

O.6.4 Local Agency Comments

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CITY OF CORONA – FIRE DEPARTMENT

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July 5, 2011

CAL TRANS
464 W. Fourth Street
San Bernardino, CA 92401

RE: Public Notice – SR 91 Draft EIR

This letter is in response to your Public Notice request for comments concerning the SR 91 Draft EIR. There were three areas specific to fire and they are as follows with our suggested changes denoted in italicized font and underlined:

L-1-1

3.5 Utilities/Emergency Services

- 3.5.1.3 - This section is INCORRECT when stating that the Riverside County Fire Department provides fire and emergency medical services for the City of Norco. Norco Fire Department provides fire and emergency medical services.
- Table 3.5.3 - Corona Regional Medical Center’s address does not have #2, 800 S. Main is the only hospital address.
- 3.5.2.2 - Permanent Impacts

L-1-2

L-1-3

Alternative 1 - Expresses beneficial effects for law enforcement, fire protection, and emergency service providers because Alternative 1 and its design variations may improve response times for emergency services using the project segments of SR-91 and I-15. In addition, emergency service providers would be able to use the HOV lanes in Alternative 1 when the other travel lanes are experiencing heavy traffic volumes and slow travel speeds.

L-1-4

Alternative 2 - The beneficial effects on emergency services under Alternative 2 and its design variations would be the same under Alternative 1. In addition emergency service providers would be able to use the express lanes in Alternative 2 when the other travel lanes are experiencing heavy

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traffic volumes and slow travel speeds. The new express lane configuration under Alternative 2 and its design variations would include a continuous 10 foot wide median shoulder that would provide emergency refuge.

↑
L-1-4

- Table 3.5.4 - Discusses relocation of water lines throughout the City - *The Fire Department is currently working with Public Works as these locations arise to be sure that our fire flow and hydrant spacing still meets our minimum standards.*

L-1-5

3.17.4.2 - Other Measures

States that while working during fire season the Resident Engineer will require the design/build contractor to ensure that appropriate firefighting equipment is available on site during all phases of project construction to help minimize the potential for human caused wildfires. Fire preventive methods will be used while grinding and welding and other spark inducing activities. Personnel trained in fire hazards, preventive actions, and responses to fires will advise contractors regarding fire risk from all construction-related activities. It goes on to mention that if OCFA requires defensible space to be cleared during construction then the Resident Engineer will meet with the biologist prior to clearing. *We want to add if Corona by changing OCFA to RESPONSIBLE FIRE AGENCY.*

L-1-6

Should you have additional questions please contact Fire Marshal Michael Gutierrez at 951 736-2459.

Sincerely,



David E. Waltemeyer,
Fire Chief

cc: Aaron Burton, CAL TRANS District 8

“EVERYONE GOES HOME”

L-1-1

Refer to responses to comments L-1-2 through L-1-6, below.

L-1-2

The text in Section 3.5.1.3, Fire Protection and Emergency Medical Services, on page 3.5-3 in the EIR/EIS was revised to indicate that the RCFD provides fire and emergency medical services for unincorporated areas in Riverside County, deleting the reference in that sentence to the City of Norco. The following was added after that revised sentence “The City of Norco Fire Department provides fire and emergency medical services in that city.” Table 3.5.2, Local Fire Stations in the Study Area on page 3.5-4, in Section 3.5, Utilities/Emergency Services, in the EIR/EIS correctly shows the fire agencies that provide service in the City of Norco and in unincorporated Riverside County. The potential temporary and permanent impacts of the SR-91 Build Alternatives related to fire services are addressed in Section 3.5.2 Environmental Consequences, on page 3.5-5 in the EIR/EIS.

L-1-3

The “#2” in the address for the Corona Regional Medical Center in Table 3.5.3, Hospitals and Medical Facilities in the Study Area, on page 3.5-4 in Section 3.5.1.4, Emergency Medical Facilities, in the EIR/EIS was deleted.

L-1-4

No response is necessary because this comment repeats material from the Draft EIR/EIS and does not ask a question or provide a comment relative to the technical information in the EIR/EIS.

L-1-5

It is acknowledged that the City of Corona is actively implementing improvements to the City’s water lines. It is further acknowledged that RCTC will coordinate closely with the City of Corona during final design to ensure that all the City water lines are properly addressed in final design and properly shown on the project plans.

L-1-6

Refer to Measure NC-4 in Section 3.17.4.2, Other Measures, on page 3.17-31 in the EIR/EIS, which was revised to define “responsible fire agencies” as the OCFA, RCFD, the City of Norco Fire Department, and the City of Corona Fire Department.



PUBLIC WORKS DEPARTMENT

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July 5, 2011

Aaron Burton
State of California Department of Transportation
464 W. 4th Street
San Bernardino, CA 92401

SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT FOR SR-91 CORRIDOR IMPROVEMENT PROJECT

Dear Mr. Burton:

Thank you for the opportunity to review and comment on the above-referenced DEIR. Below are comments from the City of Corona Public Works Department, Community Development Department, and Finance Department.

L-2-1

The Community Development Department offers the following comments:

- Section 3.4 discusses community impacts relating to residential and nonresidential relocation. The City's concern is the fact that the digital billboards affected by the freeway widening are not discussed as business displacements under Alternatives 1 and 2. The City is specifically concerned with this because of its relocation agreements with Lamar Central Outdoor and General Outdoor Advertising. The removal of these signs will have a fiscal impact to the City as the City currently receives annual revenue from the billboard companies for each digital panel. Based on the SR 91 widening design, three billboard locations are affected which will impact five digital billboard panels. First, the City would like to see these digital billboards relocated to another location within the City upon final design of the SR 91 widening. Second, the potential economic impacts regarding the displacement of these billboards should be discussed under Section 3.4.2.4. Finally, the City's billboard relocation agreements with Lamar and General Outdoor do not have a term limit; therefore, the longstanding economic impact this would have on community programs funded by this revenue source should be addressed.
- Section 3.7 discusses visual and aesthetics related to the SR 91 widening design. The City recognizes the aesthetic treatments being offered for the project and does not object to those options. However, in the discussion concerning aesthetics there was no mention that the proposed treatments are intended to deter graffiti, which is

L-2-2

L-2-3

L-2-4

L-2-5



L-2

considered by the City an aesthetic impact due to new retaining walls and sound walls being constructed for the project. Also, the draft EIR does not mention mitigation for graffiti that can potentially occur on these walls. Caltrans' program for dealing with graffiti along state highways should be mentioned in the draft EIR.

L-2-5

The City is not opposed to the off-site landscaping being proposed in mitigation measure V-3. However, the City's concern is with the lack of vertical landscaping for the retaining wall at Bollero Place (Key View 4). The City recognizes that the space between the wall and the right-of-way is limited; however, vine planting in addition to the additional street trees should be implemented for this wall. The height and appearance of this wall will be overwhelming to the adjacent residential properties; therefore, every effort should be made to soften the appearance of this wall.

L-2-6

- Section 3.4 quantifies and discusses the loss of housing and refers to mitigation measures C-1 through C-3. Furthermore, the conclusion is drawn on page 3.4-27 that "...there would be ample relocation sites, residential units, and business units for all owner and tenant displacees, both residential and commercial. Recent research indicates that housing would be widely available at the time the acquisition process begins." However, there is no discussion about the affordability of the residential units to be removed and the availability of comparable affordability for the replacement housing.

L-2-7

Sections 3.2 and 4.2 make reference to the applicability of CEQA and the review of this project within the context of CEQA. CEQA Guidelines Checklist Number VIII.b calls for evaluation of the loss of housing. The State of California Department of Housing and Community Development holds the City accountable for the provision of affordable housing, and the loss of affordable housing can ultimately affect the Regional Housing Needs Allocation (RNHA) for the City. The DEIR needs to discuss in more detail the affordability of the homes to be removed and the availability of comparably affordable replacement housing.

L-2-8

The Public Works Department offers the following comments:

- Attachment 22 – Structure Advanced Planning Studies – was an exhibit for the East Grand UC –Widening and it shows the (once planned) WB SR-91 off ramp connecting into Grand (sheet 2 of 3). This exhibit needs to be changed.

L-2-9

The Finance Department offers the following comments:

- The document states that construction is expected to begin in 2013, and conclude in 2017. Alternative #2, the local preferred alternative, is the most likely option to be the approved.

L-2-10

The report's estimated property acquisitions in alternative #2 would have the following revenue impacts on the City of Corona, depending on which design variation is selected:

L-2

- Property tax revenue loss of \$274,216 - \$399,372
- Sales tax revenue loss of \$277,402 - \$299,894
- Total revenue loss \$551,618 - \$699,266

L-2-10

Based on the information provided in the report, the Finance Department was unable to confirm the revenue estimates. Actual parcel numbers are needed to confirm the estimated revenue losses.

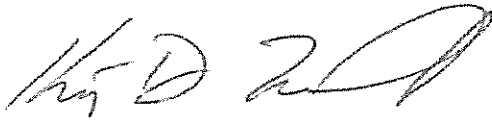
- Other potential revenue impacts, both positive and negative, may include:
 - Temporary business closures related to construction
 - Limited access to businesses due to construction (road closures, ramp closures, detours, etc.)
 - Displaced businesses relocating within the City of Corona
 - Creation of 30,563 - 32,154 direct and indirect jobs for the project

L-2-11

If you have questions or require any additional information, please contact Bob Morin, Principal Civil Engineer at (951) 736-2446.

L-2-12

Sincerely,



Kip D. Field, P.E.
Public Works Director

L-2-1

Refer to responses to comments L-1-2 through L-1-12, below.

L-2-2

The following was inserted as a new subsection titled “Other Revenue” in Section 3.4.2.4, on page 3.4-49 in the EIR/EIS:

“Alternative 1 would require relocation of 9 billboards and Alternative 2, including Alternative 2f, would require relocation of 10 billboards within the project limits in the City of Corona. These billboards generate revenue for the City. To minimize impacts associated with the relocation of digital and static billboards, the RCTC Project Engineer and Right-of-Way Agents will work with the billboard owners and the City of Corona to assist with the relocations within the City in accordance with the City of Corona municipal code and the Department’s Outdoor Advertising Unit for appropriate permits and approvals. Existing agreements between the City and billboard owners will be considered during the process. Every effort will be made to relocate all affected billboards on the same parcels or elsewhere in the City. The relocations of the billboards would be completed prior to the removal of the existing billboards. Although there is a potential that the City may experience economic impacts from the relocation of these billboards, those impacts are not considered substantial, and therefore are not discussed further in this EIR/EIS.”

The following measure was added in Section 3.4.2.5, Avoidance, Minimization, and/or Mitigation Measures for Relocations and Real Property Acquisition, on page 3.4-52 in the EIR/EIS:

CI-4 During final design and property acquisition, the RCTC Project Engineer and Right-of-Way Agents will work with billboard/property owners, the City of Corona, and the Department’s Outdoor Advertising Unit to find locations for relocating the affected billboards within the existing sites where the billboards are currently located or other sites in the City where billboards are allowed. The Right-of-Way Agents will work with the City and the Department’s Outdoor Advertising Unit to ensure that the

sites for the relocated billboards comply with the requirements in the City of Corona Municipal Code and the Outdoor Advertising Act and Regulations. The Right-of-Way Agents will also work with the billboard/property owners to develop Billboard Relocation Agreements with the City of Corona.

Refer also to Section O.5.8, Common Response Related to Billboard Relocation, on page O-36 in Section O.5, Common Responses for additional discussion regarding project impacts on billboards. Loss of revenue to the City if billboards cannot be relocated in the City limits may be eligible for compensation under the Uniform Act.

L-2-3

Refer to response to comment L-2-2, above.

L-2-4

Refer to response to Comment L-2-2, above, and Section O.5.8, Common Response Related to Billboard Relocation, on page O-36 in Section O.5, Common Responses.

L-2-5

Discussion of graffiti control was inserted as the last section in Section 2.3.2.2, Permanent Project Features, on page 2-31 in the EIR/EIS.

Discussions related to graffiti were added in Section 3.7, Visual/Aesthetics, as follows:

- New Section 3.7.3.8, Affected Environment, on page 3.7-12
- Just before the subsection titled “Summary of Visual Impact of Alternatives” in Section 3.7.4.2, Permanent Impacts, on page 3.7-27
- At the end of the subsection titled “Summary of Visual Impacts for Alternative 1” in Section 3.7.4.2, Permanent Impacts, on page 3.7-28
- At the end of the subsection titled “Summary of Visual Impacts for Alternative 2” in Section 3.7.4.2, Permanent Impacts, on page 3.7-28
- At the end of the subsection titled “Alternatives 1 and 2” in Section 3.7.4.3, Temporary Impacts, on page 3.7-29
- New Measure V-4 was inserted after Measure V-3 on page 3.7-33 in Section 3.7.5, Avoidance, Minimization, and Mitigation Measures

Discussion of graffiti impacts, control, and removal was inserted as the second paragraph in Section 4.2.3.1, Aesthetics, on page 4-21.

L-2-6

As discussed in Section 3.7, Visual/Aesthetics, starting on page 3.7-1 in the EIR/EIS aesthetic and design features for retaining walls, including the retaining wall at Bollero Place, will be included in the design of the retaining walls consistent with the potential aesthetic treatments for retaining walls shown on Figure 3.7-18 in the EIR/EIS. RCTC's Resident Engineer will ensure that those aesthetic and design features are constructed during the construction phase when the impact occurs. Measure V-1 on page 3.7-30 in Section 3.7 describes the landscaping that will be provided as part of the project. The simulation shown for Key View 4 was not intended to show specific aesthetic and design features because those features will not be determined for individual locations, including Key View 4, until final design. As a result, a collage of potential aesthetic treatments for retaining walls consistent with the *215/91 Corridor Master Plan* was provided instead as shown on Figure 3.7-18 on page 3.7-55 in the EIR/EIS.

During final design, RCTC's Project Engineer will coordinate with the City of Corona to identify specific aesthetic and design features consistent with those shown on Figure 3.7-18, including landscaping, for all project structures, including the retaining wall at Bollero Place. At a minimum, vine planting at this retaining wall is included as a project feature.

L-2-7

According to the *Final Relocation Impact Report* (FRIR; November 2011, page 54, Section V.13, Low Income [30 percent] and Poverty) for the proposed project, 6 percent of the total households in the City of Corona are considered extremely low income, which is defined as households with incomes below 30 percent of the Average Median Income (AMI); 7 percent are identified as low income, which is defined as households with incomes between 31 percent and 50 percent of the AMI; and 8.6 percent were below the poverty line. Therefore, it is likely that residents displaced by, and require relocation as a result of, the project will be low income.

As discussed in the FRIR, individuals with low incomes typically require higher relocation payments of last resort and greater assistance in finding replacement housing due to their financial limitations. In addition, there are large minority, elderly, and disability populations in the displacement area who may also have financial constraints associated with securing replacement housing for themselves.

Extra measures as discussed in Section D.4.5, Last Resort Housing, in Appendix D, Summary of Relocation Benefits, would be required to adequately address challenges associated with relocation assistance for those who are facing serious financial hardships as a result of the current economic climate.

Research conducted for the FRIR was based on market conditions as of July 2011 and showed that there are many affordable replacement properties available in the vicinity of the project segment of SR-91. This is due in part to the real estate slump over the last several years. A detailed list of single-family and multifamily residential units for rent and for sale and their respective dollar values are provided in Attachments 3.4.A through 3.4.I to Section 3.4, Community Impacts, in the EIR/EIS. Of the population in Corona, 8 percent is elderly and 6 percent is considered extremely low income; therefore, it is likely that elderly and low-income residents will be affected by the acquisition of residential properties and the removal of the homes on those properties for the SR-91 CIP. Special considerations to address financial limitations and the affordability of replacement housing for these types of displacees will be addressed by RCTC based on compliance with the Uniform Act. Refer also to Appendix D, Summary of Relocation Benefits, for additional information regarding benefits available to residential displacees, including elderly and low-income residents.

The recent economic and housing market declines have contributed to an ample supply of replacement housing, and also allow for lower housing prices and room for negotiation. It is believed the current relocation resources are affordable with the provision of replacement housing and rental assistance payments. RCTC will provide relocation assistance payments and counseling to displacees in accordance with the Uniform Act, as amended, and RCTC's Relocation Assistance Program (RAP), as discussed in Measure CI-2 on page 3.4-51 in the EIR/EIS. This program assures relocation advisory assistance and availability of comparable replacement housing for displaced residents. Additionally, the RCTC RAP provides for replacement housing payments to assist with increased housing costs.

Homeowners may qualify to receive a price differential payment, reimbursement for nonrecurring costs incidental to the purchase of the replacement property, and an interest rate for the loan on the replacement dwelling, subject to certain eligibility requirements. The statutory maximum combination of these three supplemental payments that an owner can receive is \$22,500. If the total expected payment exceeds \$22,500, the Last Resort Housing Program will be used.

Tenants may qualify to receive a rental assistance payment. This payment is made if the cost to rent a comparable decent, safe, and sanitary replacement dwelling will be more than the present rent of the displacement dwelling. As an alternative, if the tenant is eligible for a rental assistance payment, the tenant can elect to use it for down payment assistance to purchase a replacement home and/or payment of certain costs incidental to the purchase of the replacement property.

All benefits and services will be provided equitably to all residential and business displacees without regard to race, color, religion, age, national origin, and disability as specified under Title VI of the Civil Rights Act of 1964.

Text was added to subsection titled “Permanent Impacts” on page 3.4-27 in Section 3.4.1.3, in the EIR/EIS to clarify the availability of comparable affordable housing. In the event that such housing does not exist, the alternative measures included in the project ensure that all displacees will be properly relocated and compensated.

Refer to response to comment L-2-8, below, for additional discussion regarding affordable housing.

L-2-8

As discussed in Section 4.2.3.7, Land Use and Planning, Population and Housing, on page 4-34 in the EIR/EIS, because of Corona’s demographics and the residential resources available in the immediate areas surrounding the project limits, it is anticipated there will be ample resources to relocate the affected residents (owners and tenants) elsewhere in the City. Refer to Attachments 3.4.A through 3.4.I to Section 3.4, Community Impacts, in the EIR/EIS, which list available housing and business replacement opportunities in the SR-91 study area, including the City of Corona. As described later in this response, only an estimated 30 low-income replacement units are expected to be needed. Therefore, it should be possible to relocate all the affected residents, including low-income residents, to other housing based on the overall availability of housing (listed in Attachments 3.4.A to 3.4.I in Section 3.4) and, as described below, new housing anticipated to be constructed in the City.

Measures CI-1 through CI-3 starting on page 3.4-51 would partially mitigate the effects of Alternative 2f related to community character and cohesion. The remaining impacts would be adverse but not significant after mitigation under CEQA.

It is not possible at this time to assess whether the affected housing units are considered affordable housing as defined by the State of California Department of Housing and Community Development. Further, it is not possible at this time to assess how many of the displaced residents would need or qualify for some form of affordable housing. This information would not be available until the right-of-way acquisition process is initiated. During that process, personal interviews will be conducted with affected residents, in compliance with the Uniform Act, and the financial viability, living conditions, specific occupancy situations, and other factors that will influence the relocation of affected residents will be identified. Based on information collected during the right-of-way acquisition process, it is possible that some of the residential units in the City of Corona acquired and removed for the project will be identified as affordable and, therefore, the project could contribute to an overall reduction in the amount of affordable housing in the City. This could ultimately affect the Regional Housing Needs Allocation for the City. Nonetheless, with the mitigation identified above, the impacts on displaced residents (including residents displaced from single- and multiple-family homes for properties fully or partially acquired for the project) would be reduced but still be adverse. Refer also to response to comment L-2-7, above, for additional information regarding the relocation efforts for low-income, minority, elderly, and disabled residents.

Available survey data indicate that up to 20 percent of residents displaced by the project could be considered low income. These data are derived from City of Corona housing statistics and field research conducted since the preparation of the *Draft Relocation Impact Report (DRIR)*. This could represent up to approximately 30 of the homes removed by the project. For those affected residents who qualify for Section 8 Housing, the analysis derived from the FRIR identified 89 homes in the replacement area that could accommodate that need.

According to the City of Corona Final Housing Element 2008 to 2014 Housing Cycle (August 2009), the Regional Housing Needs Assessment (RHNA) for the City of Corona is 3,307 units. During the period of January 1, 2006, through June 30, 2007, a total of 2,209 units out of the 3,307 units were either constructed or approved for construction. Another 1,473 units are anticipated to be either constructed or have received approval for construction between July 1, 2007, and June 30, 2014. Based on the units anticipated to be constructed by June 30, 2014, it is unlikely that the removal of 30 units of low-income housing units by the project will substantially impact the number of available RHNA housing units in the City of Corona. Only an estimated 30 low-income replacement units are expected to be needed. In an email dated July 3,

2012, the City of Corona indicated that the removal of 30 low-income units in connection with the widening of SR-91 will be subject to relocation requirements under State law (and Uniform Relocation Assistance if federal funds are used). Furthermore, the City maintains an inventory of available high-density residential and mixed-use sites (through its various specific plans and General Plan) that offer a combined capacity for over 2,000 additional units. This capacity is adequate to meet the City's projected housing needs for all income levels and allows for replenishment of the affordable housing inventory as the market dictates. Therefore, it should be possible to relocate all the affected residents, including low-income residents, to other housing based on the overall availability of housing (listed in Attachments 3.4.A to 3.4.I in Section 3.4) and, as described below, new housing anticipated to be constructed in the City.

L-2-9

Sheet 2 of the Planning Study for the West Grand Boulevard Undercrossing Widening, in Attachment 22 in the *Project Report*, was revised to reflect the changes to this undercrossing.

L-2-10

The property that will be acquired as part of the Preferred Alternative (Alternative 2f) is described in Section 3.4.1.3, Environmental Consequences, in the EIR/EIS. Based on information in that section, the estimated annual property tax revenue loss under Alternative 2f is approximately \$300,000, and the estimated annual sales tax loss due to business displacements is \$660,000. Therefore, the total revenue loss to the City under Alternative 2f would be approximately \$960,000.

This loss in sales tax and property tax revenues as a result of the proposed project would not be offset by Development Impact Fees (DIF). This is because the property will be acquired by a public agency (RCTC) for use in a public project (widening an existing public freeway) and public agencies do not pay any sort of DIF or other fee to offset reductions in property or sales tax revenues as a result of the removal of land from the tax rolls. In addition, as discussed in Section 3.4.2.4, Economics, on page 3.4-47 in the EIR/EIS, these losses in City revenue are not considered substantial at 0.18 percent in total property taxes accrued to the City and 2.2 percent total sales taxes generated in the City under Alternative 2f. In addition, these impacts are not considered substantial because it is expected that the majority of the displaced residents and businesses would likely be relocated in the City of Corona, and some part of the lost sales and property tax revenues would be generated at the new

locations of those residents and businesses. The basis for this conclusion is the availability of suitable relocation properties within the City of Corona, as documented in Attachments 3.4.A through 3.4.I in Section 3.4, Community Impacts.

Refer to Section O.5.8, Common Response Related to Billboard Relocation, on page O-36 in Section O.5, Common Responses, for additional discussion regarding revenue loss resulting from billboard relocations.

L-2-11

The City is actively engaged with RCTC in evaluating measures to minimize the loss of parking and other potential impacts to businesses. RCTC will make every effort to provide access to businesses during construction. In addition, RCTC will monitor any problems related to construction, including dust, dirt, noise, and access to businesses, and will make every effort to reduce construction impacts and promote access to businesses during construction. In addition, as noted in this comment, the project will provide a substantial number of direct and indirect jobs during project construction, which is a substantial benefit to the City and surrounding areas.

L-2-12

Comment noted. No response is necessary because this comment does not ask a question or provide a comment relative to the technical information in the EIR/EIS.