

2. Introduction

2.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

The California Environmental Quality Act (CEQA) requires that all state and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority before taking action on those projects. This draft environmental impact report (EIR) has been prepared to satisfy CEQA and the CEQA Guidelines. The EIR is the public document designed to provide decision makers and the public with an analysis of the environmental effects of the proposed project, to indicate possible ways to reduce or avoid environmental damage and to identify alternatives to the project. The EIR must also disclose significant environmental impacts that cannot be avoided; growth inducing impacts; effects not found to be significant; and significant cumulative impacts of all past, present, and reasonably foreseeable future projects.

The lead agency means “the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment” (Guidelines Section 21067). The Riverside Unified School District (RUSD or District) has the principal responsibility for approval of the Eastside Elementary School Project. For this reason, the District is the CEQA lead agency for this project.

The intent of the Draft EIR is to provide sufficient information on the potential environmental impacts of the proposed Eastside Elementary School Project to allow the District to make an informed decision regarding the proposed actions of the project. Specific discretionary actions to be reviewed by the District and responsible agencies are described in Section 3.5, *Intended Uses of the EIR*.

This Draft EIR has been prepared in accordance with requirements of the:

- California Environmental Quality Act (CEQA) of 1970, as amended (Public Resources Code, Section 21000 et seq.)
- State Guidelines for the Implementation of the CEQA of 1970 (CEQA Guidelines), as amended (California Code of Regulations, Section 15000 et seq.)

2.2 NOTICE OF PREPARATION

The District determined that an EIR would be required for the proposed project and issued a Notice of Preparation (NOP) on May 10, 2021 (see Appendix A, *Notice of Preparation and Comments*). An Initial Study was not attached. The NOP process helps determine the scope of the environmental topics to be addressed in the Draft EIR. The NOP public review period was from May 10, 2021 to June 9, 2021. During the NOP public review period, four comment letters from public agencies and five comment letters from residents/interested parties were received (see Appendix A, *Notice of Preparation and Comments*).

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Table 2-1, *NOP Period Written Comments Summary*, compiles the comment letters received during the NOP public review period. The table provides a brief response to comments and identifies the section(s) of the Draft EIR where the issues are addressed.

Table 2-1 NOP Review Period: Written Comments Summary

Commenting Agency (letter date)	Summary of Comments	Response/Issue Addressed In:
City of Riverside (6/9/21)		
Community & Economic Development Department – Planning Division.	The comment requests that the proposed development be consistent with Chapter 19.395 (Schools) of the Zoning Code.	The District plans to exempt the school site from local zoning pursuant to Government Code Section 53094.
	The comment indicates that the DEIR should fully analyze any impacts to all nearby historical resources including the City landmarks, Irving School and Auditorium (City Landmark #96) and Food Machinery Corporation (City Landmark #102).	The proposed project would not impact any offsite historic resources including the Food Machinery Corporation. However, impacts to Irving School and Auditorium have been addressed in Section 5.2, <i>Cultural and Paleontological Resources</i> .
	The comment asserts that the EIR should take into account the proposed Metrolink expansion by the Riverside County Transportation Commission when analyzing cumulative impacts to the adjacent neighborhood.	The Metrolink expansion has been included as a cumulative project as shown in Table 4-2, and has been analyzed as part of cumulative impacts. See Section 5.7, <i>Transportation</i> . Appendix I, <i>Traffic Impact Analysis</i> .
Housing Authority	The comment indicates that the parcel at 4307 Park Avenue is owned by the City Housing Authority and is operated as an affordable Artist-in-Residence. The Housing Authority requests that this residence to be preserved in place or repay the US Department of Housing Authority and the City Housing Authority funds.	See Chapter 8, <i>Impacts Found Not to be Significant</i> , Section 8.9, <i>Population and Housing</i> . The proposed project would remove this Artist-in-Residence and the District will repay the negotiated funds to the US Department of Housing Authority and the City Housing Authority.
Public Works – Traffic Division	<p>The comment indicates that due to potential conflicts with the City's Affordable Housing & Sustainable Communities + Transformative Climate Communities grant, the City requests that all possible means to leave Park Avenue open to pedestrian and bicycle access (at a minimum) should be exhausted, because the full vacation of Park Avenue will place two grants, one \$20 million and one \$30 million, at risk.</p> <p>The City's traffic engineer is also concerned about displacing vehicular traffic onto adjacent roadways and creating impacts within the neighborhood.</p>	See Chapter 8, <i>Impacts Found Not to be Significant</i> , and Section 5.7, <i>Transportation</i> . The District understands that Park Avenue between 14th Street and University Avenue is identified as "People Street" with various active transportation and mobility enhancements by the Eastside Neighborhood's Transformative Climate Communities grant project. The District coordinated with the City to create a realignment plan that moved the bike path to Howard Avenue from Park Avenue, therefore, not resulting in a conflict with the City's

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Commenting Agency (letter date)	Summary of Comments	Response/Issue Addressed In:
		<p>intent and requirements of the grants.</p> <p>Section 5.7, <i>Transportation</i>, discusses impacts from Park Avenue and 13th Street vacation and displacing traffic onto adjacent roadways.</p>
<p>Riverside Public Utilities – Water</p>	<p>The City has an existing 30-inch transmission main and a 6-inch distribution pipeline within the Park Avenue right-of-way. The 30-inch transmission main cannot be abandoned and will need to remain in place. This main is to be upsized to a 54-inch pipeline in approximately 5 years. RPU would require a minimum 40-foot wide utility easement where no structure or improvements would be allowed.</p>	<p>See Section 8.11, <i>Utilities and Service Systems</i>. All three design options will allow the provision of the required utility easement for the water pipelines and will not place any habitable structures on the easement that cannot be removed. The vacated Park Avenue would be developed as hardcourts under Option 1; driveway, entry court, walkway, and playfields with an amphitheater under Option 2; and bus drop-off, kindergarten play area, and outdoor learning area under Option 3. The development of the proposed project under all three options would not interfere with the City's ability to upsize the pipeline.</p>
	<p>The letter states that in the event that the pipeline needs to be accessed or repaired, any landscaping or hardscape affected by the necessary excavation work would need to be replaced at the District's expense.</p>	<p>The District will be responsible for the necessary expense incurred by the implementation of the proposed project. Any utility improvements within the easement after the construction of the proposed project should be the responsibility of the RPU. The DEIR evaluates physical impacts of the proposed project and the financial responsibility of maintaining and repairing underground water pipelines is not under the purview of CEQA analysis.</p>
	<p>RPU's preferred alternative is Option 1 and is open to providing the easement with a westerly offset to run within the playfield to minimize impacts to the hardcourts.</p>	<p>Comment noted. Option 1 was fully analyzed in the Draft EIR.</p>
	<p>The comment states that there is an existing 4-inch distribution pipeline within 13th Street from Park Avenue to Howard Avenue. This pipeline can be abandoned only if the existing 4-inch main within 13th Street from Howard Avenue to Victoria Avenue has been upsized to a 12-inch line.</p>	<p>See Section 8.11, <i>Utilities and Service Systems</i>. The vacation of 13th Street under Option 2 will not require abandoning of any utility lines on 13th Street. No structures</p>

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	<p>RPU would require that the existing fire hydrant at Howard and 13th Street be relocated to feed off of the 12-inch distribution main within Howard Avenue and water services to Lincoln Park would need to be relocated to be served from an alternate location. The fire hydrant at the corner of 13th Street and Park Avenue would require an upsizing of the existing pipelines within Park Avenue or 13th Street to be able to make up for any loss in existing fire flow distribution pipelines within 13th Street and Park Avenue were to be abandoned.</p>	<p>will be constructed on 13th Street under Option 2.</p> <p>See Section 8.11, Utilities and Service Systems. The District will coordinate with RPU to minimize impacts to its water lines and fire hydrants. The design of the proposed project under all three options would not require abandoning of any water lines within the streets to be vacated. Final design and utility plans will be reviewed and approved by RPU.</p>
Riverside Public Utilities – Electric	<p>RPU would need to make infrastructure improvements, construct new facilities, and underground conversion of overhead facilities to serve the proposed project, and these improvements are driven by the developer and would be at the District’s expense. The comment letter requests that the DEIR take these improvements into account and fully analyze any potential impacts.</p>	<p>See Section 8.11, Utilities and Service Systems. The District is required to coordinate with the RPU engineers to provide the necessary electric power infrastructure for the proposed project. Although the District will be financially responsible for the necessary utility infrastructure to serve adequate services to the proposed project, underground conversion of overhead facilities will not be part of the necessary improvements.</p>
Parks, Recreation, and Community Services Department	<p>PRCSD prefers Options 1 and 3.</p> <p>The letter states that the District must contact PRCSD prior to proceeding with Option 2 to discuss appropriate mitigations to reduce impacts to Lincoln Park. The letter provides a few options for mitigation. The letter indicates what that joint use agreement terms should include. It indicates that fencing off portions of the park should be avoided due to its value to the neighborhood for generations.</p>	<p>Comment noted.</p> <p>See Section 5.6, <i>Recreation</i>. The District has been coordinating with the City to draft a joint use agreement in the event that Option 2 is selected as the preferred option. Although the joint-use portion of Lincoln Park will need to be fenced off, the remaining Lincoln Park will remain without fencing. Additional recreational space would be provided during non-school operating hours from 4:30 pm to 10 pm, which would compensate for the time lost during school hours.</p>

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Commenting Agency (letter date)	Summary of Comments	Response/Issue Addressed In:
South Coast Air Quality Management District (6/1/21)	The letter requests that all supporting documents related to air quality, health risk, and greenhouse gas analyses be sent to South Coast AQMD. The staff recommends using South Coast AQMD's CEQA Air Quality Handbook and website as guidance when preparing the air quality and greenhouse gas analyses and also use the CalEEMod land use emissions software. The letter also provides guidance related to significance thresholds and the type of impacts to be analyzed and mitigated.	See Section 5.1, <i>Air Quality</i> , and Section 5.3, <i>Greenhouse Gas Emissions</i> . The Draft EIR, including supporting modeling data for air quality and GHG emissions will be sent to South Coast AQMD with the circulation of the Notice of Availability.
Riverside County Flood Control and Water Conservation District (6/1/21)	The letter states that the Flood Control District normally does not provide comments/recommendations on cases within incorporated cities other than items of specific interest to the Flood Control District. The letter indicates that the proposed project would not be impacted by District Master Drainage facilities, nor are other facilities of regional interest proposed, therefore, the comment letter only provided general information on the National Pollutant Discharge Elimination System permit and flood maps from the Federal Emergency Management Agency.	See Section 8.6, <i>Hydrology and Water Quality</i> .
Riverside Transit Agency (RTA) (5/28/21)	Informs the District that there are two active bus stops on 14th Street that will be impacted by the proposed project.	See Section 5.7, <i>Transportation</i> . The proposed project does not involve the vacation of 14th Street and would be accessed from 13 th Street, therefore, would not impact bus stops on 14th Street.
Resident/interested Parties		
Anthony Noriega, Secretary of LULAC Veterans of Southern California, Member of the Eastside Task Force	The commenter asserts that none of the three options take into consideration past inputs and recommendations by the Riverside League of United Latin American Citizens council 3190, the Eastside Taskforce and of other east-side community organizations and its citizens. Stated that providing written comments may be uncomfortable for some community members while they are more willing to make verbal comments. The commenter requests that a copy of the scoping meeting be sent to him.	The DEIR evaluates physical impact of the environment by the proposed project. The comment does not provide any environmental issues.
Beatrice Molina	The commenter supports an elementary school in Eastside, but does not support the options presented by the District. The joint use of Lincoln Park under Option 2 would not be fair to community members who currently use the park in the morning and day. It may not be safe for students who might come upon dangerous objects, if it is not a closed campus. Lincoln High School should be left as is or provide more programming for the students. The comment states that the proposed project will add additional traffic and air pollution to an already busy area. There are 91 freeway, train, Metrolink, RTA hub, and other businesses in the area.	Comment noted. See Section 5.6, Recreation and Appendix H, Park Assessment for the discussion of the loss of park space during school operating hours. The joint-use park space would be fenced. Comment related to Lincoln High School is noted. See Section 5.2, <i>Air Quality</i> and Section 5.7, <i>Transportation</i> .

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Commenting Agency (letter date)	Summary of Comments	Response/Issue Addressed In:
Various Eastside Community Organizations	The letter states that Option 3 most closely depicts the needs of the Latino community, which leaves Lincoln Park and maintains Lincoln High School's presence in the Eastside. However, the comment questions funding for this option. The comment also is concerned about the Park Street vacation and its impact on city traffic to access the local businesses on Park Avenue between 12th Street and 9th Street.	See Section 8.7, <i>Land Use and Planning</i> . The proposed project would not obstruct access to local businesses along Park Avenue between 12th Street and 9th Street. 12th Street would remain open under all options and 13th Street would only be vacated under Option 2.
	The comment letter asserts that the families and residents of Eastside were only aware of the selected development site once the District had already begun buying the property.	Comment noted. The DEIR evaluates physical impact of the environment by the proposed project.
	The comment states that the proximity to the 91 freeway, railroad tracks, and the development of 500 parking vehicle spaces on Howard Avenue between 12th Street and 9th Street to serve the needs of the developing transportation center would result in health hazards to children.	California Code of Regulation Title 5 standards regulates siting of new schools or modernization of existing schools in California. For new schools, Title 5 studies must demonstrate that facilities with the potential to emit hazardous air pollutants within a quarter mile radius of the school site will not constitute an actual or potential public health risk to students and staff that will attend the school. Therefore, a Health Risk Assessment (HRA) was prepared for the project site, which included the SR-91 and BNSF Metrolink Rail Line. The HRA determined that the cancer risk for students would be 1.7 per million and 6.0 per million for school staff. The South Coast Air Quality Management District's threshold level is 10 per million. Therefore, siting of a school at the proposed location would not result in health hazards to children. Although the proposed Riverside County Transportation Commission's Riverside-Downtown Station Improvements project that includes 560 parking spaces was not included in the HRA, based on the EIR prepared for the RCTC Station Improvements project, the increase in traffic would be 143.4 trips during the AM peak hour and 141.6 trips during the PM peak hour, because it would relocate existing traffic from Prism Aerospace, an existing

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Commenting Agency (letter date)	Summary of Comments	Response/Issue Addressed In:
	<p>The comment outlines past plans by the District for an elementary school in Eastside that did not occur. The comment provides two alternative locations to consider for elementary school development, a property located between University Avenue, 12th Street, and Ottawa Avenue and an empty parking lot near the University and Ottawa Avenue.</p> <p>The commenter requests that the District prioritize the development of the Eastside School in advance of other District projects.</p>	<p>manufacturing warehouse. Considering that the cancer risk for students was calculated at 1.7 per million, and the health risk threshold level is 10 per million, the addition of the 560 parking lot is not expected to create significant health hazard to the proposed project.</p> <p>See Chapter 7, <i>Alternatives to the Proposed Project</i>. The District has considered a site at the southwest corner of University Avenue and Chicago Avenue. However, this option was rejected because of its adjacency to busy arterial roadways and the District was not able to use the existing commercial buildings for elementary school use.</p> <p>Comment noted. The DEIR evaluates physical impact of the environment by the proposed project.</p>
Hector Valdez	The comment states that Option 3 does not include the new auto shop related to the CTE Auto pathway program at Lincoln High School.	Under Option 3, all existing programs at Lincoln High School would be accommodated on-site. The included site plan for Option 3 is conceptual only and would be developed in detail if selected as the preferred option.
Jesse Valenzuela, Member of LULAC de Riverside and the Eastside Elementary School Task Force	The comment recommends that the elementary school to be placed on the existing Lincoln High School site and Lincoln High School along with a Community Career Development Center be built at the corner of Victoria Avenue and Central Avenue.	Comment noted. The DEIR analyzed two options (Options 1 and 3) that include Lincoln High School as part of the project boundaries.

2.3 SCOPE OF THIS DRAFT EIR

The scope of the Draft EIR was determined based on the understanding of the proposed project, initial research, and comments received in response to the NOP (see Appendix A). Pursuant to Sections 15126.2 and 15126.4 of the CEQA Guidelines, the Draft EIR should identify any potentially significant adverse impacts and recommend mitigation that would reduce or eliminate these impacts to levels of insignificance. The information in Chapter 3, *Project Description*, establishes the basis for analyzing future, project-related environmental impacts.

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2.3.1 Impacts Considered Less Than Significant

During preparation of the Draft EIR, the District determined that 12 environmental impact topics (shown below) would not be significantly affected by the proposed project. The less than significant findings are substantiated in Chapter 8, *Impacts Found Not to Be Significant*, in this Draft EIR.

- Aesthetics
- Agriculture & Forestry Resources
- Biological Resources
- Energy
- Geology and Soils
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Utilities and Service Systems
- Wildfire

The following environmental impact categories were determined to have less than significant impacts in Chapter 5, *Environmental Impacts*.

- Greenhouse Gas Emissions
- Recreation
- Transportation

2.3.2 Potentially Significant Adverse Impacts

The District determined that five environmental factors have potentially significant impacts. These topics are analyzed in Chapter 5.

- Air Quality
- Cultural and Paleontological Resources
- Hazards and Hazardous Materials
- Noise
- Tribal Cultural Resources

2.3.3 Unavoidable Significant Adverse Impacts

This Draft EIR identifies two significant and unavoidable adverse impacts, as defined by CEQA, that would result from implementation of the proposed project. Unavoidable adverse impacts may be considered significant on a project-specific basis, cumulatively significant, and/or potentially significant. The District must prepare a “statement of overriding considerations” before it can approve the project, attesting that the decision-making body has balanced the benefits of the proposed project against its unavoidable significant environmental effects and has determined that the benefits outweigh the adverse effects, and therefore the adverse effects are considered acceptable. The impacts that the Draft EIR found to be significant and unavoidable are:

- Cultural Resources (historic resources)
- Noise (operational)

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2.4 FINAL EIR CERTIFICATION

This Draft EIR will circulate for public review for 45 days. Agencies and interested parties are invited to provide written comments on the Draft EIR to the District address shown on the title page of this document and on the Notice of Availability of a Draft EIR (NOA). Upon completion of the 45-day review period, the District will review all written comments received and prepare written responses for each. A Final EIR will incorporate the written comments, responses to the comments, and any changes to the Draft EIR that result from comments along with the circulated Draft EIR. The Final EIR will be reviewed by the RUSD Board of Education. All persons who comment on the Draft EIR will be notified of the availability of the Final EIR and the date of the RUSD Board of Education public hearing.

The Draft EIR is available to agencies and the public for review on the District's website: www.riversideunified.org/measureo.

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