

To: City of Riverside Cultural Heritage Board
Subject: RCTC Draft EIR and 1938 FMC Building

The Food Manufacturing Corporation (FMC) building was constructed in 1938 and an adjacent sister building was built to the south in 1942. Both FMC buildings are City of Riverside and County of Riverside designated Landmark Structures, and both are eligible for listing on the United States National Register of Historic Places. The primary purpose of the 1938 FMC building was to manufacture citrus industry processing equipment that was used in either the citrus groves or the packing houses. The processing equipment was based on designs for mechanical wooden box construction or sorting line equipment that was invented by George Parker and Fred Stebler, and was first produced in the Iron Works building on the west side of the railroad tracks, which is also a City and County Landmark. The Riverside County Transportation Commission (RCTC) is currently circulating a Draft Environmental Impact Report (EIR) for the proposed expansion of the Metrolink Riverside Downtown Station East Platform that calls for the demolition of the 1938 FMC building and the construction of a new platform in its place. The Draft EIR, companion Federal EA, and associated Appendixes are together over 4,400 pages in length, and fill many volumes. Comments are due for the draft EIR by February 3, 2022. The Project Details exhibit is found at the end of this report.

The City of Riverside Cultural Heritage Board (CHB) has heard presentations from RCTC staff and consultants about the proposed project at three of its regularly scheduled meetings over the past year, and the Draft EIR notes several of those presentations. At its December, 2021, meeting, the Board again discussed the proposed project and created, by motion, a Committee to review the Draft EIR and bring recommendations back to the full Board at its January, 2022, meeting. Even though the 1938 FMC building is a designated City of Riverside Landmark, and its proposed demolition would normally be considered under Title 20 of the City of Riverside, and thus be subject to CHB and City review, RCTC is its own governmental entity, and as such has the right to acquire the 1938 FMC property, demolish the building, and construct a new passenger boarding station in its place. Prior to that action, however, as the property is still privately owned and a City Landmark, the CHB and City has the right to comment on the Draft EIR and request additions and revisions.

The Committee has the following comments and recommendations about the RCTC Draft EIR:

Comment Period-The Draft EIR will be circulated for sixty days and the comment period ends on February 3, 2022. Under normal circumstances a 60 day circulation period might be adequate, but these are not normal circumstances. First there is Covid and the restrictions that it has placed on daily life. Second, the building is a Landmark structure that has played a significant role in the history of the City and the lives of many who live in the adjacent community. Third, the demolition of the existing building will expose the adjacent community to increased noise levels, potentially release known hazardous contaminants from the soils, and displace the current tenant, who provides over 100 jobs at the site. Therefore the Committee recommends:

- 1) That RCTC extend the comment period for the Draft EIR by at least 90 days, and that during that time it conduct additional community in-person and on-line meetings to review the project with the adjacent residents and other interested parties. The Committee further recommends that after RCTC makes revisions to the Draft EIR based on these and other comments, that the revised Draft EIR be re-circulated in draft form to guarantee the completeness of those revisions and additions.

Avoidance Alternatives-The Draft EIR identifies seven separate Avoidance Alternatives to the proposed demolition of the 1938 FMC building and the construction of a new platform on the site. These seven Avoidance Alternatives call for the construction of improvements and platforms at other locations of the Downtown Station on either the east or west sides of the three railroad mainlines that run through the Riverside Metrolink Station. The Committee assumes that

RCTC has included the Avoidance Alternatives in the Draft EIR as examples of real, bona fide, projects that could actually be constructed in lieu of the proposed project. Therefore the Committee recommends:

- 2) That RCTC significantly expand the sections in the Draft EIR on the Avoidance Alternatives, and analyze each Avoidance Alternative in terms of to what degree it can expand overall passenger service at the entire Downtown Station, and not just on the east side of the mainline. The Committee further recommends that the expanded analysis should include a detailed cost analysis to build each alternative in comparison to the proposed project, and to place special emphasis on Avoidance Alternatives 1 and 1A that are located on the west side of the Station closest to the new RTC Transportation Center.

Relocation-The Draft EIR proposed project calls for the demolition of the 1938 FMC building and its replacement by the construction of a new eastside passenger loading platform and parking lot. The document also discusses the possibility of the Adaptive Reuse of the FMC building by attempting to incorporate the building into a new station design. The building is primarily a wood truss structure, although portions are metal beam. In the opinion of the Committee, there is no reason why the building could not be saved in its entirety, and several organizations have expressed interest in taking the building, or it could be moved to an adjacent industrial property and continued in the same use. Therefore the Committee recommends:

- 3) That RCTC expand the Draft EIR to include a comprehensive analysis of how the 1938 FMC building could be disassembled and reconstructed at a new location, either in the immediate vicinity, within the City of Riverside, or in a neighboring community. The Committee further recommends that RCTC work with the City of Riverside to develop a full and complete long term build-out plan for the Riverside Downtown Metrolink Station, and a Specific Plan for the area from 14th to 3rd Streets that would incorporate the existing historic features and buildings of the area into a comprehensive plan that would blend transportation with residential, commercial and industrial development.

Hazardous Waste-The hazardous waste appendix in the Draft EIR is 1,642 pages in length, and even so does not clearly define the origins of the sub-surface contamination or comprehensively discuss how it could be completely eliminated. Both the SARWQCB and the State DTSC have investigated the existing site over the years, and both have concluded that there is no action to be taken unless the site is disturbed. The remediation cost used in the Draft EIR does not include the cost of the complete sub-surface removal of all of the contaminants or the on-going monitoring cost for the site, nor does it include any hazardous waste removal cost for the demolition of the FMC building itself, should that occur. Therefore the Committee recommends:

- 4) That RCTC retain a qualified hazardous waste remediation firm that can fully investigate the sub-surface conditions at the site and develop a true cost for the complete remediation of all of the contaminants, and the cost for on-going monitoring. The Committee further recommends that the City of Riverside and the Eastside Community participate in the selection of the remediation firm with RCTC, and work directly with that firm as it undergoes its investigation of the site. Finally, any processing of a Final EIR for the proposed project should be deferred until the site investigation is complete and includes a full and complete cost for the comprehensive remediation of the site contaminants and the hazardous waste removal and disposal costs for the demolition of the 1938 FMC building.

No Project Alternative-California CEQA law requires that all feasible alternatives, and the No Project Alternative be given equal consideration, and analysis, to the Proposed Project. RCTC made a presentation to the Riverside City Council on December 7, 2021, stressing that the freight railroads wish to make greater use of Main Line #3 next to the existing east Platform #2. This expanded freight line use would require that the Metrolink passenger loading operations be moved from the west side of Platform #2 and along with the construction of various safety improvements, would also require that the north end of the spur be connected to the mainline. Therefore, the Committee recommends:

- 5) That RCTC provide an equal in-depth analysis of the No Project Alternative in the Draft EIR as it has given to the Proposed Project. The expanded analysis should review the platform safety issues involved to move Metrolink

boarding operations to the east side of the existing platform, and also identify the cost of connecting the eastern most existing spur to the mainline.

These are the recommendations of the committee.

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