

A. Notice of Preparation and Comments

Notice of Preparation

TO: Agencies, Organizations, and Interested Parties

FROM: Riverside Unified School District
3070 Washington Street
Riverside, CA 92504
Contact: Ana Gonzalez, Director of Planning and Development

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report for the Longfellow Elementary School Expansion Project

Pursuant to Public Resources Code Section 21165 and the California Environmental Quality Act Guidelines (CEQA Guidelines) Section 15050, the Riverside Unified School District (District) is the Lead Agency responsible for preparation of an Environmental Impact Report (EIR) addressing potential impacts associated with the project identified below.

PURPOSE OF THE NOTICE OF PREPARATION: The purpose of this notice is: (1) to serve as a Notice of Preparation (NOP) of a Draft EIR pursuant to CEQA Guidelines Section 15082 and (2) to advise and solicit comments and suggestions regarding the scope and content of the EIR to be prepared for the proposed project. The District, as Lead Agency, respectfully requests that any Responsible or Trustee Agency responding to this notice respond in a manner consistent with State CEQA Guidelines Section 15082(b). Comments and suggestions should, at a minimum, identify the significant environmental issues, reasonable alternatives, and mitigation measures that should be explored in the EIR, in addition to whether the responding agency will be a responsible or trustee agency for the proposed project, and any related issues raised by interested parties other than potential responsible or trustee agencies, including interested or affected members of the public.

The enclosed summary of the proposed project and its probable environmental effects is not an analysis of the project or its impacts. The project summary information is intended to provide said agencies, organizations, and interested parties with sufficient information describing the proposed project and the environmental issues that will be addressed in the EIR so that meaningful responses and comments can be provided.

PUBLIC REVIEW PERIOD: The District welcomes input and comments regarding the preparation of the EIR. The NOP is available for a 30-day public review period beginning **December 21, 2018** and ending **January 21, 2019**. Pursuant to CEQA Guidelines Section 15082, responsible and trustee agencies and other interested parties, including members of the public, must submit any comments in response to this notice **no later than 30 days** after receipt of the notice.

Copies of the NOP are available for review at the following locations:

- Riverside Unified School District Facilities Planning Office, 3070 Washington Street, Riverside, CA 92504
- Longfellow Elementary School, 3610 Eucalyptus Avenue, Riverside, CA 92507
- Jesus Duran Eastside Library, 4033-C Chicago Avenue, Riverside, CA 92507

The NOP can also be viewed on the District's website at the following address:
<http://www.riversideunified.org/cms/One.aspx?portalId=580805&pageId=3594435>.

RESPONDING TO THIS NOTICE: The District will accept written comments regarding this notice through the close of business on **January 21, 2019**. Please indicate a contact person for your agency or organization and send your written comments to Ana Gonzales, Director, Planning and Development, of the Riverside Unified School District at the above address or by e-mail at anagonzalez@rusd.k12.ca.us.

SCOPING MEETING: A public meeting will be held at Longfellow Elementary School, Multi-Purpose Room on January 14, 2019 between 6:00 pm and 7:00 pm. District representatives will be in attendance to describe the proposed campus improvements, explain the environmental process as required by the California Environmental Quality Act and to solicit comments on the potential environmental effects of the project.

PROJECT TITLE: Longfellow Elementary School Expansion

PROJECT LOCATION: The project site is Longfellow Elementary School at 3610 Eucalyptus Avenue in the City of Riverside in Riverside County. The school is in the central part of the City about one mile south of the State Route 91 (SR-91)/SR-60 interchange and about 0.9 mile east of Riverside City Hall. Most of the approximately 6.9-acre campus is in two blocks surrounded by 6th Street to the north, Eucalyptus Avenue to the west, Franklin Avenue to the east, and an alley to the south. The school has two parking lots: one at the northeast corner of Eucalyptus Avenue and 6th Street, and one at the northeast corner of Franklin Avenue and Mission Inn Avenue (see Figures 1, *Local Vicinity Map*, and 2, *Aerial Photograph*). The project work area consists of about 2.84 acres mainly in the central and southern parts of the campus (see Figure 3, *Conceptual Site Plan*).

The proposed project site also includes two parcels developed with single-family residences: 2210 7th Street (Assessor's Parcel Number [APN] 211-143-008) and 2226 7th Street (APN 211-143-007). Note that the houses on these parcels face Mission Inn Avenue, which passes along the parcels' northern boundaries. 7th Street is a dirt alley at the south end of the parcels; the alley is included in the expansion site. The parcels are in the northeast corner of the southern of the two blocks containing most of the campus (see Figure 2, *Aerial Photograph*).

EXISTING CONDITIONS AND SURROUNDING LAND USES: Most of the permanent and portable school buildings are in the north half of the campus. The south half of the campus—south of Mission Inn Avenue—consists of a playfield, hardcourts, and one classroom building. Longfellow Elementary School had enrollment of about 777 students in grades K-6 in the 2017-18 school year (CDE 2018). The school offers dual language immersion in English and Spanish. The school was first built in 1890; various portions of the school have been rebuilt multiple times since then. The school is surrounded by residential and commercial uses to the west across Eucalyptus Avenue; residential uses across 6th Street to the north; residential uses across Franklin Avenue to the east; and commercial uses to the south (see Figure 2, *Aerial Photograph*).

Longfellow Elementary School operates on a two-semester academic calendar beginning in August and ending in May. School hours are 8:20 AM to 2:40 PM.

EXISTING LAND USE DESIGNATIONS: The general plan land use and zoning designations of the project site are Public Facilities/Institutional (PF) and Public Facilities (PF), respectively.

PROJECT DESCRIPTION AND ELEMENTS:

Acquisition

The project includes acquisition of two residential parcels at 2210 7th Street (Assessor's Parcel Number [APN] 211-143-008) and 2226 7th Street (APN 211-143-007); the 7th Street alley abutting the south side of those two parcels; and the Mission Inn Avenue cul-de-sac next to the eastern campus boundary (see Figure 2, *Aerial Photograph*).

Demolition

The project includes demolition or relocation offsite of both residences (see Figure 4, *Demolition Plan*).

Removal

Ten to twelve portable classrooms would be removed from the central part of the campus (see Figure 4).

Construction

Buildings

The project proposes construction of three buildings:

1. A two-story classroom building containing 10 classrooms, including 4 kindergarten classrooms
2. A one-story modular building containing 2 kindergarten classrooms
3. A one-story administration building

The two classroom buildings would be in the central part of the campus, and the administration building would be in the east-central part of the campus (see Figure 3).

Play Areas and Landscaping

The project includes construction of a new kindergarten play area in the central part of the campus; a new hardcourt play area on the west side of the campus; and a new hardcourt play area in the northeast quadrant of the campus (see Figure 5, *Conceptual Landscape Plan*).

Modernization

Five of the existing classroom buildings (Buildings A, B, C, D, and E), and the multipurpose room and cafeteria in Building F, would be modernized (see Figure 3). Work would include new paint, windows, ceilings, and flooring; lighting and electrical system upgrades; new doors and hardware; ADA access upgrades; and roofing repair.

Conversion

The existing administration building, part of Building F, would be converted to parent center/classroom and daycare uses after completion of the new administration building (see Figure 3).

Access, Circulation, and Parking

The existing Mission Inn Avenue cul-de-sac next to the east-central part of the campus would be vacated and demolished and the land added to the campus. The project proposes a two-lane loop driveway with one intersection on Franklin Avenue opposite its intersection with Mission Inn Avenue and a second intersection with Franklin Avenue about 190 feet to the south. Driveway circulation would be one way southbound. A parking lot with 40 spaces, including three ADA spaces, would be built between the driveway and Franklin Avenue; circulation in the drive aisle through the center of the parking lot would be two-way (see Figure 6, *Paving Plan*). The two existing school parking lots would remain.

Utility Improvements

The project includes installation of storm drains and catch basins under the proposed hardcourts in the west-central part of the campus and under the proposed driveway in the east-central part of the campus; one of the proposed catch basins would be in the west curb of Franklin Avenue next to the proposed driveway entrance. All proposed storm drains would connect to an existing 39-inch reinforced concrete pipe storm drain that passes east-west under the central part of the campus (see Figure 7, *Utility Plan*).

The project includes installation of sewers from the proposed buildings connecting to an existing 6-inch sewer under the central part of the campus (see Figure 7).

The project would install domestic water and fire water lines. The domestic water lines would connect to an existing water line in Eucalyptus Avenue, and the fire water lines would connect to an existing water line passing east-west under the middle of the campus (see Figure 7).

The project would include lighting and electrical system upgrades in six existing buildings (see *Modernization* above).

Discretionary Approval and Permits

Project implementation requires certification of the EIR and project approval by the District Board of Education.

POTENTIAL ENVIRONMENTAL EFFECTS: An Initial Study was not prepared for the proposed project. CEQA Statute and Guidelines states that the environmental categories listed below should be addressed. During the scoping process, the District will determine which environmental topical areas will be focused on in the upcoming EIR.

<ul style="list-style-type: none"> ▪ Aesthetics ▪ Agriculture and Forestry Resources ▪ Air Quality ▪ Biological Resources ▪ Cultural Resources ▪ Geology and Soils ▪ Greenhouse Gas Emissions 	<ul style="list-style-type: none"> ▪ Hazards/Hazardous Materials ▪ Hydrology/Water Quality ▪ Land Use/Planning ▪ Mineral Resources ▪ Noise ▪ Population/Housing 	<ul style="list-style-type: none"> ▪ Public Services ▪ Recreation ▪ Transportation/Traffic ▪ Tribal Cultural Resources ▪ Utilities/Service Systems/Energy
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Impacts Expected to Be Less Than Significant

Based on a preliminary screening, impacts to the following topics are expected to be less than significant or no impact. These topics will be addressed in Chapter 8, *Impacts Found Not to be Significant*, in the EIR.

» **Agriculture and Forestry Resources:** The project site is mapped as Urban and Built-Up Land, not as farmland, on the California Important Farmland Finder maintained by the Division of Land Resource Protection (DLRP 2018). The site is developed as an elementary school and residential uses, and there is no agricultural use on or next to the site. Trees onsite are ornamental landscape vegetation and not cultivated for forest resources.

» **Biological Resources:** The project site is built out with school and residential uses and there is no suitable habitat for sensitive species, sensitive natural communities, riparian habitats, or wetlands onsite.

The project site is in the plan area of two habitat conservation plans (HCPs)—the Western Riverside County Multiple Species Conservation Plan (WRCMSHCP) and the Stephens’ Kangaroo Rat Habitat Conservation Plan (SKRHCP). However, as the site is fully developed, no survey requirements apply to the site under either HCP, and a WRCMSHCP Consistency Analysis is not required.

The City of Riverside does not have an ordinance protecting biological resources on private property, and project implementation is not expected to conflict with local ordinances protecting biological resources.

Project implementation would involve removal of trees and thus could impact nesting birds protected under federal and state laws. This impact is expected to be less than significant after compliance with federal and state regulations. However, a focused biological resources section will address impacts to nesting birds so that such regulatory requirements, set forth in a mitigation measure, can be included in the project’s mitigation monitoring and reporting plan.

» **Geology and Soils:** Geology and soils impacts are expected to be less than significant after compliance with state building regulations for schools under the oversight of the Division of the State Architect.

» **Hazards and Hazardous Materials:** A Phase I Environmental Site Assessment (ESA) for the school expansion site was completed in October 2018. A Phase I ESA for the sites of the three proposed buildings will either be prepared as a separate report or will be incorporated into the existing ESA. Hazardous materials impacts—both existing hazardous materials onsite and hazardous materials to be used by the project—will be analyzed in the hazards and hazardous materials section of the EIR.

Impacts related to airports, emergency response planning, and wildfire hazards are expected to be less than significant and will be addressed in Chapter 8 of the EIR.

The nearest airport to the project site is Flabob Airport in the City of Jurupa Valley about 2.7 miles to the west (Caltrans 2018). The site is outside of the area surrounding Flabob Airport where land uses are regulated to minimize aviation hazards to people on the ground (RCALUC 2004).

The proposed work would be within the Longfellow Elementary School campus except for the vacating and removal of the Mission Inn Avenue cul-de-sac and the 7th Street alley segment. The cul-de-sac provides access to the school expansion site—the two residential properties—and to the school. The alley provides local access to the aforementioned two properties but does not provide access to the school. Therefore, upon acquisition and demolition of the residential properties and the alley, project implementation is not expected to impede emergency access to surrounding properties or interfere with emergency response planning.

The project site is not in a fire hazard severity zone mapped by the California Department of Forestry and Fire Protection (CAL FIRE); the nearest Very High Fire Hazard Severity Zone to the site is about 1.5 miles to the northeast (CAL FIRE 2009). Project development is not expected to place people or buildings at risk from wildfires.

- » **Hydrology and Water Quality:** The Box Spring Storm Drain passes under the school, continuing westward (partway in Mission Inn Avenue) until it discharges into the Santa Ana River about 2.3 miles to the west (RCFCWCD 2018). Storm drain inlets are present next to the school boundaries on 7th Street, the Mission Inn Avenue cul-de-sac, Eucalyptus Avenue, and Franklin Avenue. Project development is not expected to change the drainage pattern on or near the site.

Project development would not substantially increase impervious areas onsite, and so is not expected to impact groundwater recharge.

Project construction water quality impacts are expected to be less than significant after preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) pursuant to the Statewide General Construction Permit issued by the State Water Resources Control Board in 2009. Project operational water quality impacts are expected to be less than significant after preparation and implementation of a Water Quality Management Plan (WQMP) pursuant to the Water Quality Management Plan Guidance Document for the Santa Ana Region of Riverside County approved by the Santa Ana Regional Water Quality Control Board in 2012.

The school is in flood zone X mapped by the Federal Emergency Management Agency; that is, it is outside of 100-year and 500-year flood zones (FEMA 2018).

- » **Land Use and Planning:** The proposed school expansion would be permitted under the existing Public Facilities/Institutional (PF) General Plan land use designation and Public Facilities (PF) Zone, and project implementation is not expected to conflict with land use regulations for the site. Project implementation would not divide an established community.
- » **Mineral Resources:** The site is mapped as Urban Area, and not in an area where significant mineral resources are known to be present or are considered likely to be present, by the California Geological Survey (CGS 2008). The project site is built out with an elementary school and is not available for mining. No mineral resources are mapped on or near the site in the City of Riverside General Plan (Riverside 2012).
- » **Population and Housing:** Project implementation will not develop housing or businesses and would not extend roadways or other infrastructure into areas where such infrastructure is currently absent. Project implementation will involve acquisition and demolition of two single-family houses. There were an estimated 100,515 total housing units in the City of Riverside in January 2018 and 94,703 occupied units, with a vacancy rate of 5.8 percent (CDF 2018). Therefore, it is expected that the two households that would be displaced by project implementation would be able to find replacement housing in the project region, and project implementation would not require construction of replacement housing elsewhere.

- » **Public Services:** Project implementation would either not change school capacity or would add a net increase of 2 classrooms to the school. Longfellow Elementary School currently has 38 classrooms, so a net increase of 2 classrooms would be an increase of about 5 percent in the school's capacity. Such increase is not expected to increase demands for fire protection or police protection to the extent that new or expanded fire stations or police stations would be required. No adverse impact to school facilities is expected. The school has play facilities and a library, and the project proposes construction of new play facilities; thus, project implementation would not require construction of new or expanded offsite park or library facilities.
- » **Recreation:** See the preceding discussion of Public Services.
- » **Utilities and Service Systems and Energy:** Project implementation would add a net increase of no more than two classrooms to the school. Such net increase would not substantially increase wastewater or solid waste generation or water or energy demands. The proposed buildings would meet 2016 California Green Building Code (CALGreen) requirements, and project development would not cause *wasteful, inefficient, or unnecessary energy consumption*.¹

The existing conditions of the project site and its surroundings will be used to set the baseline for the environmental analysis of the EIR. The EIR will examine all phases of the project, including planning, construction, and operation, and will address the short- and long-term effects of the project's phases on the environment. Where potentially significant environmental impacts are identified, the EIR will discuss mitigation measures that may make it possible to avoid or reduce significant impacts, as appropriate.

The EIR will also include a discussion of the potentially significant cumulative impacts of the project when considered with other past, present, and reasonably foreseeable future projects in the project area. Furthermore, in compliance with CEQA, the EIR will address a reasonable range of alternatives that are defined and analyzed on the basis of their ability to: 1) avoid or reduce any of the identified significant impacts of the project, and 2) feasibly attain most of the basic objectives of the project.

The following technical studies/reports will be prepared for the proposed project in support of and be included as appendices to the EIR:

- » Air Quality and Greenhouse Gas Emissions Analysis
- » Cultural and Historical Resources Analysis Reports
- » Noise and Vibration Analysis
- » Phase I Environmental Site Assessment and Phase I Addendum
- » Traffic Impact Analysis

A Geologic and Environmental Hazards Assessment (GEHA) is being prepared separately for the proposed project; the geology and soils impact analysis in DEIR Chapter 8 will be based on the GEHA.

REFERENCES

California Department of Education (CDE). 2018, November 28. Dataquest. <http://dq.cde.ca.gov/dataquest/>.

California Department of Finance (CDF). 2018, May. E-5 Population and Housing Estimates for Cities, Counties, and the State, January 2011- 2018. http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/documents/E-5_2018InternetVersion.xls.

California Department of Forestry and Fire Prevention (CAL FIRE). 2009, December 21. Very High Fire Hazard Severity Zones in LRA: Riverside. http://www.fire.ca.gov/fire_prevention/fhsz_maps/FHSZ/riverside/Riverside.pdf.

¹ The italicized text is from the CEQA Guidelines Update submitted to the California Natural Resources Agency by the Office of Planning and Research in January 2018.

California Department of Transportation (Caltrans). 2018, November 30. Caltrans Aviation GIS Data.
<https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=32c3cbe24491427d872e2fec173a4b22>.

California Geological Survey (CGS). 2008. Updated Mineral Land Classification Map for Portland Cement Concrete-Grade Aggregate in the San Bernardino Production-Consumption Region, San Bernardino and Riverside Counties, California. Special Report 206, Plate 1.
ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_206/SR206_Plate1.pdf.

Division of Land Resource Protection (DLRP). 2018, November 28. California Important Farmland Finder.
<https://maps.conservation.ca.gov/dlrp/ciff/>.

Federal Emergency Management Agency (FEMA). 2018, November 29. Flood Map Service Center.
<https://msc.fema.gov/portal/home>.

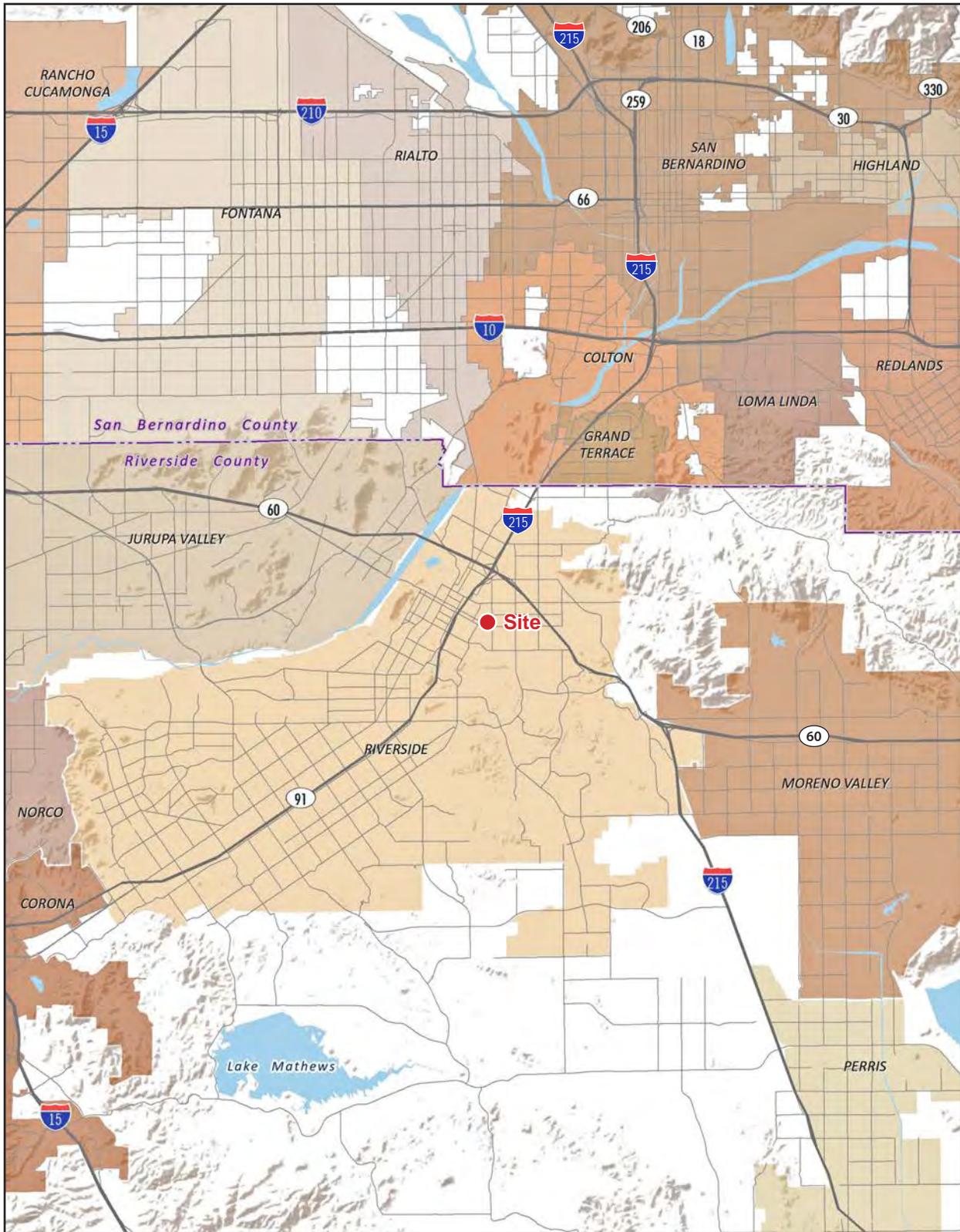
Riverside, City of. 2012. General Plan 2025. Open Space and Conservation Element.
https://www.riversideca.gov/planning/gp2025program/GP/12_Open_Space_and_Conservation_Element.pdf.

Riverside County Airport Land Use Commission (RCALUC). 2004, December. Riverside County Airport Land Use Compatibility Plan Policy Document. Chapter 3: Individual Airport Policies and Compatibility Maps. FL: Flabob Airport. <http://www.rcaluc.org/Portals/0/PDFGeneral/plan/newplan/14-%20Vol.%201%20Flabob.pdf>.

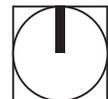
Attachments:

- Figure 1. Local Vicinity Map
- Figure 2. Aerial Photograph
- Figure 3. Conceptual Site Plan
- Figure 4. Demolition Plan
- Figure 5. Conceptual Landscape Plan
- Figure 6. Paving Plan
- Figure 7. Utility Plan

Figure 1 - Location Map



Note: Unincorporated county areas are shown in white.



Source: ESRI, 2018

Figure 2 - Aerial Photograph



— Project Boundary □ School Expansion Site
Note: Residential properties to be acquired: 2210 and 2226 East 7th Street
Source: ESRI, 2018

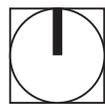
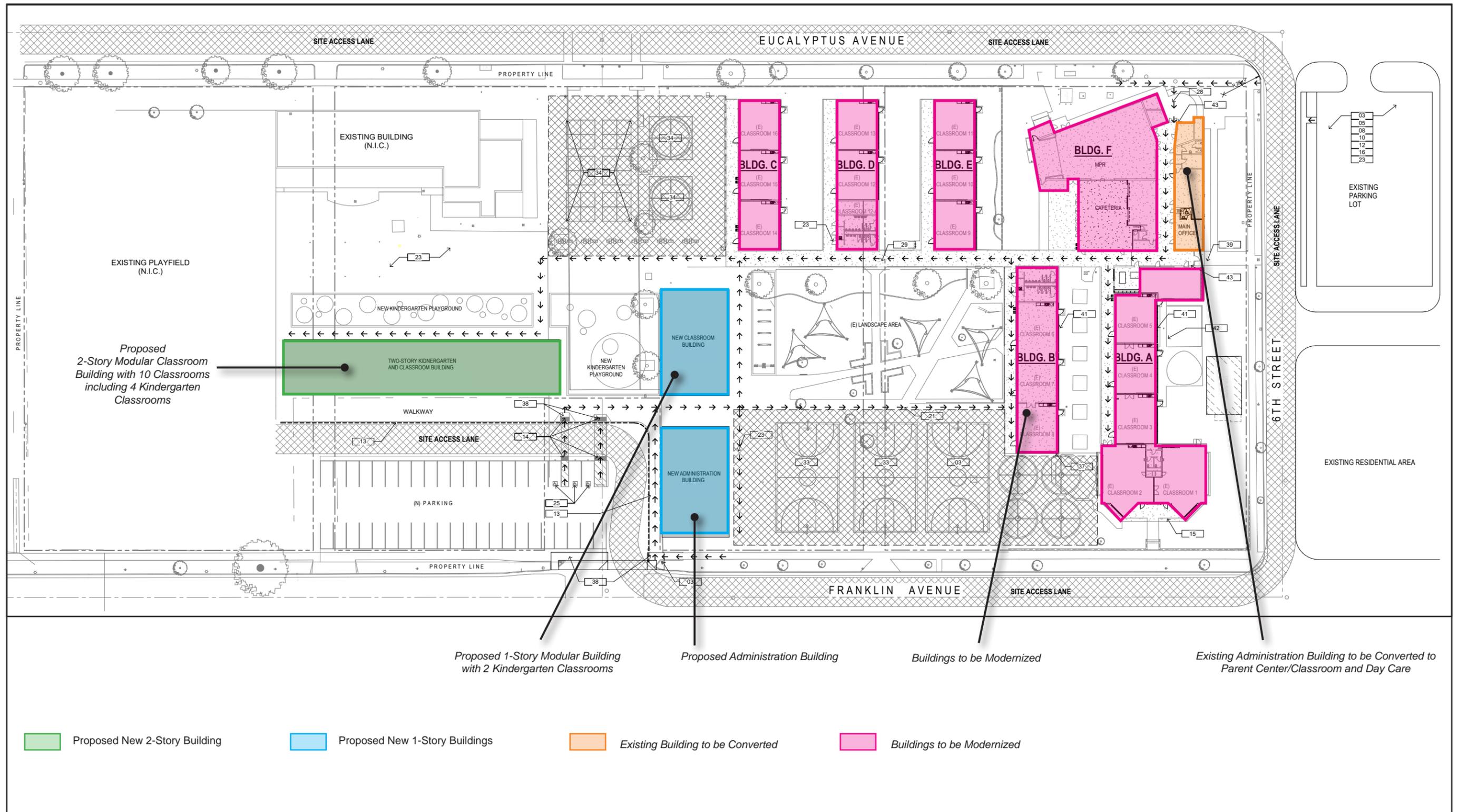


Figure 3 - Conceptual Site Plan



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Scale (Feet)



Figure 4 - Demolition Plan

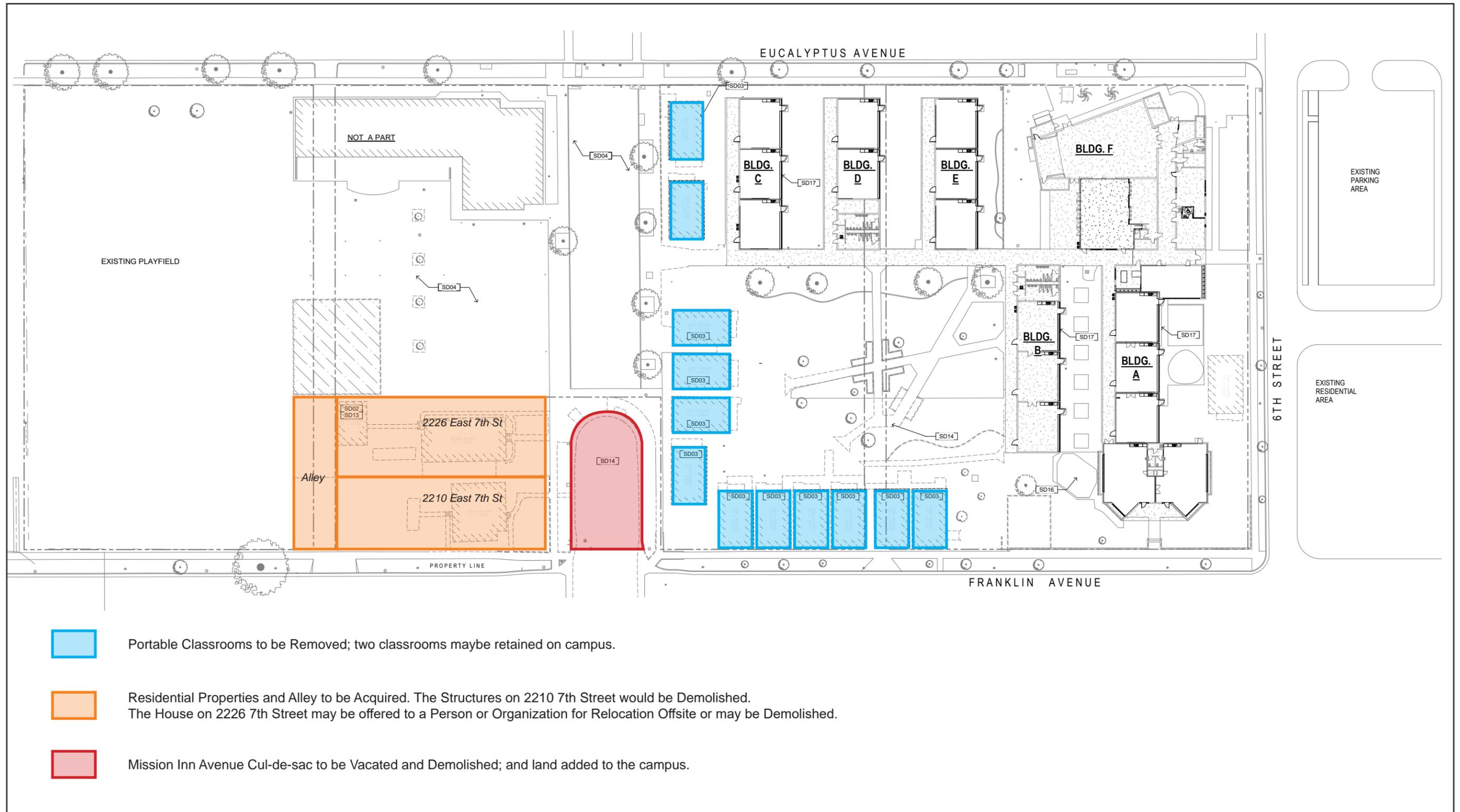


Figure 5 - Conceptual Landscape Plan

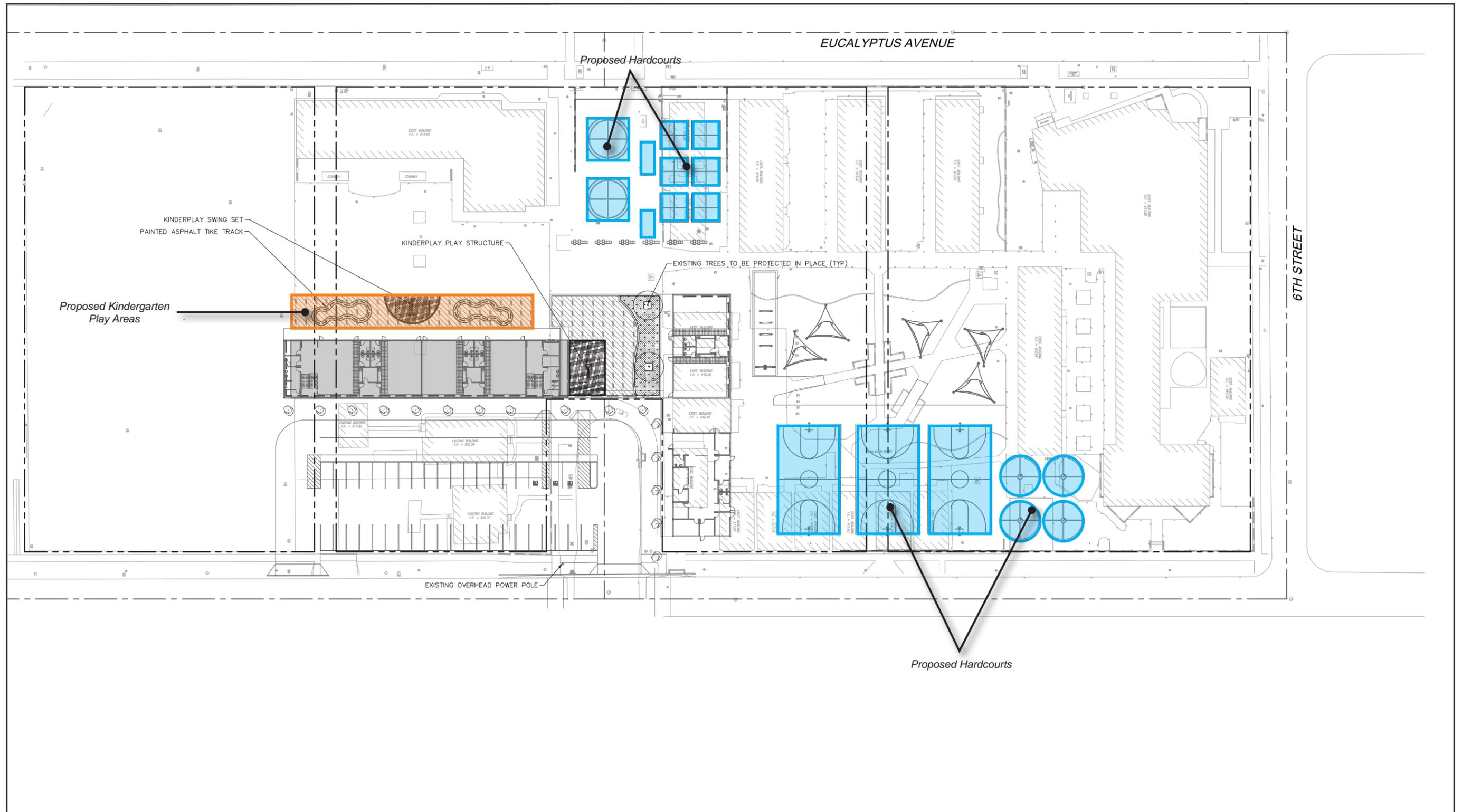
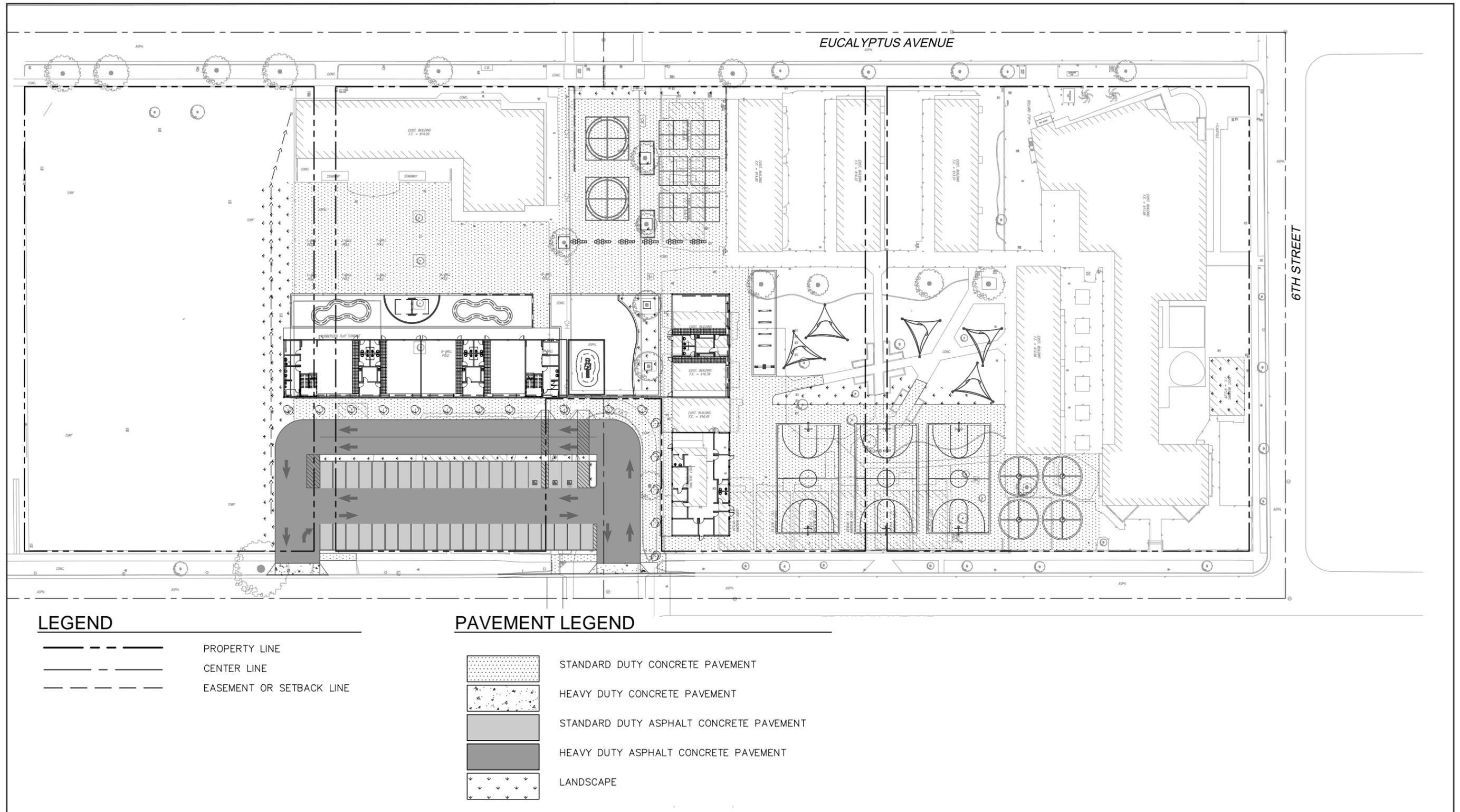


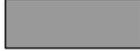
Figure 6 - Paving Plan



LEGEND

- — — — — PROPERTY LINE
- — — — — CENTER LINE
- — — — — EASEMENT OR SETBACK LINE

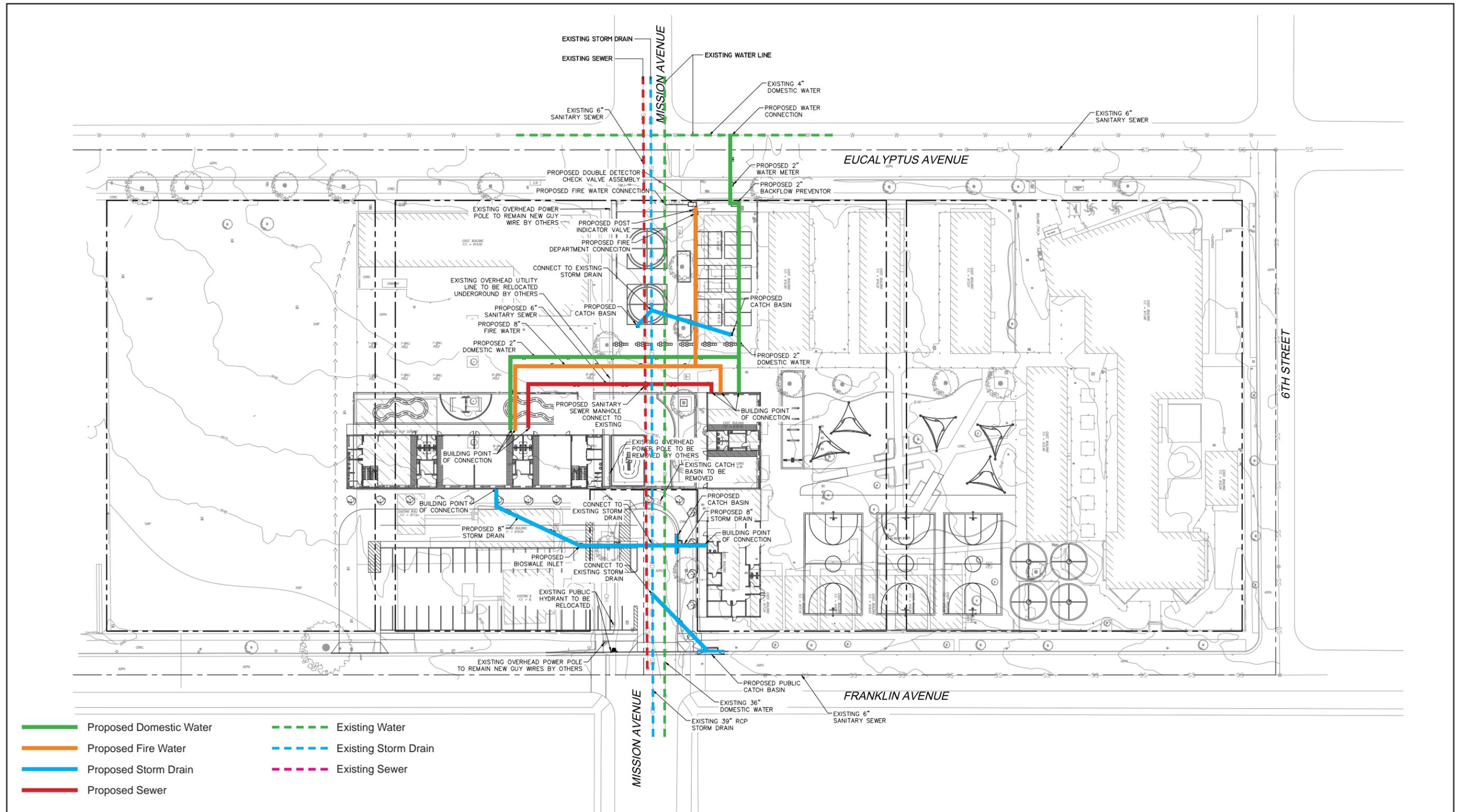
PAVEMENT LEGEND

-  STANDARD DUTY CONCRETE PAVEMENT
-  HEAVY DUTY CONCRETE PAVEMENT
-  STANDARD DUTY ASPHALT CONCRETE PAVEMENT
-  HEAVY DUTY ASPHALT CONCRETE PAVEMENT
-  LANDSCAPE

0 70
Scale (Feet)



Figure 7 - Utility Plan



Source: DLR Group, 2018



Notice of Preparation (NOP) Comments



Jared Blumenfeld
Secretary for
Environmental Protection



Department of Toxic Substances Control

Barbara A. Lee, Director
5796 Corporate Avenue
Cypress, California 90630



Gavin Newsom
Governor

January 10, 2019

Ms. Ava Gonzalez
Riverside Unified School District
3070 Washington Street
Riverside, California 92504

NOTICE OF PREPARATION FOR LONGFELLOW SCHOOL EXPANSION PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT, RIVERSIDE, CALIFORNIA (STATE CLEARINGHOUSE NUMBER 2018121059)

Dear Ms. Gonzalez:

The Department of Toxic Substances Control (DTSC) has received your Notice of Preparation (NOP) for the above-mentioned project. The proposed project will facilitate the expansion of an existing elementary school. The project involves acquisition and demolition of two residential properties; construction of three new buildings; modernization of six buildings; renovation of the existing administrative building; and development of new play areas and a parking lot. The project site is Longfellow Elementary School located at 3610 Eucalyptus Avenue, Riverside, California. The project work area consists of about 2.84 acres (mainly in the central and southern parts of the campus), two parcels developed with single-family residences (2210 7th Street and 2226 7th Street), and a dirt alley at the south end of the parcels.

Based on review of the submitted document, DTSC provides the following comments:

1. Because the proposed project is school-site related, DTSC recommends that an environmental review under DTSC oversight be conducted. The environmental review may include, but is not limited to, a Phase I Environmental Site Assessment (Phase I ESA), to determine whether there has been, or may have been, a release or threatened release of a hazardous material(s), or whether a naturally occurring hazardous material is present based on reasonably available information about each property and the area in its vicinity. Such an environmental review should generally be conducted as part of the California Environmental Quality Act process and recommended for compliance with the requirements of California Education Code, §17213(a), as applicable. The NOP states that a Phase I ESA for the

project was completed in October 2018 and that a Phase I ESA for the sites of the three proposed buildings will either be prepared as a separate report or will be incorporated into the existing ESA. If the Riverside Unified School District elects to proceed to conduct an environmental assessment at the site under DTSC oversight, it should enter into an Environmental Oversight Agreement or a Standard Voluntary Agreement with DTSC to oversee the preparation of the environmental assessment.

2. An environmental evaluation should be conducted to identify and determine whether current or historic uses at the project site, including the storage of hazardous materials or wastes, may have resulted in a release of hazardous wastes/substances. If the site was previously used for agricultural purposes, pesticides (DDT, DDE, toxaphene) and fertilizers (usually containing heavy metals), commonly used as part of agricultural operations, are likely to be present. These agricultural chemicals are persistent and bio-accumulative toxic substances. DTSC recommends that these environmental concerns be investigated and possibly mitigated, in accordance with DTSC's *"Interim Guidance for Sampling Agricultural Properties (Third Revision)"*, dated August 7, 2008. This guidance should be followed to sample agricultural properties where development is anticipated.
3. If a release occurred, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. All environmental investigations, sampling and/or remediation for the site should be conducted under a workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. All waste generated as a result of investigation and remediation activities should be properly disposed of according to all applicable laws and regulations. It may be necessary to determine if an expedited response action is required to reduce existing or potential threats to public health or the environment. If no immediate threat exists, the final remedy should be implemented in compliance with state laws, regulations and policies.
4. The Environmental Impact Report (EIR) requires an analysis of the potential public health and environmental impacts associated with the response action(s), if deemed necessary based on the results of the environmental investigation(s), pursuant to requirements of the California Environmental Quality Act (Public Resources Code, div. 13, §21000 et seq.) and its implementing Guidelines (California Code of Regulations, tit. 14, §15000 et seq.), prior to approval or adoption of the EIR for the project. A discussion of the mitigation and/or removal actions, including associated impacts to the site and the surrounding environment, should be included in the EIR if deemed to be necessary.

5. Based on the age of the buildings, demolition of old structures may result in potential environmental concerns at the site due to lead-based paint and organochlorine pesticides from termiticide applications. DTSC recommends that these environmental concerns be investigated and possibly mitigated, in accordance with DTSC's *"Interim Guidance Evaluation of School Sites with Potential Soil Contamination as a Result of Lead from Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers,"* dated June 9, 2006.
6. The project construction may require soil excavation and soil filling in certain areas. Appropriate sampling is required prior to disposal of the excavated soil. If the soil is contaminated, properly dispose of it rather than placing it in another location. Land Disposal Restrictions may be applicable to these soils. Also, if the project proposes to import soil to backfill the areas excavated, proper sampling should be conducted to make sure that the imported soil is free of contamination.

Please see the following links on DTSC's website for additional information:

- School process: <https://dtsc.ca.gov/Schools/index.cfm>
- Standard Voluntary Agreement: <https://dtsc.ca.gov/SiteCleanup/Brownfields/voluntary-agreements-guide.cfm>

In addition to voluntary agreements, DTSC administers funding programs that may be applicable to this project or other brownfield projects. The attached flyer provides summary information on our funding resources and contact information should you be interested in learning how these tools may apply to this and other brownfield projects.

If you have any questions regarding this letter, please contact me at (714) 484-5460 or by email at christine.chiu@dtsc.ca.gov.

Sincerely,



Christine Chiu
Project Manager
Brownfields Restoration and School Evaluation Branch
Site Mitigation and Restoration Program

kl/cc/yg

Attachment

cc: See next page.

Ms. Ava Gonzalez
January 10, 2019
Page 4

cc: Governor's Office of Planning and Research (via e-mail)
State Clearinghouse
state.clearinghouse@opr.ca.gov

Mr. Dave Kereazis (via e-mail)
Office of Planning & Environmental Analysis
Department of Toxic Substances Control
dave.kereazis@dtsc.ca.gov

Ms. Yolanda Garza (via e-mail)
Site Mitigation and Restoration Program
Department of Toxic Substances Control
yolanda.garza@dtsc.ca.gov

Brownfields Environmental Assessment and Cleanup Funding Now Available!



Brownfields can be any property where reuse or redevelopment is hampered because of known or perceived environmental contamination. Addressing brownfields through environmental investigation and cleanup facilitates redevelopment, community revitalization and provides safe living, working, and recreational spaces for Californians.

Brownfields can include the following:

- *Properties with minimal historical information*
- *Factories*
- *Crop farms*
- *Dairy Farms*
- *Cattle ranches*
- *Dry-cleaners*
- *Mining sites*
- *Illegal drug labs*
- *Abandoned buildings & vacant properties*
- *Properties near to those with known environmental contamination*

For more information, contact:

Maryam Tasnif-Abbasi
DTSC Regional Brownfields
Coordinator
Maryam.Tasnif-Abbasi@dtsc.ca.gov

The California EPA Department of Toxic Substances Control (DTSC), has several funding programs to assist with the investigation and cleanup of environmentally impacted properties, also known as "Brownfields". These funding programs are supported by grants from US EPA.

Cleanup Loans (Revolving Loan Fund):

DTSC provides financing for brownfield cleanups through simple interest loans at below market rates. Specific loan terms are negotiated on a site-by-site basis. Most parties are eligible, including local agencies, nonprofit organizations and private companies – as long as they are not considered to be a responsible party. DTSC currently has ~\$1,200,000 available. Under certain circumstances, grants are also considered. Qualified properties will be funded on a first-come, first served basis. Please contact DTSC for detailed information on applicant and property eligibility requirements.

I-710 Brownfields Assessment Grant:

DTSC has funding available to conduct environmental assessments at underutilized, developable properties along the I-710 Corridor. DTSC's goal is to utilize our technical and regulatory expertise to assist local agencies and non-profit organizations to facilitate safe and productive use of brownfields. Properties will be selected on a first-come, first-served basis.

Targeted Site Investigation (TSI) Program:

DTSC has ~\$300,000 available state-wide to perform environmental assessments for local agencies, school districts, and nonprofit organizations. Projects are selected through a competitive process. The application period for this program is currently closed, but will re-open in late spring.

Additional information available on DTSC's Loans and Grants page at:

<http://dtsc.ca.gov/SiteCleanup/Brownfields/LoansGrants.cfm>



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL:

January 15, 2019

anagonzalez@rusd.k12.ca.us

Ana Gonzales, Director
Riverside Unified School District, Planning and Development
3070 Washington Street
Riverside, CA 92504

Notice of Preparation of a Draft Environmental Impact Report for the Proposed Longfellow Elementary School Expansion Project

South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address shown in the letterhead. **In addition, please send with the Draft EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files¹. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from SCAQMD's Subscription Services Department by calling (909) 396-3720. More guidance developed since this Handbook is also available on SCAQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

SCAQMD has also developed both regional and localized significance thresholds. SCAQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to SCAQMD's CEQA regional pollutant emissions significance thresholds to determine air quality impacts.

¹ Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

SCAQMD's CEQA regional pollutant emissions significance thresholds can be found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by SCAQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis.

In the event that the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Guidance² on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

Mitigation Measures

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are

² In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

- Chapter 11 “Mitigating the Impact of a Project” of SCAQMD’S *CEQA Air Quality Handbook*. SCAQMD’s CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- SCAQMD’s Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- SCAQMD’s Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>
- CAPCOA’s *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Alternatives

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a “no project” alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the Draft EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

Permits and SCAQMD Rules

In the event that the Proposed Project requires a permit from SCAQMD, SCAQMD should be identified as a Responsible Agency for the Proposed Project. The assumptions in the air quality analysis in the Final EIR will be the basis for permit conditions and limits. For more information on permits, please visit SCAQMD’s webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD’s Engineering and Permitting staff at (909) 396-3385.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling SCAQMD’s Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available at SCAQMD’s webpage at: <http://www.aqmd.gov>.

SCAQMD staff is available to work with the Lead Agency to ensure that project air quality and health risk impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov or (909) 396-3308.

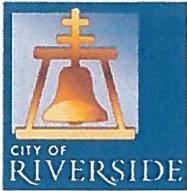
Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources



Community Development
Department
Planning Division

City of Arts & Innovation

January 29, 2019

Ana Gonzalez,
Director of Planning and Development
Riverside Unified School District
3070 Washington Street
Riverside, CA 92504

Subject: Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Longfellow Elementary School Expansion – 3610 Eucalyptus Avenue

Dear Ms. Gonzalez:

Thank you for the opportunity to review the Notice of Preparation of an Environmental Impact Report (EIR) for Riverside Unified School District's (RUSD) proposed expansion to an existing 6.9-acre elementary school within the Eastside Neighborhood, bounded by 6th Street to the north, Eucalyptus Avenue to the west, Franklin Avenue to the east, and an alley to the south. The expansion includes acquisition of two adjacent residential properties, demolition of the existing residences, removal of existing portables, and construction of three new buildings (one 1-story classroom building, one 2-story classroom building, and one 1-story administration building).

City Staff has reviewed the Environmental Initial Study for the project, and offers the following comments:

Transportation/Traffic:

- The City's Public Works Department, Traffic Engineering Division requests that the traffic impact analysis of the EIR analyze and appropriately mitigate impacts to student pickup and drop-off patterns, and impacts associated with additional traffic as a result of the expansion. The City request the opportunity to review the scoping documentation for the traffic impact analysis, and that the assessment of City of Riverside roadways and intersections adheres to the guidelines published at <https://www.riversideca.gov/traffic/pdf/traffic-impact-analysis.pdf>.

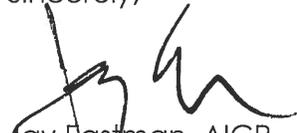
Cultural Resources:

- The existing dwellings located on properties to be acquired (2226 7th Street and 2210 7th Street) are both designated as City Structures of Merit. These parcels, and Longfellow Elementary, are located within the Seventh Street East Historic District. Longfellow Elementary should be evaluated for cultural significance as an early desegregated school.

Should you have any questions regarding this letter, please contact Doug Darnell, AICP, Senior Planner, at (951) 826-5219, or by e-mail at ddarnell@riversideca.gov.

We thank you again for the opportunity to provide comments on the project, and we look forward to working with you in the future.

Sincerely,



Jay Eastman, AICP
Principal Planner

cc: Rusty Bailey, Mayor
Riverside City Council Members
Al Zelinka, City Manager
Rafael Guzman, Assistant City Manager
Moises Lopez, Deputy City Manager
Chris Martinez, Public Works Director
David Welch, Community & Economic Development Interim Director
Mary Kopaskie-Brown, City Planner

JE:dd



January 02, 2019

[VIA EMAIL TO:anagonzalez@rusd.k12.ca.us]
Riverside Unified School District
Ms. Ana Gonzalez
3070 Washington Street
Riverside, California 92504

Re: Longfellow Elementary School Expansion

Dear Ms. Ana Gonzalez,

The Agua Caliente Band of Cahuilla Indians (ACBCI) appreciates your efforts to include the Tribal Historic Preservation Office (THPO) in the Longfellow Elementary School Expansion project. The project area is not located within the boundaries of the ACBCI Reservation. However, it is within the Tribe's Traditional Use Area. For this reason, the ACBCI THPO requests the following:

*At this time ACBCI defers to Soboba. This letter shall conclude our consultation efforts.

Again, the Agua Caliente appreciates your interest in our cultural heritage. If you have questions or require additional information, please call me at (760)699-6956. You may also email me at ACBCI-THPO@aguacaliente.net.

Cordially,

Lacy Padilla
Archaeological Technician
Tribal Historic Preservation Office
AGUA CALIENTE BAND
OF CAHUILLA INDIANS

From: Jessica Mauck <JMauck@sanmanuel-nsn.gov>
Sent: Wednesday, December 26, 2018 2:05 PM
To: Gonzalez, Anazele <AnaGonzalez@rusd.k12.ca.us>
Subject: Longfellow Elementary School Expansion Project

Hi Ana,

Thank you for contacting the San Manuel Band of Mission Indians (SMBMI) regarding the above referenced project. SMBMI appreciates the opportunity to review the project documentation, which was received by our Cultural Resources Management Department on 26 December 2018. The proposed project is located just outside of Serrano ancestral territory and, as such, SMBMI will not request consulting party status or elect to participate in the scoping, development, and/or review of documents created pursuant to these legal and regulatory mandates.

Regards,

Jessica Mauck

CULTURAL RESOURCES ANALYST

O: (909) 864-8933 x3249

M: (909) 725-9054

26569 Community Center Drive Highland California 92346



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Appendices

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