

5 Other CEQA Required Discussions

This section discusses growth-inducing impacts and significant irreversible environmental changes resulting from the proposed 2021 LRDP. As part of this analysis, the EIR must also identify the following: 1) significant environmental effects that cannot be avoided if the project is implemented, 2) significant irreversible environmental changes that would result from implementation of the project, and 3) growth-inducing impacts of the project.

5.1 Significant and Unavoidable Adverse Impacts

Public Resources Code Section 21100(b)(2) and the CEQA Guidelines Section 15126.2(c) requires EIRs to include a discussion of the significant environmental effects that cannot be avoided if the proposed 2021 LRDP is implemented. As documented in Section 4, *Environmental Impact Analysis*, after implementation of the recommended mitigation measures, most of the impacts associated with the proposed 2021 LRDP would be reduced to a less-than-significant level. The following impacts are considered significant and unavoidable; that is, no feasible mitigation is available to reduce these impacts to a less-than-significant level:

- **Aesthetics**
 - **Impact AES-1:** Development under the proposed 2021 LRDP could block or impede views of scenic vistas.
- **Agricultural Resources**
 - **Impact AG-1:** Implementation of the proposed 2021 LRDP would result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use. The establishment of the Coachella Valley Agricultural Research Station (CVARS) as mitigation (from MM 4.1-1 in the 1990 LRDP EIR) for impacts to Farmland does not fully offset the net reduction in farmland in the region as no new farmlands were being created in the vicinity of the campus.
- **Air Quality**
 - **Impact AQ-2:** Construction under the proposed 2021 LRDP would generate ROG and NO_x in quantities that exceed SCAQMD significance thresholds. Operation would exceed SCAQMD thresholds for ROG, NO_x, and PM₁₀.
- **Cultural Resources**
 - **Impact CUL-1:** The proposed 2021 LRDP would adversely affect historical resources through the full and partial demolition of historical resources, renovation/rehabilitation of historical resources, and new construction adjacent to historical resources.
- **Noise**
 - **Impact N-1:** Construction under the proposed 2021 LRDP would exceed applicable noise thresholds.
- **Transportation**
 - **Impact T-3:** Development under the proposed 2021 LRDP would be constructed in such a way that changes would remain consistent to surrounding geometric design features and any redesign or construction of on-campus circulation paths would be designed and constructed to meet the Campus Construction and Design Standards. However, the increase

in campus population under Cumulative plus Project conditions would result in an impact related to AM Peak Hour queueing at the I-215/SR 60 Freeway Southbound Ramps at Martin Luther King Boulevard.

Cumulative impacts in these areas, in turn, would also be significant and unavoidable (cumulatively considerable) as a result of the implementation of the proposed 2021 LRDP.

5.2 Significant and Irreversible Environmental Changes

The CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by a project. Specifically, the CEQA Guidelines Section 15126.2(d) states:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irrecoverable commitments of resources should be evaluated to assure that such current consumption is justified.

Generally, a project would result in significant irreversible environmental changes if one of the following would occur:

- The primary and secondary impacts would generally commit future generations to similar uses
- A project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project
- A project would involve a large commitment of nonrenewable resources
- Proposed consumption of resources is not justified (e.g., a project involves the wasteful use of energy)

UCR's ownership of the campus represents a long term-commitment of the campus and education uses; implementation of the proposed 2021 LRDP would continue and expand these uses. Restoration of the campus to pre-developed conditions would not be feasible given the degree of disturbance, the urbanization of the area, and the level of capital investment. Irreversible commitments to future use include those related to new housing or academic/administrative space development.

Most future development and redevelopment under the proposed 2021 LRDP would be infill in existing urban areas, but some development of existing agricultural lands may occur (although these too are infill areas-surrounded on three sides by development). Development of lands currently used for agricultural uses would constitute an irreversible change of use on these lands because once buildings or pavement are constructed, underlying soils would no longer be available for agricultural production. As described in Section 4.2, *Agricultural Resources*, the 1990 LRDP identified and recognized the need to convert Prime Farmland to non-agricultural land uses to accommodate future campus growth. To combat future loss of the Prime Farmland, UCR acquired 540 acres in Coachella Valley and established the CVARS. The 2005 LRDP proposed development on West Campus of approximately 125 acres of academic, support, housing, parking, and recreational uses north of Martin Luther King Boulevard. The 2005 LRDP EIR concluded that while the acquisition of agricultural land in the Coachella Valley in the 1990s reduced the programmatic loss of the

approximate 125 acres of agricultural land at the main campus, it did not offset the net reduction in farmland in the region as no new farmlands were being created in the vicinity of the campus and therefore, impacts to Prime Farmland were found to be significant and unavoidable. Notably, since analysis and approval of the 2005 LRDP, UCR has only converted approximately 43 acres of Farmland in the West Campus (which is less than the 125 acres assumed to be converted). Agricultural and land-based research is expected to continue to be a major component of UCR's research portfolio over the lifetime of the proposed 2021 LRDP. The proposed 2021 LRDP would impact fewer acres of Farmland than previous UCR LRDPs. However, implementation of the proposed 2021 LRDP would still reduce land available for agricultural research on Farmland in comparison to existing conditions. Consistent with past LRDP EIRs, the establishment of the CVARS as mitigation for impacts to Farmland does not fully offset the net reduction in farmland in the region as no new farmlands were being created in the vicinity of the campus.

As described in Section 4.5 *Cultural Resources*, at the program level, development under the proposed 2021 LRDP could affect identified historical resources, or presently unknown historical resources through demolition, construction, and reconstruction activities associated with buildout. Thus, mitigation measures that reduce impacts to less than significant cannot be assured in all cases and demolition or removal of a historically significant built-environment resource typically cannot be mitigated to below a level of significance under CEQA. Implementation of Mitigation Measure MM CUL-1 would reduce, mitigate, or avoid significant impacts to historic resources to the maximum extent feasible, but irreversible loss of historical resources would occur, nonetheless.

Resources that would be permanently and continually consumed by the proposed 2021 LRDP implementation include water, electricity, natural gas, and fossil fuels. However, all new buildings would be constructed in accordance with the most recent California Building Code at the time of construction, which require measures to reduce energy use and GHG emissions. Additionally, the UC Policy on Sustainable Practices and existing and proposed UCR policies and initiatives to use renewable energy, environmentally conscious design and materials, and measures to enhance pedestrian and bicycle use, would further reduce environmental impacts. Despite these conservation measures, construction and operational activities would still result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels, natural gas, and gasoline for automobiles and construction equipment.

In respect to operational activities, compliance with and exceedance of applicable building codes, along with mitigation measures, would ensure that natural resources are conserved or recycled to the maximum extent feasible. Additionally, over time, new technologies or systems will likely emerge, or become more cost-effective or user-friendly, which would further reduce UCR reliance on nonrenewable natural resources. Please see Section 4.6, *Energy*, and Section 4.8, *Greenhouse Gas Emissions*, for additional information.

5.3 Growth Inducing Impacts

Section 15126.2(e) of the CEQA Guidelines requires a discussion of a proposed project's potential for growth inducing impacts. More specifically, provides for discussion of the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could

cause significant environmental effects. Further, the characteristics of some projects may encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

5.3.1 Population and Housing Growth

As discussed in Section 4.12, *Population and Housing*, the region surrounding UCR, including Riverside, has a population of 2,213,761, which is anticipated to increase by approximately 357,000 residents between 2020 and 2035. In the 2018/2019 academic year UCR had a student population of 23,922 students and 4,789 faculty and staff, resulting in a total campus population of 28,861.

UCR projects student enrollment will grow to 35,000 students by the 2035/2036 academic year (42,545 total campus population). The proposed 2021 LRDP would incrementally accommodate an additional 7,419 undergraduate students and 3,659 graduate students plus 2,806 faculty and staff, resulting in a net increase to the campus population of approximately 13,884 people by the 2035 horizon year.

Approximately 68 percent of the increase in student population could be housed in new UCR-affiliated housing. More specifically 7,489 new beds for 11,078 new student population (7,419 undergraduate and 3,659 graduate). Much of the student housing capacity accommodated under the proposed 2021 LRDP would occur through strategic infill and selective replacement of existing housing facilities in the northern half of East Campus. As outlined below, faculty, staff, and students would be accommodated by housing in Riverside and surrounding communities.

As discussed in Section 4.12, *Population and Housing*, the net increase of approximately 6,395 new students and faculty/staff would require non-UCR affiliated, off-campus housing (13,884 net increase to the campus population minus 7,489 new on-campus beds) by academic year 2035/2036. Using the conservative assumption that each new person would require one housing unit¹, the net increase of 6,395 housing units by academic year 2035/2036 represents approximately 5.6 percent of the net increase of total regional housing unit projections for 2035 (6,395 net increase in off-campus housing units/113,401 net increase in regional housing units).

Using an estimate of even population growth each year, approximately 380 new residents could move to the region each year and need housing between the baseline (2018/2019) and buildout (2035/2036) years. The estimate of average increased off-campus housing needs each year is highly conservative and does not factor in the existing population that may already reside in the area and subsequently attend UCR or get a job at UCR in the future. In recent years, a large portion of the new undergraduate student population (approximately 48 percent of freshmen and 53 percent of transfer students) resided in the region prior to attending UCR. It is reasonable to assume that a portion of the new undergraduate and graduate student population would continue to reside in the same household during their studies and not occupy a new residence, or would relocate from within the region. It is also unlikely that every student would occupy a single housing unit; the region has on average 3.28 persons per household (City of Riverside 2021). It can also be assumed that some new faculty and staff would already reside in the region prior to working at UCR. As discussed Section 4.12, *Population and Housing*, approximately 85 percent of the entire campus population currently lists an address within a “reasonable” commute radius (approximately one hour each way).

¹ In California, the average number of people per household is 2.93 (DOF 2020). Applying the statewide average to UCR off-campus housing needs would result in the need for 2,183 housing units.

It is reasonable to assume that these trends will continue through academic year 2035/2036. Therefore, much of the off-campus housing needs projected in the proposed 2021 LRDP would be from in the Inland Empire region and not constitute new residents.

Furthermore, if the vacancy rate for the region remains in line with 2020 at 4.8 percent, then approximately 37,080 available housing units would be available (4.8 percent of 772,500 regional housing units) in the region in 2035. Considering recent housing vacancy rates, the region is anticipated to absorb the incremental population increase over the 15-year life of the proposed 2021 LRDP and no new housing or infrastructure would be needed as a direct result of the proposed 2021 LRDP.

The net increase of 13,884 people by academic year 2035/2036 would be accommodated by the 356,839 net increase in regional population. According to data from UC, approximately 82 percent of UCR students are in-state residents, meaning that they resided in California prior to attending UCR. More precisely, approximately 60 percent of the undergraduate student population lived within a 50-mile radius of the UCR campus prior to enrolling at the University (UC 2019). Furthermore, according to available zip code information for UCR students, faculty, and staff, approximately 85 percent of the campus population currently resides within a “reasonable” commute radius (approximately 1 hour each way). It is reasonable to assume that these trends will continue, and that much of the campus population projected in the proposed 2021 LRDP will have already been accounted for in existing and/or projected population growth in the Inland Empire region.

Given all these considerations, the proposed 2021 LRDP would induce planned population growth but would not generate a need for construction of new off-campus housing beyond what is already anticipated in the SCAG regional forecasts.

UCR and the surrounding area is already heavily urbanized and contains existing infrastructure and services. The 2021 LRDP would not involve the extension of roads and utility infrastructure into undeveloped areas. Development on campus would be focused within the existing campus footprint and infill areas. Thus, population growth resulting from the 2021 LRDP would not result in significant physical impacts associated with a potential increase in need for public systems or services infrastructure beyond what has already been analyzed.

5.3.2 Economic Growth

Implementation of the proposed 2021 LRDP would generate temporary employment opportunities during construction of individual buildings and projects. Because construction workers would likely be drawn from the existing regional work force, construction of projects under the proposed 2021 LRDP are not considered growth-inducing. The proposed 2021 LRDP would add approximately 2,806 permanent employment opportunities in the region associated with operation of the campus.

Under CEQA, a social or economic change generally is not considered a significant effect on the environment unless the changes can be directly linked to a physical change. (CEQA Guidelines section 15131.) As further discussed under CEQA Guidelines Section 15126.2(e), “[I]t must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.” The purpose behind looking at growth is to determine whether increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. The proposed 2021 LRDP could indirectly foster economic growth consistent with regional growth projections in the surrounding region that may indirectly prompt development of community-service facilities. Such commercial development in

the region, however, would be subject to local planning and discretionary actions by local jurisdictions, including the City. The potential environmental impacts associated with indirect development would be identified consistent with local planning requirements and evaluated through local jurisdictions' General Plans and project-level evaluations of commercial development proposals.

5.3.3 Removal of Obstacles to Growth

Growth in an area may result from the removal of physical impediments or restrictions to growth, as well as the removal of planning impediments resulting from land use plans and policies. In this context, physical growth impediments may include nonexistent or inadequate access to an area or the lack of essential public services, while planning impediments may include restrictive zoning and/or land use designations. The 2021 LRDP would be implemented within the existing campus boundaries and focused within infill areas, in which established land uses and supporting infrastructure exist (roads, water distribution, wastewater and drainage collection, and energy distribution). The proposed 2021 LRDP includes redevelopment of campus buildings and facilities and may intensify existing land uses. To account for this possible intensification, the proposed 2021 LRDP proposes circulation infrastructure improvements, to provide for the safe and efficient movement of pedestrians, bicycles, and vehicles around campus, while also encouraging transitions to active transportation. Utilities infrastructure improvements are proposed, such as minor improvements to water, wastewater, and storm drainage infrastructure, to accommodate growth under the proposed 2021 LRDP. No new roads outside of the existing campus boundaries would be required. Because the proposed 2021 LRDP constitutes redevelopment within an urbanized area and does not require the extension of new infrastructure through undeveloped areas, implementation of the proposed 2021 LRDP would not remove an obstacle to growth.

5.4 References

California Department of Finance (DOF). 2020. Table 2: E-5 City/County Population and Housing Estimates, 1/1/2020. <http://dof.ca.gov/Forecasting/Demographics/Estimates/E-5/>.

Riverside, City of. 2021. Riverside Housing and Public Safety Element Updates and Environmental Justice Policies Project. https://riversideca.gov/cedd/sites/riversideca.gov.icedd/files/pdf/planning/2021/Housing_Element/2021-04-05%20Final%20IS%20for%20Publication.pdf.

University of California (UC). 2019. Accountability Report: Chapter 1.4 Geographic Origins and Non-Residents. <https://accountability.universityofcalifornia.edu/2019/chapters/chapter-1.html#1.4.1>.