

February 1, 2022

David Lewis, Capital Projects Manager
Attn: Riverside-Downtown Station Improvements Project
Riverside County Transportation Commission
4080 Lemon Street, 3rd Floor
Riverside, CA 92501

SUBJECT: COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE RIVERSIDE-DOWNTOWN STATION IMPROVEMENTS PROJECT

Dear Mr. Lewis:

The Riverside Unified School District (District) would like to thank you for the opportunity to review and provide comments on the proposed Riverside-Downtown Station Improvements Project Draft Environmental Impact Report (DEIR) and technical appendices. It is our understanding that the Riverside County Transportation Commission (RCTC) and the Southern California Rail Authority (Metrolink), in collaboration with the Federal Transit Administration (FTA), propose construction of an additional passenger loading platform and train tracks, extension of the existing pedestrian bridge, an increase of up to 560 parking spaces, as well as other station improvements (RCTC project). The purpose of the project is to increase capacity and services to the Riverside-Downtown Station.

The Riverside Unified School District has reviewed the DEIR for the RCTC project and provides the following comments.

GENERAL

The District currently operates an existing school, Abraham Lincoln High School (Lincoln High School), and is in the planning phase of developing an Eastside Neighborhood School in close proximity of the RCTC project. The proposed Eastside Neighborhood School project area includes the Lincoln High School at 4341 Victoria Avenue, Lincoln Park, and the blocks bounded by Howard Street on the west, 13th Street on the north, and 14th Street on the south. See the attached figure for school site and project locations.

The District issued the Notice of Preparation (NOP) for an Environmental Impact Report (EIR) for the Eastside Neighborhood School on May 10, 2021, and is currently preparing an EIR. As stated in the NOP, under Option 2 of the Eastside Neighborhood School, the school would have a joint-use agreement with the City of Riverside to use Lincoln Park. The RCTC project extends to the southwest corner of the intersection of 12th Street and Howard Avenue, immediately across from Lincoln Park to the northwest. However, the RCTC Project DEIR indicates that the proposed school site is located approximately 0.1 miles from the RCTC project. The District requests that the Final EIR accurately identifies the distance to the planned Eastside Neighborhood School site.

In addition, the DEIR did not consistently include the planned Eastside Neighborhood School or the existing Lincoln High School as sensitive receptors. The proposed Eastside Neighborhood School was considered in the RCTC DEIR for hazard impacts from trucks hauling impacted materials, potential emissions of hazardous substances within one-quarter mile of an existing or proposed school, and capping operations at new parking lot reducing potential exposures to the proposed school site. However, the proposed Eastside Neighborhood School was not included as a sensitive receptor in the noise analysis or in the cumulative analysis section of the traffic analysis. We request that the existing and proposed RUSD schools are addressed consistently throughout the EIR as sensitive receptors.

AIR QUALITY AND GREENHOUSE GASES

According to our review, emissions from the project construction would not exceed the South Coast Air Quality Management District (South Coast AQMD) regional significance thresholds. Additionally, the DEIR provided an analysis of localized construction impacts to nearby sensitive receptors that resulted in a less than significant impact. However, the District is still concerned about the local impacts to nearby sensitive receptors, including our existing school, Lincoln High School, as well as the proposed Eastside Neighborhood School project. The proposed Eastside Neighborhood School has an option to work with the City of Riverside on a joint-use agreement for the use of Lincoln Park for playfields. On page 3.2-6 of the DEIR, Air Quality Section, Lincoln Park is identified as a sensitive receptor, but not the nearby Lincoln High School. The District requests that in the Final EIR, the future Eastside Neighborhood School and existing Lincoln High School are identified as nearby sensitive receptors.

As shown in Tables 3.2-7 and 3.2-8 of the DEIR, the localized construction impacts are right at the significance thresholds for PM10. Since there are no additional mitigations for construction emissions other than South Coast AQMD's standard fugitive dust mitigations, the District is concerned about the diesel-exhaust PM10 risks from both off-road equipment as well as haul trucks that might still impact nearby school sites. We ask RCTC to consider the following additional mitigations to ensure that concentrations of air pollutants near sensitive receptors are minimized to the maximum extent practical over the 2 to 2.5-year construction period, and during the permanent operation of the project:

- Construction contractor utilizes equipment meeting EPA Tier 3 or higher engine standards for diesel-fueled off-road equipment over 50 horsepower.
- Where possible, use non-diesel fueled portable or off-road equipment (e.g., electric, CNG, LPG).
- Restrict haul trucks away from sensitive receptors (i.e., Lincoln Park, residences, and school sites).

HAZARDS AND HAZARDOUS MATERIALS

The proposed Eastside Neighborhood School was considered in the RCTC DEIR for hazard impacts from trucks hauling impacted materials, potential emissions of hazardous substances within one-quarter mile of an existing or proposed school, and capping operations at new parking lot reducing potential exposures to the proposed school site. The District requests that RCTC provide a detailed

Mitigation Monitoring and Reporting Program (MMRP) to the District so that we can be sure they will be implemented appropriately.

NOISE

Despite identifying schools as noise-sensitive land uses (NSLUs), the DEIR fails to address noise impacts from the RCTC project at the existing Lincoln High School. Also, the planned Eastside Neighborhood School includes an option that uses Lincoln Park as a joint-use playfield for the school, which is at the southeast corner of 12th Street and Howard Avenue. This will be less than 100 feet southeast of the RCTC project. The District requests that RCTC consider the potential noise impacts the implementation of the RCTC project will have on the proposed Eastside Neighborhood School and existing Lincoln High School.

The District requests that the Final EIR includes a noise impact assessment that conservatively applies the construction noise threshold of 80 dBA L_{eq} (8-hr) to the schools. In addition, the District requests that the Final EIR confirm that no pile driving would be needed for bridge/overpass/platform foundations construction.

While the FTA significance criteria shown in Figures 4-1 and 4-2 of Appendix N are fine for rail noise impacts, the RCTC project would also add vehicular trips to the local roadway network, including buses. Therefore, the District recommends RCTC follow several thresholds of significance. A significant impact would occur if traffic noise increase would exceed:

- 1.5 dBA in ambient noise environments of 65 dBA CNEL and higher,
- 3 dBA in ambient noise environments of 60 to 64 dBA CNEL, or
- 5 dBA in ambient noise environments of less than 60 dBA CNEL.

It is not clear from the noise analysis or Appendix N, Noise and Vibration Technical Report, what vehicle mix was used for on-road vehicular traffic (i.e., autos, medium-duty trucks, and heavy-duty trucks), day/evening/night percentage splits for vehicle travel, and speeds along local roadways modeled. Existing and future vehicle mix is particularly important to the predicted traffic noise levels, especially with the RCTC project adding more bus trips to the local roadway network. The District requests RCTC to specify the vehicle mix used for on-road vehicular traffic for the analysis for the District.

Table 6-2 of Appendix N is called Existing and Future Traffic Volumes, yet does not appear to show existing traffic volumes, only future. In addition, PM peak hour trips are reported, but to determine L_{dn} , which was used to determine impact significance, average daily trips (ADT) are needed. The District requests RCTC to please disclose the modeled ADT volumes for Existing and Future traffic conditions and the methodology that was used to develop ADT volumes from peak hour.

The District requests that RCTC thoroughly addresses the traffic noise impacts at the District schools (planned Eastside Neighborhood School and Lincoln High School) in the Final EIR. Currently, only residential and park receivers are evaluated. The Final EIR should also address cumulative noise impacts. Only an Opening Year condition is evaluated in the DEIR.

The District asks that construction hauling and vehicle noise is addressed quantitatively, not qualitatively, at the District's nearby schools (planned Eastside Neighborhood School and Lincoln High School).

TRAFFIC ANALYSIS

The RCTC project has the potential to result in a direct and indirect physical change to the nearby community and environment. The projected increase to train services within the next 5 to 30 years is expected to impact the Riverside-Downtown Station and residents next door. Based on the DEIR, the number of Metrolink passenger trains traveling through the Riverside-Downtown Station would increase to 69 percent by 2025 during the weekday, in addition to Amtrak and freight trains. By 2050, additional peak hour and off-peak services could increase to 183 percent. The report projects that by 2040, the state's freight railroad loads may also increase by 38 percent, compared to 2013. Therefore, potentially increasing the demand of vehicular trips to the local existing roadway network. The DEIR fails to analyze the long-term traffic impacts to the District's existing Lincoln High School, the existing community, and the District's proposed Eastside Neighborhood School.

The proposed Eastside Neighborhood School is listed in Table 4.1-1 of the DEIR as one of the Reasonably Foreseeable Actions and Projects in the Cumulative Impacts section of the DEIR. However, the Eastside Neighborhood School is not included as one of the projects addressed in the cumulative analysis section of the DEIR Traffic Impact Analysis. The District requests that RCTC traffic analysis include the proposed Eastside Neighborhood School and existing Lincoln High School in the cumulative analysis addressing not only the impacts during construction, but also the long term RCTC project permanent operational impacts.

CONCLUSION

The District is concerned that the DEIR does not adequately evaluate several key environmental issues as addressed in this letter. The District requests that RCTC prepare detailed responses to these comments and provide additional review time before taking any or further action on the project. Please continue to notify the District of all actions on the proposed project.

We look forward to working cooperatively with the RCTC to create the best environment for our students, staff, and community.

Respectfully,



Ms. Renee Hill
District Superintendent

cc: RUSD Board of Education
Ms. Karen Spiegel, County of Riverside Supervisor, District 2
Ms. Clarissa Cervantes, City of Riverside Council Member, Ward 2
Ms. Gaby Plascencia, City of Riverside Council Member, Ward 5

Figure - School Location and Transit Projects

