect to groundwater because no potable water would be required to construct or operate Proposed “C” Street. Groundwater is not expected to be encountered during grading operations, and where required Low Impact Development (LID) principles would be implemented. The new impervious surfaces added by the original alignment of C Street would require the extension of storm drain facilities from existing lines near the intersection of Madison and Victoria Avenues. The revised alignment would be **similar** to the original alignment in that it would also add new impervious surface for the roadbed. Although the Proposed “C” Street – Design B would be in a location a few hundred feet from the original alignment and a reduced overall ROW, the Project is introducing new impervious surface for the roadbed and would implement similar design measures to reduce impacts to groundwater to **less than significant**.

### *Issue 3: Drainage Patterns*

Construction of the original alignment of Proposed “C” Street would not cause an increase in flows during storm events, and in turn would not cause substantial erosion or flooding either on- or off-site. Compliance with water quality regulations (i.e., implementation of a SWPPP, CSMP, and operational Best Management Practices [BMPs]) would ensure that erosion does not occur either on- or off-site. The revised alignment of Proposed “C” Street – Design B would

retain the same characteristics, but is simply shifted a few hundred feet southwesterly, In addition, the paving width would be reduced overall, which would provide additional undeveloped areas for drainage. Compliance with the same water quality regulations as for the original alignment would be required. Impacts would be **similar** to the original alignment and would be **less than significant** based on regulatory compliance.

### ***Energy Use and Conservation***

#### *Issue 1: Electric Power & Issue 2: Fuel*

As with the previous alignment, utility line improvements would be installed during construction of the Proposed “C” Street – Design B consistent with the Riverside Public Utilities Board-adopted Electric System Master Plan. Impacts would be **similar** to the original alignment. Because the construction of the revised alignment would still consume approximately the same amount of fuel as the original alignment (moved to a slightly southerly location); the revised alignment would have similar impacts with respect to energy use compared to the original alignment. For both alignments, electric power and fuel consumption would be **less than significant** for the same reasons detailed in Section 3.6 – Energy Use and Conservation of the DEIR.

### ***Geology and Soils***

#### *Issue 1: Seismic Hazards*

As described in Section 3.7 – Geology and Soils of the DEIR, most southern California roadways (including the Proposed “C” Street) have the potential to be affected by strong ground shaking and associated seismic hazards as a result of their proximity to nearby active fault zones. For both the original alignment and the revised alignment, the final construction plans would be required to meet specifications of the California Department of Transportation (Caltrans), specifically the Highway Design Manual (HDM), Bridge Design Specifications, and Seismic Design Criteria, and additional standard roadway design features used by the City. Therefore, impacts would be **similar**, and compliance with existing regulations would ensure that potential impacts of the revised alignment which are associated with seismic hazards would be **less than significant**.

#### *Issue 2: Soil Erosion*

As with the original alignment, construction of the revised alignment of Proposed “C” Street – Design B would require that the City and/or contractor prepare a SWPPP that would detail the erosion and sediment control BMPs to be utilized on the construction site. Therefore, impacts would be **similar** and the revised alignment of Proposed “C” Street – Design B would not result in substantial soil erosion or the loss of topsoil; therefore, impacts are **less than significant**.

#### *Issue 3: Geologic Stability and Expansive Soils*

For the original alignment there were no expansive soils found within the Western Survey Area. Impacts of the revised alignment would be **similar** to the original alignment; the revised

alignment does not shift westerly enough to be in area where there are high shrink-swell soil types. No mitigation would be required and impacts are **less than significant**.

## **Greenhouse Gases**

### *Issue 1: GHG Emissions*

As discussed in Section 3.8 – Greenhouse Gases of the DEIR, buildout vehicle miles traveled (VMT) when combined with construction GHG emissions, would be **less than significant** for Scenario 4 (which includes Proposed “C” Street) and no mitigation would be necessary. The revised alignment slightly alters the location of Proposed “C” Street but would not affect VMTs. With regard to construction emissions, the revised alignment would have reduced impacts due to the reduced ROW width. Therefore, the revised alignment would have **similar or reduced (but less than significant)** impacts when compared to the original alignment and no mitigation would be necessary.

### *Issue 2: Applicable Plans, Policies, and Regulations*

The revised alignment for Proposed “C” Street – Design B remains consistent with the goals and strategies of state plans, policies, and regulations aimed at reducing GHG emissions. Therefore, impacts remain **less than significant** under the revised alignment.

## **Land Use and Aesthetics**

### *Issue 1: Physically Divides an Established Community*

Neither the original alignment, nor the revised alignment of Proposed “C” Street – Design B would divide an established community, conflict with any provisions of the Western Riverside County MSHCP, result in an adverse effect to the scenic integrity of Victoria Avenue, or create a new source of substantial light or glare. Impacts would be **similar** to the original alignment (**less than significant**) and no mitigation would be required.

### *Issue 2: Plans, Policy, or Regulations*

Scenario 4 is not consistent with Policy CCM-2.3 of the General Plan 2025 related to traffic flow, specifically maintaining a LOS D or better on certain arterial roadways and would also result in unacceptable LOS operations along Victoria Avenue, which conflicts with Policy CCM-4.3. With implementation of mitigation measures as defined in Section 3.11 – Transportation/Traffic, traffic along certain arterial roadways would continue at unacceptable levels of service (e.g., LOS E or F), and would result in **significant and unavoidable impacts** to land use. This condition is unrelated to the alignment of Proposed “C” Street – Design B and would not be affected by shifting the alignment of the Proposed “C” Street slightly to the southwest; however, impacts associated with the revised alignment and within the overall context of Scenario 4 would remain **significant and unavoidable similar** to the original alignment.

### *Issue 3: Habitat Conservation Plan*

The revised alignment for Proposed “C” Street – Design B would not conflict with any approved conservation plan and impacts would be **less than significant**.

### *Issue 4: Scenic Resources and Vistas*

Under the revised alignment of Proposed “C” Street – Design B the same improvements as proposed under Scenario 3 to Overlook Parkway would occur. The construction of the bridge over Alessandro Arroyo would provide a new viewpoint and would be completed in such a manner that impacts would be **less than significant**.

In addition, the implementation of mitigation measure MM-CUL-1 would minimize the changes to scenic elements of Victoria Avenue and would not significantly alter existing views, so impacts would be **less than significant**.

### *Issue 5: Visual Character/Light and Glare*

The revised Proposed “C” Street – Design B would not create a new source of substantial light or glare, and impacts would be **less than significant**.

## **Noise**

### *Issue 1: Noise Exposure*

According to Section 3.10.4.2 – Significance of Impacts of the DEIR (page 3.10-45), under Scenario 4, noise levels would exceed 65 CNEL causing a significant impact (**S4-NOS-1**) on sensitive receivers along Madison Avenue between Washington Street and Railroad Avenue and Washington Street between Overlook Parkway and Engel Drive. The noise contours shift slightly along a limited segment to the southwest with the revised alignment (see Figure R-4 -- Proposed “C” Street – Design B); however, based on a review of the revised contours noise levels would not exceed 65 CNEL on sensitive receivers southwest of the alignment. In its original alignment, the portion of the Proposed “C” Street between Dufferin Avenue and Victoria Avenue would be adjacent to agricultural land and would not exceed the City of Riverside agricultural compatibility noise level limits and noise impacts would be **less than significant**. Additionally, the revised alignment would not affect or change noise levels at residences adjacent to Crystal View Terrace and Green Orchard Place which would be **less than significant**. Therefore, impacts of the revised alignment would be **similar** to the previous alignment and would be **less than significant**.

### *Issue 2: Permanent Ambient Noise Increase*

Similar to Proposed “C” Street – Design A, the modified alignment would not create any new permanent stationary sources that would increase the ambient noise environment. However, a permanent increase in ambient noise levels would result from the change in traffic patterns on roadways in the Project vicinity. These traffic noise impacts are discussed above under Issue 1. Therefore, impacts of the revised alignment would be **similar** to the previous alignment.

### *Issue 3: Temporary Ambient Noise Increase*

As with the previous alignment, because construction activities undertaken for the revised alignment would be limited to the daytime hours, would not exceed 75 dB(A)  $L_{eq}$ , and would not occur at nighttime, on Sundays, or on federal holidays, construction noise impacts would be **similar** and **less than significant**.

## ***Transportation/Traffic***

### *Issue 1: Circulation Systems*

Revising a segment of the alignment of the Proposed “C” Street slightly to the south would not increase or decrease VMTs; thus, Scenario 4 in its entirety has significant and unavoidable impacts, but the revised alignment would not alter this circumstance. Impacts would be similar and remain significant for the same nine intersections as for the previous alignment. Correspondingly, the revised alignment would also have **unavoidable impacts at three of those nine intersections**, similar to the original alignment.

### *Issue 2: Conflict with Congestion Management Programs*

As discussed under Circulation Systems above, revising the alignment of the Proposed “C” Street – Design B would not increase or decrease VMTs. Scenario 4 in its entirety would have a **significant and unavoidable impact** on one Congestion Management Plan (CMP) intersection in 2035, one CMP roadway link in 2011, and two CMP roadway links in 2035 and impacts would be **similar** when analyzing the revised alignment of C Street within the context of Scenario 4.

### *Issue 3: Emergency Access*

Scenario 4 would remove physical barriers, such as the gates at Crystal View Terrace and Green Orchard Place, and connect additional arterial streets. These improvements could provide a benefit to response times and thus emergency access. Impacts are concluded in Section 3.11—Transportation/Traffic of the DEIR as being less than significant. The revised alignment slightly changes a segment of Proposed “C” Street, but impacts would be **similar** to those of the original alignment and remain **less than significant**.

### *Issue 4: Traffic Hazards*

The revised alignment of the Proposed “C” Street has been designed to conform to all federal, state, and local roadway design guidelines and includes a gradual curve with a centerline radius that conforms to the specifications of the Public Works Department. As with the original alignment, the revised alignment would have standard roadway signage that indicates the proper speed limit when approaching this curve and would also include signage indicating the possibility of encountering tractors, other farm equipment, or equestrians. Lastly, the revised alignment would require intersection improvements at Victoria Avenue and Madison Street which would be the same as for the original alignment. The intersection would be signalized and an ADA compliant crosswalk would be installed across Victoria Avenue on the western

side of the intersection. Impacts for original alignment were found to be **less than significant** with no mitigation required and the revised alignment would have **similar** impacts.

#### *Issue 5: Conflict with Alternate Transportation Policies*

As discussed in Section 3.11.8 – Issue 5: Conflict with Alternate Transportation Policies of the DEIR, the original alignment would not conflict with bus transit, pedestrian, or bicycle plans, strategies, or existing trails. Impacts were found to be **less than significant** and no mitigation would be required. The revised alignment would not alter the route or function of the Proposed “C” Street or create additional conflicts with transit, bicycle, or pedestrians. The revised alignment would avoid an orchard, but similar to the original alignment would not change alternate transportation policies. Therefore impacts of the revised alignment would be **similar**.

## **3.2 Clarification and Revisions as a Result of Comments, Clarification of Terms and Formatting & Additional Corrections and Clarifications**

This section addresses revisions as a result of the distribution of the DEIR and responses to comment letters, minor revisions and editorial changes and to correct minor inaccuracies, clarifying or correcting terms and formatting in the DEIR as follows:

### **3.2.S – Executive Summary**

- Table S-1, located at the end of the Executive Summary, “Scenario 3: Gates removed, Overlook Parkway connected” page S-8 -- Scenario 3 requires an amendment to Policy CCM-4.24, which requires that a plan analyzing potential connection routes between Washington Street and the SR-91 be performed prior to connecting Overlook Parkway east to Alessandro Boulevard. The Traffic Impact Analysis (TIA) prepared for the proposed Project addressed this geographic area in the study to satisfy this requirement, however, a potential route identified on the Master Plan of Roadways would not be constructed.
- Table S-1, pages S-10 through S-51 –This table is amended as noted below whenever Mitigation Measures are updated.
- Section S.4 – “Issues to be Resolved by the Decision Making Body,” page S-6 – Within the larger project vicinity, 28 intersections and ~~3929 roadway~~ segments were studied.
- Section S.5.6 – “Environmentally Superior Alternative,” page S-9 – Based on an evaluation of impacts, Scenario 2, also the No Project Alternative would be the environmentally superior alternative.

### **3.2.1 – Introduction**

- No changes made.

### **3.2.2 – Project Description**

- Section 2.1 “Project Overview,” page 2-1 — Under Scenario 3, the gates at Crystal View Terrace and Green Orchard Place would be removed and Overlook Parkway would be connected ~~over the Alessandro Arroyo~~ through the construction of a fill crossing between Via Vista Drive and Sandtrack Road and a bridge over the Alessandro Arroyo. The roadway would be striped for two lanes of travel—one eastbound and one westbound—and would be sized to accommodate a four-lane arterial roadway at build-out.
- Section 2.2 “Project Background,” page 2-4 — The connection of Overlook Parkway is considered an important parkway connection between the Arlington Heights Greenbelt and Sycamore Canyon Wilderness Park (City of Riverside 2007b, page LU-3514).
- Section 2.6.3 “Scenario 3 – Project Components – Fill Crossing,” page 2-24 — While the roadway has been designed to accommodate four lanes as the ultimate or buildout design, the roadway would be striped for the continuation of the existing two-lane arterial roadway, consisting of a 42-foot-wide median and 14-foot-wide parkways located on each side, with a six-foot-wide sidewalk adjacent to the curb and a Class II bike lane (Figure 2-8).
- Section 2.6.3 “Scenario 3 – Project Components – Alessandro Arroyo Bridge,” page 2-24 — Each bridge would accommodate a 26-foot-wide travel way, which would be striped to include only one 12-foot-wide traffic lane, ~~and~~ a two-foot-wide left shoulder, and a Class II bike lane.
- Section 2.7, “Off-site Improvements,” page 2-46 –  
Washington Street at Victoria Avenue
  - Signalize the intersection (Scenario 1).
  - Signalize the intersection and add an additional south-bound through lane on Washington Street (Scenarios 2, ~~3~~, and 34).
  - Signalize the intersection and add a separate left-turn lanes on Victoria Avenue in both directions (Scenario 3).

#### **3.2.3.0 – Environmental Analysis**

- No changes made.

#### **3.2.3.1 – Agricultural Resources**

- Section 3.1.2.1 “Important Farmland,” page 3.1-7 — As shown in Figures 3.1-1 and 3.1-2, a portion of the Arlington Heights Greenbelt is within the Project vicinity, while the other portion is outside of the Project vicinity boundary.

### 3.2.3.2 – Air Quality

- Air Quality, Section 3.2.5.1(a) – “Construction Emissions – Scenario 3,” page 3.2-18– In addition to the equipment listed in Table 3.2-4, trucks would be required for material delivery and hauling. Emissions due to on-road trucks as well as worker commute were calculated using CalEEMod. Using a weight of 1.35 tons per cubic yard of dirt and a truck hauling capacity of 20 tons, it was calculated that a total of 68 trucks would be required. Distributing these truck trips evenly over the 40 work days fill crossing construction phase results in an average of 1.7 trucks per day. To be conservative, a total of two truck trips per day were modeled during the fill crossing construction phase.
- Section 3.2.5.1(a) – “Construction Emissions – Scenario 3,” Table 3.2-4 – “Construction Equipment Parameters,” page 3.2-19 – Construction parameters were adjusted as follows, however, the total projected construction maximum daily emission levels for each criteria pollutant would be less than the applicable thresholds for all criteria pollutants.

TABLE 3.2-4 CONSTRUCTION EQUIPMENT PARAMETERS			
Phase and Length (days)	Equipment	Horsepower	Load Factor
Abutment Construction (40)	1 Excavator	157162	0.570.38
	1 Backhoe	7597	0.550.37
	1 Bob Cat	3764	0.550.37
	1 Pile Driver and Lead	82205	0.750.50
	1 Crawler Crane	208226	0.430.29
	1 Mobile Crane	208226	0.430.29
	1 Concrete Pump	84	0.74
	2 Portable Generators	84	0.74
	2 Air Compressors	78	0.48
Bent Construction (20)	1 Backhoe	7597	0.550.37
	1 Bob Cat	3764	0.550.37
	1 Pile Drill Rig	82205	0.750.50
	1 Crawler Crane	208226	0.430.29
	1 Mobile Crane	208226	0.430.29
	1 Concrete Pump	20884	0.430.74
	2 Portable Generators	84	0.74
	2 Air Compressors	8478	0.740.48
Superstructure Construction (120)	1 Backhoe	7597	0.550.37
	2 Forklifts	14964	0.300.37
	1 Pile Drill Rig	82205	0.750.50
	2 Mobile Cranes	208226	0.430.29
	2 Concrete Pumps	20884	0.430.74
	2 Portable Generators	84	0.74
	2 Air Compressors	8478	0.740.48
Fill Crossing (40)	1 Loader	7597	0.550.37
	2 Backhoes	7597	0.550.37
	1 Trencher	6980	0.750.50
	1 Paving Machine	89125	0.620.42
	1 Compactor	8	0.43
	1 Curb and Gutter Machine	82130	0.530.36

SOURCE: Personal communication with Simon Wong, Rick Engineering, and City of Riverside Public Works Department.

\*Assumes construction would occur five days per week.

- Section 3.2.5.1(b) – “Operational Emissions,” page 3.2-22 - The increase in ADT from existing to buildout is due to population growth in the region and is not due to the Project since the Project would not generate trips. The redistribution in traffic would not result in roadways of 100,000 vehicles per day or rural roads of 50,000 vehicles per day including Overlook Parkway, Green Orchard Place, Crystal View Terrace, Proposed “C” Street, and other roadways in the project vicinity. In addition, the project would not substantially increase or attract diesel traffic on Overlook Parkway, defined as 8 percent of the total traffic volume in the *Transportation Conformity Guidance for Qualitative Hot-Spot Analysis in PM2.5 and PM10 Nonattainment and Maintenance Areas*, published by the Federal Highway Administration and US Environmental Protection Agency, to a roadway with an average daily traffic volume of 100,000 or more.

### **3.2.3.3 – Biological Resources**

- Section 3.3.1.3(c) “City of Riverside General Plan 2025,” Page 3.3-13 -- Furthermore, since major arroyos are recognized by the General Plan 2025 for their functions and values to wildlife and wildlife movement, grading and removal of native vegetation within the arroyo outside the graded pad is prohibited by the City’s Grading Code Title 17, Ordinances 6453 Section 1 and 6673 Sections 6, 7, 8, 9.

In response to a comment from the California Department of Fish and Wildlife, the City has clarified and modified the minimum mitigation ratios for sensitive vegetation. The City will require that permanent impacts to southern willow scrub and jurisdictional waters require mitigation at a 3:1 ratio, not a 2:1 ratio. The previous minimum requirement of 2:1 would not preclude a higher mitigation ratio; however, the modification is intended to further demonstrate that the project would provide appropriate compensation to impacts to biological resources to the extent feasible. In addition, the mitigation requirement for the number of acres of wetland creation has been adjusted for consistency with the Biological Technical Report and the modified minimum mitigation ratio. Therefore, the following revisions have been made for consistency:

- Section 3.3.5.3 – “Mitigation, Monitoring, and Reporting,” pages 3.3-58 – 3.3-59, Executive Summary “Table S-1 – Summary of Environmental Analysis Results,” pages S-21 – S-22, and pages S-34 – S-35 --

**MM-BIO-2:** To reduce impacts to southern willow scrub and jurisdictional resources to less than significant, the City shall provide 1.764.48 acres of wetland creation and restoration/enhancement of existing disturbed wetlands for impacts to ACOE and CDFG jurisdictional resources (see Table 3.3-6).

Temporary impacts to southern willow scrub and jurisdictional waters shall be mitigated on-site through restoration of the areas disturbed during construction at a 1:1 ratio.

Permanent impacts to southern willow scrub and jurisdictional waters require mitigation at a minimum 32:1 ratio through one of the following.

1. Creation of additional wetlands (e.g., southern willow scrub) and enhancement of existing wetlands containing southern willow scrub shall be implemented to meet the minimum 32:1 mitigation ratio for the permanent impacts to southern willow scrub and jurisdictional waters/wetlands. Creation and enhancement activities shall occur at a suitable location and restoration/enhancement of existing wetlands within the Alessandro Arroyo. A Wetland Mitigation Plan shall be prepared which identifies the location of creation/restoration and enhancement areas, methods involved to implement the mitigation effort, and maintenance and monitoring program which is required to ensure the success of the mitigation.
2. Provide compensation through the purchase of credits from an established wetland mitigation site within the same watershed, if available, for impacts that cannot be mitigated on-site.

Either of these mitigation options or a combination of on-site and off-site mitigation would reduce permanent impacts to southern willow scrub and jurisdictional waters to less than significant. With mitigation, the net effect of the Project on riparian/riverine areas would be equivalent or superior to the existing conditions.

#### **Appendix D – Biological Technical Report**

- Section 1.0 – “Executive Summary,” page 3 — A total of ~~1.756~~ acres of mitigation for permanent impacts at a 23:1 ratio, and temporary impacts at a 1:1 ratio would be required.
- Section 6.3 – “Jurisdictional Area Mitigation,” page 36 — To reduce impacts to jurisdictional resources to less than significant, the City is proposing ~~1.761-56~~ acres of wetland creation and restoration/enhancement of existing disturbed wetlands for impacts to ACOE and CDFG jurisdictional resources within the Eastern Alessandro Arroyo, and Western Survey Areas (see Table 6).
- Section 6.3 – “Jurisdictional Area Mitigation,” page 36 — Permanent impacts to wetlands require mitigation at a minimum 23:1 ratio through one of the following:
  1. Creation of additional wetlands (e.g., southern willow scrub) at a 1:1 ratio and enhancement of existing wetlands containing southern willow scrub at a 1:1 ratio shall be implemented to meet the 23:1 mitigation ratio for the permanent impacts to southern willow scrub wetlands.
  2. An alternative for permanent impacts to wetlands is to provide compensation through the purchase of credits from an established wetland mitigation site, if

available. A total of 1.756 acres shall be purchased from an established wetland mitigation site within the same watershed as the proposed project.

- Section 6.3 “Jurisdictional Area Mitigation,” page 37 — Table 6 has been retitled to reflect the change in the mitigation ratio: “MITIGATION FOR TEMPORARY AND PERMANENT IMPACTS TO JURISDICTIONAL RESOURCES (acres) WITH PERMANENT IMPACTS AT A 32:1 RATIO this change is also made to the Table of Contents, page ii under Table 6.” For consistency, the total mitigation columns in Table 6 have been recalculated as follows:

**TABLE 6  
MITIGATION FOR TEMPORARY AND PERMANENT IMPACTS TO JURISDICTIONAL RESOURCES (acres)  
WITH PERMANENT IMPACTS AT A 32:1 RATIO**

Jurisdictional Resources	Eastern Survey Area		Total Mitigation	Alessandro Arroyo Survey Area		Total Mitigation	Western Survey Area		Total Mitigation	Total Mitigation Required for Study Area (acres)
	Temporary Mitigation Ratio (1:1)	Permanent Mitigation Ratio (32:1)		Temporary Mitigation Ratio (1:1)	Permanent Mitigation Ratio (32:1)		Temporary Mitigation Ratio (1:1)	Permanent Mitigation Ratio (32:1)		
<b>ACOE Jurisdiction</b>										
<i>Wetland</i>	0.00	0.03	0.096	0.31	0.00	0.31	0.00	0.00	0.00	-
<i>Non-wetland waters</i>	0.00	0.02	0.064	<0.01 (76 sf)	0.00	<0.01 (76 sf)	<0.01 (430 sf)	0.02	0.04	-
<i>Erosive feature</i>	-	-	-	<0.01 (327 sf)	0.00	<0.01 (327 sf)	-	-	-	-
<b>Total ACOE Mitigation</b>	-	-	<b>0.150</b>	-	-	<b>0.32</b>			<b>0.04</b>	<b>0.46</b>
<b>CDFG Resources</b>										
<i>Wetland*</i>	0.02	0.12	0.3826	0.76	<0.01 (77 sf)	.0776	0.00	0.00	0.00	
<i>Streambed</i>	0.00	0.02	0.064	<0.01 (76 sf)	0.00	<0.01 (76 sf)	<0.01 (430 sf)	0.02	0.04	
<b>Total CDFG Mitigation</b>	-	-	<b>0.4430</b>	-	-	<b>0.776</b>	-	-	<b>0.04</b>	<b>1.12</b>
<b>TOTAL Jurisdictional Mitigation per Survey Area</b>			<b>0.5940</b>			<b>1.098</b>			<b>0.08</b>	<b>1.56</b>

sf= square feet

\*Includes 0.90-acre of southern willow scrub.

- Section 6.3.1 – “Federal and State Agencies,” page 38 — Temporary impacts to ACOE, CDFG, and RWQCB jurisdictional resources require mitigation through habitat creation, restoration, and/or enhancement at a minimum of 1:1 ratio to achieve a no-net-loss of jurisdictional resources, in consultation with the regulatory agencies, and permanent impacts at a ~~23~~:1 ratio. Biological Technical Report, Appendix B (Determination of Biologically Equivalent or Superior Preservation), Section 4.1 “Mitigation for Direct Effects,” page 24 — Permanent impacts to 0.12 acre of southern willow scrub and 0.02 acre of unvegetated drainage would require mitigation at a minimum of ~~23~~:1 ratio (including 1:1 creation) to ensure no net loss of riparian/riverine resources.

### **3.2.3.4 – Cultural/Paleontological Resources**

- Section 3.4.4.2 – “Significance of Impacts,” page 3.4-19 -- Because maintaining the gates would not require construction, no significant impacts to historical resources would occur under Scenarios 1 ~~and~~, 2 ~~and~~ 3.
- Section 3.4.4.2 – “Significance of Impacts,” page 3.4-20 -- Because the off-site improvements propose upgrades and alterations to intersections along Victoria Avenue, which is considered a historic resource, off-site impacts would also be significant (**S4-CUL-1**).
- Section 3.4.4.3 – “Mitigation, Monitoring, and Reporting,” page 3.4-21 -- Design steps are required to ~~would~~ reduce the impact. Therefore, the Mitigation Measure **MM-CUL-1** would also apply.
- Section 3.4.5.2 – “Significance of Impacts,” page 3.4-23 – Under Scenario 3, potential significant impacts to subsurface prehistoric or historic deposits that may be present and could be uncovered during construction activities associated with the connection of Overlook Parkway (**S3-CUL-24**) were identified.
- Section 3.4.5.3 – “Mitigation, Monitoring, and Reporting,” page 3.4-23 – Construction of Overlook Parkway could potentially impact additional unknown archaeological resources (**MMS3-CUL-24** and **MMS4-CUL-32**).

In response to requests from tribal entities in letters received during public review, select mitigation measures have been revised to clarify the process and intent of the protection measure required by the City as follows:

- Section 3.4.5.3 – “Mitigation, Monitoring, and Reporting,” pages 3.4-23 – 24, Executive Summary, “Table S-1 – Summary of Significant Environmental Analysis Results,” pages S-22 – S-23 and S-36 – S37 --

**MM-CUL-2:** To reduce impacts to archaeological resources during grading and other ground disturbing activities of previously undisturbed deposits, monitoring by a qualified archaeologist and Native American ~~representative~~ monitor shall occur for the construction of Overlook Parkway and the Proposed “C” Street, including within the Alessandro

Arroyo. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections shall be determined by the Project Archaeologist in consultation with the Native American Monitor. ~~Monitoring of cutting of previously disturbed deposits shall be determined by the Project Archaeologist.~~

If previously unknown subsurface resources are found during grading, the Project Archaeologist, in consultation with the Native American monitor, shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources. At the time of discovery, the City shall be notified and measures shall be implemented to insure any Project-related impacts are reduced to a level below significance. Construction activities shall be allowed to resume in the affected area only after the City has concurred with the evaluation. For significant cultural resources, a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the Project Archaeologist and approved by the City, then carried out using professional archaeological methods and sensitivity to tribal preferences and cultural concerns.

The Project Archaeologist shall submit monthly status reports to the City Public Works Department and the City Historic Preservation Officer starting from the date of the Notice to Proceed to termination of implementation of the grading monitoring program. The reports shall briefly summarize all activities during the period and the status of progress on overall plan implementation. Upon completion of the implementation phase, a final report shall be submitted describing the plan compliance procedures and site conditions before and after construction. Any final archaeological monitoring report shall be submitted to the City, the Eastern Information Center, and the monitoring tribe.

Upon completion of the Project, if no archaeological resources are encountered during grading, then a final Negative Monitoring Report shall be submitted substantiating that grading activities are completed and no cultural resources were encountered. Monitoring logs showing the date and time that the monitor was on site must be included in the Negative Monitoring Report.

If archaeological resources were encountered during grading, the Project Archaeologist shall provide a Monitoring Report stating that the field grading monitoring activities have been completed, and that resources have been encountered. The report shall detail all cultural artifacts and deposits discovered during monitoring and the

anticipated time schedule for completion of the curation phase of the monitoring. Materials to be curated may include archaeological specimens and samples. All project related collections subject curation should be suitably packaged and transferred to a facility that meets the standards of 36 CFR 79 for long-term storage.

- Section 3.4.5.3 – “Mitigation, Monitoring, and Reporting,” pages 3.4-24 – 25 –

**MM-CUL-3:** To reduce impacts to archaeological resources for the Proposed “C” Street, prior to commencement of grading, the unsurveyed portions of the route shall be surveyed by a qualified archaeologist and a Native American monitor-representative to determine if cultural resources are present. The survey shall follow City of Riverside guidelines in effect at the time of the survey. If no cultural resources are found during the survey, no additional work is required prior to construction.

- The testing program shall be written by an archaeologist qualified by the City of Riverside as a Principal Investigator and follow current guidelines for testing of cultural resources, in consultation with the Native American representativemonitor. Testing programs shall consist of a combination of site mapping and the excavation of an appropriate number of test units and shovel test pits. The testing program shall be used to identify subsurface deposits and to define site boundaries. Testing will also determine the integrity of each resource, including presence of disturbance to the site, extent of disturbance, and if any intact subsurface deposits remain. Analysis of the resources shall be addressed in context of any surrounding sites and shall include any tribal and cultural information that is available. This testing program will also determine whether the portions of the sites in the proposed Area of Potential Effect are significant historical resources under City of Riverside and CEQA criteria.
- If testing determines a resource is significant under City of Riverside or CEQA guidelines, a research design and data recovery program shall be required to mitigate Project related impacts to a level below that of significance. The research design/data recovery program shall be written by a City of Riverside archaeologist qualified as a Principal Investigator, in consultation with the appropriate tribe. The research design/data recovery program shall identify important research questions and explain procedures to be used in the excavation, analysis, and curation of recovered materials.
- Section 3.4.5.3 – “Mitigation, Monitoring, and Reporting,” pages 3.4-25, Executive Summary, “Table S-1 – Summary of Significant Environmental Analysis Results,” pages S-24 and S-39 –

**MM-CUL-4:** All sacred sites, and other cultural resources, should they be encountered within the project area, shall be avoided and preserved as the preferred mitigation.

- Section 3.4.6.1 “Scenario 4,” Section 3.4.6.2 “Significance of Impacts,” Section 3.4.6.3 “Mitigation, Monitoring, and Reporting,” and Section 3.4.6.4 “Significance after

Mitigation” pages 3.4-27 and 3.4-29, Executive Summary, “Table S-1 – Summary of Significant Environmental Analysis Results,” pages S-39 and S-41 — Due to the addition of a new mitigation measure, MM-CUL-4 has been renumbered to MM-CUL-5. The buffer distance in this mitigation measure has also been increased. It now reads as follows:

#### **Scenario 4**

Similar to Scenario 3, Project components related to construction of Overlook Parkway would be located in an area with a low potential for paleontological resources. However, construction activities west of Washington Street associated with construction of the Proposed C Street could directly or indirectly destroy a unique paleontological resource. The Proposed C Street would be located in an area with high paleontological sensitivity. Ground-disturbing activities in fossil-bearing soils and rock formations have the potential to damage or destroy paleontological resources that may be present below the ground surface. Although roadway construction would not require deep excavation, construction-related and earth-disturbing actions associated with the new road could damage or destroy fossils in rock units. As with archaeological resources, paleontological resources are generally considered to be historical resources, as defined in CEQA Guidelines Section 15064.5(a)(3)(D). Consequently, damage or destruction to these resources could result in a **significant impact (S4-CUL-54)**.

#### **3.4.6.2 Significance of Impacts**

No impacts to paleontological resources would occur under Scenarios 1 or 2.

Because all construction would occur in low sensitivity potential areas for paleontological resources impacts to paleontological resources under Scenario 3 would be less than significant.

Because of the high sensitivity potential areas for paleontological resources within the area in and around the Proposed C Street, Project grading under Scenario 4 could potentially destroy fossil remains, resulting in a significant impact to paleontological resources (**S4-CUL-54**).

No impacts to paleontological resources would occur under as a result of off-site improvements

Significant impacts to paleontological resources are most often mitigated by the implementation of a monitoring program carried out under the supervision of a qualified paleontologist (**S4-CUL-54**).

**MM-CUL-54:** The grading contractor shall be responsible for the monitoring for paleontological resources during all grading activities. If any fossils are found, all grading activities shall be stopped and the grading contractor shall contact the City. The City shall retain a qualified Paleontological Resources Monitor that shall be on-

site to monitor as determined necessary by the Qualified Paleontologist and the City. The grading monitoring program shall comply with the following requirements during grading:

1. The Qualified Paleontological Resources Monitor shall have the authority to direct, divert, or halt any grading/excavation within ~~100~~50 feet of the find until such time that the sensitivity of the resource can be determined and the appropriate salvage implemented.
2. The Qualified Paleontological Resources Monitor shall immediately contact the City.
3. The Qualified Paleontologist Resources Monitor shall determine if the discovered resource is significant under the criteria set forth in CEQA Guidelines Section 15064.5. If it is not significant, the paleontologist shall document the discovery as needed and the significance determination, and grading/excavation shall resume.
4. If the paleontological resource is significant or potentially significant and if the City determines that avoidance is not feasible, the Qualified Paleontological Resources Monitor, shall complete the following tasks in the field:

a. An excavation plan for mitigating the effect of the Project on the qualities that make the resource important. Requirements of the plan shall include:

- Salvage unearthed fossil remains, including simple excavation of exposed specimens or, if necessary, plaster-jacketing of large and/or fragile specimens or more elaborate quarry excavations of richly fossiliferous deposits;
- Record stratigraphic and geologic data to provide a context for the recovered fossil remains, typically including a detailed description of all paleontological localities within the Project site, as well as the lithology of fossil-bearing strata within the measured stratigraphic section, if feasible, and photographic documentation of the geologic setting; and
- Transport the collected specimens to a laboratory for processing (cleaning, curation, cataloging, etc.).

b. The plan shall be submitted to the City for review and approval prior to implementation.

#### **3.4.6.4 Significance after Mitigation**

With implementation of Mitigation Measure **MM-CUL-54**, impacts to paleontological resources associated with Scenario 4 would be reduced to a level less than significant.

### **3.2.3.5 – Drainage/Hydrology/Water Quality**

- No changes made.

### **3.2.3.6 – Energy Use and Conservation**

- No changes made.

### **3.2.3.7 – Geology and Soils**

- No changes made.

### **3.2.3.8 – Greenhouse Gases**

- Section 3.8.4.1 “Impact Analysis – Scenario 3,” page 3.8-14 – Table 3.8-3 summarizes the fill-crossing and bridge construction GHG emissions for Scenario 3. As shown, construction GHG emissions would be less than significant. Section 3.8.4.1 “Impact Analysis – Scenario 4,” page 3.8-16 – Table 3.8-5 summarizes the Scenario 4 construction GHG emissions. These include emissions from construction of the Proposed “C” Street as well as emissions from construction of the fill-crossing and bridge. As shown, construction GHG emissions would be less than significant. Section 3.8.4.1 “Off-site,” page 3.8-21 – When added to the GHG emissions summarized in Tables 3.8-3 and 3.8-5, there would be no change to the significance conclusions in the impact discussion above, and, therefore, impacts would be less than significant.
- Section 3.8.5 “Applicable Plans, Policies, and Regulations,” page 3.8-24 – The heading of this section has been edited to clarify this section addresses both the Scoping Plan and Executive Order S-3-05 as follows: a. Consistency with the Scoping Plan and Executive Order S-3-05.
- Section 3.8.5 “Applicable Plans, Policies, and Regulations,” page 3.8-25 – The following text has been added to the discussion under this section. This information reflects updated information since the public review period and does not change the conclusions of the analysis, nor does it represent significant new information in the DEIR.

With regard to Executive Order S-3-05, and as described on DEIR page 3.8-2, Governor Schwarzenegger set greenhouse gas emission reduction targets for the state as follows:

By 2010, reduce GHG emissions to 2000 levels;

By 2020, reduce GHG emissions to 1990 levels; and

By 2050, reduce GHG emissions to 80% below 1990 levels.

Although the Executive Order does not state that these GHG reduction targets apply local agencies, the Order does direct the Secretary of the California Environmental Protection Agency to coordinate oversight of various state agency efforts to meet the targets. In part, and as acknowledged above, the targets in the Executive Order are what led to the adoption of Assembly Bill 32, CARB's Scoping Plan, and other laws and standards aimed at reducing GHG emissions statewide. Accordingly, and even though the City of Riverside is outside the California Executive Branch, it has nonetheless considered whether the Proposed Project is consistent with the GHG reduction targets set forth in Executive Order S-3-05 as part of the City's analysis of Scoping Plan consistency.

Specifically, in May 2014, CARB adopted an Update to the Climate Change Scoping Plan that addresses the Executive Order's 2050 reduction target. The Scoping Plan Update states that achieving the 2050 target will require the pace of GHG emissions reductions in California to accelerate significantly. The Scoping Plan Update lists four strategies for the transportation sector related to achieving the 2050 target: (1) improve vehicle efficiency and develop zero emission technologies, (2) reduce the carbon content of fuels and provide market support to get these lower-carbon fuels into the marketplace, (3) plan and build communities to reduce vehicular GHG emissions and provide more transportation options, and (4) improve the efficiency and throughput of existing transportation systems (Climate Change Scoping Plan Update, p. 46). The Scoping Plan Update does not include numerical standards regarding these strategies, nor does it impose the responsibility for achieving these metrics on local land use agencies lacking any legal authority (like the City of Riverside) to enforce them. Further, studies relied upon by CARB in developing the Scoping Plan Update conclude that achieving GHG emissions reductions of 80 percent below 1990 levels in 2050 would potentially require technology that is not yet available on the market. Finally, the Scoping Report confirms that achieving the 2050 GHG reduction goal would require statewide (i) reductions in electricity demand through energy efficient and zero net energy buildings, (ii) decarbonizing the transportation sector through increased reliance on fuel efficiency, electric and alternative fuel vehicles, and (iii) decarbonizing the state's electricity resource portfolio.

The Overlook Parkway Project does not involve new buildings or other "generators" of new trips, but instead would redistribute existing trips within the City. (DEIR p. 3.8-26.) Accordingly, the Project does not introduce new sources of emissions that might otherwise conflict with the Scoping Plan and the GHG reduction goals of the Executive Order. Further, and as shown in Table 3.8-7, the Overlook Parkway Project would result in no potentially significant GHG emissions (and would even cause net decreases in GHG emissions in some instances) as to all scenarios under the "Gates Closed Baseline;" as to Scenarios 2 and 4 under the "Gates Open Baseline;" and as to "Existing + Project" conditions for Scenarios 1 and 3 under the "Gates Open Baseline." This, too, shows that the Project would not conflict with the GHG reduction goals of the Executive Order and would, for those scenarios, actually move the area towards compliance with the GHG reduction targets by reducing GHG

emissions. Even as to the potentially significant GHG emission impacts identified by the DEIR for future conditions for Scenarios 1 and 3 under the “Gates Open Baseline,” the City finds that the overall Project would still be consistent with the Executive Order’s GHG reduction targets. This is because – consistent with the Scoping Plan’s goals – the Project would increase transportation options by providing bike lanes in the Overlook area. Additionally, the Project would further the Scoping Plan’s goals by providing a more efficiently functioning transportation network in the Overlook area of the City. Accordingly, and based on the all of the above, the Project would not impede the GHG reduction targets set forth in the Executive Order, and no potentially significant impacts with regard to applicable policies and regulations would result.

### **3.2.3.9 – Land Use and Aesthetics**

Section 3.9.1, “Regulatory Setting,” – The regulatory section related to land use and the structure of the Riverside Municipal Code is revised by this Errata as follows:

- Section 3.9.1.3 “City of Riverside Municipal Code and Zoning,” pages 3.9-13 – 3.9.16 —

a. ~~Zoning~~

~~The Project vicinity comprises various residential zones, reflective of General Plan 2025 land uses. However, use regulations and development standards associated with the zones found within the Project vicinity are not applicable to the proposed Project, which includes only City infrastructure capital improvements.~~

b. Riverside Municipal Code

The proposed Project is subject to a number of other provisions, established in the RMC, that govern various aspects of Project development. ~~In addition to zoning,~~ The RMC includes regulations pertaining to: building and construction, grading, utility installation, landscaping, and the identification and treatment of cultural resources, among others.

Section 3.9.1.3 “City of Riverside Municipal Code,” page 3.9-14 — Grading Ordinance (Title 17)

Section 3.9.1.3 “City of Riverside Municipal Code,” page 3.9-14 — Zoning Code (Title 19)

The City’s Zoning Code is defined in Title 19 of the RMC. Zoning ordinances implement General Plan 2025 land use designations in a community by establishing use regulations and development standards for specific types of land use. The Project vicinity comprises various residential zones, reflective of General Plan 2025 land uses. However, use regulations and development standards associated with the zones found within the Project vicinity are not applicable to the proposed Project, which includes only City infrastructure capital improvements.

Section 3.9.1.3 "City of Riverside Municipal Code" page 3.9-14 – Cultural Resources Code (Title 20)

Section 3.9.1.3 "City of Riverside Municipal Code" page 3.9-15 – new section added as "Section 3.9.1.4 "County of Riverside – Dark Sky Regulations,"

Section 3.9.1.3 "City of Riverside Municipal Code" page 3.9-15 – section renumbered "Section 3.9.1.45 "Habitat Conservation Plans,"

Section 3.9.1.3 "City of Riverside Municipal Code" page 3.9-16 – section renumbered "Section 3.9.1.56 "Riverside County Airport Land Use Compatibility Plan,"

- Section 3.9.4.1 "Impact Analysis for Issue 1: Physically Divides an Established Community, Scenario 4", page 3.9-34 – "The Proposed "C" Street would be constructed to provide a connection to SR-91, reducing traffic congestion on existing roadways within neighborhoods near the Proposed "C" Street ~~the associated Project vicinity~~, and—as stated previously—help connect a community. Impacts associated with the physical division of an established community would be **less than significant.**"
- Section 3.9.2.1.a, "Land Use," page 3.9-19 - The Project vicinity also includes a designated open space area for the Alessandro Arroyo, west of Sycamore Canyon Wilderness Park, and Victoria Avenue, a historic corridor and scenic parkway is located at the western edge of the Western Project Impact Area (PIA).
- Section 3.9.4.1, "Scenario 3," page 3.9-33 - According to the Land Use and Urban Design Element of the General Plan 2025, the connection of Overlook Parkway is an important connection between the Arlington Heights Greenbelt and Sycamore Canyon Wilderness Park.
- Section 3.9.5.1 "Impact Analysis," page 3.9-35 — **No impact would occur.**
- Section 3.9.5.1.b "Municipal Code," page 3.9-45 — Grading Code (Title 17)
- Section 3.9.5.1 "Impact Analysis for Issue 2: Plans, Policy, or Regulations, Consistency with the City of Riverside General Plan 2025 --- following the discussion of the Grading Code (Title 17), and prior to the discussion of the Cultural Resources Code (Title 20), the following discussion of the Zoning Code (Title 19) has been added for all scenarios and off-site improvements," page 3.9-46 –

### **Zoning Code (Title 19)**

#### **Scenarios 1–4 and Off-site**

Zoning ordinances implement General Plan 2025 land use designations in a community by establishing use regulations and development standards for specific types of land use. The Project vicinity comprises various residential zones, reflective of General Plan 2025 land uses. However, use regulations and development standards associated with

the zones found within the Project vicinity are not applicable to the proposed Project, which includes only City infrastructure capital improvements. **No impacts** are identified.

- Section 3.9.5.1.c “County of Riverside Dark Sky Regulations,” page 3.9-48
- Section 3.9.5.1.d “Airport Land Use Plans,” page 3.9-49
- Section 3.9.5.2.a “Consistency with the City of Riverside General Plan 2025,” page 3.9-49 — The off-site improvements for all four scenarios were analyzed within the General Plan 2025 consistency table (Appendix H of the DEIR). Because the off-site improvements are limited to developed areas and involve signalization and restriping in existing intersections to improve traffic flow, the off-site improvements would be **consistent** with General Plan 2025 policies. **No impact** would occur.
- Section 3.9.5.2.b “Municipal Code,” pages 3.9-49-50 — Neither Scenario 1 nor 2 includes new improvements, grading, or other ground-disturbing activity, and would therefore not be in conflict with the City’s Grading Code, Zoning Code, Cultural Resources Code, or the ~~City’s lighting~~ Dark-Sky regulations. **No impacts would occur.**

Grading associated with the fill section and bridge construction for Scenario 3 and the roadway improvements would be conducted in accordance with the City’s Grading Code, ~~lighting regulations~~ and the Cultural Resources Code. Scenario 4 would include grading associated with the fill section and bridge construction. Grading also would occur in conjunction with construction of the Proposed “C” Street. All proposed grading would be conducted in accordance with the City’s Grading Code, ~~lighting regulations~~ and the Cultural Resources Code. Scenarios 3 and 4 would not be subject to use regulations and development standards associated with the Zoning Code. Therefore, no environmental impacts related to consistency with these regulations would occur. ~~Off-site improvements, if implemented, would comply with the regulations in the City’s Cultural Resources Code; thus, these scenarios would not conflict with any of the regulations, and impacts would be less than significant.~~

be. Dark Sky Regulations

No street improvements would be constructed under Scenarios 1 and 2, and no new lighting would be employed. No impact would occur.

Lighting proposed in conjunction with roadways under Scenarios 3 and 4 would be required to comply with the City’s lighting regulations, which include the use of high-pressure sodium lighting for public roadway lighting and full-cutoff optics, if feasible, or partial shielding to minimize spill light into the night sky and onto adjacent properties. Through implementation of these requirements, Scenarios 3 and 4 would be consistent with the dark sky regulations, and impacts would be less than significant.

If new or relocated lighting is needed in order to accommodate off-site improvements, all lighting would be required to comply with the City’s lighting

regulations, described above. Through implementation of these requirements, the off-site improvements under each scenario would be consistent with the dark sky regulations, and impacts would be less than significant.

- Section 3.9.5.2 "Significance of Impacts," page 3.9.50 – Section 3.9.5.2.ed, "Airport Land Use Plans."

### **3.2.3.10 – Noise**

- Section 3.10.4.2 Significance of Impacts, "Future Traffic Noise – Existing Roadways," page 3.10-44 - There are existing walls located adjacent to these segments of Overlook Parkway, ~~Victoria Avenue,~~ and Washington Street, as well as along Victoria Avenue, northeast of Washington Street. Traffic noise impacts adjacent to Overlook Parkway and Victoria Avenue would be less than significant.
- Section 3.10.5.3 "Mitigation, Monitoring, and Reporting," page 3.10-48 — Because the significant noise impacts are to existing homes in an already urbanized area, there is no feasible mitigation. Impacts under Scenarios 3 and 4 would remain significant and unavoidable.

### **3.2.3.11 – Transportation/Traffic**

Within Section 3.11, Transportation/Traffic, the text has been modified to better distinguish between regionally diverted and local cut-through traffic. Also in Transportation/Traffic, the discussion of off-site improvements has been modified for clarity. Therefore, the following revisions have been made for consistency:

- Transportation/Traffic, Section 3.11.1.3.b "Local," page 3.11-7 — Policy CCM-4.2 has been edited to correct Dufferin Avenue and now reads as follows: Analysis of the fore mentioned connection route should at a minimum include the area bounded by Mary Street, Adams Street, ~~Dufferin Street-Avenue,~~ and SR-91.
- Section 3.11.4.a "Issue 1: Circulation System - Methodology," page 3.11-41 — A second paragraph has been added to Methodology which reads as follows: It should also be noted that the "off-site improvements" analyzed throughout the EIR are the intersection-related mitigation measures which are intended to reduce impacts under each scenario (detailed at the end of this section). Thus, the off-site improvements are not analyzed under Issue 1. However, the off-site improvements are analyzed against other transportation/traffic issues in this section (i.e., Issues 2–5).
- Section 3.11-4.1(a) "Impact Analysis, City of Riverside Significance Criteria," pages 3.11-45 - 96 have been modified to correct that the intersection of Overlook Parkway/Orozco Drive is currently a four-way stop, not a two-way stop as analyzed. The stop sign was in place at the time the NOP was released (originally installed in 2005), however was not identified as such in the DEIR. In reviewing the analysis, it was determined that with a four-way stop, mitigation measures would no longer apply for

Scenario 4 as detailed below. No new impacts were identified, and in some cases, an impact does not exist or is reduced from what was described.

In 2011 Existing Plus Project Analysis:

- Scenario 4 compared to the Gates Closed baseline (Table 3.11-13, page 3.11-53): At intersection number 28, Overlook Parkway and Orozco Drive, there is no impact with the current four-way stop sign (a significant impact was previously shown). Thus, mitigation previously identified on page 3.11-114 (**MM-S4-INT-4**: Modify intersection to a four-way stop) would no longer apply.
- Scenario 4 compared to the Gates Open baseline (Table 3.11-19, page 3.11-63): At intersection number 28, Overlook Parkway and Orozco Drive, there is no impact with the current four-way stop sign (a significant impact was previously shown). Thus, mitigation previously identified on page 3.11-115 (**MM-S4-INT-4**: Modify intersection to a four-way stop) would no longer apply.

In 2035 Analysis:

- Scenario 4 compared to the Gates Closed baseline (Table 3.11-27, page 3.11-78): At intersection number 28, Overlook Parkway and Orozco Drive, there is no impact in the AM peak hour (a significant impact was previously shown). The significant impact in the PM peak hour remains. Mitigation identified on page 3.11-131 (**MM-S4-INT-14**) remains the same, which would reduce impacts to less than significant.
- Scenario 4 compared to the Gates Open baseline (Table 3.11-35, page 3.11-93): At intersection number 28, Overlook Parkway and Orozco Drive, there is no impact in the AM peak hour (a significant impact was previously shown). The significant impact in the PM peak hour remains. Mitigation identified on page 3.11-140 (**MM-S4-INT-14**) remains the same, which would reduce impacts to less than significant.
- Section 3.11.5.1 “Issue 2: Conflict with Congestion Management Programs,” page 3.11-158 and page 3.11-162 — Text has been removed from the discussion of Issue 1 and reworked into a discussion of potential impacts from off-site improvements under Issue 2. An additional discussion of off-site improvements has been added following the discussion of Scenarios 1-4, as noted in the revised Methodology section. This text reads as follows:

○ ~~Off-site~~

○ ~~Victoria Avenue has been identified as an historical resource pursuant to Section 15064.5 of the CEQA Guidelines.~~

● Off-site

The TIA prepared for the Project indicates that off-site improvements, such as signalizing intersections or adding turn lanes, are needed at key intersections to accommodate flows and mitigate LOS impacts under all four scenarios. Proposed mitigation measures include alterations to the following intersections: Washington

Street at Victoria Avenue; Madison Street/Proposed “C” Street at Victoria Avenue; Arlington Avenue at Victoria Avenue; and Mary Street at Victoria Avenue. The lane configurations at these intersections have been reviewed to ensure that the intersection improvements can be accommodated. Conceptual design plans have also been developed for intersections at Washington Street and Victoria Avenue and Madison Street and Victoria Avenue. These improvements would not conflict with the County of Riverside CMP, as these improvements are aimed at improving traffic flow at intersections which would operate at an unacceptable LOS. Impacts would be **less than significant.**

- Section 3.11.4.c “Regionally Diverted Traffic Potential Cut-through Traffic,” page 3.11-96 — The City does not have adopted thresholds governing potential regionally diverted traffic cut-through traffic and evaluates traffic impacts based on LOS standards; however, each scenario was evaluated in the TIA for the potential to cause an increase in regionally diverted traffic cut-through traffic in the Project vicinity in order to provide the most complete information disclosure possible. Regionally diverted traffic refers to new vehicles coming into the Project vicinity that would use arterial roadways within the City instead of highways to arrive at their ultimate destination, but does not include residents that reside in the Project vicinity.
- Section 3.11.4.c “Regionally Diverted Traffic,” page 3.11-97 — Since Scenarios 3 and 4 would add new arterial east-west roadway(s) not currently available to drivers, the potential for regionally diverted cut-through traffic exists.
- Section 3.11.4.c “Regionally Diverted Traffic,” page 3.11-97 — Any new regionally diverted traffic cut-through traffic would eventually enter or leave the area via roads on the east of the study area; this analysis focuses on east-west facilities that are generally parallel to Overlook Parkway.
- Section 3.11.4.c “Regionally Diverted Traffic,” page 3.11-97 — The analysis shows that for both 2011 and 2035 conditions, the projected regionally diverted traffic cut-through traffic volumes are low. As explained below, new potential regionally diverted traffic cut-through traffic entering the area is low overall; however, Scenario 3 would have less cut-through traffic compared to Scenario 4.
- Section 3.11.4.3.a “City of Riverside Significance Criteria,” page 3.11-108 — Additional background and explanation was added to the discussion of City Significance Criteria. This section now includes the following text to be inserted after the first paragraph:

The General Plan 2025 FEIR studied future roadway link operations. Several roadway links in this study were projected to operate at an unacceptable LOS. As detailed in the General Plan 2025 FEIR (Page 5.15-33):

As described in [Table 5.15-J], some roadway [links] which are identified in the General Plan Transportation Study as operating at LOS E or F at build-out may be improved under other projects, such as CETAP. Others are currently being evaluated through studies funded in the CIP or otherwise. In some cases, it appears that the General Plan

traffic analysis, which is done at a programmatic regional scale, cannot evaluate some localized details which will likely cause impacts to be found to be less than significant when [Mitigation Measure] Trans 1 is implemented.

Finally, in certain cases, the City has made a determination that potential impacts caused by widening a roadway segment to accommodate regional cut-through traffic, or to accommodate local traffic in key areas, would cause greater adverse environmental impacts to the neighborhoods and businesses than the traffic congestion, and is therefore infeasible as mitigation.

Segments of Alessandro Boulevard and Arlington Avenue are examples of roadways that would not be built larger just to accommodate regionally diverted traffic (see Table 5.15-J in the General Plan 2025 FEIR).

- Section 3.11.4.3 “Mitigation, Monitoring, and Reporting (a) Scenario 3 Intersections,” page 3.11-115 – This scenario would have a significant impact at one location (**S3-INT-1**).
- Section 3.11.4.3 “Mitigation, Monitoring, and Reporting (a) Scenario 4 Intersections,” page 3.11-115 – This scenario would have a significant impact at five locations (**S4-INT-4** through **S4-INT 8**).
- Section 3.11.5.1 “Impact Analysis,” page 3.11-158 — Segments of Alessandro Boulevard and Arlington Avenue are examples of roadways that would not be built larger just to accommodate regionally diverted ~~cut-through~~ traffic (see Table 5.15-J in the General Plan 2025 FEIR).
- Section 3.11.5.2 “Significance of Impacts,” page 3.11-162 — Off-site improvements would not conflict with the County of Riverside CMP, as these improvements are aimed at improving traffic flow at intersections which would operate at an unacceptable LOS. Impacts would be less than significant.
- Section 3.11.5.3 “Mitigation, Monitoring, and Reporting,” page 3.11-162 — Mitigation for roadway links was determined to be infeasible. The General Plan 2025 recognizes these CMP roadway links as locations that may operate at LOS E-F (see also Table 3.11-7), and would not be improved to accommodate regional traffic. Therefore, no mitigation has been identified as it has been determined to be infeasible. Impacts would remain significant and unavoidable.
- Section 3.11.5.4 “Significance after Mitigation,” page 3.11-162 — All scenarios would impact Arlington Avenue and Alessandro Boulevard in 2011 and/or 2035. The General Plan 2025 recognizes these CMP roadway links as locations that may operate at LOS E-F (see also Table 3.11-7), and would not be improved to accommodate regional traffic. Because the City would not implement further improvements to accommodate regional traffic on all CMP facilities, therefore mitigation was determined to be infeasible. The Project would have **significant and unavoidable** impacts on CMP facilities:

- Section 3.11.5.4 “Significance after Mitigation,” page 3.11-163 — Off-site improvements would not conflict with the County of Riverside CMP, as these improvements are aimed at improving traffic flow at intersections which would operate at an unacceptable LOS. Impacts would be less than significant.
- Section 3.11.6.1 “Impacts,” page 3.11-167 —

Off-site

The TIA prepared for the Project indicates that off-site improvements, such as signalizing intersections or adding turn lanes, are needed at key intersections to accommodate flows and mitigate LOS impacts under all four scenarios. Proposed mitigation measures include alterations to the following intersections: Washington Street at Victoria Avenue; Madison Street/Proposed “C” Street at Victoria Avenue; Arlington Avenue at Victoria Avenue; and Mary Street at Victoria Avenue. The lane configurations at these intersections have been reviewed to ensure that the intersection improvements can be accommodated. Conceptual design plans have also been developed for intersections at Washington Street and Victoria Avenue and Madison Street and Victoria Avenue. These improvements to intersections would not result in inadequate emergency access; rather, the signalization of these intersections would likely improve emergency access. These intersections are currently unsignalized, which generally takes emergency responders longer to get through as compared to signalized intersections. Thus, impacts associated with emergency access would be **less than significant**.

- Section 3.11.6.2 “Significance of Impacts,” page 3.11-167 — The off-site improvements associated with each scenario would likely improve emergency access. These intersections are currently unsignalized, which generally takes emergency responders longer to get through as compared to signalized intersections. Thus, impacts associated with emergency access would be less than significant.
- Transportation/Traffic, Section 3.11.7 “Issue 4: Traffic Hazards – Impacts – Scenario 4,” page 3.11-169 — As a result of this new roadway, other Project components are required, including: a cul-de-sac and vacated road along Washington Street from Engle Drive to just north of the existing Overlook Parkway and Washington Street intersection; a cul-de-sac and vacated road along Dufferin Avenue west of the Proposed “C” Street; the realignment of Lenox Avenue/Greylock Avenue to provide a connection to the new alignment for the Proposed “C” Street and existing Washington Street; and the vacation of a portion of Madison Avenue ~~Street~~ and a realignment and intersection with the Proposed “C” Street.
- Transportation/Traffic, Section 3.11.7 “Issue 4: Traffic Hazards—Impacts – Scenario 4,” page 3.11-170 — Finally, the construction of the Proposed “C” Street also requires intersection improvements at Victoria Avenue and Madison Street-Avenues.

- Transportation/Traffic, Section 3.11.7.2 “Significance of Impacts,” page 3.11-172 — Scenarios 1 and 2 would not include the construction of new roadways. If Scenario 1 is implemented, permanent signs would remain near the gates and Overlook Parkway that clearly indicate dead end streets. Impacts would be less than significant.

Throughout 3.11 – Transportation/Traffic, Sycamore Canyon Road has been corrected to Sycamore Canyon Boulevard and Plummer Street has been corrected to Plummer Road in the following locations: Segments 8 & 9 on Table 3.11-3 on page 3.11-37, Table 3.11-5 on page 3.11-39, Table 3.11-7 on page 3.11-44, Table 3.11-10 on page 3.11-49, Table 3.11-12 on page 3.11-52, Table 3.11-14 on page 3.11-55, Table 3.11-16 on page 3.11-58, Table 3.11-18 on page 3.11-61, Table 3.11-20 on page 3.11-64, Table 3.11-22 on page 3.11-68, Table 3.11-24 on page 3.11-72, and Table 3.11-26 on page 3.11-76. It has also been corrected in the text on page 3.11-71, 3.11-73 and 3.11-77.

### **3.2.4 – Cumulative Impacts**

With the clarification of the Dark Sky Regulations in the regulatory setting for land use, corresponding edits were made to Cumulative, Section 4.9, “Land Use and Aesthetics,” page 4-16 - The Proposed “C” Street under Scenario 4 would include a roadway, along with new volumes of traffic within a predominantly agricultural area. However, the addition of street lights along Proposed “C” Street would not create a new substantial source of light and glare, as high-pressure sodium lighting for public roadway lighting and full-cutoff optics would be required pursuant to the City’s lighting regulations, limiting the amount of light that could spill onto adjacent properties or into the night sky. The Proposed “C” Street would ~~therefore not~~ result in significant impacts associated with ~~both~~ visual character ~~and~~ or light and glare. ~~No viable mitigation for this impact exists.~~

### **3.2.5 – Growth Inducement**

With the clarification of the terminology for transportation, corresponding edits were made to Growth Inducement, Section 5.2, “Indirect Growth-inducing Impacts in the Surrounding Environment,” page 5-4 – The analysis examined the numbers of new vehicles coming into the Project vicinity that can be attributed to cut-through traffic (traffic that comes into the area that did not come to this area before). Specifically, the daily traffic volume changes between Scenarios 3 and 4 were analyzed against the Gates Open baseline, for both Year 2011 and Year 2035 conditions. The Gates Closed baseline was not analyzed because the intent of the analysis for Scenarios 3 and 4 was to evaluate regionally diverted traffic, which would be prevented if the gates were closed. It should be noted that the differences in volumes was negligible when comparing Scenarios 1 and 2 (Gates Closed v. Gates Open).

### **3.2.6 – Significant Unavoidable Environmental Effects/Irreversible Changes**

- No changes made.

### **3.2.7 – Effects Found Not to be Significant**

- Section 7.1 “Hazardous Materials and Public Health,” page 7-1 – a hazardous materials threshold inadvertently left out of the list of thresholds has been included as follows: 8. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? This threshold was considered in the environmental analysis (see Appendix B of the DEIR) and was determined to have no impact.
- Section 7.1 “Hazardous Materials and Public Health,” page 7-2 – had been revised to specify that contract specifications address the use of hazardous materials during construction. – During construction activities for Scenarios 3 and 4, there may be small quantities of hazardous materials associated with construction equipment such as fuels, lubricants, and solvents. City of Riverside standards and policies regarding the use of hazardous material would be followed. The City uses the 2012 Edition of the Standard Specifications for Public Works Construction Greenbook. Contract specifications for construction projects require contractors to follow the requirements in that book. In particular, Section 7-10.4.4 requires the strict adherence by the contractor to the California Division of Industrial Safety in regard to the use of hazardous materials. The contractors are also required to adhere to all existing state and federal laws, which would include the proper disposal of hazardous materials. The Project does not include the permanent use of hazardous materials; therefore, impacts associated with the potential short-term use of hazardous materials during construction would be considered not significant.
- Section 7.1 “Hazardous Materials and Public Health,” page 7-3 – The Western Project Impact Area (PIA) associated with Scenario 4 is located within the AIA of the Riverside Municipal County Airport.

### **3.2.8 – Project Alternatives**

- No changes made.

### **3.2.9 – References Cited**

- References, Section 9.0 has been updated to include the references added in response to Master Response #12: Agricultural/Citrus Groves west of Washington Street and #13: Emergency Access and Response Times and Concerns about Crime and Safety. It has also been updated to include a reference added to support a response on the purpose of the EPA in response to comment L-28:  
Brandon, Pauline Mazzetti  
1962 "The History of the Gage Canal Company of Riverside: A Story of the Development of Arid Land in California." Unpublished MS.  
City of Riverside Community Development Department  
2013 Citrus Groves, personal communication with Teri Delcamp, Historic Preservation Senior Planner, July 31, 2013.

Environmental Protection Agency (EPA)

2015 Clean Air Act Requirements and History.  
<http://www.epa.gov/air/caa/requirements.html>. Accessed June 15, 2015.

Keller, Jean

1999 "A Phase I Cultural Resources Assessment of Tentative Parcel Map 29477: 20.5 Acres of Land in the City of Riverside, Riverside County, California, USGS Riverside West, California Quadrangle 7.5' Series."  
Unpublished MS.

Lawton, Harry W.

1987a "Selected Newspaper Accounts of Riverside's Chinese Settlers." In Wong Ho Leun: An American Chinatown, vol. 1. Edited by Great Basin Foundation. San Diego, CA: Great Basin Foundation, pp. 267-285.

1987b "A Selected Chronological History of Chinese Pioneers in Riverside and the Southern California Citrus Belt." In Wong Ho Leun: An American Chinatown, vol. 1. Edited by Great Basin Foundation. San Diego, CA: Great Basin Foundation, pp. 53-140.

Patterson, Tom.

1996 A Colony for Riverside: Second Edition 1996. Riverside, CA: the Museum Press of the Riverside Museum Associates.

Riverside Police Department

2013 2009-2012 Comparison, personal communication with Traci Dosé, Supervising Crime Analyst, June 20, 2013.

Riverside Public Utilities

2015 Overlook EIR -- Santa Ana Sucker Fish, personal communication with Kevin S. Milligan, Utilities Deputy General Manager, October 2.

Wormser, Paul.

1987 "Chinese Agricultural Labor in the Citrus Belt of inland Southern California." In Wong Ho Leun: An American Chinatown, vol. 1. Edited by Great Basin Foundation. San Diego, CA: Great Basin Foundation, pp. 173-191.

**3.2.10 – Individuals and Agencies Consulted**

- No changes made.

**3.2.11 – Certification**

- No changes made.

**3.2.H – Appendix H**

Appendix H contains the land use policy consistency table. The header on alternating pages has been corrected to reflect the correct project title.

***THIS PAGE IS INTENTIONALLY BLANK.***