5. Environmental Analysis

5.7 TRANSPORTATION

This section of the Draft Environmental Impact Report (EIR) evaluates the potential for implementation of the Eastside Neighborhood School to impact transportation facilities and traffic in the City of Riverside. The analysis in this section is based in part on the following technical study:

 Traffic Impact Analysis for the Proposed Eastside Neighborhood School, Garland Associates, July 2022 (see Appendix I of this Draft EIR).

5.7.1 Environmental Setting

5.7.1.1 REGULATORY BACKGROUND

State and local laws, regulations, plans, and guidelines are summarized herein.

State

Senate Bill 743

On September 27, 2013, Senate Bill (SB) 743 was signed into law, starting a process that fundamentally changed transportation impact analysis as part of California Environmental Quality Act (CEQA) compliance. The legislature found that with the adoption of SB 375 (Sustainable Communities and Climate Protection Act), the state had signaled its commitment to encourage land use and transportation planning decisions and investments that reduce vehicle miles traveled (VMT) and thereby contribute to the reduction of greenhouse gas (GHG) emissions, as required by the California Global Warming Solutions Act of 2006 (Assembly Bill [AB] 32).

SB 743 eliminates auto delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as the sole basis for determining significant impacts under CEQA. Instead, other measurements such as VMT are to be used to measure impacts. Pursuant to SB 743, the Natural Resources Agency adopted revisions to the CEQA Guidelines to implement SB 743 on December 28, 2018, and established new criteria for determining the significance of transportation impacts.

The purpose of SB 743 is to balance the needs of congestion management, infill development, public health, GHG reductions, and other goals. The Governor's Office of Planning and Research (OPR's) released the Technical Advisory on Evaluating Transportation Impacts in CEQA in December 2018.

The City of Riverside's (City's) Draft Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment, July 2020, provides the City's VMT threshold.

California Department of Transportation

Intersections within incorporated cities associated with freeway on- and off-ramps fall under California Department of Transportation (Caltrans) jurisdiction. Caltrans approves the planning, design, and construction of improvements for all state-controlled facilities. Caltrans uses the Highway Capacity Manual 6 methodology to evaluate intersections within its jurisdiction. LOS criteria for unsignalized intersections differ from LOS

criteria for signalized intersections because signalized intersections are designed for heavier traffic and therefore a greater delay. Unsignalized intersections are also associated with more uncertainty for users, as delays are less predictable, which can reduce users' delay tolerance. For state-controlled intersections, LOS standards and impact criteria specified by Caltrans will apply.

Regional

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is a council of governments representing Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. SCAG is the federally recognized metropolitan planning organization for this region, which encompasses over 38,000 square miles. SCAG is a regional planning agency and a forum for addressing regional issues concerning transportation, the economy, community development, and the environment. SCAG is also the regional clearinghouse for projects requiring environmental documentation under federal and state law. In this role, SCAG reviews proposed development and infrastructure projects to analyze their impacts on regional planning programs.

2020 Regional Transportation Plan/Sustainable Community Strategy (Connect SoCal)

Every four years, SCAG updates the regional transportation plan/sustainable community strategy (RTP/SCS) for the six-county region that includes Los Angeles, San Bernardino, Riverside, Orange, Ventura, and Imperial Counties.

On September 3, 2020, SCAG adopted the 2020-2045 RTP/SCS, Connect SoCal, which encompasses four principles that are important to the region's future—mobility, economy, healthy/complete communities, and environment. Connect SoCal explicitly lays out goals related to housing, transportation technologies, equity, and resilience to adequately reflect the increasing importance of these topics in the region. The RTP/SCS outlines a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce GHG emissions from transportation (excluding good movement). The RTP/SCS is meant to provide growth strategies that would achieve the regional GHG emissions-reduction targets identified by the California Air Resources Board. However, the RTP/SCS does not require that local general plans, specific plans, or zoning be consistent with the RTP/SCS; instead, it provides incentives to governments and developers for consistency.

Riverside County Transportation Commission

The Riverside County Transportation Commission (RCTC) plans and implements transportation and transit improvements and assists local governments with funding for local streets and roads.

Riverside County Congestion Management Program

In the State of California, the Congestion Management Program (CMP) was first established in 1990 under Proposition 111. Proposition 111 established a process for each metropolitan county in California to designate a Congestion Management Agency (CMA) that would be responsible for development and implementation of the CMP within county boundaries. The Riverside County Transportation Commission (RCTC) was designated

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as the CMA for Riverside County in 1990, and therefore, prepares CMP updates in consultation with the Technical Advisory Committee (TAC), which consists of local agencies, the County of Riverside, transit agencies, and sub-regional agencies (RCTC 2019).

The intent of the CMP is to more directly link land use, transportation, and air quality, thereby promoting reasonable growth management programs that will effectively utilize new transportation funds, alleviate traffic congestion and related impacts, and improve air quality. Counties within California have developed CMP's with varying methods and strategies to meet the intent of the CMP legislation.

The focus of the CMP is the development of an "enhanced traffic monitoring system," in which real-time traffic count data can be accessed by RCTC to evaluate the condition of the Congestion Management System (CMS), as well as meet other monitoring requirements at the state and federal levels. Per the adopted LOS standard of E, when a CMS segment falls to "F," a deficiency plan is required. Preparation of a deficiency plan is the responsibility of the local agency where the deficiency is located. Other agencies identified as contributors to the deficiency will also be required to coordinate with the development of the plan. The plan must contain mitigation measures, including transportation demand management (TDM) strategies, transit alternatives, and a schedule for mitigating the deficiency. To ensure that the CMS is appropriately monitored to reduce CMP deficiencies, it is the responsibility of local agencies, when reviewing and approving development proposals, to consider the traffic impacts on the CMS.

Additionally, under the Riverside County CMP, LOS A through E represent acceptable conditions, and LOS F represents unacceptable conditions. The CMP indicates that a project may have a significant impact and that a traffic study would be required if the project would adversely affect the morning or afternoon peak periods on a designated CMP arterial roadway or freeway.

County of Riverside Transportation Uniform Mitigation Fee

The County of Riverside's transportation uniform mitigation fee is administered by the Western Riverside Council of Governments. Under this fee, the council collects fees from new development to fund transportation improvements, such as roadway widening, new roadways, intersection improvements, traffic signalization, etc., for the purpose of mitigating future growth through 2035. Public schools are exempt from this fee.

Local

City of Riverside General Plan 2025

The Circulation and Community Mobility Element of the City of Riverside General Plan 2025 outlines the goals, recommendations, objectives, guidelines, and standards required to improve and enhance Riverside's local and regional transportation system. The following General Plan policies are related to the proposed project and aim to minimize adverse conditions for traffic and transportation in the city.

Policy CCM-2.3. Maintain LOS D or better on Arterial Streets wherever possible. At key locations, such as City Arterials that are used by regional freeway bypass traffic and at heavily traveled freeway interchanges, allow LOS E at peak hours as the acceptable standard on a case-by-case basis.

- Policy CCM-6.1. Encourage the reduction of vehicle miles, reduce the total number of daily peak-hour vehicular trips, increase the vehicle occupancy rate and provide better utilization of the circulation system through the development and implementation of TDM programs contained in the SCAQMD [South Coast Air Quality Management District] and County of Riverside TDM Guidelines.¹
- Policy CCM-8.1. Continue to regularly meet with local school districts to identify safe routes to all schools, enabling better school access by cyclists and pedestrians. Support the establishment of safe drop-off and pick-up zones around schools during the morning and afternoon peak hours.
- Policy CCM-8.2. Promote walking and biking as a safe mode of travel for children attending local schools.
- Policy CCM-8.3. Apply creative traffic management approaches to address congestion in areas with unique problems, particularly on roadways and intersections in the vicinity of schools in the morning and afternoon peak hours and near churches, parks, and community centers.
- Policy CCM-8.4. Give priority to sidewalk and curb construction to areas near schools with pedestrian traffic.
- Policy CCM-8.5. Continue to participate in the Riverside County Transportation Commission's SB 821 program for the funding of facilities for the exclusive use of pedestrians and bicyclists to eliminate missing sidewalk and/or bicycle path links.
- Policy CCM-8.6. Continue to administer the Pedestrian and Bicycle School Safety Program through the
 Police Department to provide education for school aged children to help them identify traffic hazards and
 to develop safe pedestrian and biking habits.

City of Riverside Traffic Impact Analysis Guidelines

The City's Traffic Impact Analysis (TIA) Guidelines for Vehicle Miles Traveled and Level of Service Assessment (TIA Guidelines) prescribes methods for traffic studies in the City. The City's TIA Guidelines states that a TIA that includes LOS analysis not required for "preschools, local serving elementary schools and local serving middle schools."

The TIA also states that the following activities generally will not require a TIA that includes VMT analysis. The TIA Guidelines' presumption is based on the substantial evidence provide in the OPR's Technical Advisory supporting SB 743 implementation or is related to projects that are local serving, which, by definition, would decrease the number of trips or the distance those trips travel to access the development (and are VMT-reducing projects).

- Projects located in a low-VMT generating area (as defined later in this guidance)
- Local-serving K-12 schools

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City of Riverside. 2018, February. Circulation and Community Mobility Element. https://www.riversideca.gov/planning/gp2025program/GP/12_Circulation_&_Community%20Mobility_Element_with%20map s.pdf.

- Local parks
- Daycare centers
- Local-serving gas stations
- Local-serving banks
- Local-serving hotels (e.g., non-destination hotels)
- Student housing projects
- Local-serving community colleges that are consistent with the assumptions noted in the RTP/SCS
- Projects generating less than 110 daily vehicle trips.

The proposed project is a local-serving TK-6 school project; therefore, it is screened from preparing a TIA with LOS and VMT analysis.

5.7.1.2 EXISTING CONDITIONS

Existing Circulation Network

The traffic study evaluated 10 street intersections in the vicinity of the project site, as shown in Table 5.7-1, *Traffic Study Area Intersections*. Figure 5.7-1, *Existing Street Network and Intersection Controls*, show the existing street configurations and intersection controls.

Table 5.7-1 Traffic Study Area Intersections

Intersections	Traffic Control	Jurisdiction		
Signalized Intersections				
1. 14th Street/Victoria Avenue	Traffic Signal	City of Riverside		
2. 14th Street/Park Avenue	Traffic Signal	City of Riverside		
3. 14th Street/Howard Avenue	Traffic Signal	City of Riverside		
4. 14th Street/Eastbound 91 Freeway Ramps	Traffic Signal	Caltrans		
5. 14th Street/Mulberry Street	Traffic Signal	City of Riverside		
Unsignalized Intersections				
6. 13th Street/Victoria Avenue	Stop Signs on 13th Street	City of Riverside		
7. 13th Street/Park Avenue	4-Way Stop Signs	City of Riverside		
8. 13th Street/Howard Avenue	Stop Sign on 13th Street	City of Riverside		
9. 12th Street/Park Avenue	Stop Signs on 12th Street	City of Riverside		
10. 12th Street/Howard Avenue	4-Way Stop Signs City			

Pedestrian and Bicycle Facilities

The streets adjacent to the project site (14th Street, Howard Avenue, 13th Street, Park Avenue, and Victoria Avenue) have paved sidewalks along both sides of the street and all of the intersections adjacent to the project site, with the exception of a three-way intersection at Howard Avenue and 13th Street, are equipped with painted crosswalks; and the signalized intersections also have pedestrian signals and pedestrian push buttons to activate the signals. There is striped (Class 2) bike lane on Victoria Avenue from 14th Street to Central Avenue, and the bike lane on Victoria continues on as Class 1 and 2 bike lane from Central Avenue to La Sierra Avenue.

Public Transit

The Riverside Transit Agency (RTA) operates public transit bus services in the City of Riverside. The nearest bus stops from the project site are on 14th Street between Victoria Avenue and Howard Avenue for RTA Routes 10 and 13. Additionally, the project site is approximately 0.2 mile southeast of the proposed Vine Street Mobility Hub. The Vine Street Mobility Hub is a multi-modal transportation hub, consisting of an 18-bay bus transfer station and associated layover facilities, including a driver lounge, security office, and restrooms for drivers and coach operators. When completed, the Vine Street Mobility Hub project will consolidate the existing on-street transfer and layover zones on Vine Street and some of the on-street bus transfer and layover zones in Downtown Riverside. Vine Street Mobility Hub would add several buses per hour to Vine Street but these buses currently have their transfer/layover activities along Vine Street, and would not result in an increase in bus volumes on the streets adjacent to the project site. Furthermore, a minor increase in vehicular traffic associated with park-and-ride and drop-off/pick-up activity is anticipated from the Mobility Hub project because most of that traffic would be using the streets adjacent to the school site regardless of whether the bus stop zones were located at the new hub or curbside along the streets (Garland 2020).

The RCTC Riverside-Downtown Metrolink Station is approximately 0.12 mile west of the project site. RCTC and Metrolink are proposing to expand passenger-loading platform and tracks, extend the pedestrian overpass to access the new platform, and provide pedestrian access and parking improvements along Howard Avenue. According to the Traffic Impact Analysis prepared by RCTC as part of the Draft EIR for the Riverside Downtown Metrolink Station Improvements, the net increase in traffic would be minimal as the RCTC's station improvement project would replace the trips generated by the existing Prism Aerospace. The net increase is estimated at143.4 trips during AM peak hours and 141.6 trips during PM peak hours. The Riverside Downtown Metrolink Station Improvement project was included as a cumulative project in this EIR's analysis.

5.7.2 Thresholds of Significance

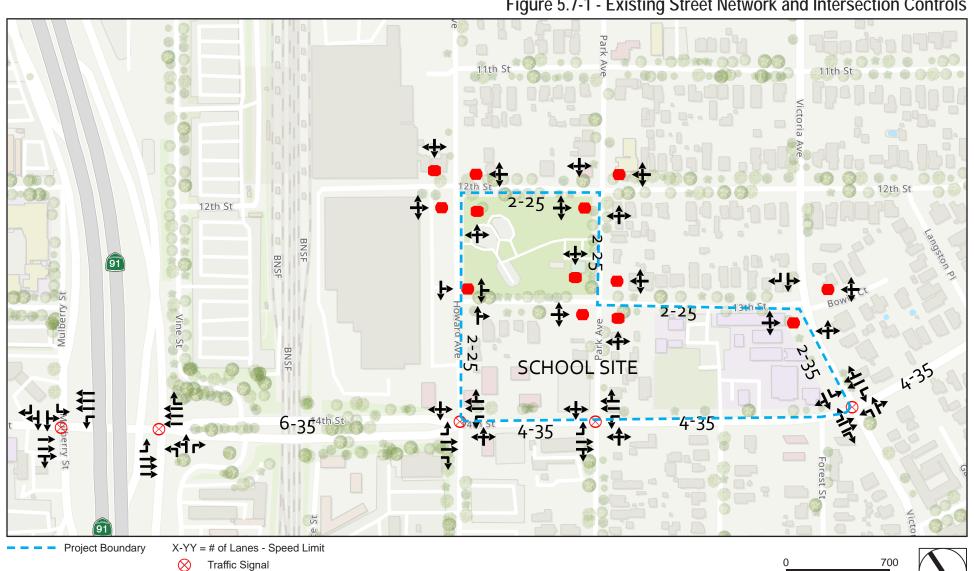
According to CEQA Guidelines Appendix G, a project would normally have a significant effect on the environment if it would:

- T-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
- T-2 Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).
- T-3 Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- T-4 Result in inadequate emergency access.

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5. Environmental Analysis

Figure 5.7-1 - Existing Street Network and Intersection Controls



Stop Sign

Source: Garland & Associates, 2022

Scale (Feet)

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5.7.3 Plans, Programs, and Policies

- PPP T-1 The proposed project's construction activities will be conducted in accordance with the provision of traffic-control devices in compliance with the California Manual for Uniform Traffic Control Devices to ensure traffic safety on public streets, highways, pedestrian walkways, and bikeways.
- PPP T-2 The proposed project's construction contractor will be required to comply with all City of Riverside standard conditions pertaining to construction, including work hours, traffic control plan, haul route, and access. Where possible, construction-related trips will be restricted to off-peak hours.
- PPP T-3 The proposed project's construction contractor will be required to obtain an oversized-vehicle transportation permit, if necessary, from Caltrans.

5.7.4 Environmental Impacts

5.7.4.1 PROJECT-GENERATED TRAFFIC

Trip generation represents the amount of traffic that is attracted and produced by a development and is based on the specific land uses planned for a given project. As the project would result in the displacement of existing land uses at the project site, the net increase in site-generated traffic was determined by subtracting the traffic that is generated by the existing uses from the volumes of traffic that are projected to be generated by the new school.

The trip generation rates that were used to calculate the volumes of traffic generated by each land use are shown in Table 5.7-2, *Project Trip Generation Rates*. These trip generation rates are from the Institute of Transportation Engineers (ITE) Trip Generation Manual (11th Edition, 2021). The ITE Trip Generation Manual presents a summary of the trip generation data that have been voluntarily collected and submitted to ITE, and is a nationally recognized and accredited method of estimating trips used by traffic engineers throughout the country. Although the trip generation rates are based on the number of students, the data represents the total number of vehicle trips generated by the schools, including staff/faculty vehicles, drop-off/pick-up activities, visitors, and deliveries.

Table 5.7-2 Project Trip Generation Rates

		AM Peak Hour			
Land Use	Total	Inbound	Outbound	Traffic	
Elementary School (trips per student)	0.74	54%	46%	2.27	
High School (trips per student)	0.52	68%	32%	1.94	
Single-Family Residential (trips per unit)	0.70	26%	74%	9.43	
Multifamily Residential (trips per unit)	0.40	24%	76%	6.74	
Tire Store (trips per 1,000 square feet)	2.61	64%	36%	27.69	
Auto Parts and Service (trips per 1,000 square feet)	1.91	72%	28%	16.6	

Option 1 Trip Generation

Under all three options, the residential, commercial, and church uses from blocks B and C would be removed from the project site. In addition, under Option 1, the existing Lincoln High School operation would also be eliminated from the project site. Table 5.7-3, *Option 1 Project-Generated Traffic*, shows estimated trips from Option 1. As shown, the proposed project under Option 1 would generate 592 vehicle trips during the morning peak hour (320 inbound and 272 outbound) and approximately 1,816 vehicle trips per day. After deducting the traffic that is generated by the existing land uses that will be eliminated from the project site, the net increase in site-generated traffic volumes would be 457 trips during the morning peak hour (232 inbound and 225 outbound) and 1,100 trips per day.

Table 5.7-3 Option 1 Project-Generated Traffic

		AM Peak Hour		
Land Use	Total	Inbound	Outbound	Daily Traffic
NEW TRIPS				
Elementary School (800 students)	592	320	272	1,816
TRIPS ELIMINATED				
High School (196 students)	102	69	33	380
Single-Family Residential (9 units)	7	2	5	85
Multifamily Residential (2 units)	1	0	1	15
Tire Store – Johnny's (5,320 square feet)	14	9	5	150
Auto Parts and Service – L&M (5,699 square feet)	11	8	3	90
Total Trips Eliminated	135	88	47	720
NET INCREASE IN SITE-GENERATED TRAFFIC	-	•	•	
Net Increase	457	232	225	1,100
		•		

Option 2 Trip Generation

Under Option 2, the operation of Lincoln High School would remain as existing and a portion of the existing Lincoln Park would be used for school use during school hours under a joint-use agreement with the City of Riverside. Although the actual use schedule for the joint-use component would be determined by a future joint-use agreement, it is assumed for the traffic analysis that the joint-use portion of the park would be available for use by the public during after-school hours (4:30 to 10:00 pm) on school days and throughout the day on days when school is not in session. The joint-use athletic fields for the proposed school would be regular grass fields typical of an elementary school and would not be configured for specific sports, such as soccer or baseball. However, for the purposes of this traffic analysis, it is assumed that the joint-use fields may accommodate soccer games and practices, attracting up to 60 AYSO players, 10 referees/coaches, and 90 spectators on a typical weekday as a worst-case scenario. In addition, it is assumed that the basketball courts may attract up to 40 players and 10 spectators as worst-case scenario for the purposes of analysis. Based on the worst-case assumption for the joint-use field to be used as soccer fields, a reasonable assumption was made that the AYSO players would not independently drive to the park, the referees and coaches would each drive to the park, and that the spectators and basketball players would generate one vehicle trip for every two individuals. Therefore, it was estimated that the joint-use fields and the hardcourts would generate 80 vehicle trips per day, which

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equates to a total daily traffic volume of 160 trips per day (one inbound and one outbound for each driver). The assumption of one trip for every two individuals is based on the fact that some of the people would travel together and some of the people would walk to the park from the nearby residential neighborhood. Table 5.7-4, *Option 2 Project-Generated Traffic*, shows estimated trips from Option 2. As shown, the proposed project under Option 2 would generate 592 vehicle trips during the morning peak hour (320 inbound and 272 outbound) and approximately 1,820 vehicle trips per day. And the joint-use park would generate 160 daily trips. After deducting the traffic that is generated by the existing land uses that will be eliminated from the project site, the net increase in site-generated traffic volumes would be 559 trips during the morning peak hour (301 inbound and 258 outbound) and 1,640 trips per day.

Table 5.7-4 Option 2 Project-Generated Traffic

	AM Peak Hour			Daily
Land Use	Total	Inbound	Outbound	Traffic
New Trips				
Elementary School (800 students)	592	320	272	1,820
Joint-Use Park – Public Usage	0	0	0	160
TRIPS ELIMINATED				
Single-Family Residential (9 units)	7	2	5	85
Multifamily Residential (2 units)	1	0	1	15
Tire Store – Johnny's (5,320 square feet)	14	9	5	150
Auto Parts and Service – L&M (5,699 square feet)	11	8	3	90
Total Trips Eliminated	33	19	14	340
NET INCREASE IN SITE-GENERATED TRAFFIC				
Net Increase	559	301	258	1,640

Option 3 Trip Generation

Under Option 3, the existing high school would be redeveloped on the project site and the number of students and the volumes of generated traffic would remain the same. Table 5.7-5, *Option 3 Project-Generated Traffic*, shows estimated trips from Option 3. As shown, the proposed project under Option 3 would generate 592 vehicle trips during the morning peak hour (320 inbound and 272 outbound) and approximately 1,820 vehicle trips per day. After deducting the traffic that is generated by the existing land uses that will be eliminated from the project site, the net increase in site-generated traffic volumes would be 559 trips during the morning peak hour (301 inbound and 258 outbound) and 1,480 trips per day.

Table 5.7-5 Option 3 Project-Generated Traffic

		AM Peak Hour		
Land Use	Total	Inbound	Outbound	Traffic
New Trips				
Elementary School (800 students)	592	320	272	1,820
TRIPS ELIMINATED				
Single-Family Residential (9 units)	7	2	5	85
Multi-Family Residential (2 units)	1	0	1	15
Tire Store – Johnny's (5,320 square feet)	14	9	5	150
Auto Parts and Service – L&M (5,699 square feet)	11	8	3	90
Total Trips Eliminated	33	19	14	340
NET INCREASE IN SITE-GENERATED TRAFFIC				
Net Increase	559	301	258	1,480

5.7.4.2 IMPACT ANALYSIS

The following impact analysis addresses the thresholds of significance; the applicable thresholds are identified in brackets after the impact statement.

Impact 5.7-1: The proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. [Threshold T-1]

Construction Traffic

Construction of the proposed project would generate various levels of truck and automobile traffic throughout the duration of the construction period. The construction-related traffic includes construction workers traveling to and from the site as well as trucks hauling construction materials to the site and demolition/excavation material away from the site. The construction activities would generate an estimated 50 to 60 workers' trips per day and approximately 20 to 30 truck trips per day. The truck trips would be spread out throughout the workday and would generally occur during non-peak traffic periods. This level of construction-related traffic would be temporary and would not result in a significant traffic impact on the study area roadway network as it would be negligible compared to the volumes of traffic that would be generated by the proposed project. Therefore, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system. Construction traffic impacts would not be significant

City of Riverside Circulation and Community Mobility Element

The applicable policies from the City's Circulation and Community Mobility Element are described in Section 5.7.1.1, Regulatory Framework, under the heading, City of Riverside General Plan 2025. The Eastside Neighborhood students are currently being transported to five schools outside of Eastside Neighborhood. The proposed project would allow Eastside Neighborhood students to attend school within their neighborhood, thereby allowing students to walk to school for some students and also reducing travel distances. Therefore, the

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proposed project would be consistent with the City's Policy CCM 6.1 of encouraging the reduction of vehicle miles.

The proposed project would also be consistent with the City's policies related to providing safe routes to school and enhancing pedestrian safety around schools, community centers, and parks. The proposed project would generate a demand for non-motorized travel as some students would travel to and from the school as pedestrians or on bicycles. The streets in the vicinity of the project site have sidewalks along both sides of the street and the signalized intersections along 14th Street are equipped with painted crosswalks and pedestrian crossing signals. Painted crosswalks are in place at the unsignalized intersections of 13th Street at Park Avenue, 13th Street at Victoria Avenue, and 12th Street at Park Avenue. The crosswalks at the four corners of the block where Lincoln High School is located are painted yellow to indicate that they are in a school zone. Additionally, the proposed project would provide appropriate signs and striping in the vicinity of the project site in accordance with the city's and Division of the State Architect (DSA) requirements. Therefore, the proposed project would not conflict with the policies related to providing safe walking and biking routes to the proposed school.

The District proposes to vacate Park Avenue under all three options and vacate Park Avenue and 13th Street under Option 2. Although the proposed project would change travel patterns in the vicinity of the project due to the introduction of a new elementary school under Options 1 and 3, and also joint-use park use under Option 2, as substantiated in the TIA (included in Appendix I to the Draft EIR), no intersection would experience traffic delays that would exceed the acceptable LOS impact threshold identified in the Circulation and Community Mobility Element—LOS D for arterial and collector streets and LOS C for local streets. Therefore, although the traffic impact in terms of LOS is no longer an appropriate method of traffic evaluation in terms of CEQA, the TIA demonstrated that the proposed project would not result in exceedance of the City's standards. Therefore, the proposed project would not conflict with the City's Circulation and Community Mobility Element.

Congestion Management Program

The nearest CMP roadway to the project site, which is the only CMP roadway in the project vicinity, is the Riverside Freeway (State Route 91). It is approximately one-quarter mile west of the project site. It is estimated that approximately 2.5 percent of the project-generated traffic would travel on any particular segment of State Route 91. This equates to a maximum of 12 vehicles during the morning peak hour for Option 1 and 14 vehicles per hour for Options 2 and 3. This level of project-generated traffic is negligible compared to the existing volumes of traffic on this freeway and would not result in a significant impact on this CMP roadway. The proposed project would not exceed an LOS standard established by the County congestion management agency for designated roads or highways and the project's impacts on the CMP network would be less than significant.

Riverside Transit Agency

With regard to public transit, RTA operates Route 10 along 14th Street and Victoria Avenue south of 14th Street and Route 10 along 14th Street. Both of these bus lines have stops adjacent to the project site. The project access would occur from 13th Street, therefore, the proposed project would not adversely affect the

performance of these transit or non-motorized transportation facilities. and the proposed project would not conflict with any plans or policies relative to these transportation modes.

City's Affordable Housing & Sustainable Communities (AHSC) + Transformative Climate Communities (TCC) program

The project site is within the planning boundaries of the City's Affordable Housing & Sustainable Communities (AHSC) + Transformative Climate Communities (TCC) program, where the grants are offered by the California Strategic Growth Council to fund affordable housing, smart transit and walkable communities, urban greening, and solar and water/power efficiency project, among a wide range of activities. The main objective is to reduce GHG emissions and establish healthier communities over time. The City of Riverside was awarded grant funding, which includes active transportation and mobility enhancements in the vicinity of the project site. The initial plan showed bike and pedestrian improvements that go through Park Avenue from 14th Street to University Avenue, which would conflict with the proposed project since all three options would require vacation of Park Avenue. However, after a collaborative effort between the City and District staff, the City determined that the bike and pedestrian improvements would occur on Howard Avenue from 14th Street to 12th Street. Therefore, the proposed project would not interfere with the City's AHSC and TCC program. Additionally, the development of a school in the Eastside Neighborhood would allow students to walk to school and reduce VMT by placing the school closer to its service population. The proposed project would not conflict with this program.

Level of Significance Before Mitigation: Less than significant impact.

Impact 5.7-2: The project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). [Threshold T-2]

Consistent with the City's TIA Guidelines, projects that meet certain screening thresholds based on their project type may be presumed to result in a less than significant transportation impact. As described in Section 5.7.1, *Environmental Setting*, City of Riverside TIA Guidelines, local-serving K-12 schools are screened from further VMT analysis consistent with the screening criteria recommended in OPR's Technical Advisory. The proposed project involves development of a K-5 school to serve the Eastside Neighborhood and reduce students being bused to schools outside of the Eastside Neighborhood. The project is presumed to result in a less-than-significant VMT impact; therefore, no further VMT analysis is required. The proposed project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

Level of Significance Before Mitigation: Less than significant impact.

Impact 5.7-3: The project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). [Threshold T-3]

Vehicular access to the proposed project site would be provided by driveways along the south side of 13th Street between Park Avenue and Victoria Avenue. The increased levels of traffic, the increased number of pedestrians, and the increased number of vehicular turning movements at the school entrances and at the

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nearby intersections would result in an increased number of traffic conflicts and a corresponding increase in the probability of an accident occurring. These impacts would not be significant, however, because the streets, intersections, and driveways are designed to accommodate the anticipated levels of vehicular and pedestrian activity. The streets and intersections have historically been accommodating school-related traffic on a daily basis for the existing Lincoln High School. The addition of an elementary school would be compatible with the neighborhood and the proposed project would not result in any major hazards for vehicular traffic, pedestrians, or bicyclists.

The streets in the vicinity of the project site have sidewalks adjacent to the street and the intersections adjacent to the project site are equipped with painted crosswalks and pedestrian signals at the signalized intersections. These features would enhance pedestrian safety and facilitate pedestrian access to the school. The proposed project would not, therefore, substantially increase hazards due to a geometric design feature or incompatible uses.

The proposed project would be compatible with the design and operation of a high school and would not result in any major modifications to the existing access or circulation features at the school. The proposed project would not, therefore, substantially increase hazards due to a design feature or incompatible uses.

Level of Significance Before Mitigation: Less than significant impact.

Impact 5.7-4: The project would not result in inadequate emergency access. [Threshold T-4]

The proposed access and circulation features at the school, including the on-site roadways, parking lots, and fire lanes, would accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. The project site has multiple street frontages and all access features are subject to and must satisfy the DSA and the City of Riverside design requirements and would be subject to approval by the Fire Department. Emergency vehicles would be able to access the school grounds and buildings and all other areas of the school, including the playfields, via on-site travel corridors. Emergency preparedness and response planning and coordination would be coordinated through the District's Risk Management Department. The proposed school would have a school safety plan in compliance with the District's "safe school plans." The project would not interfere with any emergency response plans or emergency evacuation plans. The proposed project would not, therefore, result in inadequate emergency access.

Level of Significance Before Mitigation: Less than significant impact.

5.7.5 Cumulative Impacts

The proposed project would be consistent with adopted policies, plans, and programs regarding circulation, including public transit, bicycle, and pedestrian facilities. The proposed project is also a local-serving project that would result in a less-than-significant VMT impact. Therefore, when combined with other development projects in the city, as listed in Table 4-2, *Development Projects for Cumulative Analysis*, the proposed project would not conflict with applicable policies and plans and would not result in a significant VMT impact. Cumulative transportation impacts would be less than significant.

5.7.6 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and plans, programs, and policies, the following impacts would be less than significant: Impacts 5.7-1, 5.7-2, 5.7-3, and 5.7-4.

5.7.7 Mitigation Measures

No significant impacts related to transportation were identified, and no mitigation is required.

5.7.8 Level of Significance After Mitigation

Transportation impacts would be less than significant.

5.7.9 References

Garland Associates. 2022, July. Traffic Impact Analysis for the Proposed Eastside Neighborhood School.

Riverside, City of. 2018, February. Circulation and Community Mobility Element. https://www.riversideca.gov/planning/gp2025program/GP/12_Circulation_&_Community%20Mobility_Element_with%20maps.pdf.

Riverside County Transportation Commission (RCTC). 2019, December. Riverside County Long Range Transportation Study.

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