

RESOLUTION NO.

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF RIVERSIDE, CALIFORNIA, CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE KAISER EXPANSION PROJECT, MAKING CERTAIN FINDINGS OF FACT RELATED THERETO, ADOPTING A STATEMENT OF OVERRIDING CONSIDERATIONS, AND ADOPTING A MITIGATION MONITORING AND REPORTING PROGRAM, ALL PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT.

WHEREAS, an application submitted by Kaiser Permanente for the expansion of the Kaiser Permanente Riverside Medical Center (hereinafter referred to as the Hospital Expansion Site) and the construction and operation of two parking lots located at 10821 Magnolia Avenue and 1510 Magnolia Avenue, including modification of a Conditional Use Permit (“CUP”), granting a Minor CUP, a Rezone and a Minor CUP, a Summary Vacation, and Design Review (collectively the “Project”) was presented for consideration; and

WHEREAS, in accordance with the requirements of the California Environmental Quality Act (“CEQA”) (Public Resources Code Section 21000 et seq.), the State of California CEQA Guidelines (“State CEQA Guidelines”) (California Code of Regulations Title 14, Chapter 3, Sections 15000 et seq.) and the City of Riverside (“City”) CEQA Guidelines (collectively “CEQA Regulations”) an Environmental Impact Report (“EIR”) was prepared for the Project; and

WHEREAS, in accordance with the requirements of Section 15082(a) of the State CEQA Guidelines, on September 15, 2021, the City prepared and distributed a Notice of Preparation (“NOP”) to responsible agencies, and other interested parties, stating that an EIR would be prepared for the Project; and

WHEREAS, on September 15, 2021, the NOP was sent to the State Clearinghouse (SCH No. 2021090271); and

WHEREAS, all responses to the NOP were considered in the preparation of the Draft EIR and interested agencies and individuals were contacted to secure their input; and

WHEREAS, the Draft EIR was completed and a Notice of Completion (“NOC”) and the Draft EIR was filed with the State Clearinghouse on or about January 26, 2022, in accordance with the provisions of section 15085 of the State CEQA Guidelines; and

1 WHEREAS, the Draft EIR was posted on the City’s website, and copies of the Draft EIR
2 were made available for review at the Riverside Main Public Library and at the Riverside La Sierra
3 Public Library once the library was open again after COVID-19 pandemic closures, which was
4 after the end of the public review comment period, and a Notice of Availability (“NOA”) of the
5 Draft EIR was published in the Riverside Press Enterprise, a newspaper of general circulation,
6 mailed to a list of interested parties, and posted with the Riverside County Clerk’s Office; and

7 WHEREAS, the NOC and the NOA provided a 45-day public review period commencing
8 on January 15, 2022, and ending on March 14, 2022; and

9 WHEREAS, the City received comments from the public and responsible agencies on the
10 Draft EIR during this public comment period; and

11 WHEREAS, all comments on the Draft EIR concerning environmental issues that were
12 received during the public review period, were evaluated by the City as the Lead Agency in
13 accordance with Section 15088 of the State CEQA Guidelines; and

14 WHEREAS, the City Planning Commission held a duly noticed hearing on the Draft EIR
15 on April 28, 2022, and made certain recommendations to the City Council; and

16 WHEREAS, the Final Environmental Impact Report dated June 2022, for the Project
17 consists of a Draft EIR dated March 2022, comments and recommendations received on the Draft
18 EIR, responses to comments on the Draft EIR, changes to the Draft EIR, and a Mitigation
19 Monitoring and Reporting Program (collectively “FEIR”); and

20 WHEREAS, the FEIR includes comments received on the Draft EIR and written responses
21 to those comments, the focus of which is on the disposition of significant environmental issues
22 raised in the comments, as specified by CEQA Guidelines section 15088(b); and

23 WHEREAS, the FEIR contains the elements required by the CEQA Regulations, including,
24 but not limited to: (a) identification, description and discussion of all potentially significant
25 environmental effects of the proposed Project; (b) a description of mitigation measures proposed
26 to minimize potential significant environmental effects on the project identified in the FEIR; (c) a
27 description of those potential environmental effects which cannot be avoided or can be mitigated
28 but not to a level of insignificance; (d) a description of a range of reasonable alternatives to the

1 proposed Project and evaluation of the comparative merits and potential significant environmental
2 effects of the alternatives; (e) a discussion of cumulative impacts in accordance with the
3 requirements of section 15130 of the State CEQA Guidelines; (f) a discussion of growth inducing
4 impacts; (g) a discussion of significant irreversible environmental changes; (h) a discussion of
5 energy conservation; and (i) a list of all federal, state and local agencies, other organizations and
6 private individuals consulted in preparing the FEIR and the firm preparing the FEIR; and

7 WHEREAS, the City Council held a duly noticed hearing on the FEIR on July 5, 2022, at
8 which time additional written and oral testimony was received; and

9 WHEREAS, the City Council has been presented with and is familiar with the information
10 in the administrative record, including the Staff Reports and the written and verbal testimony
11 submitted thereon, and has reviewed and considered the information in the FEIR for completeness
12 and compliance with the CEQA Regulations, has independently reviewed and analyzed the FEIR
13 and has duly heard and considered the Staff Reports and all written and oral arguments presented
14 at its meeting of July 5, 2022; and

15 WHEREAS, the City has made the written findings set forth in Findings of Fact and
16 Statement of Overriding Considerations (“Findings/SOC”) attached hereto as Exhibit “A” and
17 incorporated herein by reference, for each potentially significant environmental impact identified
18 in the FEIR pursuant to State CEQA Guidelines Section 15091 based upon all of the evidence in
19 the administrative record, including, but not limited to the FEIR, written and oral testimony given
20 at meetings and hearings, and submission of testimony from the public, organizations and
21 regulatory agencies, and has determined that the Findings contain a complete and accurate
22 reporting of the environmental impacts and mitigation measures associated with the Project, as
23 well as complete and accurate reporting of the unavoidable impacts and benefits of the Project;
24 and

25 WHEREAS, approval of the Project will result in significant effects which are identified
26 in the FEIR that cannot be avoided or substantially lessened; and

27 WHEREAS, the City has stated in writing the specific reasons to support its action to
28 approve the Project, despite its significant environmental impacts, based on the FEIR and other

1 information in the record, including in the Findings/SOC set forth in Exhibit “A” attached hereto;
2 and

3 WHEREAS, the City Council certifies that (1) the FEIR for the Project has been completed
4 in compliance with CEQA; (2) that the FEIR was presented to the City Council, and that the City
5 Council reviewed and considered the information contained in the FEIR prior to making a decision
6 on the Project; and (3) the FEIR reflects the City’s independent judgment and analysis, and has
7 reviewed and considered all comments received during the public review process and at the public
8 hearings; and

9 WHEREAS, the City Council found that the Project identified in the FEIR incorporated
10 alterations or mitigation measures that avoid or substantially lessen potentially significant
11 environmental effects associated with the Project to the fullest extent feasible; and

12 WHEREAS, in accordance with the requirements of the CEQA Regulations, a Mitigation
13 Monitoring and Reporting Program was prepared that identified (i) all feasible measures required
14 to mitigate potentially significant impacts, and (ii) standards and requirements contained in
15 Ordinances and State Laws with which the Project will be required to comply, which Mitigation
16 Monitoring and Reporting Program is attached hereto as Exhibit “B” and incorporated herein by
17 reference; and

18 WHEREAS, the City has not received any comments or additional information that
19 constitutes substantial new information requiring recirculation under Public Resources Code
20 section 21092.1 and State CEQA Guidelines section 15088.5; and

21 WHEREAS, all requirements of the CEQA Regulations have been satisfied by the City in
22 the EIR, which is sufficiently detailed so that all of the potentially significant environmental effects
23 of the Project have been adequately evaluated.

24 NOW, THEREFORE, IT IS RESOLVED by the City Council of the City of Riverside,
25 California, and making the following findings, as follows:

26 Section 1: The above recitals are hereby found and determined to be true and correct and
27 are hereby incorporated herein as if stated in full.

28 Section 2: The City Council hereby makes the following findings and conclusions:

- 1 (a) The FEIR for the Project has been completed and processed in compliance with the
2 requirements of CEQA;
- 3 (b) The FEIR was presented to the City Council, and the City Council, as the decision
4 making body for the City, reviewed and considered the information contained in
5 the FEIR and the administrative record as a whole, which includes, but is not
6 limited to, staff reports, testimony and information received, and scientific and
7 factual data presented in evidence during the review process, prior to approving the
8 Project; and
- 9 (c) The FEIR reflects the City's independent judgment and analysis.

10 Section 3: The City Council hereby finds that any changes to the FEIR in response to
11 comments received on the Draft EIR merely clarify, amplify or make insignificant modifications
12 to an already adequate EIR pursuant to CEQA Guidelines Section 15088.5(b) and that no
13 significant new information has been received that would require recirculation.

14 Section 4: The City Council finds that the Findings/SOC set forth in Exhibit "A," attached
15 hereto and incorporated by reference herein as if stated in full, are supported by substantial
16 evidence in the administrative record and are hereby adopted by the City Council.

17 Section 5: Potential environmental effects have been studied and, except as stated in
18 Section 8 below, there is no substantial evidence in the record, as a whole, that supports any
19 argument that the Project, as designed and mitigated, may cause a significant effect on the
20 environment. No facts, reasonable assumptions predicated on facts, testimony supported by
21 adequate factual foundation, or expert opinion supported by facts has been submitted that refute
22 the conclusions reached by the FEIR, studies, data and reports. Nor does anything in the record
23 alter the environmental determination, as presented, based upon investigation and independent
24 assessment of those studies, data and reports. No new significant impacts have been raised by any
25 commenting individual or entity, nor has any significant new information been added to the FEIR
26 that would require recirculation under State CEQA Guidelines section 15088.5.

27 Section 6: The FEIR dated June, 2022 for the Project reflects the independent judgment
28 of the City based upon the findings and conclusions stated in the FEIR, staff reports, and in

1 consideration of testimony and information received, and scientific and factual data presented in
2 evidence during the review process.

3 Section 7: The City Council Finds that the FEIR dated June 2022 has fully examined the
4 environmental impacts of the Project and, based on the information in the administrative record,
5 including the analysis in the FEIR, has determined that the impacts on aesthetics, agricultural and
6 forestry resources, air quality, biological resources, cultural resources, energy conservation,
7 geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and
8 water quality, land use and planning, mineral resources, noise, population and housing, public
9 services, recreation, transportation and traffic (except direct and cumulative impacts to VMT),
10 tribal cultural resources, and utilities and service systems either have no impact, are less than
11 significant or are potentially significant but that with mitigation the impacts are reduced to less
12 than significant based on the Findings/SOC set forth in Exhibit “A” attached hereto and
13 incorporated herein by reference, as well as the findings and analysis contained in the FEIR
14 (collectively “Findings”). The Findings are supported by substantial evidence contained therein
15 as well as in the record, and as such, said Findings are hereby adopted by the City Council.

16 Section 8: The City Council finds that the FEIR dated May 2019, has fully examined the
17 environmental concerns associated with the Project and, based on the information in the
18 administrative record, including the analysis in the FEIR, has determined that the following
19 significant impacts, identified in the FEIR, cannot be mitigated to a level of insignificant: direct
20 and cumulative impacts to VMT. As explained in attached Exhibit “A” Findings/SOC, the City
21 Council finds pursuant to Public Resources Code section 21081(a)(3) that specific economic, legal,
22 social, technological or other considerations make infeasible additional mitigation measures or
23 alternatives that would substantially lessen such impacts. The City Council further finds, pursuant
24 to Public Resources Code section 21081(a)(1) and as explained in the Findings/SOC (Exhibit “A”)
25 that changes or alterations have been incorporated into the Project which mitigate or avoid those
26 significant impacts identified in the FEIR to the fullest extent feasible.

27 Section 9: With the exception of the impacts identified in Section 8 above, the City Council
28 finds that, the Project, including all mitigation measures, conditions, permits and approvals will

1 not have any other significant adverse unmitigated impacts on the environment. Potential
2 environmental effects have been studied and there is no substantial evidence in the record, as a
3 whole, that supports any argument that the Project, as designed and mitigated, would cause a
4 significant effect on the environment, except as to the impacts identified in Section 8. No facts,
5 reasonable assumptions predicated on facts, testimony supported by adequate factual foundation,
6 or expert opinion supported by facts has been submitted that refute the conclusions reached by the
7 FEIR, studies, data and reports. Nor does anything in the record alter the environmental
8 determination, as presented, based upon investigation and independent assessment of those studies,
9 data and reports

10 Section 10: The City Council finds that three (3) alternatives, including the No Project
11 Alternative, were identified and analyzed in the FEIR and all were rejected as failing to meet most
12 of the Project objectives (No Project Alternative, Alternative Project Location, and Reduced
13 Intensity Alternative), as not sufficiently reducing environmental impacts as compared to the
14 Project (Alternative Project Location, and Reduced Intensity Alternative), and/or as infeasible, due
15 to specific economic, legal, social technological and other considerations (all alternatives). These
16 grounds are contained in the entirety of the administrative record, including the FEIR, the attached
17 Exhibit "A" Findings/SOC, and the written and verbal testimony. Specifically:

- 18 (a) No Project Alternative. This Alternative was rejected because it fails to most or all
19 of the Project objectives to: expand the Riverside Medical Center campus through
20 the construction and operation of new medical facilities in order to accommodate
21 future growth of Kaiser members and the need to provide additional medical
22 services that benefit the community; develop a comprehensively planned,
23 integrated medical campus within the existing hospital campus boundaries by
24 facilitating construction of a new five story hospital tower with 359-hospital-
25 licensed bed buildout capacity, and increasing services for Newborn Intensive Care
26 Unit (NICU), operating rooms, perioperative services, diagnostic and treatment,
27 increased emergency services and ancillary services to keep pace with increasing
28 population growth in the City and the region; allow members to access a full suite

1 of medical services nearer to their homes and workplaces; optimize the use of
2 development potential on the existing Medical Center property; accommodate
3 Medical Center expansion to continue without interruption, while offering all
4 current medical services and 24/7 emergency services; maximize the number of
5 single-occupancy in-patient hospital rooms in order to meet modern standards and
6 expectations; increase member parking to meet current and projected future
7 demand; increase employment opportunities in healthcare, by expanding personnel
8 in specialty healthcare departments; implement the vision, objectives and policies
9 of the Magnolia Avenue Specific Plan by enhancing the role of the La Sierra
10 District as a major employment center in the City; redesign internal circulation in
11 order to implement safety, provide enhanced health and wellness and create a
12 seamless flow between pedestrians and vehicle traffic; continue to provide
13 employee parking to medical center staff during construction by introducing off-
14 site parking lots with shuttle support during construction; and incorporate
15 sustainable green building design features developed by the Leadership in Energy
16 and Environmental Design (LEED) to meet and exceed the LEED Gold
17 performance standards and Kaiser Permanente's long-term environmental
18 stewardship goals.

- 19 (b) Alternative Project Location. This alternative was analyzed and not carried forward
20 for further analysis, as an alternative site for the hospital expansion Project would
21 not be logical and would not meet the basic project objectives. The need as outlined
22 in the Project Objectives, is to expand hospital services at the current hospital
23 location, including increasing the number of emergency room, operating room and
24 recovery room beds at the Riverside Medical Center Hospital Expansion location
25 (10800 Magnolia Avenue) in order to support the growing population and service
26 demands in the localized region. Currently, there is a deficiency in the hospital
27 capacity at the Riverside location, thus different Kaiser hospitals in the region are
28 used by patients for emergency room services, operating rooms, intensive care

1 units, and neonatal intensive care units. Therefore, an alternative location for these
2 facilities is already being utilized and will not fix the underserved population at the
3 Riverside Medical Center Hospital location. There is no reason to believe potential
4 impacts would be any different than those associated with the Project site if the
5 proposed Project were to be constructed elsewhere. Because this alternative does
6 not meet most or all Project Objectives, it is also not feasible, and rejected on these
7 bases.

- 8 (c) Reduced Intensity Alternative. This alternative would reduce significant and
9 unavoidable impacts to VMT, compared to the proposed project, but fails to meet
10 most or all of the Project Objectives. Although Alternative 2 meets six out of the
11 twelve Project Objectives, these objectives would be met to a lesser degree than the
12 proposed Project because of the smaller project that would be envisioned. Since
13 VMT would be generated by the employees at the Riverside location, no matter the
14 size, even a smaller footprint of the buildings under Alternative 2 would still create
15 VMT impacts that would exceed the City's standard of no net increase of VMT.
16 Therefore, since the purpose of the Project is to accommodate jobs and provide for
17 medical services to be centrally located instead of having Kaiser patients drive to
18 separate facilities across the region, Alternative 2 does not meet the basic Project
19 Objectives, and does not reduce the significant impacts to less than significant
20 levels. For these reasons, this alternative is rejected as infeasible.

21 Section 11: The FEIR dated June, 2022, for the Project has been completed and processed
22 in compliance with the requirements of the CEQA Regulations (both state and local), and based
23 on the entirety of the administrative record is hereby certified.

24 Section 12: The City Council has balanced the benefits of the adoption of the Project
25 against its unavoidable environmental impacts and has determined that for the reasons set forth
26 below, the economic, legal, social, technological and other benefits of the Project outweigh the
27 unavoidable adverse environmental effects which have been identified in attached Exhibit "A"
28

Findings/SOC and the adverse environmental effects are therefore considered acceptable. Some of the benefits of implementing and approving the Project are summarized as follows:

(a) The Project will supply much-needed healthcare facilities and services to meet current and projected population growth in the City and the region. As a result of the Project, a greater number of Kaiser members will have increased access to medical care, and both Kaiser members and City residents will have increased access to emergency services closer to home.

(b) The Project will provide expanded medical facilities in an already urbanized area where public services are available, including utilities, a well-developed network of roadways and where public transit is immediately adjacent to the site.

(c) New practices and standards of sustainability, relying on both current and future technologies, are applied to the Project and will enable the most efficient use of resources. These include sustainable green building design features developed by the Leadership in Energy and Environmental Design (LEED) to meet and exceed the LEED Gold performance standards.

(d) The Project will reduce the need for Kaiser members to travel greater distances to other medical facilities to receive care, thereby reducing the vehicle miles traveled across the region.

(e) The Project will maximize the number of single-occupancy in-patient hospital rooms, including ICU rooms, in order to improve patient comfort, care, and health outcomes.

(f) The Project will produce approximately 746 new full-time jobs, not including jobs during construction. Benefits and wages to employees will boost the economic vitality of the City and the region.

These findings are supported by substantial evidence and the data to support these overriding considerations are found throughout the FEIR, the supporting comments and responses section of the FEIR, and by information throughout the administrative record.

Section 13: Specific environmental, economic, social, legal, technical and other considerations and benefits derived from the development of the Project override and make infeasible any alternative to the Project or further mitigation measures beyond those incorporated into this Project.

1 Section 14: The City Council further finds that the Project will provide numerous
2 benefits to the City, as stated in Section 12 above, which outweigh its unavoidable environmental
3 impacts and therefore adopts the Statement of Overriding Considerations set forth more fully
4 Exhibit “A” attached hereto and incorporated herein by reference.

5 Section 15: The City Council finds that all significant environmental impacts from
6 implementation of the Project have been identified in the FEIR and, with the implementation of
7 the mitigation measures set forth in the Mitigation Monitoring and Reporting Program contained
8 in Exhibit “B” attached hereto and incorporated herein by reference, will be mitigated to a less-
9 than-significant level, with the exception of the impacts identified in Section 8 above. The City
10 Council hereby adopts the Mitigation Monitoring and Reporting Program for the Project to
11 implement the policies, goals and implementation measures identified in the FEIR as necessary to
12 preclude the need for further mitigation measures. Said Mitigation Monitoring and Reporting
13 Program, contained in the FEIR and attached hereto as Exhibit “B”, is hereby incorporated as part
14 of the approval of the City Council for the adoption of the Project.

15 Section 16: The City Council hereby finds that the locations of documents and other
16 materials which constitute the record of proceedings upon which its decision is based are the
17 Community & Economic Development Department, Planning Division and the City Clerk’s Office
18 located at 3900 Main Street, Riverside, California 92522, and the custodian of such records shall
19 be the Community & Economic Development Director and the City Clerk, respectively.

20 ADOPTED by the City Council this _____ day of _____, 2022.

21
22
23 _____
24 PATRICIA LOCK DAWSON
 Mayor of the City of Riverside

25 Attest:

26
27 _____
28 DONESIA GAUSE
 City Clerk of the City of Riverside

1 I, Donesia Gause, City Clerk of the City of Riverside, California, hereby certify that the
2 foregoing resolution was duly and regularly introduced at a meeting of the City Council on the
3 ____ day of _____, 2022, by the following vote, to wit:

4 Ayes:

5 Noes:

6 Abstain:

7 Absent:

8 IN WITNESS WHEREOF I have hereunto set my hand and affixed the official seal of
9 the City of Riverside, California, this ____ day of _____, 2022.

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11 _____
12 DONESIA GAUSE
13 City Clerk of the City of Riverside
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EXHIBIT A

**CEQA FINDINGS OF FACT AND
STATEMENT OF OVERRIDING CONSIDERATIONS**

EXHIBIT “A”

CEQA FINDINGS OF FACT, STATEMENT OF OVERRIDING CONSIDERATIONS

This document includes the following sections:

- I. Introduction to CEQA Findings of Fact
- II. Location and Custodian of the Record
- III. Findings for Less than Significant Impacts
- IV. Findings for Impacts Identified as Significant but Mitigated to Less than Significant Level
- V. Findings Regarding Cumulative Impacts
- VI. Findings Regarding Significant Irreversible Environmental Changes
- VII. Findings Regarding Significant Unavoidable Impacts
- VIII. Findings Regarding Growth Inducing Impacts
- IX. Findings Regarding Alternatives
- X. Findings Regarding No Need for Recirculation
- XI. Statement of Overriding Considerations
- XII. Mitigation Monitoring and Reporting Program

I. INTRODUCTION TO CEQA FINDINGS OF FACT

These Findings of Fact are made pursuant to the California Environmental Quality Act (Pub. Res. Code §21000 et seq., “CEQA”) and the CEQA Guidelines (Cal. Code Regs. title 14, §15000 et seq.) by the City of Riverside, as the lead agency for the expansion of the existing Kaiser Permanente Medical Center. These Findings of Fact pertain to the Final Environmental Impact Report (“EIR”), State Clearinghouse (SCH) #2021090271.

A. PROJECT LOCATION

The proposed Project, as described below, includes the expansion of the existing Kaiser Permanente Riverside Medical Center (referred to as the “Hospital Expansion” in the DEIR) and the construction of two off-site parking lots (referred to as “Off-Site Area 1” and “Off-Site Area 2” in this DEIR). The Hospital Expansion Site is located at 10800 Magnolia Avenue. Off-Site Area 1 and Off-Site Area 2 are located at 10821 Magnolia Avenue and 11510 Magnolia Avenue, respectively. All sites are located within the City of Riverside. The Hospital Expansion Site, Off-Site Area 1 and Off-Site Area 2 are collectively referred to as the Project Site. The Project Site encompasses approximately 43.8 gross acres, of which 21.8 acres will be developed as part of this Project. The Project Site is located in the southwestern portion of the City within the La Sierra District of the Magnolia Avenue Specific Plan. The Hospital Expansion Site is bounded by Magnolia Avenue (to the north), Park Sierra Drive (to the west), Polk Street (to the east), and the Castle Park amusement park (to the south). La Sierra Avenue is the nearest major cross street. Off-Site Area 1 is located north of Magnolia Avenue and across the street from the Hospital Expansion Site. Off-Site Area 2 is located west of the Hospital Site and is bounded by Magnolia Avenue (to the north), Fillmore Street (to the east), State Route 91 (SR-91) (to the south) and an existing apartment complex (to the west).

B. PROJECT DESCRIPTION SUMMARY

The Environmental Impact Report (EIR) analyzes the potential environmental impacts of the construction and operation of an expansion of the Kaiser Permanente Riverside Medical Center, two off-site parking lots, and all associated on- and off-site supporting improvements, which are collectively referred to as the “Project.” Implementation of the proposed Project will require the approval of a number of applications

by the City of Riverside. As part of the entitlements, the Project requires consideration of the proposed Floor Area Ratio (FAR) if it can be found that the Project (a) will not have a detrimental effect on infrastructure and municipal services, (b) will not adversely impact the surrounding neighborhood, and (c) will not likely set a precedent for additional development that would adversely affect infrastructure, service, or surrounding land uses. The land use applications are as follows:

Conditional Use Permit Modification (CUP) – DP-2021-00008

Implementation of the Project will require approval of a modification to the original CUP (CU-038-834), approved in 1984 for the construction of the existing Kaiser Permanente Riverside Medical Center campus. The facilities proposed at the Kaiser Permanente Riverside Medical Center campus are referred to as the “Hospital Expansion”. The Hospital Expansion will entail redevelopment of approximately 15.5-acres of the existing 37.5-acre Riverside Medical Center Site with a five-story hospital tower, a two-story diagnostic and treatment (D&T) building, a five-story (six decks) aboveground parking structure, and ancillary features.

Minor Conditional Use Permit (MCUP) – DP-2021-01307 – Off-Site Area 1

Approval of MCUP DP-2021-01307 would permit the construction of an 87-stall parking lot (82 standard stalls and five ADA compliant stalls) and five (5) construction trailers for use by construction staff at Off-Site Area 1. The parking lot and construction trailers will be used by Hospital Expansion construction staff during business hours for no more than 36 months. Due to the proximity of Off-Site Area 1 to the Hospital Expansion Site, there will be no shuttle service between this lot and the Hospital Expansion Site. Once the Hospital Expansion construction has concluded, the trailers will be removed and Off-Site Area 1 will remain a parking lot.

ReZone (RZ) – DP-2021-01650 and Minor Conditional Use Permit (MCUP) – DP-2021-01306) – Off-Site Area 2

Off-Site Area 2 is currently zoned R-1-7000-SP – Single Family Residential and Specific Plan (Magnolia Avenue) Overlay Zones and CG-SP – Commercial General and Specific Plan (Magnolia Avenue) Overlay Zones. The City of Riverside’s recently approved Housing Element Update identified Off-Site Area 2 as Opportunity Site 11, and proposed to amend the zoning to MU-U-SP – Mixed-Use Urban and Specific Plan (Magnolia Avenue) Overlay Zones. However, Opportunity Site 11 was removed from the ordinance rezoning the various housing opportunity sites and, as a result, the MU U-SP Zoning was not applied to Off-Site Area 2.

The Project Applicant has therefore submitted an application for Off-Site Area 2 to be rezoned to MU-V-SP – Mixed Use Village Specific Plan. The proposed MU-V-SP zone will be consistent with the General Plan land use designation and Magnolia Specific Plan, and allow the establishment of a parking lot, which is a permitted use in the MU-V zone with the granting of an MCUP. The proposed rezoning of Off-Site Area 2 is for the explicit purpose of a parking lot. Approval of RZ DP-2021-01650 and DP-2021-01306 would permit the construction of a 516-stall (505 standard stalls and 11 ADA compliant stalls) parking lot at Off-Site Area 2. Initially, this lot would be used by Kaiser Permanente Riverside Medical Center employees 24 hours every day for approximately 18 months, during construction of the onsite parking structure. Medical

Center employees would be shuttled between Off-Site Area 2 and the Kaiser Permanente Riverside Medical Center in hospital-operated vehicles. Following employee utilization, Hospital Expansion construction staff would park at Off-Site Area 2 during business hours for an additional 18 months for a total of approximately 36 months. Access will be secured with a vehicle gate arm activated by a personnel badge. There would be no on-site security guard.

Summary Vacation (VC-S) – SD-2021-00020

The proposed Project includes vacation of Lot D of Parcel Map No. 16073 (recorded August 25, 1983 on page 92, Book 166 of Parcel Maps, an unimproved public right-of-way area, totaling 0.042 acre (1,816.14 square feet). Lot D is an existing unimproved public right-of-way, totaling 0.042 acres (1,816.14 square feet). Riverside Municipal Code Chapter 19.890– Street, Alley and Walkway Vacations sets forth the procedures for vacating unneeded rights-of-way for streets, alleys, and pedestrian walkways. The 1,816 square feet of unimproved, excess, public right of way is no longer needed as it was intended for the construction of a driveway along Park Sierra Drive that was never built and not needed for access. The excess public right of way will allow the proposed parking structure to comply with the minimum 15-foot setback required for parking structures.

Design Review (DR) – DPR-2021-00009

The City's Design Review process is required by the Zoning Code for any new buildings, structures, signs, exterior alterations, enlargements of existing buildings, or new landscaping and irrigation. The purpose of the Design Review procedures is to protect and preserve the value of properties and to encourage excellence in development.

The Hospital Expansion would expand acute medical services facilities and ancillary uses. The proposed Hospital Expansion would include a new 175,968 square-foot (SF) five-story hospital tower, 115,526 SF two-story diagnostic and treatment (D&T) Building, and a five-story (six decks) approximately 1,200-space aboveground parking structure.

The proposed hospital tower would be five stories with a subgrade basement and would stand 74.5 feet from ground level to the top of the roof. Mechanical equipment on the roof would be screened by a parapet and screen, which would result in a total building height of 95.5 feet. The Zoning Code allows for parapet and screen walls to exceed the maximum building height prescribed in the underlying zone, provided it does not add another floor space, subject to approval by the appropriate Approving or Appeal Authority. The proposed building height can be supported as it complies with the intent of the Zoning Code.

The proposed tower would provide an additional 152 acute care beds, consisting of 116 single occupancy rooms and 36 neonatal intensive care unit (NICU) rooms for a total of 359 beds. Existing double occupancy rooms in the existing hospital tower would be upgraded and converted to single occupancy rooms. The proposed tower would also include new emergency and surgical departments, eight operating rooms, 58 emergency department treatment bays, and other hospital related functions, including an inpatient pharmacy. A rotunda connecting the new tower to the existing Medical Center and various outdoor seating areas with meandering pathways and landscaping would also be constructed. The new patient

tower will receive a new 12 (kilovolt) kV power circuit from Riverside Public Utilities and a meter at 12kV. There will be a Unit substation 12kV-480V installed in the basement providing power to the new hospital tower.

The D&T building would be two stories, approximately 34 feet in height to the top of the parapet and would be constructed on the northwestern side of the proposed hospital tower. The D&T building would provide direct support to the new emergency and surgical departments as well as expanded diagnostic services and interventional radiology treatment. The existing central utility plant and utility connections from the central utility plant to the new buildings are proposed to be upgraded and will include: a new 1.5 megawatt (MW) to 2 MW generator, a new 15,000 gallon diesel fuel tank, a new 500 brake horsepower (BHP) boiler, and a 1,000 ton chiller. The Project also includes new underground storage tanks for propane (60,000 gallons), sewage (two 25,000 gallon tanks), and water (two 25,000 gallon tanks). The building code, enforced by the Office of Statewide Health Planning and Development (OSHPD), requires that a hospital facility have a 72-hour water supply tank and a sewer storage tank for disaster preparedness. The water tank is a flow-through, continuously utilized facility providing the required water storage resource should the municipal infrastructure fail in a disaster. The sewer tank is only utilized through a diverter valve should the municipal sewer system fail in a disaster. The sewer tank would be pumped out post-disaster utilization

The five-story (6 decks) parking structure would be constructed in the southwest corner of the Hospital Expansion Site. The maximum proposed height of the parking structure would be approximately 70 feet. Construction of the parking structure would result in a temporary loss of 354 parking stall during construction. Once completed, the parking structure would replace approximately 250 parking stalls and modifications would be made to the surrounding on-site surface parking lots. The parking structure would provide approximately 1,151 vehicle parking stalls of which 45 will be Americans with Disabilities Act (ADA) compliant. In addition, there will be 78 motorcycle stalls and 55 bicycle stalls. The parking structure will include two stairwells on the northern and southern corner, respectively, and three elevators all centralized on the northern corner of the structure.

Ancillary features proposed as part of the Hospital Expansion are a new patient drop-off canopy, driveway, walkways, surface parking, landscaping, lighting, and signage. A new entry plaza with a patient drop-off canopy would be constructed south of the existing hospital building to connect to the existing driveway on Park Sierra Drive. A tech dock connected to the northeast side of the proposed new tower with access from Polk Street would also be constructed. An additional right-in and right-out driveway off of Magnolia Avenue would also be constructed for use by emergency vehicles only.

Construction is anticipated to begin in the fall of 2022 and take approximately 58 months. Construction will be completed in summer of 2027. Project construction will occur in two major build phases with seven subphases. The Project proposes to operate 24 hours a day 7 days a week.

C. PROCEDURAL COMPLIANCE WITH CEQA

The City of Riverside published a Draft EIR on January 26, 2022 and completed a Final EIR in compliance with CEQA requirements that was published on June 10, 2022. As allowed by CEQA Guidelines §15084(d)(2), the City retained consultants to assist with the preparation of the environmental

documents. Acting as lead agency, the City has directed, reviewed and edited as necessary all material prepared by the consultants, and such material reflects the City's independent judgment. In general, the preparation of the EIR included the following key steps and public notification efforts.

- Pursuant to Section 15060(d) of the State CEQA Guidelines, the City prepared an Initial Study for the Project in order to determine if the Project may have a significant effect on the environment. Based upon the findings of fact contained within the Initial Study, the City concluded that the Project may cause potentially significant impacts related to transportation (vehicle miles traveled) and tribal cultural resources, and that an EIR should be prepared to address those topics. In addition, the Initial Study concluded that two impacts (potential inadvertent discovery of cultural resources and of paleontological resources) would be significant but could be mitigated to a less than significant level with the implementation of standard City mitigation measures. Those impacts were not studied in the EIR, but the mitigation measures are discussed in the findings below and included in the MMRP.
- A 30-day scoping process began with the City's issuance of the Notice of Preparation (NOP) of an EIR on September 15, 2021. The NOP was filed with the State Clearinghouse on September 15, 2021, which started a 30-day comment period that ended October 15, 2021. Due to the COVID-19 global pandemic, the City noticed and held a virtual EIR Public Scoping Meeting during the 30-day comment period to receive perspective and input from agencies, organizations and individuals on the scope and content of the environmental information to be addressed in the EIR. The virtual EIR scoping meeting was held on September 27, 2021. No comments were received.
- The City issued the Draft EIR by filing a Notice of Completion (NOC) with the State Clearinghouse on January 26, 2022. The Notice of Availability for the Draft EIR was published in the Press Enterprise newspaper and distributed to a variety of government agencies, organizations and interested parties, including: local jurisdictions, tribal governments, state and federal agencies, resource agencies, water districts and boards, transportation agencies, community groups and organizations, business organizations, chambers of commerce, universities and school districts, senior/aging organizations, interested parties and members of the public. The Draft EIR was also posted on the City's website and made available for review at the Riverside Main Public Library and at the Riverside La Sierra Public Library once the library was open again after COVID-19 pandemic closures, which was after the end of the public review comment period.
- The Draft EIR was available for a 45-day public review period beginning January 26, 2022 and ending March 14, 2022. Due to the COVID-19 global pandemic, the City held a virtual public Planning Commission hearing on April 28, 2022, which discussed findings and information within the Draft EIR.
- Following the close of the public review period, clarifying changes were made to the Draft EIR. Revisions made to the Draft EIR are shown throughout the Final EIR in strikethrough and underline text.
- As part of its Final EIR, the City responded to all timely written comments on the Draft EIR, and provided written responses to all public agencies that timely commented on the Draft EIR,

consistent with the legal requirement that such agencies be provided written responses at least 10 days prior to any lead agency action to certify the EIR. The Final EIR also includes responses to late comment letters that were received after the close of the 45-day public review comment period. The City Council hearing is scheduled for July 5, 2022 to consider certification of the Final EIR and approval of the proposed Project.

D. INCORPORATION OF FINAL EIR BY REFERENCE

The Final EIR is hereby incorporated by reference into these Findings of Fact. The Final EIR consists of three volumes:

1. Comments and Responses to Comments on the Draft Environmental Impact Report (Vol. I),
2. Text Revisions to the Draft EIR (Vol. I),
3. Mitigation Monitoring and Reporting Program (Vol. I),
4. Draft Environmental Impact Report, January 2022 (Vol. II), and
5. Draft Environmental Impact Report Appendices, January 2022 (Vol. III).

E. REQUIREMENTS FOR CEQA FINDINGS

Pursuant to Public Resources Code §21081 and CEQA Guidelines §15091, no public agency shall approve or carry out a project for which an EIR has been certified, which identifies one or more significant effects on the environment that would occur if the project is approved or carried out, unless the public agency makes one or more of the following findings with respect to each significant impact.

1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.
2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR.

For purposes of the third of these possible findings, the CEQA Guidelines define “feasible” as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.” (CEQA Guidelines §15364) Thus, a decision-making body may reject a mitigation measure or project alternative as infeasible if the measure or alternative fails to meet this definition. Importantly, the courts understand the legal concept of infeasibility to encompass both (i) the ineffectiveness of a particular alternative or mitigation measure in promoting the agency’s underlying project purpose and objectives and (ii) the desirability of the measure or alternative from a policy standpoint, as reasonably determined by the decision-makers. (See *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417; *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1000-1001; *San Diego Citizenry Group v. County of San Diego* (2013) 2129 Cal.App.4th 1, 17-18.) Environmental impacts that are less than significant do not require the

imposition of mitigation measures. (*Leonoff v. Monterey County Board of Supervisors* (1990) 222 Cal.App.3d 1337, 1347.)

The City of Riverside has made specific written findings regarding less than significant impacts, significant impacts that can be reduced to a less than significant level through the implementation of mitigation measures, and certain impacts associated with the project that are significant and unavoidable. Those findings are presented below, along with a presentation of facts in support of the findings. The City certifies that these findings are based on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental issues identified and discussed. These findings are based on substantial evidence contained in the totality of the administrative record before the City, including, but not limited to, the Final EIR supporting evidence cited herein.

A full explanation of the environmental findings, conclusions, and mitigation measures referenced herein can be found in the Draft EIR and Final EIR; and these Findings hereby incorporate by reference the discussions and analyses in those documents. In making these Findings, the City hereby ratifies, adopts, and incorporates those discussions and analyses, adopting them as the City's own.

II. LOCATION AND CUSTODIAN OF THE RECORD

The documents and other materials that constitute the record of proceedings on which the City of Riverside's Findings of Fact are based, are located at 3900 Main Street, Riverside, California. The custodian of these documents is Brian Norton, Senior Planner. This information is provided in compliance with Public Resources Code § 21081.6(a)(2) and CEQA Guidelines § 15091(e).

For purposes of CEQA and these Findings of Fact, the Record of Proceedings for the proposed Project consists of the following documents, among others:

- The Notice of Preparation and all other public notices issued by the City of Riverside and in conjunction with the proposed Project.
- The Draft and Final EIRs, including appendices and technical studies included or referenced in the Draft and Final EIRs.
- All comments submitted by agencies or members of the public during the public comment period on the Draft EIR and after the close of the public comment period, including those received prior to the Planning Commission and City Council meetings.
- The Mitigation Monitoring and Reporting Program (MMRP) for the proposed Project.
- All Findings and resolutions adopted by the City of Riverside decision-makers in connection with the proposed Project and all documents cited or referred to therein.
- All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the proposed Project prepared by Albert A. Webb Associates, Inc., consultants to the City of Riverside those reports, technical memoranda relating to the proposed project prepared by LSA and Michael Baker and Associates, Inc., consultants to the Applicant and peer reviewed by Albert A. Webb Associates.
- All documents and information submitted to the City of Riverside by responsible trustee, or other public agencies, or by individuals or organizations, in connection with the proposed Project, up through the date that the City approved the proposed Project.

- Any documentary or other evidence submitted to the City of Riverside at such information sessions, public meetings, and public hearings.
- Matters of common knowledge to the City of Riverside, including but not limited to applicable federal, state, and local laws and regulations.
- Any documents expressly cited in these Findings of Fact, in addition to those cited above.
- Any other materials required to be in the Record of Proceedings by Public Resources Code § 21167.6(e).

III. FINDINGS FOR LESS THAN SIGNIFICANT IMPACTS

The City Council hereby finds that the following impacts are less than significant without mitigation measures. ***The findings below are for impacts where implementation of the proposed Project would result in less than significant environmental impacts without mitigation. These findings are based on the discussion of impacts in the detailed impact analyses in Section 4, Section 5.1 and Section 5.2 of the EIR, including the Initial Study, as well as relevant responses to comments in the Final EIR.***

The potential impacts that are less than significant without mitigation are as follows:

A. AESTHETICS

Threshold A: Would the Project have a substantial adverse effect on a scenic vista?

Finding: Less than significant. As determined in the Initial Study, the Project Site is located within an urbanized area that is completely surrounded by existing development. Due to the established surrounding areas, there are no visible scenic vistas in proximity to the Project Site.

Explanation: Due to the visibility of the Project from Magnolia Avenue, designated as a scenic boulevard in the General Plan 2025, the Project has been designed to be consistent with the existing buildings in height, scale, and size; the off-site areas have also been designed to minimize views of vehicles from Magnolia Avenue, so the proposed Project would complement the existing visual setting of the urbanized area. Therefore, direct, indirect, and cumulative impacts to scenic vistas would be less than significant. (DEIR, p.4-1.)

Threshold B: Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

Finding: Less than significant.

Explanation: The Initial Study determined that there are no state scenic highways within the City that could potentially be impacted by the proposed Project. There are also no rock outcroppings, historic trees, or historic buildings within view of this proposed Project. Therefore, impacts are expected to be less than significant. (DEIR, p. 4-2.)

Threshold C: In non-urbanized areas, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly-accessible vantage point). If the project is in an urbanized area, would the Project conflict with applicable zoning and other regulations governing scenic quality?

Finding: Less than significant.

Explanation: The proposed Project is within the La Sierra District of the Magnolia Avenue Specific Plan (MASP) and has been designed to be consistent and in compliance with the MASP. The Project would also comply with the development standards of the Zoning Code, which allows for the granting of Use Permits for hospitals and parking lots. This Project requires a modification of the original CUP for the Riverside Kaiser Permanente Medical Center for the Hospital Expansion Site, a Minor Conditional Use Permit (MCUP) for the parking lot proposed at Off-Site Area 1, which is located within the MU-V-SP – Mixed-Use Village and Specific Plan (Magnolia Avenue) Overlay Zone, and a rezoning and MCUP for the parking lot proposed at Off-Site Area 2, which is currently zoned R-1-7000-SP – Single Family Residential and Specific Plan (Magnolia Avenue) Overlay and CG-SP – Commercial General and Specific Plan (Magnolia Avenue) Overlay. With granting of the modification of the CUP for the Hospital Expansion, the MCUP for Off-Site Area 1, and the rezoning and MCUP for Off-Site Area 2, the proposed Project would be compatible with the surrounding zoning and land uses consisting of commercial, retail, recreation commercial, and mixed uses. Thus, implementation of the Project would have a less than significant impact on the visual character and quality of the area directly, indirectly, and cumulatively. (DEIR, p. 4-2.)

Threshold D: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Finding: Less than significant.

Explanation: The proposed Project would incorporate additional exterior lighting for safety and security purposes. However, all light sources will be shielded away from streets and adjoining properties. Further, all light fixtures would be required to be consistent with CALGreen standards and the City of Riverside Zoning Code (Title 19) for illumination. Compliance with CALGreen standards, the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Therefore, the Project would result in less than significant direct, indirect, and cumulative impacts. (DEIR, p. 4-2.)

B. AGRICULTURE AND FORESTRY

Threshold A: Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Finding: No impact.

Explanation: The Project is located within an urbanized area and on land that is highly disturbed and/or paved. The area surrounding the Project Site is highly developed and urbanized with a variety of land uses such as commercial, single-family residential, and medium-high density residential. Since the surrounding areas do not support farmland, implementation of the proposed Project would not affect off-site farmland. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use and no impacts would occur. (DEIR, p. 4-3.)

Threshold B: Conflict with existing zoning for agricultural use, or a Williamson Act contract?

Finding: No impact.

Explanation: The Project Site is not zoned for agricultural use or under a Williamson Act contract. As mentioned in the Initial Study and Section 5.1.4 of the DEIR, the Hospital Expansion Site is zoned CR-SP –

Commercial Retail and Specific Plan (Magnolia Avenue) Overlay and has a land use designation of MU-U – Mixed-Use Urban. Off-Site Area 1 is zoned MU-V-SP – Mixed-Use Village and Specific Plan (Magnolia Avenue) Overlay and has a land use designation of MU-V – Mixed-Use Village. Off-Site Area 2 is zoned R-1-7000-SP – Single Family Residential and Specific Plan (Magnolia Avenue) Overlay and CG-SP – Commercial General and Specific Plan (Magnolia Avenue) Overlay and has a land use designation of MU-V – Mixed-Use Village. The two Off-Site Areas do not contain farmland or an agriculture use. Therefore, the Project would not create a conflict with existing agricultural zoning, any existing agricultural use, or a Williamson Act contract. No impact would occur. (DEIR, p. 4-3.)

Threshold C: Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

Finding: No impact.

Explanation: The City of Riverside has no forestland that can support 10 percent native tree cover, nor does it have any timberland. Therefore, no impacts would occur from Project implementation. (DEIR, p. 4-3.)

Threshold D: Result in the loss of forest land or conversion of forest land to non-forest use?

Finding: No impact.

Explanation: There is no designated forestland on or adjacent to the Project Site. Therefore, the Project would not convert any such lands to non-forest uses. No impact would occur with regard to this issue. (DEIR, p. 4-3.)

Threshold E: Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

Finding: No impact.

Explanation: The properties involved in the Project are identified in the California Farmland Conservancy as Urban and Built-Up Land and are not located within an agricultural use area and do not support designated farmland or forestland. As a result, the properties involved in the Project area will not result in a direct or indirect conversion of Farmland or forestland. Implementation of the Project would not result in changes in the environment that would result in the conversion of farmland to non-agricultural use or forestland to non-forest use. No impact would occur. (DEIR, p. 4-4.)

C. AIR QUALITY

Threshold A: Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Finding: Less than significant. The Project is located within the South Coast Air Basin that is overseen by the South Coast Air Quality Management District in (SCAQMD) and is, therefore, required to conform to the rules and regulations set forth in the 2016 Air Quality Management Plan (AQMP) by demonstrating compliance with local land use plans and or population projections.

Explanation: The 2016 AQMP pollutant control strategies are based on the latest scientific and technical information and planning assumptions derived from 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS) and Southern California Association of Government (SCAG) latest growth forecast. (DEIR, p.4-4.)

Due to the proposed expansion of the Kaiser Permanente Riverside Medical Center, approximately 746 new medical support staff would be required. Therefore, based on average household size of 3.28 the Project would result in an indirect population increase of approximately 2,446 persons. This increase would account for three percent of the City's anticipated population increase and less than one percent of the City's total projected population for 2040. The anticipated 746 medical support staff would account for approximately one percent of the City's anticipated job increase by 2040. Therefore, the Project would not cause the General Plan buildout population or employment forecasts to be exceeded. Project consistency with the RTP/SCS, 2016 AQMP is considered by SCAQMD as having a less than significant cumulative impact. No increase in employment or population is associated with development of the two off-site areas as those areas are intended to support the Hospital Expansion. (DEIR, p. 4-4.)

Threshold B: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?

Finding: Less than significant. The Project-specific evaluation of emissions demonstrates that Project construction-source air pollutant emissions and Project operational-source emissions would not result in exceedances of criteria pollutant regional thresholds established by SCAQMD for any criteria pollutant. Accordingly, the Project would also not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment, and impacts would be less than significant. (DEIR, p. 4-5.)

Explanation: The proposed Project would require construction activities that would comply with the SCAQMD Rule 402, which requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off-site, and Rule 403, which requires that excessive fugitive dust emissions be controlled by regular watering or other dust prevention measures. The Project involves construction activities associated with demolition, grading, building construction, paving, and architectural coating applications. Demolition and construction would be accomplished with cranes, dozers, and other heavy equipment. Waste materials would be uploaded onto large trucks using small cranes, forklifts, and other construction equipment as needed and disposed of offsite. Based on the analysis in the Air Quality Technical Memorandum, the Initial Study determined the Project's construction emissions would not exceed SCAQMD thresholds for daily construction emissions. (DEIR, p. 4-5.)

The Project would also contribute long-term operational emissions from mobile sources such as motor vehicles and energy source emissions such as natural gas, electricity. The Initial Study concluded that operational emissions for both summer and winter would not exceed SCAQMND thresholds. (DEIR, p. 4-5.)

Existing models have limited sensitivity to small changes in criteria pollutant concentrations, and, as such, translating Project-generated criteria pollutants to specific health effects or additional days of nonattainment would produce meaningless results. Therefore, the Project's less than significant increase in regional air pollution would have nominal or negligible impacts on human health. (DEIR, p. 4-5.)

In conclusion, the Project would not exceed SCAQMD thresholds for construction and operational air emissions. Accordingly, less than significant impacts would also result with respect to adverse health effects of project emissions. Implementation of the Project would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard and air quality impacts would be less than significant. (DEIR, p. 4-5.)

Threshold C: Would the Project expose sensitive receptors to substantial pollutant concentrations?

Finding: Less than Significant. Sensitive receptors would not be exposed to substantial criteria pollutant concentrations, construction dust concentrations or Toxic Air Contaminant concentrations as the result of Project construction or operation and potential impacts would be less than significant. (DEIR, pp. 4-5 – 4-6.)

Explanation: The nearest sensitive receptors are located north of the Hospital Expansion Site at the residential area as well as the nursing home. Non-residential receptors are located west of the Hospital Expansion Site in a commercial building. Sensitive receptors are located along the northern property line adjacent to Off-Site Area 1, to the east and west of the property are commercial buildings. Off-Site Area 2 is surrounded by sensitive receptors to the east and west. SCAQMD uses local significance thresholds (LSTs), as guidance to determine project impacts. Construction emissions were calculated and determined not to exceed LST. Operational emissions that include mobile source emissions were also studied. It is anticipated that nominal truck trips will occur and are not expected to idle on-site for long periods of time. Therefore, lack of emissions would not contribute to long term LST. Carbon Monoxide Hotspots were also analyzed as part of the Initial Study. It was concluded that the City of Riverside would not experience a Carbon Monoxide hotspot at any intersection as a result of Project implementation. Based on the Project's emissions not exceeding SCAQMD's LST and the Project implementation not causing Carbon Monoxide hotspots, the Project would not create localized air quality health impacts. Therefore, the Project would not expose receptors to substantial pollutant concentrations. (DEIR, pp. 4-5 – 4-6.)

Threshold D: Would the Project result in emissions (such as those leading to odors) adversely affecting a substantial number of people?

Finding: Less than significant.

Explanation: Project construction activities may generate detectable odors. However, construction related odors would be intermittent and short term in nature and will cease upon project completion. Project construction is anticipated to occur over a time frame of approximately 58 months. Further the Project is required to comply with California Code of Regulations Title 13, Section 2449 (d) (3) and 2485 which will also reduce the detectable odors from construction equipment. Therefore, the proposed Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people and impacts would be less than significant. (DEIR, p. 4-6.)

D. BIOLOGICAL RESOURCES

Threshold A: Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Finding: Less than significant.

Explanation: The Project Site is within an urbanized area that is surrounded by existing development. The Hospital Expansion Site has been fully developed and maintained. Off-Site Area 1 and 2 show signs of disturbed vegetation with generally flat undeveloped terrain that receives frequent weed abatement (i.e. chain flail mowing, disking). Thus, the Initial Study determined that the Project Site is completely disturbed and does not have habitat to support listed or sensitive species. The proposed Project's potential to adversely affect species identified as a candidate, sensitive, or special status species in local or regional policies/regulations would be less than significant. (DEIR, p. 4-6.)

Threshold B: Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

Finding: Less than significant.

Explanation: The Project Site is disturbed and located in urbanized areas. No riparian habitat exists on the Project Site. Due to the existing development on the Hospital Expansion Site and prior disturbances at Off-Site Area 1 and Off-Site Area 2, intact vegetation communities are not present. As such, the land use type of the Project Site is classified as urban/developed, which is not considered to be a sensitive natural community. Therefore, the Project would not have a substantial adverse effect on riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service. Impacts would be less than significant. (DEIR, p. 4-7.)

Threshold C: Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Finding: No Impact. Development of the Project site will not result in impacts to Corps, Regional Board, or CDFW jurisdiction and regulatory approvals will not be required. No wetlands or vernal pools will be impacted from Project and no impacts will occur.

Explanation: The Project is located within an urbanized area where no federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) exist on-site or within proximity to the Project Site. The Project Site does not contain any discernible drainage courses, inundated areas, wetland vegetation, or hydric soils and thus does not include US Army Corps of Engineers designated jurisdictional drainages or wetlands. Therefore, the proposed Project would have no impact to federally protected wetlands as defined by Section 404 of the Clean Water Act directly, indirectly, and cumulatively. (DEIR, p. 4-7.)

Threshold E: Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Finding: Less than significant. The Project will not conflict with any local policies or ordinances protecting biological resources and therefore no impacts would occur.

Explanation: The City of Riverside General Plan 2025 includes policies to ensure that future development would not conflict with any local policies or ordinances protecting biological resources. The Project is consistent with the Magnolia Avenue Specific Plan which adopted policies from and is consistent with the General Plan 2025. Therefore, since the Project is consistent with the Magnolia Avenue Specific Plan which

adopted policies from and is consistent with the General Plan 2025, the Project would not conflict with any local policies or ordinances protecting biological resources. (DEIR, pp. 4-8 – 4-9.)

Threshold F: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Finding: Less than significant. The Project would have a less than significant impact on the provisions of the MSHCP and SKRHCP.

Explanation: The Project Site falls within the boundaries of two Habitat Conservation Plans (HCPs): the Western Riverside Multiple Species Habitat Conversation Plan (MSHCP) and the Stephens Kangaroo Rat (SKR) HCP. The Project Site is not, however, located within a Criteria Cell of the MSHCP, which would require consideration of part or all of the Project Site to be set aside for conservation. The City is a Permittee to the MSHCP and, therefore, the Project must comply with Sections 6.1.2, 6.1.3, 6.14 and 6.3.2 of the MSHCP. As a result, Off-Site Area 2 is partially located in a burrowing owl survey area. However Off-Site Area 2 is surrounded by existing development. Additionally Off-Site Area 2 shows signs of being regularly mowed/disked. Therefore, Off-Site Area 2 does not support suitable burrowing owl habitat and would not conflict with Sections 6.1.2, 6.1.3, 6.14 and 6.3.2. Nevertheless, the Project will provide payment to the established Local Development Mitigation Fee (LDMF) adopted by the City Ordinance No. 6709 to ensure compliance with the MSHCP. Additionally, the Project lies outside of the SKR HCP Core Reserves; therefore, to be compliant the Project will pay the SKR preservation fee at the time of grading permits. Therefore, the Project would have a less than significant impact on the provisions of the MSHCP and SKRHCP. (DEIR, p. 4-9.)

E. CULTURAL RESOURCES

Threshold C: Would the Project disturb any remains, including those interred outside of formal cemeteries?

Findings: Less than significant.

Explanation: The Project's Cultural Resources Inventory (March 2021) did not report the presence or discovery of human remains. The Initial Study determined that no resources or known cemeteries are located on-site. However, it is possible to discover unknown resources. Therefore, the Project would comply with regulatory requirements for treatment of the Native American human remains contained in California Health and Safety Code Sections 7050.5 and 7052 and California Public Resource Code (PRC) Section 5097. These regulations would require all work to halt if human remains are found and would require archaeologist and city to be contained to provide protection measures. Through compliance with existing regulations, impacts with regard to disturbing humans will be less than significant. (DEIR, p. 4-11.)

F. ENERGY

Threshold A: Would the Project result in potentially significant environmental impact due to wasteful, inefficient, unnecessary consumption of energy resources, during project construction or operation?

Findings: Less than significant. Project construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary. Project operations would not result in the inefficient, wasteful or unnecessary consumption of energy. Further, the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The

Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. Potential impacts would be less than significant.

Explanation: The Initial Study focused on three energy sources: electricity, natural gas, and fuel for off-road equipment and vehicle trips associated with Project construction and operation. (DEIR, p. 4-12.)

Construction related energy consumption would consist of fuel energy consumed by construction vehicles and equipment and bound energy in construction materials. Energy conservation would occur during construction through compliance with state requirements, US Environmental Protection Agency and CARB engine emission standards. In addition to reduction in energy inputs for construction material can be achieved by selecting green building materials. Therefore, it is not expected that fuel energy and construction materials consumed during construction would represent a significant demand on energy resources. (DEIR, p. 4-12.)

Operation-related energy consumption would result from fuel, electricity, and natural gas. It was noted in the Initial Study that fuel consumption would increase due to the Hospital Expansion. However, members would no longer need to commute to different hospital facilities in the region to get medical care. This would decrease transportation energy demand as patients would have centralized care. The Project would be designed to meet or exceed Title 24, CALGreen code, and meet LEED Gold performance standards. By complying and meeting Title 24, CALGreen code and LEED Gold performance standards the Project could significantly reduce Project-related energy usage. Therefore, the Project's building energy usage would result in less than significant impact. Potential impacts would be less than significant. (DEIR, p. 4-12.)

Threshold B: Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Finding: Less than significant.

Explanation: According to the Initial Study, the City of Riverside General Plan identifies objectives and policies that increase energy efficiency and reduce energy consumption. Additionally, the City of Riverside provides a City's Riverside Restorative Growthprint, which consists of the City's Economic Prosperity Action Plan and Climate Action Plan (CAP). As a result the Project will comply with the policies, regulations and actions outlined in the General Plan and City's Riverside Restorative Growthprint. Therefore, the proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. (DEIR, pp. 4-12 – 4-13.)

G. GEOLOGY AND SOILS

Threshold A: Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42; ii) strong seismic ground shaking; iii) seismic-related ground failure, including liquefaction; and/or iv) landslides?

Finding: Less than significant. The potential hazards associated with fault rupture, strong seismic ground shaking, seismic related ground failure, including liquefaction, and landslides are considered less than significant.

Explanation: As shown in the Initial Study the City of Riverside is not in an Alquist-Priolo zone; the closest active fault to the Project Site is the Elsinore fault zone. However, the Project Site does not contain any known fault lines. Therefore, the potential for rupture or seismic shaking is low. Additionally, the Project will comply with the California Building Code (CBC) which will reduce impacts related with ground shaking. The Project Site is located within a high liquefaction zone. The Initial Study found that groundwater was encountered at 57.5 feet at the Hospital Expansion Site. It was noted that the soil has low-density, non-plastic, and low plasticity alluvium layers that are susceptible to liquefaction. These results indicate that during strong earthquake events if liquefaction were to occur at the site, it would occur within localized zones at depths 20 feet or greater. Due to the lack of horizontally continuous liquefiable layers and the presence of 20 feet or more of overlying cohesive soils, the liquefaction hazard at the site is considered low. Since the Project Site is located in an urbanized setting with a generally flat topography the potential for earthquake induced landslides to occur at the site are considered low. (DEIR, p. 4-13.)

Threshold B: Would the Project Result in substantial soil erosion or the loss of topsoil?

Finding: Less than significant.

Explanation: The Initial Study indicated that erosion and loss of topsoil could occur as a result of the Project. State and federal requirements call for the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) establishing erosion and sediment controls for construction activities. The Project must also comply with the National Pollutant Discharge Elimination System (NPDES) regulations. Additionally, the Project must comply with the Grading Code (Title 17) which is designed to minimize soil erosion. (DEIR, p. 4-13.)

Threshold C: Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Finding: Less than significant.

Explanation: The Project Site is located in an urbanized area and the general topography of the Project Site is flat. The Project Site is not located in an area prone to landslides. Properties involved in the proposed improvements and adjacent properties are generally flat and have a low potential for landslides to occur. The Initial Study found that the Project's potential of liquefaction-induced lateral spread is considered remote because the site has low liquefaction potential, does not include manufacture slopes, and is not adjacent to existing slopes. Therefore, lateral spreading is not anticipated. Collapse occurs when unsaturated soil becomes wetted to the point that the overall settlement of the affected soil and overlying foundations or improvements cannot be supported. Conformance with City's Grading Code as well as the CBC would ensure collapse does not occur on-site. (DEIR, p. 4-14.)

Threshold D: Will the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Finding: Less than significant. The onsite soils are not at risk for volume change on wetting and drying. Potential impacts associated with expansive soils would be less than significant.

Explanation: Expansive soils are clayey soils characterized by their ability to undergo significant volume changes (shrinking or swelling) due to variations in moisture content, the magnitude of which is related to both clay content and plasticity index. These volume changes can be damaging to structures. Nationally, the annual value of real estate damage caused by expansive soils is exceeded only by that caused by termites. The Initial Study found that the risk for soil expansion is low. The soils located on the Project Site are not expansive. Therefore, the Project would not result in a new potential hazard or exacerbate an existing hazardous soil condition. (DEIR, p. 4-14.)

Threshold E: Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Finding: No Impact.

Explanation: As mentioned in the Initial Study the proposed Project would be served by the City of Riverside sewer infrastructure. Therefore, the Project would not require the use of septic tanks or alternative wastewater disposal systems. (DEIR, p. 4-14.)

H. GREENHOUSE GAS EMISSIONS

Threshold A: Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Findings: Less than significant.

Explanation: Based on the analysis in the *Greenhouse Gas Emissions Technical Memorandum*, the proposed Project would result in direct and indirect emissions of CO₂, N₂O, and CH₄. A threshold for accessing impacts related to greenhouse gas (GHG) emissions has not been adopted by the City or any state/regional agency. Therefore, the Project must be consistent with statewide, regional and local plans adopted for the purpose of reducing GHG emissions. The Project is consistent with those plans. As a result the Project does not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gasses and impacts would be less than significant. (DEIR, p. 4-15.)

Threshold B: Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Findings: Less than significant.

Explanation: The 2017 Scoping Plan Update reflects the 2030 target of a 40 percent reduction below 1990 levels, set by Executive Order B-30-15 and codified by SB 32. Based on the analysis in the *Greenhouse Gas Emissions Technical Memorandum*, the Project is consistent with the 2017 Scoping Plan Update, the SCAG 2020-2045 RTP/SCS (known as *Connect SoCal*), the City's CAP, and General Plan 2025 goals and policies to reduce GHG emissions. As a result the Project characteristics render it consistent with statewide, regional and local climate change mandates, plans, policies, and recommendations. Therefore, the Project would not conflict with any applicable plan, policy, regulation or recommendation (DEIR, pp. 4-15 – 4-16.)

I. HAZARDS AND HAZARDOUS MATERIALS

Threshold A: Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Findings: Less than significant.

Explanation: Based on the Initial Study the proposed Project would include routine transport, use, and disposal of hazardous materials during construction and operations, specifically the disposal of medical waste. Project construction activities would occur in accordance with all applicable local standards adopted by the City of Riverside, as well as state and federal health and safety requirements intended to minimize hazardous materials risk to the public, such as Cal/OSHA requirements, the Hazardous Waste Control Act, the California Accidental Release Protection Program, and the California Health and Safety Code. Additionally, a Hazardous Material Business Emergency Plan has already been adopted and implemented for the existing operations on-site. The proposed Project will be required to amend the existing plan to cover the operations and maintenance activities proposed by the Project. Compliance with all applicable local, State and federal laws should ensure a less than significant impact from routine transport, use, or disposal of hazardous materials. (DEIR, p. 4-16.)

Threshold B: Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Findings: Less than significant.

Explanation: As determined in the Initial Study, the proposed Project would produce hazardous waste during construction and medical waste and other hazardous materials related to hospital operations. Adherence to existing regulations would ensure compliance with safety standards related to the use and storage of hazardous materials and with the safety procedures mandated by applicable federal, state, and local laws and regulations. Project conformance with existing local, state, and federal regulations pertaining to the release of hazardous materials would ensure that potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment would be low. Therefore, construction and operational impacts would be less than significant. (DEIR, pp. 4-16 – 4-17.)

Threshold C: Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?

Findings: Less than significant.

Explanation: The Project is located within a third of a mile to La Sierra High School. Although hazardous materials and or waste would be generated from the Project during construction and operation, the Project will be required to comply with the City's Fire Code and regulations established by the California Health and Safety Code Article 1 Chapter 6.95 for the Business Emergency Plan. As a result, the existing Kaiser Permanente Riverside Medical Center has already developed a Hazardous Material Business Emergency Plan. The Project would amend this existing plan to cover the operations and maintenance activities proposed by the plan. Given the distance to the nearest school and compliance with existing

federal and state regulations, impacts associated with the exposure of schools to hazardous materials caused by this Project would be less than significant. (DEIR, p. 4-17.)

Threshold D: Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Findings: No Impact.

Explanation: The City of Riverside General Plan does not identify the Project Site (i.e., the Hospital Expansion Site, Off-Site Area 1, and Off-Site Area 2) as a known hazardous site. The GeoTracker database provided by the State Water Resource Control Board does not list the Project Site as a known hazardous materials site. A Hazardous Material Business Emergency Plan has been adopted by the existing Kaiser Permanente Riverside Medical Center. The Project will amend the existing plan and would not result in a significant impact. As the Project Site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, the Project would not create a significant hazard to the public or the environment and there will be no impact in this regard. (DEIR, p. 4-17.)

Threshold E: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Findings: No Impact.

Explanation: The Project Site is not located within 2 miles of a private or public airport. The closest airport is the Riverside Municipal Airport, located approximately 3 miles north of the Project Site. The Project is not within the Riverside Municipal Airport Influence Area. The Project Site is not located in an airport land use plan area or compatibility zone. Therefore, the Project would have no impact resulting in a safety hazard for people residing or working in the Project Site directly, indirectly, or cumulatively. (DEIR, pp. 4-17 – 4-18.)

Threshold F: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Findings: Less than significant.

Explanation: The Hospital Expansion component would require circulation at the Hospital Expansion Site to be altered. As a result, emergency vehicles will have a specified driveway and route at the Hospital Expansion Site. The Project would include improvements to adjacent streets that might result in temporary road closures. Implementation of the proposed Project will not interfere with evacuation or emergency response plans. Road access will be maintained or detours will be provided during Project construction. Further, construction activities occurring within the Project Site would comply with all conditions, including grading permit conditions regarding lay-down and fire access, and would not restrict access for emergency vehicles responding to incidents on the site or in the surrounding area. Additionally, the design of Project access and internal circulation routes, as well as the size and location of fire suppression facilities (e.g., hydrants and sprinklers), would be subject to City standards and conditions of approval. Therefore, implementation of the proposed Project would not impair or

physically interfere with an emergency response plan or evacuation plan. Impacts would be less than significant. (DEIR, p. 4-18.)

Threshold G: Would the Project expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Findings: Less than significant.

Explanation: The Project Site is not identified in high fire severity zones. It was noted the Project Site is not within a moderate, high, or very high hazard rating area. As such, the Project Site and lands in the vicinity are generally not subject to the risk of wildfire. Therefore, impacts due to wildfires are considered less than significant. (DEIR, p. 4-18.)

J. HYDROLOGY AND WATER QUALITY

Threshold A: Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Findings: Less than significant.

Explanation: A storm drain network exists on the Hospital Expansion Site that collects most of the surface water. Runoff from the Hospital Expansion Site and Off-Site Area 1 and Off-Site Area 2 will be treated in bioretention basins at each of these locations before discharge into to existing storm drains. The California Regional Water Quality Control Board – Santa Ana Region (RWQCB) provides regulatory oversight of water quality in the Groundwater Management Zones (GMZs). Potential threats to surface and ground water quality associated with the development of the parking lots at Off-Site Area 1 and Off-Site Area 2, and short-term grading and construction activities at the Hospital Expansion Site include discharges of construction-related sediment and hazardous materials (e.g., fuels). To ensure that the Project construction activities do not impair water quality of downstream receiving waters, and because the total land disturbance area is greater than 1 acre, the Applicant will obtain coverage under the statewide National Pollutant Discharge Elimination System (NPDES) permit for construction activities (i.e., Construction General Permit), which requires preparation of an effective Storm Water Pollution Prevention Plan (SWPPP) or SWPPPs by a certified Qualified SWPPP Practitioner (QSP) and implemented on the Project Site by a certified Qualified SWPPP Developer (QSD), with annual reporting and monitoring requirements and enforcement by the RWQCB. Therefore, through compliance with the NPDES permit Project impacts to surface and ground water quality would be less than significant. (DEIR, pp. 4-18 – 4-19.)

As described in the DEIR, the Project is implementing five bioretention basins at the Hospital Expansion Site designed for treatment of post-Project storm water runoff generated at that site. The bioretention basins will treat storm water and additional runoff prior to discharge into the storm drain system. It was also noted that water quality infrastructure, specifically bioretention basins are proposed at each of the parking lots at Off-Site Area 1 and Off-Site Area 2. (DEIR, pp. 4-18 – 4-19.)

Therefore, through compliance with existing regulations and incorporation of bioretention basins and other water quality features, the Project would have a less than significant impact to surface and ground water quality. (DEIR, pp. 4-18 – 4-19.)

Threshold B: Would the Project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management in the basin?

Findings: Less than significant.

Explanation: Based on the analysis in the DEIR and Initial Study, the Project does not use groundwater or support groundwater wells. The Project is serviced by Riverside Public Utilities (RPU). Due to the Hospital Expansion Site already being developed with impervious surfaces (i.e., the existing Kaiser Permanente Riverside Medical Center), the Project would most likely provide minimal ground water recharge. Even though the Project includes five bioretention basins at the Hospital Expansion Site and a bioretention basin at each of the off-site parking lots, groundwater recharge is expected to be minimal due to poor infiltration rates of the underlying soils. Therefore, Project impacts related to interfering with groundwater recharge or a groundwater management plan is not anticipated, and impacts are less than significant. (DEIR, pp. 4-19 – 4-20.)

Threshold C: Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces in a manner which would: i.) result in substantial erosion or siltation on- or off-site; ii.) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; iii.) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; iv.) impede or redirect flood flows?

Findings: Less than significant.

Explanation: The Project would not alter the course of a stream or river because those features are not present on the Project Site. Drainage improvements at the Hospital Expansion Site have been designed to match existing drainage patterns and include five bioretention basins to treat runoff prior to discharge into the existing 60-inch diameter storm drain in Magnolia Avenue. Off-Site Area 1 and Off-Site Area 2 will incorporate one bioretention basin at each site that will connect to existing storm drains. During construction, the Project is required to implement best management practices (BMPs) as required by a SWPPP (or SWPPs) to ensure Project construction does not result in substantial erosion. Therefore, the proposed Project would not result in a change in drainage patterns that would cause substantial erosion or siltation on or off-site, nor substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off-site. Impacts would be less than significant. (DEIR, pp. 4-19 — 4-20.)

The Initial Study determined that improvements at the Hospital Expansion Site will provide storm drains sized to convey the proposed 100-year storm, 1-hour storm (flood) event. The bioretention basins will be sized to provide the required water quality volume and flows in excess of the water quality volume will bypass treatment and be conveyed in the outlet riser structures located in each basin. Thus, proposed condition flow rates would be the same or less than the existing condition and no storage facilities are required. Water quality infrastructure (bioretention basins) is also proposed as part of the parking loads to be constructed at Off-Site Area 1 and Off-Site Area 2. Therefore, through Project design, impacts in this regard are less than significant. (DEIR, p. 4-20.)

As mentioned in the DEIR the Project would not result in runoff volume that would exceed the capacity of existing storm drain systems. Further, the proposed storm drain pipelines will be sized to handle up to a 100-year storm flood event. With inclusion of bioretention basins at the Hospital Expansion Site, Off-Site Area 1, and Off-Site Area 2 to treat the required water quality volume, the Project will also not contribute additional pollutants to downstream waters. Therefore, through Project design and compliance with existing requirements for providing adequately sized storm drain systems, as well as existing regulations to address construction and operational discharges of stormwater pollutants, Project impacts in this regard are less than significant. (DEIR, p. 4-20.)

The Hospital Expansion Site, is located in FEMA Flood Zone X with a 0.2 percent annual chance flood hazard. Off-Site Area 1 and Off-Site Area 2 are located within FEMA Flood Zone X, area of minimal flood hazard. The City of Riverside's Municipal Code does not include Flood Zone X as a Special Flood Hazard Area (SFHA), therefore it is not subject to the City's requirements pertaining to SFHA. Additionally, it has been noted in the Initial Study that the Project would not result in a substantial change to the overall drainage patterns. As a result, the Project would not alter the course of a stream or river resulting in a less than significant impact. (DEIR, p. 4-20.)

Threshold D: In flood hazard, tsunami, or seiche zones, would the Project risk release of pollutants due to project inundation?

Findings: Less than significant.

Explanation: As previously discussed, the Project Site is located in Flood Zone X; however, since the City's Municipal Code does not include Flood Zone X as SFHA, the Project is not required to pay flood insurance. Because the Project Site contains bioretention basins to treat storm runoff prior to entering into the City's storm drain system, system, a pollutant release is not anticipated. Due to the Project's distance from large water bodies, reservoirs, or other artificial body of water, inundation from a seiche is unlikely. The Project Site is approximately 35 miles east of the Pacific Ocean; therefore, inundation due to tsunamis is unlikely. Therefore, less than significant impacts would occur (DEIR, p. 4-21.)

Threshold E: Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Findings: Less than significant.

Explanation: The local water quality control plan (Basin Plan) outlines the regulatory programs of the Regional Water Quality Control Board (RWQCB), which address ground and surface water quality. The RWQCB requires NPDES permits, construction general permits, storm sewer system permit for post construction BMPs. The Project applicant would be required to prepare and implement a SWPPP during construction and provide the required post-construction storm water quality treatment, leading to no conflicts or obstructions with the Basin Plan. The Project is also consistent with the General Plan land uses; therefore, implementation of the Project would not conflict with the groundwater management plan or obstruct implementation or a water quality control plan. (DEIR, p. 4-21.)

K. LAND USE AND PLANNING

Threshold A: Would the Project physically divide an established community?

Findings: No Impact. The development of the Project would not displace residents or any established community or infrastructure. No impacts would occur.

Explanation: The Project Site is surrounded by highly developed urbanized areas. The surrounding areas consist of a variety of land uses such as commercial, single-family residential, and medium high density residential. Project construction includes improvements to the following existing roadways: Filmore Street, Park Sierra Avenue, Polk Street, Diana Avenue, and Park Sierra Drive. Improvements to existing roadways would have no impact on the physical arrangement of an established community. (DEIR, p. 4-22.)

Threshold B: Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Finding: Less Than Significant. The Project would not cause a conflict with the policies or regulations of the General Plan 2025, Magnolia Avenue Specific Plan, and Zoning Code, adopted for the purpose of avoiding or mitigating an adverse environmental impact. Thus, the impacts would be less than significant.

Explanation: The Project is located within the La Sierra District of the adopted Magnolia Avenue Specific Plan (MASP). The Initial Study found that the Project would not cause a conflict with the policies or regulations of the General Plan 2025, Magnolia Avenue Specific Plan, and Zoning Code, adopted for the purpose of avoiding or mitigating an adverse environmental impact. Implementation of the Project does not require change to the existing City land use designations or zoning classifications for the Hospital Expansion Site and Off-Site Area 1. (DEIR, p. 4-22.)

The recently approved Housing Element Update identified Off-Site Area 2 as Opportunity Site 11, and proposed to change the General Plan Land Use designation and zoning to MU-U – Mixed-Use Urban Opportunity. Site 11 was removed from the ordinance rezoning the various housing opportunity sites and, as a result, the MU-U Zoning was not applied to Off-Site Area 2. The existing land use designation for Off-Site Area 2 is MU-V – Mixed-Use Village, and the existing zoning is R-1-7000-SP – Single Family Residential and Specific Plan (Magnolia Avenue) Overlay Zones and CG-SP – Commercial General and Specific Plan (Magnolia Avenue) Overlay Zones. Because parking lots are not allowed in the R-1-7000 Zone, the Project Applicant has requested Off-Site Area 2 be rezoned to MU-V-SP – Mixed-Use Village and Specific Plan (Magnolia Avenue) Overlay Zones to be consistent with the site’s General Plan Land Use designation and to permit development of a parking lot. Parking lots are permitted uses in the MU-V zone with the granting of a MCUP. Because the proposed rezoning of Off-Site Area 2 is for the explicit purpose of a parking lot and will be consistent with the underlying General Plan land use designation, with approval of the proposed change of zone and MCUP, the proposed Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant. (DEIR, p. 4-22.)

L. MINERAL RESOURCES

Threshold A: Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Findings: No Impact.

Explanation: The Project is not located in a designated mining zone. The Project does not involve extraction of mineral resources. No mineral resources have been identified on the Project Site and there is no historical use of the site or surrounding area for mineral extraction purposes. Therefore, the Project is not anticipated to result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. (DEIR, p. 4-22.)

Threshold B: Would the Project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Findings: No impact.

Explanation: The Project Site is not located in a designated mining zone. Therefore, no known mineral resources of local or state importance are located on lands associated with the proposed Project. The proposed Project is consistent with the General Plan 2025 and MASP. Therefore, no impact would occur. (DEIR, p. 4-22.)

M. NOISE

Threshold A: Would the Project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Findings: Less than significant. Project traffic, operational, construction, and blasting-related noise levels will not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of applicable Federal Transit Authority (FTA) standards or exceed any of the applicable noise thresholds at the nearest sensitive residential receivers.

Explanation: Noise in the City is regulated by the Municipal Code Title 7, Noise Control, which identifies standards, specific noise restrictions, exemptions, and variances for noise sources in the City. It was noted that temporary Project construction would not be confined to one area and that Project construction noise is not expected to exceed measured maximum ambient noise levels in the Project area. The Initial Study calculated the increased mobile noise that would result from Project. As a result, the discrepancy between existing traffic noise and existing traffic noise with forecasted Project traffic noise would be an increase of 0.1 dBA. A perceptible increase in traffic noise levels is defined by a noise increase greater than 3.0 dBA. As the Project would not cause a perceptible increase in traffic noise levels, the proposed Project would not significantly increase noise levels along the roadway segments analyzed. (DEIR, p. 4- 23.)

The Initial Study analyzed anticipated mechanical equipment noise that would be generated by the proposed Project. It was determined that the proposed placement of mechanical equipment would reduce sound levels at the closest sensitive receptor. As a result, noise levels at sensitive receptors would not exceed City residential land use exterior noise level standard. The Project includes an emergency generator that would only be used sporadically during emergencies. Generators are not considered a “long term” noise impact. (DEIR, pp. 4-23 – 4-24.)

The proposed parking structure and surface parking area at the Hospital Expansion Site are not located within 1,000 feet of sensitive receptors. Therefore, noise levels resulting from parking lots would not have a significant impact to sensitive receptors. It was noted that surface parking areas were not adding any

additional parking spaces near sensitive receptors. Therefore, noise from parking lots at the Hospital Expansion Site would not be different from the existing conditions, and Project-generated parking lot noise levels at the Hospital Expansion Site would not introduce a new source of noise when compared to existing conditions. (DEIR, p. 4-24.)

Off-Site Area 1 and Off-Site Area 2 are located adjacent to residential uses, which are considered sensitive receptors. It is important to note that the Off-Site Area 1 will be used for construction employee parking and construction trailer parking for approximately 36 months, and Off-Site Area 2 will be used by Kaiser Permanente Medical Center employees for 18 months. Off-Site Area 1 is proposed to be developed with an approximately 87 stall parking lot, a bioretention basin, and contain five construction trailers. Noise will be produced at Off-Site Area 1 from air conditioning units on the construction trailers and the parking lot. (DEIR, p. 4-24.)

According to the Noise and Groundborne Vibration Technical Memorandum, air conditioning units typically generated noise levels of up to 65 dBA at 5 feet from the source. The closest sensitive receptors near Off-Site Area 1 are single-family residences located 80 feet west from the nearest construction trailer. (DEIR, p. 4-24.)

At this distance, noise levels from the air conditioning units would be approximately 41 dBA. Therefore, noise levels from air conditioning units would be much lower than the current ambient noise level of 51.5 dBA, and would not exceed the City's residential land use exterior noise level standards of 55 dBA CNEL for daytime and 45 dBA CNEL for nighttime. Additionally, Off-Site Area 1 will be used by construction staff which will primarily occur during normal work hours (7 AM to 5 PM) established by the City's Municipal Code. Therefore, the air conditioning units are not anticipated to emit noise during the nighttime and are not expect to emit noise greater than the ambient noise levels, avoiding any impacts to the single family residences. (DEIR, p. 4-25.)

Additionally, according to the U.S. Environmental Protection Agency, typical buildings in warm climate could provide 24 dBA exterior to interior noise reduction with windows closed. Therefore, air conditioning unit noise level would be reduced to 17 dBA, which would not exceed the City's residential land use interior noise level standards of 45 dBA CNEL for daytime and 35 dBA CNEL for nighttime. Thus, noise impacts of air conditioning units associated with off-site construction trailers would be less than significant. (DEIR, p. 4-25.)

Parking lot noise is generated by car doors slamming, cars starting, and cars idling. As discussed in the *Noise and Groundborne Vibration Technical Memorandum*, parking lot activities can result in instantaneous noise levels of up to 61 dBA at a distance of 50 feet. It is noted that parking lot noise are instantaneous noise levels compared to noise standards in the CNEL scale, which are averaged over time. As a result, actual noise levels over time resulting from parking lot activities would be far lower than 61 dBA. (DEIR, p. 4-26.)

The southernmost parking stalls at Off-Site Area 1 will be approximately 15 feet north from the southern lot line of Off-Site Area 1 and the rear lot lines of the residential lots. There is an existing solid block wall on the lot line between Off-Site Area 1 and the residential lots. Based on a distance of 15 feet, noise at the Off-Site Area 1 lot line would be approximately 71 dBA. Assuming the block wall provides 8 dBA of shielding, the noise level at the rear lot lines of the residences adjacent to Off-Site Area 1 would be approximately 63 dBA. Since parking lot noise are instantaneous noise levels compared to the City's noise

standards which are in CNEL and averaged over a 24-hour period,¹ the actual noise levels from parking lot activities would be much lower than 63 dBA and are not expected to exceed the City's residential noise standards. (DEIR, p. 4-26.)

Off-Site Area 2 is proposed to be developed with an approximately 516 stall parking lot and a bioretention basin. Noise will be produced at Off-Site Area 2 from the parking lot. There are residential units east and west of Off-Site Area 2. The distance between the parking stalls on the eastern portion of Off-Site Area 2 and the eastern edge of Fillmore Street is approximately 69 feet. Based on the reference parking lot noise level of 61 dBA at 50 feet, parking lot noise at the eastern edge of Fillmore Street would be approximately 58 dBA. There is a block wall along the east side of Fillmore Avenue between Off-Site Area 2 and the residential lot line. Assuming the block wall provides 8 dBA of shielding, the noise level at the residential lot line east of Off-Site Area 2 would be a maximum of 50 dBA. The western most parking stalls are located 15 feet east of the Off-Site Area 2 lot line. Based on a distance of 15 feet, noise at the Off-Site Area 2 lot line would be approximately 71 dBA. Assuming the block wall provides 8 dBA of shielding, the noise level west of the block wall would be approximately 63 dBA. Since parking lot noise are instantaneous noise levels compared to the City's noise standards, which are in CNEL and averaged over a 24-hour period,² the actual noise levels from parking lot activities would be much lower than 63 dBA and are not expected to exceed the City's residential noise standards. (DEIR, p. 4-26.)

For the reasons set forth in the preceding paragraphs, Project impacts regarding a substantial increase in ambient noise levels in excess of City standards would be less than significant. (DEIR, p. 4-26.)

Threshold B: Will the project result in the generation of excessive groundborne vibration or groundborne noise levels?

Findings: Less than significant.

Explanation: The Initial Study identified a commercial building 170 feet west of the Hospital Expansion Site as vibration sensitive land. Data from the Federal Transit Administration was used to determine thresholds for building damage and data from Caltrans was used to determine thresholds for human annoyance. It was concluded that vibration velocities resulting from construction activities at 170 feet would not exceed thresholds. It was also noted that operational vibrations would consist of occasional truck deliveries and trash-pick up. These operations would be similar to existing conditions and would not be substantial. Therefore, because Project-generated groundborne vibration would not be perceptible or felt at surrounding uses, impacts would be less than significant. (DEIR, p. 4-27.)

Threshold C: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Findings: No impact.

Explanation: The closest airport to the Project Site is the Riverside Municipal Airport, located approximately three (3) miles north. The Project Site is not within the Riverside Municipal Airport

¹ *Noise and Groundborne Vibration Technical Memorandum* (pp. 24-25), is Appendix G to the Initial Study, which can be found in Appendix A 5.1 of the DEIR.

² *Noise and Groundborne Vibration Technical Memorandum*, (pp. 24-25), is Appendix G to the Initial Study, which can be found in Appendix A.5.1 of the DEIR.

Influence Area where aircraft noise levels are a concern. Thus, the proposed Project would not expose people residing or working in the area to excessive noise levels, and no impacts would occur. (DEIR, p. 4-27)

N. POPULATION AND HOUSING

Threshold A: Will the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Findings: Less than significant.

Explanation: Per the DEIR, expanding capacity at the hospital and increasing the availability of medical services would require an increase in medical support staff. It is anticipated that approximately 746 full-time employees would be needed. It is assumed that the majority of the new employees would be sourced from the City of Riverside or surrounding communities. However, it is possible that some employees would move to the City. The Initial Study found that the implementation of the proposed Project would only represent 3 percent of the total anticipated population growth for Riverside and 1 percent of the City's anticipated jobs increase by 2040, and less than 1/2 percent of the City's total projected 2040 employment. As such, it is not reasonably foreseeable that the Project would cause the General Plan buildout population or employment forecasts to be exceeded. While the proposed Project would expand capacity at the Kaiser Permanente Riverside Medical Center and increase the availability of medical services, the proposed Project is not anticipated to induce substantial unplanned population growth either directly (i.e., by proposing construction of new homes or businesses) or indirectly (i.e., through extension of roads or other infrastructure), as the Project is intended to serve existing and planned future needs of the community. No new residential uses or expansion of utilities are proposed that would contribute to new unplanned growth. Therefore, impacts in this regard are considered to be less than significant. (DEIR, pp. 4-27 – 4-28.)

Threshold B: Will the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Findings: No impact.

Explanation: The Initial Study demonstrated that the Project would not displace housing. The Project is limited to the construction of multiple hospital buildings and a parking structure on land that currently supports existing hospital operations. Two off-site parking lots are proposed on vacant land. Site improvements would occur within existing roadway rights-of-way or on land owned by Kaiser Permanente and would not affect any existing people or housing. Therefore, no impact would occur. (DEIR, p. 4-28.)

O. PUBLIC SERVICES

Threshold A: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: fire protection; police protection; schools; parks; and/or other public facilities?

Findings: Less than significant.

Explanation: As mentioned in the Initial Study, fire protection services for the Project area are provided by the Riverside County Fire Department. The nearest fire station to the Project Site (Station No. 12) is located approximately 0.5 miles to the southeast at 10692 Indiana Avenue in the City of Riverside. The Project would be designed and operated in compliance with applicable federal, State, and local worker safety and fire protection codes and regulations to minimize the potential for occurrence of fire. Project construction activities would be short term and due to the nature of the proposed improvements, would not substantially increase the risk of fire or the need for fire protection services. The Project would comply with existing codes, standards, and General Plan 2025 policies. The Project's final development plan would also be reviewed and approved by the City's Fire Prevention Bureau. (DEIR, p. 4-28.)

Police protection services for the City are provided by the Riverside Police Department (RPD). The nearest police station to the Project Site is located approximately 0.3 miles to the northeast at 10540 Magnolia Avenue. While an incremental increase in law enforcement calls to the Project Site may occur, such calls would be consistent to the types of calls RPD responds to at the existing hospital. Implementation of the Project would not degrade the RPD's performance to the point that a new facility or expansion of an existing facility would be needed. (DEIR, p. 4-29.)

The proposed Project is located within the Riverside Unified School District (RUSD) and borders Alvorad Unified School District (AUSD). Although the Project is a nonresidential use that would not involve the addition of any housing units that would increase numbers of school-aged children, the proposed Project may result in an incremental increase in the City's population due to new employees moving to the City. In addition, the Project will pay school mitigation fees to affected school districts as required by Proposition 1A and Senate Bill 50, codified in California Government Code Sections 65995.5–65995.7 and 66000 et seq. For CEQA purposes, pursuant to State law, payment of these associated fees reduces school facilities impacts to a less than significant level. (DEIR, p. 4-29.)

Based on the Initial Study, the Project does not involve the addition of any housing units that would increase numbers of school-aged children, the proposed Project may result in an incremental increase in the City's population due to new employees moving to the City. However, the proposed Project's anticipated population contribution to the City is consistent with what was analyzed in the 2025 General Plan; as such, potential impacts of the population growth from the proposed Project has already been considered in potential impacts to the other public facilities within the City. Therefore, there would be a less than significant impact on the demand for additional park facilities or services. (DEIR, p. 4-29.)

The Initial Study determined that the proposed expansion of the Kaiser Permanente Riverside Medical Center would intensify available hospital services in the area. The proposed Project may result in an incremental increase in the City's population due to new employees moving to the City. However, the

proposed Project's anticipated population contribution to the City is consistent with what was planned in the General Plan 2025 EIR; as such, potential impacts to other public facilities due to population growth from the proposed Project has already been considered and analyzed. Therefore, less than significant impacts would occur on the demand for additional public facilities or services. (DEIR, p. 4-29.)

P. RECREATION

Threshold A: Would the project Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Findings: Less than significant.

Explanation: The Project does not involve the addition of any housing units that would increase numbers of recreation facility users. The proposed Project may result in an incremental increase in the City's population due to new employees moving to the City. However, the proposed Project's anticipated population contribution to the City is consistent with what was analyzed in the 2025 General Plan; as such, potential impacts of the population growth from the proposed Project has already been considered in potential impacts to the other public facilities within the City. Therefore, the proposed improvements would not result in the need for new or expanded parks or park facilities. (DEIR, p. 4-30.)

Threshold B: Does the project Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Findings: Less than significant.

Explanation: Project implementation does not include new recreational facilities, nor would it require the construction or expansion of recreational facilities, due to the nature of the proposed Project. Impacts would be less than significant. (DEIR, p. 4-30.)

Q. TRANSPORTATION

Threshold A: Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Findings: Less than significant. The Project will not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities; potential impacts are less than significant and no mitigation is required. (DEIR, pp. 5.1-22 – 5.1-27.)

Explanation:

Congestion Management Program (CMP) and the Long Range Transportation Study (LRTS)

The CMP is a component of the Riverside County Transportation Commission ("RCTC")'s Long Range Transportation Study (LRTS), the first countywide long range transportation study that identifies and evaluates highway, major roadway and transit projects. The LRTS identified five roadway improvement projects within the City of Riverside to reduce traffic congestion: the Main Street and 60 Interchange project, Tyler Street and 91 Interchange project, the Adam Street and 91 Interchange project, and the Arlington Avenue from Magnolia Avenue to Alessandro Boulevard project. (LRTS-A; Appendix A.) Because

Project-related traffic is not expected to use these roadways and no Improvements to these roadways are proposed, the Project would not conflict with the RCTC's CMP. (DEIR, pp. 5.1-22 – 5.1-27.)

Connect SoCal

Table 5.1-A – Consistency with Connect SoCal Goals of section 5.1, Transportation of this DEIR, presents a side by side comparison of the *Connect SoCal* goals and a discussion regarding the Project's consistency, non-consistency, or non-applicability with each goal. (DEIR, p. 5.1-23.)

Public Transit, Bicycles, and Pedestrian Facilities

The City's General Plan 2025 Circulation and Community Mobility Element introduces and implements various strategies and approaches to accommodate, improve, enhance, and maintain multiple modes of travel (vehicular and non-vehicular) throughout the City. Mode choice is influenced by sidewalk connectivity and proximity of buildings, bike accommodations, transit stop density and service characteristics, and availability of interconnected low speed routes. Non-vehicular transportation includes pedestrians (sidewalks), bicycles (on-road lanes or off-road paths), bus transit, and train transit. (DEIR, p. 5.1-25.)

General Plan 2025 Objective CCM-2 promotes and supports modes of transportation that offer an alternative to single-occupancy automobile use and help reduce air pollution and road congestion. Emphasizing non-vehicular transportation is a key element of SB 375 and SCAG's Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS). (DEIR, p. 5.1-25.)

Although there are no current or proposed trails near the Project Site as shown on **Figure 5.1-4 – Master Plan of Trails**, paved sidewalks are provided on both sides of Park Sierra Drive and Magnolia Avenue, and on the west side of Polk Street, providing direct and convenient access for visitors arriving on foot. The Project's site design will ensure that pedestrian connectivity is enhanced and is ADA compliant. Paved sidewalks, as shown on **Figure 5.1-5 – Pedestrian Circulation**, will also be provided within the Hospital Expansion Site, between the parking lots and the medical office buildings, separating pedestrian and vehicular traffic and, thereby, enhancing pedestrian safety. (DEIR, p. 5.1-25.)

As part of the City's Bikeway Network (and as shown on **Figure 5.1-3**), Class II bike lanes exist along the westbound and eastbound directions of Magnolia Avenue fronting the Hospital Expansion Site, Off-Site Area 1, and Off-Site Area 2. The existing Kaiser Driveway 1 and the proposed Kaiser Driveway 4 connect the Hospital Expansion Site to bike lanes in the eastbound direction of Magnolia Avenue. Since Kaiser Driveway 4 will be used by emergency vehicles only, bicyclists on Magnolia Avenue can only access the Kaiser Permanente Medical Center from Kaiser Driveway 1. Based on the City's Bicycle Master Plan Update; Addendum, future bike lanes are proposed within the vicinity of the Project Site. These proposed bike lanes, along La Sierra Avenue, Magnolia Avenue, and Tyler Street, would not experience a decreased performance due to the Project. The Project further supports bicycle transportation by proposing approximately 55 new bicycles stalls in the proposed parking structure. Additionally, the Hospital Expansion will include lockers, a repair station, and showers to encourage bicycle use while promoting an alternative to driving. (DEIR, pp. 5.1-25 – 5.1-26.)

The Project is currently served by the Riverside Transit Agency (RTA). RTA provides both local and regional services throughout the region with 33 fixed routes, five CommuterLink Express routes, and Dial-A-Ride services using 334 vehicles. The closest bus stops that serve the Hospital Expansion Site are Route 1 and

Route 15 located on Magnolia Avenue, adjacent to the Hospital Expansion Site. In addition, the Hospital Expansion Site approximately 0.60 miles from the Galleria at Tyler Mall that has seven additional transit stops. Routes 10, 12, 13, 14, 21, 27 have stops on Magnolia Avenue near the Galleria at Tyler Mall. These routes have connections to communities in adjacent jurisdictions such as Corona, Highgrove, Loma Linda, Jurupa Valley, Fontana, and Perris. CommuterLink Express Route 200 provides further coverage with services to San Bernardino, Orange, and Anaheim. The Riverside-La Sierra Metrolink station is also located approximately 0.40 miles to the Hospital Expansion Site. The 91/Perris Valley Line and the Inland Empire-Orange County Line stop at this station. Given that the Project Site is located within one half a mile of a transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours, the Project Site is within a High Quality Transit Area (HQT). (SCAG-A.) Additionally, the Project Site is within a transit priority area (TPA) since it is within half a mile of the La Sierra Metrolink station, which is identified as a major transit stop. (DEIR, p. 5.1-26.)

Vehicular Circulation

The City of Riverside's General Plan 2025 Policy CCM-2.3 requires Arterial Streets to maintain an LOS D or better. This policy also provides that at key locations, such as City Arterials that are used by regional freeway bypass traffic and at heavily traveled freeway interchanges, an LOS E at peak hours is acceptable on a case-by-case basis. A Traffic Operational Analysis (TOA) prepared for the Project examined the Project's traffic deficiencies on local roadways and intersections in the opening year including cumulative traffic. Table 12-B and Table 12-C of the TOA demonstrate the levels of service at which the nearby intersections will operate at the opening year and cumulative year with and without project and with and without project improvements.³ The recommended traffic improvements summarized in **Table 5.1-B – Recommended Improvements**, will be included as conditions of Project approval by the City of Riverside. The recommended all-way stop control improvements at Park Sierra Drive/Diana Avenue will reduce the delay to values less than those of opening year (2026) without Project conditions and cumulative (2040) without Project conditions. However, due to right-of-way constraints, these improvements would not achieve an LOS of C or higher and this intersection will continue to operate at a deficiency. (DEIR, p. 5.1-26.)

In 2013, the State of California passed Senate Bill (SB) 743, which mandates that lead agencies can no longer use automobile delay – commonly known as Level of Service (LOS) – as a method for conducting transportation analysis under CEQA. The State later issued guidelines for the use of a broader measure called Vehicle Miles Traveled (VMT), which measures the total amount of driving over a given distance, and is intended to better align transportation analysis with the State's Greenhouse Gas reduction goals. These changes became mandatory on July 1, 2020, and lead agencies are now required to analyze transportation impacts under VMT, not LOS. Therefore, the LOS data and the relationship of the Project's effect on LOS with General Plan goals concerning LOS are reported for informational purposes (and will be used by the City in considering General Plan consistency), but are not used to gauge environmental impacts in this EIR. (DEIR, p. 5.1-27.)

The remaining intersections are forecasted to operate at a satisfactory LOS with implementation of the recommended optimizing signal phasing improvements, payment of City Developer Impact Fees (DIF), and

³ The TOA referred to needed improvements as mitigation, but as of January 1, 2020, any actions to improve LOS are no longer considered mitigation under CEQA; however, the improvements can be required as conditions of approval for planning purposes.

payment of the Riverside County Transportation Uniform Mitigation Fee (TUMF) to offset traffic-related deficiencies. (DEIR, p. 5.27.)

In addition to the improvement identified above, the Project will also be conditioned to add MUCTD compliant “KEEP CLEAR” pavement marking and associated R10-7 signage at the driveway for the existing Magnolia Surgery Center Development (property address 10694 Magnolia Avenue). The extension of the left-turn lane pocket from 80 feet to 250 feet is one of the Project Design Features identified above Section 5.1.4. Therefore, as outlined above with the exception of the GP 2025 Policy CCM-2.3, which sets forth an LOS standard, the Project will not conflict with any program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Because LOS cannot be used as a CEQA threshold of significance, the Project’s inability to meet the LOS standard set forth in Policy CCM-2.3 cannot constitute an environmental impact. Therefore, impacts will be less than significant directly, indirectly and no mitigation is required. (DEIR, p. 5.1-27.)

Threshold C: Would the Project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

Findings: No Impact.

Explanation: The Project Site is not located within 2 miles of a private or public airport. The nearest airport is the Riverside Municipal Airport, which is located approximately 3 miles northeast. The Project Site is not located in an airport land use plan area or compatibility zone. Further, the proposed Project does not include any operations that would result in a change to air traffic. Therefore, the Project would have no impact resulting in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. (DEIR, p. 4-30.)

Threshold D: Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Findings: Less than significant.

Explanation: As discussed in the Initial Study and Project Description, the Hospital Expansion Site is accessed through five existing driveways. There are two full-access driveways off of Park Sierra Drive, two full-access driveways from Polk Street, and one right-in and right-out driveway off of Magnolia Avenue. An additional right-in and right-out driveway off of Magnolia Avenue would be constructed for use by emergency vehicles only. Off-Site Area 1 will use one-full access pre-existing driveway on Magnolia Avenue. Off-Site Area 2 will use one-full access driveway on Fillmore Street towards the southern portion of the property. (DEIR, pp. 4-30 – 4-31.)

The proposed Project is required to comply with the City’s development review process, including review for compliance with all applicable fire code requirements for construction and access to the Project Site. Project Site access does not include new travel lanes and has been designed in conformance with the City’s engineering and fire department standards. As a result, the Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses. Therefore, impacts would be less than significant. (DEIR, 4-31.)

Threshold E: Would the Project result in inadequate emergency access?

Findings: Less than significant.

Explanation: As mentioned in the Initial Study the Hospital Expansion Site is accessed through five existing driveways. There are two full-access driveways off of Park Sierra Drive, two full-access driveways from Polk Street, and one right-in and right-out driveway off of Magnolia Avenue. Additionally, adequate access will be provided on the two off-site locations. All Project access improvements have been designed in conformance with City engineering and fire department standards for emergency access and circulation. The proposed Project would not alter any established emergency vehicle routes or otherwise interfere with emergency access. In the event any Project-related construction or other activities will require work within City rights-of-way or a lane closure, an encroachment permit and traffic control plan will be required to ensure that adequate access and circulation is maintained on all surrounding streets during the Project construction phase. The Project would not result in inadequate emergency access. Impacts would be less than significant. (DEIR, p. 4-31.)

R. TRIBAL CULTURAL RESOURCES

Threshold B: Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1?

Findings: Less than significant.

Explanation: The City submitted notification letters to nine (9) Native American individuals and organizations on the City's AB 52 Notification List on August 9, 2021. To date, the City has received two responses requesting consultation, and one tribe that initially requested consultation subsequently declined to consult, as shown in **Table 5.2-A – AB 52 Response Log**. (DEIR, pp. 5.2-12 – 5.3-13.)

Although the SLF search (received January 20, 2021) yielded negative results, the NAHC indicated that "the absence of specific site information in the SLF does not indicate the absence of cultural resources in any project area." The NAHC provided a list of 21 Native American individuals and suggested that the City contact them to obtain information or concerns regarding Native American cultural resources. A record of all correspondence is found in Appendix B of the Cultural Resources Inventory, which is included in Appendix A.5.1 of this DEIR.

In addition, A Cultural Resources Report was provided to the Rincon Tribe pursuant to their request for consultation. In a letter dated October 21, 2021, the Rincon Tribe concluded consultation with a recommendation to include cultural measures such as archaeological and tribal monitoring, a monitoring report, and protocols for discovery of cultural material and human remains,

As a result of the City's consultation efforts, the City's standard mitigation measures for cultural resources and tribal cultural resources will be implemented during Project construction. Therefore, the Project would not cause an impact to known tribal cultural resources. (DEIR, p. 5.2-12.)

S. UTILITIES AND SERVICE SYSTEMS

Threshold A: Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Findings: Less than significant. As there are existing dry and wet utility facilities in the adjacent roadways and only extensions into the Project site are required, the Project will not require or result in the relocation or construction of new or expanded facilities offsite, or relocation of facilities. Potential impacts would be less than significant. (DEIR, pp. 4-31 – 4-32.)

Explanation: The Project will receive public water service by Riverside Public Utilities (RPU) and wastewater treatment by the City of Riverside Water Quality Control Plant. The Project will connect to existing storm drains on site. The proposed Project would maintain existing on-site drainage patterns and be designed to utilize LID bioretention and biotreatment BMPs and landscaping features to redirect, capture, and treat surface runoff from new development prior to entering the existing storm drain system. The RPU will continue to provide electrical services to the Hospital Expansion Site. The Hospital Expansion site would also connect to existing telecommunication services on-site. The Hospital Expansion would connect to existing utility services located onsite and in adjacent streets, these services have sufficient capacity to serve the Project without requiring reconstruction or expansion of facilities. Therefore, the Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities resulting in significant environmental effects. Potential impacts would be less than significant. (DEIR, pp. 4-31 – 4-32.)

Threshold B: Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Findings: Less than significant. The Project is within the City's anticipated 2025 growth projection and implementation of the Project would not require new or expanded entitlements for water supplies; thus, potential impacts would be less than significant.

Explanation: Water service to the Hospital Expansion Site, Off-Site Area 1, and Off-Site Area 2 would be provided by Riverside Public Utilities (RPU). The RPU's 2020 Urban Water Management Plan (UWMP), which was adopted on July 1, 2021, estimated water supply and demand during normal, dry, and multiple-dry years. Based on water projections estimated in the UWMP, RPU would have adequate water supply to serve the Project during normal, dry and multiple dry years. Therefore, this Project was found to have a less than significant impact on water supplies. (DEIR, p. 4-32.)

Threshold C: Would the Project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Findings: Less than significant. As it has been determined that the City's existing collection system has sufficient capacity to convey proposed PWWFs downstream of the Project without exceeding the established flow depth criterion, the Project would result in a determination that the Project's wastewater treatment provider (the City) has adequate capacity to serve the Project's projected demand in addition to the City's existing commitments. Therefore, potential impacts would be less than significant.

Explanation: The proposed Project would produce approximately 41,638 gallons per day (gpd) of wastewater which would not exceed permissible limits of downstream wastewater infrastructure. According to the Sewer Study Report, that was approved by the City's Public Works Department, these flow values do not meet or exceed the 250,000 gpd limit for 8-inch diameter sewer pipes. As part of the Initial Study, the Master Plan for the Wastewater Collection and Treatment Facilities was reviewed, and it was determined the City's Regional Water Quality Control Plant would have the capacity to generate a total flow of 46 million gallons per day (mgd). Projections made anticipate that buildout in year 2032 could generate 29 mgd which would not exceed the City's Regional Water Quality Control Plant capacity. Therefore, the City's Public Works Department (the wastewater treatment provider) would have adequate capacity to serve the Project's projected demand in addition to the existing commitments. Impacts would be less than significant. (DEIR, p. 4-32.)

Threshold D: Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Findings: Less than significant.

Explanation: The Initial Study reviewed potential solid waste generation due to Project construction and operation of the proposed Kaiser Permanente Riverside Medical Center expansion. It was determined that solid waste produced during Project construction will be disposed of at a licensed off-site landfill or at a recycling facility as appropriate. Solid waste and medical waste produced during Project operation, would be collected by Burrtec and Stericycle, respectively. Solid waste would be disposed of at one of the three landfills that serve the area. It was concluded in the Initial Study that the Project would not generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure. Therefore, Project implementation would result in less than significant impact. (DEIR, pp. 4-32 – 4-33.)

Threshold E: Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Findings: Less than significant.

Explanation: California cities and counties are required to achieve waste diversion goals. The Project must comply with the City's waste disposal and CALGreen requirements. Therefore, compliance with City waste disposal and CALGreen would ensure compliance with federal, state and local management and reduction statutes. Thus impacts regarding compliance solid waste regulations would be less than significant. (DEIR, p. 4-33.)

T. WILDFIRE

Threshold A: Would the Project Substantially impair an adopted emergency response plan or emergency evacuation plan?

Findings: Less than significant.

Explanation: The Project Site has not been identified as being in a very high fire hazard severity zone. The City of Riverside has a Local Hazard Mitigation Plan (LHMP) that provides a uniform approach during emergency evacuation. However, activities associated with the Project would not impede the free movement of emergency response vehicles. Indirect population growth resulting from the Project is not determined to affect evacuation of emergency services due to anticipated growth projections in the City's General Plan 2025. Therefore, the impacts due to wildfires are considered less than significant. (DEIR, p. 4-32)

Threshold B: Due to slope, prevailing winds and other factors, would the Project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Findings: Less than significant.

Explanation: The Initial Study stated that the Project Site is generally flat and no steep slopes are located on or adjacent to the affected lands that would exacerbate wildfire risk. No other natural features are present on the Project Site that would exacerbate wildfire risks. Additionally, the Project is not within a very high fire hazard severity zone. It was noted that construction, operation and maintenance activities could potentially provide ignition sources. However, the Hospital Expansion Site is currently a developed Medical Center and ignition sources from operational and maintenance activities would be similar to existing conditions. Moreover, the Project will comply with federal, state and local safety measures as well as fire protection codes and regulations. Therefore, the Project would not, due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. (DEIR, pp. 4-33 – 4-34.)

Threshold C: Would the Project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Findings: Less than significant.

Explanation: The Project Site is fully served by existing roads and utilities, and as such will not need to construct any new roads, fuel breaks, power lines or other utilities. Therefore, the Project would not have an impact. (DEIR, p. 4-34.)

Threshold D: Would the Project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Findings: Less than significant.

Explanation: The Initial Study determined that lands surrounding the Project Site are relatively flat and largely developed and therefore pose a low to nonexistent risk of downslope or downstream flooding landslide hazards. Thus, no impacts will occur in this regard. (DEIR, p. 4-34.)

IV. FINDINGS FOR IMPACTS IDENTIFIED AS SIGNIFICANT BUT MITIGATED TO A LESS THAN SIGNIFICANT LEVEL

The City Council hereby finds that mitigation measures identified in the EIR and these Findings, and included within the MMRP, will reduce the following otherwise significant environmental impacts to a less than significant level, and have been required in or incorporated into the proposed Project. ***The findings below are for impacts where implementation of the proposed Project would result in significant environmental impacts that would be reduced to less than significant following mitigation. These findings are based on the discussion of impacts in the detailed impact analyses in Section 4, Section 5.1 through Section 5.2 and Section 6 of the EIR (including the Initial Study), as well as relevant responses to comments in the Final EIR.***

Except where specifically otherwise noted below, the following statutory finding applies to all of the impacts described in this section (IV):

Changes or alterations have been required in, or incorporated into, the proposed Project which mitigate the significant effects on the environment (to less than significant levels). (See Pub. Resources Code § 21081(a)(1); State CEQA Guidelines § 15091(a)(1).)

The potentially significant impacts, and the Mitigation Measures that will reduce them to a less than significant level, are as follows:

A. BIOLOGICAL RESOURCES

Threshold D: Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.?

Finding: Potential impacts would be less than significant with implementation of mitigation measures **MM Bio 1** (DEIR, pp. 4-7 – 4-8.)

Explanation: According to the Initial Study the Project Site is located within an urban built-up area within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP); however, it is not located in a criteria cell or a MSHCP linkage area intended to protect lands for wildlife movement. The Project Site has been previously disturbed; therefore, chances of that the Project would interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. However, due to the Project having ornamental trees, on site mitigation measure **MM Bio 1** would minimize any impact tree removal may cause to migratory birds. (DEIR, pp. 4-7 – 4-8.)

The following mitigation measure will be implemented:

MM Bio 1: Pursuant to the MBTA and Fish and Game Code, removal of any trees, shrubs, or any other potential nesting habitat should be conducted outside the avian nesting season. The nesting season generally extends from February 1 through August 31, beginning as early as January 1 for raptor species, but can vary slightly from year to year based upon seasonal weather conditions. If

ground disturbance and vegetation removal cannot occur outside of the nesting season (**September 1 through January 31**), a pre-construction clearance survey for nesting birds shall be conducted within three (3) days of the start of any ground disturbing activities to ensure that no nesting birds will be disturbed during construction.

If the biologist finds an active nest on the proposed Project site and determines that the nest may be impacted, the biologist shall delineate an appropriate buffer zone around the nest. The size of the buffer shall be determined by the biologist and shall be based on the nesting species, its sensitivity to disturbance, expected types of disturbance, and location in relation to the construction activities. These buffers are typically 300 feet from the nests of non-listed species and 500 feet from the nests of raptors and listed species. Any active nests observed during the survey shall be mapped on an aerial photograph. Only construction activities (if any) that have been approved by a Biological Monitor shall take place within the buffer zone until the nest is vacated. The biologist shall serve as a Construction Monitor when construction activities take place near active nest areas to ensure that no inadvertent impacts on these nests occur. Results of the pre-construction survey and any subsequent monitoring shall be provided to the Property Owner/Developer and the City. The monitoring report shall summarize the results of the nest monitoring, describe construction restrictions currently in place, and confirm that construction activities can proceed within the buffer area without jeopardizing the survival of the young birds.

The City finds that Mitigation Measure **MM Bio 1** is feasible, can be adopted, and will reduce impacts associated with this issue to a level of less than significant. Accordingly, the City finds that pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed Project that mitigate or avoid the potentially significant impacts of the proposed Project related to this issue, as identified in the EIR. With implementation of proposed Project design considerations and mitigation measure **MM Bio 1**, impacts will be less than significant.

B. CULTURAL RESOURCES

Threshold A: Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5 of the CEQA Guidelines?

Finding: Potential Project impacts to historical resources would be less than significant with implementation of mitigation measures **MM Cult 1** through **MM Cult 3**. (DEIR, pp. 4-9 – 4-11.)

Explanation: Based on the Initial Study, the proposed Project does not involve the restoration, rehabilitation, alteration, or demolition of a historical resource as defined under Section 15064.5 (a) of the CEQA Guidelines. Archival research evaluated potential historic-period resources on the Project Site. However, the Project did not find any resources within the Project Site nor within a one-mile radius. Additionally, no resources were identified as listed as California Historical Landmarks. Due to the disturbed and developed nature of the Hospital Expansion Site and the previous ground disturbance that has taken place at Off-Site Area 1 and Off-Site Area 2, there is a low potential for historic-period resources to exist subsurface. As such, development of the Project Site as proposed would not cause a substantial adverse change in the significance of a known historical resource pursuant to CEQA Guidelines Section 15064.5. (DEIR, p.4-10.)

Nevertheless, there is potential for unknown resources or properties to be present and Project construction activities may potentially impact unknown resources within the Project Site. Therefore, mitigation measures **MM Cult 1**, **MM Cult 2**, and **MM Cult 3** will be implemented to reduce potential impacts to unknown resources, resulting in the proposed Project having a less than significant impact with mitigation incorporated. (DEIR, p. 4-10.)

The following mitigation measures will be implemented:

MM Cult 1: Changes to Project Site Design. Prior to grading permit issuance, if there are any changes to Project Site design and/or proposed grades, the Applicant and the City shall contact consulting tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and consulting tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the Project Site. The City and the developer/applicant shall make all attempts to avoid and/or preserve in place as many cultural and paleontological resources as possible that are located on the Project Site if the site design and/or proposed grades should be revised. In the event of inadvertent discoveries of archaeological resources, work shall temporarily halt until agreements are executed with consulting tribe, to provide tribal monitoring for ground disturbing activities.

MM Cult 2: Archaeological and Paleontological Monitoring: At least 30 days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities take place, the developer/applicant shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources.

1. The Project archaeologist, in consultation with consulting tribes, the Developer, and the City, shall develop an Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the Project site. Details in the plan shall include:
 - a. Project grading and development scheduling;
 - b. The development of a rotating or simultaneous schedule in coordination with the developer/applicant and the Project archaeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all Project archaeologists;
 - c. The protocols and stipulations that the Applicant and Project archaeologist/paleontologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits, or nonrenewable paleontological resources that shall be subject to a cultural resources evaluation;

- d. Treatment and final disposition of any cultural and paleontological resources, sacred sites, and human remains if discovered on the Project site; and
- e. The scheduling and timing of the Cultural Sensitivity Training noted in mitigation measure **MM Cult 3**.

MM Cult 3: Cultural Sensitivity Training: The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.

The City finds that Mitigation Measures **MM Cult 1** through **MM Cult 3** are feasible, can be adopted, and will reduce impacts associated with this issue to a level of less than significant. Accordingly, the City finds that pursuant to Public Resources Code section 21081(a)(1) and State CEQA Guidelines section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed Project that mitigate or avoid the potentially significant impacts of the proposed Project related to this issue, as identified in the EIR. With the implementation of these recommended mitigation measures, potential Project impacts to historical resources would be less than significant with implementation of mitigation measures **MM Cult 1** through **MM Cult 3**. (DEIR, pp. 4-9 – 4-12).

Threshold B: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines?

Findings: Less than significant with mitigation.

Explanation: The Project has a low potential to discover archeological resources. However, it is possible that unknown resources would be discovered. As a result, mitigation measures **MM Cult 1**, **MM Cult 2**, **MM Cult 3** (identified above) will be implemented to reduce potential impacts to unknown resources. As a result, the proposed Project would result in a less than significant impact with mitigation incorporated. (DEIR, p. 4-11.)

C. GEOLOGY AND SOILS

Threshold F: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Finding: Implementation of mitigation measure **MM GEO-1** is required to reduce potential impacts from inadvertent discovery of paleontological resources to less than significant with mitigation.

Explanation: The Initial Study determined that the Hospital Expansion Site is underlain by young (Holocene-aged) alluvial fan deposits which have the potential for younger sediments to overlie older Pleistocene sediments. These sediments have a high potential to contain paleontological resources. Based on the Project requiring grading and excavation, there is a potential for an inadvertent discovery of paleontological resources. Implementation of mitigation measure **MM Geo 1** would reduce this potential impact to unique paleontological resources. (DEIR, p. 4-14)

The following mitigation measure will be implemented:

MM Geo 1: Should any paleontological resource(s) be accidentally discovered during construction, construction activities shall be moved to other parts of the construction site and a qualified paleontologist shall be retained to determine the significance of the resource(s). If the find is determined to be a unique paleontological resource, as defined in Section 15064.5 of the State CEQA Guidelines, then a mitigation program shall be developed in accordance with the provisions of CEQA as well as the guidelines of the Society of Vertebrate Paleontology (2010).

The paleontologist (or designee(s)) shall wash any collected samples of sediments to recover small invertebrate and vertebrate fossils. Recovered specimens shall be prepared so that they can be identified and permanently preserved. Specimens shall be identified and curated at a repository with permanent retrievable storage to allow further research in the future (e.g., Western Science Center, Raymond Alf Museum, or the Natural History Museum of Los Angeles County). The cost of curation is assessed by the repository and is the responsibility of the landowner. If specimens are found, the qualified paleontologist shall prepare a report of findings, including an itemized inventory of recovered specimens, upon completion of all Project fieldwork. The report shall include a discussion of the significance of all recovered specimens. The report and inventory, when submitted to the City of Riverside Planning Division, shall signify completion of the program to mitigate impacts to paleontological resources. If the monitoring efforts produced fossils, then a copy of the report will also be submitted to the curation facility.

The City finds that Mitigation Measure **MM Geo 1** is feasible, can be adopted, and will reduce impacts associated with this issue to a level of less than significant. Accordingly, the City finds that changes or alterations have been required in, or incorporated into, the proposed Project that mitigate or avoid the potentially significant impacts of the proposed Project related to this issue, as identified in the Initial Study. Implementation of mitigation measure MM GEO-1 is required to reduce potential impacts from settlement to less than significant with mitigation. (DEIR, pp. 4-14 – 4-15)

D. TRIBAL CULTURAL RESOURCES

Threshold A: Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe that is

- listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?
- a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, would the lead agency consider the significance of the resource to a California Native American tribe?

Finding: Potential proposed Project impacts to tribal cultural resources would be less than significant with mitigation measures **MM Cult 1** through **MM Cult 3** and **MM TCR 1**.

Explanation: The proposed Project may potentially result in substantial adverse change in the significance of a tribal cultural resource, defined by PRC Section 21074 as it relates to historical resources in PRC Section 5020.1(k). However, as part of the Cultural Resource Inventory for the proposed Project, the Project Site was analyzed for cultural resources. An archaeological literature and records search at the EIC of the CHRIS resulted in the identification of 16 cultural resources and 28 previous cultural resource investigations within a one-mile wide buffer of the Project area. No resources were recorded within the Project boundaries. None of the Project area has been surveyed previously and none of the documented cultural resources are within the Project area. (ECORP, p.13). The results of the pedestrian survey indicated that the entire Project area has been developed or previously modified (i.e., graded), and no unmodified natural or native surfaces were apparent during the survey. (DEIR, pp. 5.2-10 – 5.2-11.)

To determine if any known Native American cultural properties (e.g., traditional use or gathering areas, places of religious or sacred activity, etc.) are present within or adjacent to the Project site, ECORP contacted the Native American Heritage Commission (NAHC). The NAHC responded on January 20, 2021, indicating that the Sacred Lands File (SLF) search was completed with negative results (no cultural properties were found). The NAHC requested that Native American individuals and organizations be contacted to elicit information and/or concerns regarding cultural resource issues related to the proposed Project. A letter describing the Project and asking these individuals and organizations who are culturally and traditionally affiliated with the area, or who have expressed interest in the area, for their input was sent via mail on February 12, 2021. (DEIR, p. 5.2-11.)

In an email received by ECORP on February 17, 2021, the Torres-Martinez Desert Cahuilla Indians and the Agua Caliente Band of Cahuilla Indians stated that the tribes had no comments on the Project and deferred to other tribes. (DEIR, p. 5.2-12.)

In an email received by ECORP on February 24, 2021, Cheryl Madrigal of the Rincon Band of Luiseño Indians stated that they did not have knowledge of cultural resources in the area; however, the tribe requested that an archaeological records search be completed and that the results of the records search be sent to the tribe. (DEIR, p. 5.2-12.) A Cultural Resources Report was provided to the Tribe pursuant to this request. In a letter dated October 21, 2021, the Rincon Tribe concluded consultation with a recommendation to include cultural measures such as archaeological and tribal monitoring, a monitoring report, and protocols for discovery of cultural material and human remains.

In a letter dated March 11, 2021, Arysa Gonzalez Romero of the Agua Caliente Band of Cahuilla Indians stated that the Project Area is not located within Agua Caliente's traditional use area and deferred to other tribes regarding any consultation. (DEIR, p. 5.2-12.)

Based on the EIC records search, review of aerial photographs, the intensive reconnaissance survey, NAHC response, and correspondence from the Native American tribes that responded, there are no known listed or eligible for listing tribal cultural resources on the Project Site. (DEIR, p. 5.2-12.)

However, in the event a resource is inadvertently discovered during ground disturbance activities, implementation of mitigation measures **MM Cult 1** through **MM Cult 3** would ensure impacts are reduced to less than significant. Mitigation measure **MM TCR 1** will be incorporated in order to address the dispensation of any artifacts that may inadvertently be discovered during ground disturbing activities. (DEIR, p. 5.2-12.)

Thus, through implementation of mitigation measures **MM Cult 1** through **MM Cult 3** as well as **MM TCR 1**, the proposed Project will not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe. Additionally, the Project is not listed nor eligible for listing of historic resources as defined by Public Resource Code section 5020.1(k). Therefore, impacts are less than significant with mitigation incorporated. (DEIR, p. 5.2-12.)

Pursuant to the outcome of the Tribal Consultation with the Rincon Tribe, the City's standard mitigation measure related to the disposition of any uncovered artifacts that may be inadvertently discovered during ground disturbance will be incorporated as outlined below to reduce impacts related to tribal cultural resources to less than significant levels:

MM TCR 1: Treatment and Disposition of Cultural Resources: In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries:

1. Consulting Tribes Notified: within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. The developer shall provide the city evidence of notification to consulting tribes. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation.
2. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the project archaeologist. The removal of any artifacts from the Project Site will need to be thoroughly inventoried with tribal monitor oversight of the process; and.
3. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The Applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same:
 - a. Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed;
 - b. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation;

c. If more than one Native American tribe or band is involved with the project and cannot come to a consensus as to the disposition of cultural materials, they shall be curated at the Western Science Center or Museum of Riverside by default; and

d. At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center, and consulting tribes. (DEIR, pp. 5.2-13 – 5.2-15.)

The full text of Mitigation Measures **MM Cult 1** through **MM Cult 3** is contained under Section C. Cultural Resources above.

The City finds that Mitigation Measures **MM Cult 1** through **MM Cult 3** and **MM TCR 1** are feasible, can be adopted, and will reduce impacts associated with this issue to a level of less than significant. Accordingly, the City finds that changes or alterations have been required in, or incorporated into, the proposed Project that mitigate or avoid the potentially significant impacts of the proposed Project related to this issue, as identified in the EIR. Potential proposed Project impacts to tribal cultural resources would be less than significant with mitigation measures **MM Cult 1** through **MM Cult 3** and **MM TCR 1**. (DEIR, pp. 5.2-10 – 5.2-14.)

V. FINDINGS REGARDING CUMULATIVE IMPACTS

Consistent with CEQA's requirements, the EIR includes an analysis of cumulative impacts, which include the impacts of the proposed Project plus all other pending or approved projects within the affected area for each resource. The discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to a project alone (State *CEQA Guidelines* Section 15130(b)).

All impacts were assessed for Cumulative Impacts in the Initial Study (Appendix A.5), except for Transportation and Tribal Cultural Resources, which are discussed below. (DEIR, pp. 6-1 – 6-8.) State *CEQA Guidelines* Section 15130(b)(1) requires that a discussion of cumulative impacts be based on either a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency ("the list method"); or a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact ("summary of projections method"). (DEIR, pp. 6-1 – 6-8.)

This EIR utilizes the "summary of projections method." State *CEQA Guidelines* Section 15130(d) states that, "Previously approved land use documents such as general plans, specific plans, and local coastal

plans may be used in cumulative impact analysis. A pertinent discussion of cumulative impacts contained in one or more previously certified EIRs may be incorporated by reference pursuant to the provisions for tiering and program EIRs. No further cumulative impact analysis is required when a project is consistent with a general, specific, master, or comparable programmatic plan where the lead agency determines that the regional or area-wide cumulative impacts of the proposed project have been adequately addressed, as defined in Section 15152(f), in a certified EIR for that plan.” Additionally, if a cumulative impact was adequately addressed in a prior EIR for a community plan, zoning action, or general plan, and the project is consistent with that plan or action, then an EIR for such a project should not further analyze that cumulative impact. (State *CEQA Guidelines* Section 15130(e).)The cumulative impact analysis considers total development within the City (per General Plan 2025, implementation of the Housing Element Update, plus regional growth consistent with the SCAG RTP/SCS (*Connect SoCal*). (DEIR, pp. 6-1 – 6-8.)

A. TRANSPORTATION

The geographic context for an analysis of cumulative transportation impacts considers total development within the City (per General Plan 2025), implementation of the Housing Element Update, plus regional growth consistent with *Connect SoCal* (the SCAG 2020-2045 RTP/SCS). There are two transportation thresholds evaluated in Section 5.1 of this DEIR: (A) conflicts with a program, plan, ordinance, or policy addressing the circulation system and (B) conflict or be inconsistent with State *CEQA Guidelines* section 15064.3, subdivision (b). Cumulative impacts are discussed separately for each threshold. (DEIR, pp. 6-2 – 6-4.)

A. Conflict with program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Implementation of the Project along with buildout per the General Plan 2025 and Housing Element Update would not conflict with adopted policies, plans, or programs. The General Plan 2025 and Housing Element Update policies include focusing future development near existing transportation corridors, ensuring land uses are supported by an efficient local roadway network, and supporting alternative modes of transportation such as walking, biking, and transit. These policies support, rather than conflict with, policies, plans, and programs concerning alternative transportation, thereby limiting impact of the proposed Project and other projects within the City. Because the Project’s land uses are consistent with those identified in the General Plan 2025, the Project’s contribution to a cumulative impact regarding conflicts with a program, plan, ordinance, or policy addressing the circulation system is less than significant. (DEIR, p. 6-2.)

B. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Kaiser Permanente operates a nation-wide system of medical facilities. Kaiser Permanente’s patients may receive services at any Kaiser Permanente facility. If the Kaiser Permanente facility closest to a given patient’s home or place of employment does not have the needed service or capacity for the service needed, the patient will be served at another facility. Because the Kaiser Permanente Riverside Medical Center is currently deficient in hospital capacity and certain services, patients drive to regional Kaiser facilities to avail themselves of services. Since patients residing in the City travel to the Fontana Medical Center, Orange County Anaheim Medical Center, Ontario Medical Center, and Moreno Valley Medical Center to access different medical services such as Emergency Department (ED), Operating Rooms (OR), In-patient Facility (IP), Intensive Care Unit (ICU), and Neonatal Intensive Care Unit (NICU), the geographic scope for cumulative VMT impacts are the areas served by Kaiser-Permanente’s Fontana, Anaheim,

Ontario, and Moreno Valley Medical Centers as shown on **Figure 5.1-1 – Regional Kaiser Facilities**, which is located within the SCAG region. The VMT Analysis is included as Appendix B of this DEIR. (DEIR, p. 6-3.)

As documented in the VMT Analysis, implementation of the proposed Project would result in the rerouting of trips from patients residing in Riverside’s zip code areas from Kaiser’s Regional Facilities to the Project Site as shown on VMT Analysis Figures 2-4A, 2-4B, and 2-4C.) Rerouting patients within Riverside zip codes to the Kaiser Permanente Riverside Medical Center location would result in a total reduction of 156,218 patient-generated VMTs within the regional service area as summarized in **Table 6-A – Project-Related Changed in Patient-Generated VMT**. (DEIR, pp. 6-1 – 6-4.)

Table 6-A – Project Related Changed in Patient-Generated VMT

| Department/Service | Number of Visits / Admits | VMT Reduction |
|--|---------------------------|----------------|
| Emergency Department Visitations (Refer to VMT Analysis Table 2-A and Figure 2-4A) | 7,715 | 127,298 |
| Operating Room Service Changes (Refer to VMT Analysis Table 2-B and Figure 2-4B) | 1,699 | 28,228 |
| In-patient Facility Service Changes (Refer to VMT Analysis Table 2-C and Figure 2-4C) | 6,027 | 692 |
| Total VMT Reduction: | | 156,218 |

Source: LSA-A, Tables 2-A, 2-B, and 2-C)

The VMT Analysis conservatively assumes the 746 new Project-generated employees would represent new VMTs to the Project Site. However, if expansion does not occur at the Riverside Medical Center, other Kaiser facilities would have to be expanded or constructed at a new location within the regional service area to serve existing and future patient’s needs. As shown on VMT Analysis **Figure 2-6D – All Employee Residence**, the majority of Kaiser employees reside within the SCAG region. Thus, it is reasonable to expect that any new Kaiser employees would also reside in the SCAG region. (DEIR, pp. 6-3 – 6-4.)

Regarding cumulative VMT impacts, the City’s TIA/VMT guidelines state, “...the cumulative no project shall reflect the adopted RTP/SCS; if a project is consistent with the regional RTP/SCS, then the cumulative impacts shall be considered less than significant subject to consideration of other substantial evidence.” However, because the Project, in combination with other projects in the City and SCAG region, will result in an increase in VMT within the City and SCAG region attributable to the fact that the Project will increase employment within the City, and other development within the City and SCAG region will increase population and employment, cumulative impacts regarding VMT are considered significant. (DEIR, p. 6-4.)

As discussed in Section 5.1.7 of the DEIR and in these findings below, the proposed Project will implement mitigation measures **MM TRAN 1** through **MM TRAN 13**, which could reduce the Project’s VMT by between approximately 4.5 and 52 percent. However, even with these reductions, which are not guaranteed, the Project would still increase VMT and this impact is considered significant and unavoidable. Additionally, given the uncertainty in some components that influence VMT (such as the cost of fuel) combined with the City’s inability to influence other measures that would have the largest effect on VMT (such as implementation of a VMT tax or an increase in the fuel tax), the effectiveness of Transportation Demand Management measures to mitigate VMT cannot be guaranteed to reduce impacts

and the impact is considered significant and unavoidable. The Project's increase in VMT combined with other projects within the City and SCAG region would result in a significant unavoidable cumulative impact to VMT. (DEIR, p. 6-4.)

B. TRIBAL CULTURAL RESOURCES

The geographic scope for an analysis of cumulative impacts on tribal cultural resources (TCRs) includes the City, the larger region encompassing the City, and several surrounding cities and communities that compose the settled area of the various Native American tribes that inhabited this region. A cumulatively considerable impact on TCRs would result if, in combination with build-out of the past, present, and reasonably foreseeable future plans, the Project's incremental contribution to significant cumulative TCR impacts would be considerable. (DEIR, p. 6-4.)

The impacts from past development projects on TCRs is unknown; however, they are assumed to have occurred, as cultural resource laws and regulations were not in place when much of the City was developed. TCRs can be sites, features, places, cultural landscapes, or sacred places, and it is assumed that such features existed within the boundaries of the City. Given the known existence of TCRs through oral histories and statements from Native American tribes that occupied and continue to occupy this region, it is assumed that some TCRs may have been affected by past development. While individual present and future projects may not affect known TCRs, it is possible that currently unknown TCRs such as buried archaeological sites, sacred features, or as-yet-undefined cultural landscapes could be affected. The possibility that the Project and subsequent development within the geographic context could affect currently unknown TCRs, in combination with the impacts of past projects which are assumed to have occurred, would result in a potential cumulative impact on TCRs. (DEIR, pp. 6-4 – 6-5.)

Demolition and construction of new structures associated with proposed Project and other development within the geographic context could include varying depths of excavation and ground disturbance. If ground-disturbing activities were to occur in areas identified as sensitive by Native American tribes, these activities could damage or destroy TCRs, which would be a significant impact. (DEIR, p. 6-4.)

As discussed in Section 5.2 – Tribal Cultural Resources of the DEIR, although no TCRs have been identified as being present on or in proximity to the Project Site, there is the potential that unknown resources on the Project Site may have been obscured by pavement or other materials over the years. As such, the potential exists for unknown tribal cultural resources to be present and Project construction activities may impact unknown tribal cultural resources within the Project disturbance area. As discussed in the Initial Study (Appendix A.5) and included in Section 4 – Environmental Effects Found Not to be Significant of this DEIR, mitigation measures **MM Cult 1**, **MM Cult 2**, and **MM Cult 3** will be implemented to reduce impacts to unknown cultural resources to less than significant with mitigation incorporated. As discussed in Section 5.2.6 of the DEIR and in these findings above, the Project will also implement the City's standard mitigation measure **MM TCR 1**. (DEIR, p. 6-5.)

While a significant cumulative impact on TCRs would occur within the geographic context, these mitigation measures would reduce the Project's effects on TCRs to the extent the Project's contribution to the cumulative impact would not be cumulatively considerable. (DEIR, p. 6-5.)

VI. FINDINGS REGARDING SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Sections 15126(c) and 15126.2(d) of the CEQA Guidelines requires EIRs to contain a discussion of significant irreversible environmental changes which would be caused by the proposed Project should it be implemented. Generally, a project would result in significant irreversible environmental changes if any of the following would occur:

- The proposed Project would involve a large commitment of non-renewable resources;
- The primary and secondary impacts of the proposed Project would generally commit future generations to similar uses;
- The proposed Project involves uses in which irreversible damage could result from any potential environmental accidents; or
- The proposed consumption of resources are not justified.

This section addresses the use of non-renewable resources during initial and continued phases of the proposed Project, the commitment of future generations to environmental changes or impacts because of the proposed Project, and any irreversible damage from environmental accidents associated with the proposed Project.

Nonrenewable resources, such as gravel and steel, will be consumed during Project construction. Energy, fossil fuels, oils, and natural gas will be irreversibly committed during Project construction. These same resources are used for vehicles traveling to and from the Project Site and energy used to operate the Project. The continued use of these resources associated with Project operations represents a long-term obligation. The energy consumed in construction and operation of the Project may be considered a permanent investment. However, the Project will use “green” building materials, where feasible, to reduce impacts to nonrenewable resources. In accordance with Kaiser Permanente’s long-term environmental stewardship goals, the proposed hospital tower and diagnostic and treatment building would be constructed to meet or exceed the LEED Gold performance standards. Because the LEED certification program does not include parking structures, the proposed parking structure would be designed and constructed in accordance with the rating system and performance standards for certification under the Green Garage Certification Program, which is the parking industry’s equivalent of LEED certification, provided by the Green Parking Council, an affiliate of the International Parking Institute. (DEIR, p. 6-7.)

The Project would also be designed to meet or exceed requirements of the most current version of the Title 24 and CALGreen Building Codes. Energy-saving features incorporated into the proposed Project are anticipated to include low-impact design features such as drought-tolerant landscaping, low water and recycled water irrigation systems, energy-saving lighting, mechanical systems, low-flow plumbing fixtures and fittings, and transportation-related sustainability features, such as EV charging stations and bicycle facilities. (DEIR, pp. 6-7 – 6-8.)

Because the Project would incorporate energy efficiency features in an effort to conserve energy over the life of its operation, the proposed Project would not result in long-term significant energy use. (DEIR, p. 6-8.)

VII. FINDINGS FOR SIGNIFICANT AND UNAVOIDABLE IMPACTS

This topic is intended to address any significant impacts that cannot be mitigated to below a level of significance (State CEQA Guidelines Section 15126.2).

Threshold B: Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Findings: Significant and unavoidable.

Explanation: A VMT Analysis was prepared to determine whether the proposed Project would result in a significant VMT impact. The following includes a summary of the VMT Analysis. (DEIR, pp. 5.1-27 – 5.1-31.)

Patient Visit VMT

Emergency Department (ED) VMT

The VMT analysis used ED visitation data extracted from Kaiser for the Riverside facility and the regional facilities (Fontana Medical Center; Orange County Anaheim Medical Center; Ontario Medical Center; and Moreno Valley Medical Center). The data for each facility included number of annual visitations to the facility from the patient residential zip codes/origins. The distance from the residential zip codes to the currently visited facility as well as the distance to the Riverside facility was estimated by geocoding the dataset. Trips from the subset of zip codes, where the distance from the zip code to the Riverside facility is lower than the currently visited facility, were selected as the potential set of reroutes to the Riverside facility due to the proposed expansion. (DEIR, p. 5.1-27.)

ED patient visitation trips to the Riverside Medical Facility would increase by 8,655 gross trips as a result of the proposed Project; with 7,386 trips redirected from regional facilities and 1,269 new trips from ED growth. Kaiser estimates a total reduction of 940 existing trips due to additional similar services in southern Riverside County, including the Moreno Valley facility and the Murrieta facility, which are both currently under construction. Moreno Valley Diagnostic and Testing Expansion is projected to open in July 2023, while the Murrieta Ambulatory Surgery Unit is projected to open in December 2022. As such, the proposed Project would have a net total increase of 7,715 ED trips and would effectively reduce trip lengths to other regional facilities traveled by current and future patients, because these patients would instead be traveling to the Project Site. An assumption of two trips (to/from) per ED visit was used to convert trips and average distances into daily VMT for ED reroutes. The reduction in miles traveled equates to a net daily VMT reduction of 349 (annual VMT reduction of 127,298) as illustrated in **Table 5.1-C – Difference in VMT Emergency Department Visitations**. (DEIR, p. 5.1-28.)

Operating Rooms (ORs) VMT

A methodology similar to the ED methodology was used to estimate VMT effects due to proposed changes to ORs. The VMT estimation includes VMT reduction due to redirected visitations and increase due to growth at full occupancy (2036). The growth projection for the Project is based on the ultimate occupancy of the Project. The Project is anticipated to expand occupancy/usage in phases and full occupancy is projected to be achieved by year 2036. For purposes of this analysis, as a conservative approach, full occupancy was considered in the VMT analysis. Ambulatory OR services are currently available only at Kaiser Permanente's Ontario Vineyard Ambulatory Surgery, so VMT estimates due to redirected

visitations were estimated only for this facility. **Table 5.1 D – Difference in VMT Operating Rooms** shows a net daily VMT reduction of 113 (annual VMT reduction of 28,228) due to OR services. Like ED visits, only two trips (to/from) were considered for VMT estimation purposes. (DEIR, p. 5.1-29.)

Inpatient (IP) Beds VMT

IP facilities include services for Surgery, ICU, and NICU, among other services. The methodology used to estimate VMT changes is similar to ED and OR – redirected visitations and growth at full occupancy (2036). However, typical in-patient visits last multiple days and involve multiple trips; therefore, a few additional assumptions were made to estimate the number of in-patient admissions and VMT. (DEIR, p. 5.1-29.)

Information regarding IP facilities was available in terms of beds and patient days when the beds are occupied. Patient days were converted to number of admissions using Average Length of Stay (ALOS), which was developed using observed data. An assumption of a total of four trips (to/from per admission and to/from for one visitor trip per admission) was used to convert trips and average trips lengths to VMT, compared to two trips that was used for ED and OR. **Table 5.1-E – Difference in VMT Inpatient Beds** shows a net daily VMT reduction of 2 (annual VMT reduction of 692) due to IP redirects and incremental capacity. (DEIR, p. 5.1-29.)

Employee VMT

Employee VMT assumed two daily trips per employee (Home-Work and Work-Home). Home-work/commute trips have the longest trip lengths. Trips to lunch, meetings, and other work-related errands are minimal and usually much shorter in length. These shorter trips are likely already occurring wherever the employees work. Therefore, only commute trips were considered for calculating employee VMT. It is assumed that travel patterns by the new employees will be similar to that of current employees at the Riverside facility. Existing employees at the Riverside facility were categorized into Doctor of Medicine (MD), Registered Nurse (RN), and other staff. Average commute trip lengths from the employee residential zip codes to the Riverside facility were estimated by geocoding the existing employee database. The employees were categorized by employee type because average commute trip length varies with household income. For example, based on the California Household Travel Survey (CHTS) and the American Community Survey (ACS), it has been observed that the average trip lengths for employees of higher income households are typically longer than those of lower income households. (DEIR, p. 5.1-30.)

The proposed Project is an expansion to relieve overcrowding at the Riverside facility and other regional facilities. Even without the proposed expansion, Kaiser would hire employees at other facilities to meet the existing demand at those facilities. However, due to the proposed expansion, the employees that might otherwise be hired at other facilities would be redirected to the Riverside facility. As a conservative estimate, all employees added to the proposed Project were included for calculation of employee VMT. The employment VMT was estimated by the ED, OR, and IP categories. Average trip lengths from the existing observed data were applied to measure employee related VMT. **Table 5.1-F – Employee Related VMT** shows a net daily VMT increase of 9,780 associated with employees. (DEIR, pp. 5.1-30 – 5.1-31.)

Project VMT

Based on the VMT analysis, and as shown in **Table 5.1-G – Project Net Daily VMT Change** of the DEIR, the Project adds a daily net total of 9,316 VMT. (DEIR, p. 5.1-31.)

Per the City's VMT guidelines, a significant VMT impact would occur if the net total VMT of the City with the project is higher than the net total VMT of the City without the project. Therefore, the proposed Project would have a significant transportation impact. (DEIR, p. 5.1-31.)

It is expected that implementation of the following mitigation measures will reduce Project-generated VMT by between approximately 4.5 and 52.0 percent.

MM TRAN 1: Preferential Parking. Prior to Project design approval, Kaiser shall designate preferential parking, which means dedicated parking spaces reserved for users that use a non-single-occupancy vehicles (SOV) mode of transportation, such as carpool and vanpool. Such spaces shall be located near building entrances to encourage and incentivize non-SOV trips. The preferential parking for vanpool and carpool vehicles shall be located on the west side of the Project Site, near the existing four medical office buildings (MOB) and the hospital.

MM TRAN 2: Carpooling. Kaiser shall provide information regarding carpooling on various platforms such as bulletin boards, intranet, new hire information packets, etc., to encourage carpools and thereby reducing employee VMT. Kaiser shall encourage the use of carpool matching service, such as Waze Carpool, to help employees find carpool partners. Information on UberPool and Lyft Share can help find riders along the route to fill the empty seats and split the costs. Kaiser shall facilitate a carpooling program for employees and encourage employees to use the program.

MM TRAN 3: Vanpooling. Kaiser shall provide information about vanpooling on bulletin boards and intranet (private network for employees), allowing employees to find available seats in an existing vanpool that matches their commuting preferences.

MM TRAN 4: Guaranteed Ride Home Program. Kaiser shall provide information about the Guaranteed Ride Home (GRH) Program to employees via emails, bulletin board, and intranet so that employees participating in carpool/vanpool programs can sign up for the program, thereby reducing VMT.

MM TRAN 5: Website. Kaiser shall create a webpage to access information about the transportation services available to reduce employee VMT. The website can provide essential travel information for first time visitors to the project. The website should include information such as address, site map, transportation options (carpool and vanpool), and timetables for transit routes near the Project Site. Additionally, external resource links to the Riverside Transit Agency (RTA) can be provided for users to access relevant transit schedules and transit network map. The intranet can provide employees information and resources regarding carpooling, vanpooling, GRH Program, and other relevant information regarding transportation options and services.

MM TRAN 6: Marketing. Kaiser shall provide marketing and outreach efforts to encourage employees to participate in various alternative transportation events. Marketing shall be in the form of flyers, brochures, raffles, and other promotional events. Flyers shall be posted for events such as National Bike to Work Day and World Car-Free Day to encourage employees to use alternative modes of transportation.

MM TRAN 7: Information Center. Kaiser shall provide an information center, a static board, or an interactive kiosk, at commonly trafficked areas for the convenience of employees to obtain information about various transportation services.

MM TRAN 8: Bus Stop Amenities. Kaiser shall provide bus stop amenities at existing stops on Magnolia Avenue (between Nye Avenue and Skofstad Street), within the vicinity of the Project. These amenities may include shelters, benches, and trash receptacles. Shelters at bus stops provide protection to passengers in the event of inclement weather. Kaiser shall coordinate with City/RTA to determine the design and placement of shelters, benches, and trash receptacles prior to implementation of these added amenities. Kaiser shall provide ADA compliant connectivity from the Hospital Expansion site directly to the existing bus stop.

MM TRAN 9: Telecommuting/Alternative Work Schedules. Kaiser shall encourage telecommuting opportunities and alternative work schedules. Telecommuting eliminates the need to be physically present at the worksite if the work can be done remotely. Alternative work schedules include a compressed work week, flexible daily work schedule, and staggered shifts to alleviate transportation demand during peak hours.

MM TRAN 10: Transportation Coordinator. Kaiser shall designate an onsite transportation coordinator to oversee, monitor, and promote the Transportation Demand Management (TDM) program. The coordinator will answer questions that employees and patients have about the available transportation services, prepare mobile amenities for employees, promote the TDM program through public outreach, conduct employee surveys about the TDM program and improve/adjust if necessary, and coordinate with local transit agencies and transportation authorities to relay up-to-date information about transit service changes and active/future projects. The transportation coordinator shall provide an annual report of each TDM program including utilization details, effectiveness and recommendations for improvements, if any, in the annual report.

MM TRAN 11: Bus Passes. Kaiser shall provide partial subsidy of CommuterLink bus passes for new employees for the first three years after the Project opening date to encourage the use of public transit.

MM TRAN 12: IE Commuter Program. Kaiser shall promote the IE Commuter program and provide rideshare information to all employees via emails, project website, information center, and the Transportation Coordinator required per **MM TRAN 10**.

MM TRAN 13: Service Amenities. Kaiser shall provide service amenities on-site such as ATMs, cafeteria, café, gift shop, food carts and vending machines to reduce the need for employees to travel off-site throughout the workday.

Environmental Impacts after Mitigation Measures are Implemented

Implementation of these mitigation measures may reduce the Project's commute VMT and effectively lower VMT. Mitigation measures **MM TRAN 2, MM TRAN 3, MM TRAN 6, MM TRAN 8, MM TRAN 9, and MM TRAN 12** could reduce the Project's VMT between approximately 4.5 and 52.0 percent. However, Project VMT would remain significant since the Project's net VMT would still be higher than the net total VMT of the City without the Project. Even with implementation of mitigation measures **MM TRANS 1** through **MM TRANS 13**, the proposed Project will result in Project-specific and cumulatively significant unavoidable impacts to vehicle miles traveled. (DEIR, pp. 5.1-32 – 5.1-33.)

VIII. FINDINGS REGARDING GROWTH INDUCING IMPACTS

Section 15126.2(e) of the CEQA Guidelines requires a discussion of a proposed Project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. The proposed Project's growth inducing potential is therefore considered significant if project-induced growth could result in significant physical effects in one or more environmental issue areas. (DEIR, p. 6-5.)

As discussed under the Population and Housing subheading in Section 4, Environmental Effects Found Not to be Significant of the Draft EIR and Initial Study threshold 14, Population and Housing, the proposed Project would require approximately 746 new full-time employees. Although it is likely that the majority of new employees would already be living in the City or surrounding communities, it is possible that some employees would move to the City. Assuming an average household size of 3.28 persons, the Project could, at most, result in an indirect population increase of approximately 2,446 persons. (DEIR, p. 6-6.)

Connect SoCal is the 2020-2045 Regional Transportation Program and Sustainable Communities Strategy (RTP/SCS) prepared by the Southern California Association of Governments (SCAG). Connect SoCal establishes population, housing, and growth trends for the City, Riverside County, and SCAG region. SCAG growth forecasts in Connect SoCal estimate the City's population to reach 395,800 persons by 2045, representing a total increase of 70,500 persons between 2016 and 2045. The Project's highest potential indirect population growth (2,446 persons) represents approximately 3.5 percent of the City's anticipated population increase by 2045, and less than one percent of the City's total projected 2045 population. (DEIR, p. 6-6.)

Connect SoCal employment forecasts estimate the City's employment to reach 188,700 jobs by 2045, representing a total increase of 43,300 jobs between 2016 and 2045. The approximately 746 Project-generated jobs represent approximately 1.7 percent of the City's anticipated jobs increase by 2045, and less than one half of one percent of the City's total projected 2045 employment. Since the Project is consistent with the Typical Growth Scenario of the GP 2025, it is not reasonably foreseeable that the Project would cause the GP 2025 buildout population or employment forecasts to be exceeded. (DEIR, p. 6-6.)

Implementation of the proposed Project does not require the provision or extension of utilities that could serve future development. Off-site waterline and storage upgrades are not required to supply water to the Project as the existing water system has adequate capacity. The Project would expand the sewer conveyance system on the Hospital Expansion Site and connect the new facilities to the existing sewer system. Based on the Project's estimated wastewater generation of approximately 41,638 gallons per day (gpd), modeling results suggest that under existing and buildout conditions, the Project would not exceed permissible limits of downstream wastewater infrastructure including the Pierce Street Pump Station which conveys flows from the hospital to the Riverside Water Quality Control Plant (RWQCP) for treatment. Based on the analysis in *Sewer Study Report*⁴ prepared for the Project, the RWQCP has sufficient capacity to serve the Project. (DEIR, p. 6-6.)

⁴ The *Sewer Study Report* is Appendix J to the Initial Study, which can be found in Appendix A 5.1 of the DEIR.

The existing storm drain system at the Hospital Expansion Site would be expanded as part of the Project (refer to **Figure 3-12 - BMP Plan**). This expansion is to handle on-site flows so there would be no increase in stormwater runoff with the implementation of the proposed Project. Each of the off-site parking lots will include water quality bioretention basins that will treat stormwater prior to discharge into existing storm drains in Magnolia Avenue. Therefore, no off-site improvements to the existing stormwater system would be required. (DEIR, p. 6-7.)

The Project Site is located in a highly developed area that is fully served with all utilities. The Project does not include or require utility infrastructure that accommodates growth or development beyond what is proposed. Additionally, the Project does not open any large undeveloped areas for new uses. Therefore, direct and indirect growth-inducing impacts would be less than significant. (DEIR, p. 6.7.)

IX. FINDINGS REGARDING ALTERNATIVES

A. LEGAL REQUIREMENTS FOR ALTERNATIVES

Section 15126.6 of the CEQA Guidelines requires EIRs to consider and discuss alternatives to the proposed actions. Subsection (a) states:

(a) An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

Subsection 15126.6(b) states the purpose of the alternatives analysis:

(b) Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

In subsection 15126.6(c), the CEQA Guidelines describe the selection process for a range of reasonable alternatives:

(c) The range of potential alternatives to the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

The range of alternatives required is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project. Alternatives are limited to ones that would avoid or substantially lessen any of the significant effects of the proposed Project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the proposed Project.

“Feasible” means “capable of being accomplished in a reasonable period of time taking into account economic, environmental, legal, social and technological factors” (CEQA Guidelines §15364). The concept of feasibility also encompasses whether a particular alternative promotes the proposed Project’s underlying goals and objectives, and whether an alternative is impractical or undesirable from a policy standpoint. (See *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417; *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1001 (CNPS).)

The issue of alternatives feasibility arises twice in the CEQA process, once when the EIR is prepared and again when CEQA findings are adopted. When assessing feasibility in an EIR, the EIR preparer evaluates whether an alternative is “potentially” feasible. Potentially feasible alternatives are suggestions by the EIR preparers that may or may not be adopted by lead agency decision-makers. When CEQA findings are made, the lead agency decision-making body independently evaluates whether the alternatives are actually feasible based on all the evidence in the record, including whether an alternative is impractical or undesirable from a policy standpoint. (See *CNPS*, supra, 177 Cal.App.4th at p. 999.)

B. SUMMARY OF PROJECT OBJECTIVES

State CEQA Guidelines Section 15124(b) requires that a project description contain a statement of objectives including the underlying purpose of the project. The objectives of the Project include:

1. Expand the Kaiser Permanente Riverside Medical Center campus through the construction and operation of new medical facilities in order to accommodate future growth of Kaiser members and the need to provide additional medical services that benefit the community.
2. Develop a comprehensively planned, integrated medical campus within the existing hospital campus boundaries by facilitating construction of a new five story hospital tower with 359-hospital-licensed bed buildout capacity, and increasing services for Newborn Intensive Care Unit (NICU), operating rooms, perioperative services, diagnostic and treatment, increased emergency services and ancillary services to keep pace with increasing population growth in the City and the region.
3. Allow members to access a full suite of medical services nearer to their homes and workplaces.
4. Optimize the use of development potential on the existing Medical Center property.
5. Accommodate Medical Center expansion to continue without interruption, while offering all current medical services and 24/7 emergency services.
6. Maximize the number of single-occupancy in-patient hospital rooms in order to meet modern standards and expectations.
7. Increase member parking to meet current and projected future demand.

8. Increase employment opportunities in healthcare, by expanding personnel in specialty healthcare departments.
9. Implement the vision, objectives and policies of the Magnolia Avenue Specific Plan by enhancing the role of the La Sierra District as a major employment center in the City.
10. Redesign internal circulation in order to implement safety, provide enhanced health and wellness and create a seamless flow between pedestrians and vehicle traffic.
11. Continue to provide employee parking to medical center staff during construction by introducing off-site parking lots with shuttle support during construction.
12. Incorporate sustainable green building design features developed by the Leadership in Energy and Environmental Design (LEED) to meet and exceed the LEED Gold performance standards and Kaiser Permanente's long-term environmental stewardship goals.

C. ALTERNATIVES CONSIDERED AND REJECTED FROM FURTHER CONSIDERATION

Section 15126.6(c) of the *CEQA Guidelines* specifies that an EIR should identify alternatives that were considered by the lead agency, but were rejected during the scoping process, and identify the reasons for eliminating the alternatives from further consideration. Section 15126.6(c) further indicates that a lead agency may eliminate an alternative from detailed consideration in an EIR if it fails to meet the basic Project objectives, is infeasible, or does not avoid significant environmental impacts. One such alternative was considered and rejected by the City.

Alternative Project Location

Pursuant to *CEQA Guidelines* Section 15126.6(f)(2), alternate sites should be evaluated, if any feasible sites exist, where significant impacts can be lessened.

An alternative site for the hospital expansion Project would not be logical and would not meet the basic project objectives. Kaiser has identified the need as outlined in the Project Objectives, to expand hospital services at the current hospital location, including increasing the number of emergency room, operating room and recovery room beds at the Riverside Medical Center Hospital Expansion location (10800 Magnolia Avenue) in order to support the growing population and service demands in the localized region. (DEIR, p. 7-3.)

While Kaiser does have multiple facilities and medical office buildings throughout the Inland Empire area (e.g. Fontana, Moreno Valley, Murrieta) as outlined on **Figure 7-1 – Regional Kaiser Facilities**, and a few others located in the City of Riverside, the Riverside location at 10800 Magnolia Avenue is the main Kaiser hospital in Western Riverside County. Comprehensive, “one stop shop” services are currently offered at this location. Currently, there is a deficiency in the hospital capacity at the Riverside location. Specifically, different Kaiser hospitals in the region are used by patients for emergency room services, operating rooms, intensive care units, and neonatal intensive care units. Therefore, an alternative location for these facilities is already being utilized and will not fix the underserved population at the Riverside Medical Center Hospital location. (DEIR, p. 7-3.)

Selecting another offsite location or utilizing other off-site facilities for the same care facilities being offered by the Project would not be feasible and would be an inefficient use of systems already in place

at the current site to support the Project. Hence, the Project Objectives would not be satisfied by dispersion of services and facilities. (DEIR, p. 7-5.)

Furthermore, use of an alternative site or sites for the uses within the Project would not minimize the significant VMT impact, and in fact may well exacerbate it and increase its severity. Existing patients are taking extra trips throughout the region in order to obtain services that could be all located within one facility, and vehicle miles traveled impacts would increase by having patients travel to multiple locations for services. The expansion of the hospital and having comprehensive services, especially emergency room, operating room, and recovery rooms expanded in one location, will shorten member trips in the region, thereby reducing trips and hence emissions. The only identified VMT impact of the Project stems from employee trips and applying conservative assumptions to the number and length of such trips. The same assumptions as to employee need, and employee trips, would pertain to an alternate site or sites for Project facilities, thus resulting in the same employee VMT effects as with the Project, but likely without the VMT reduction from the Project's consolidation of patient services. There is thus every reason to believe that an alternate site option would increase VMT impacts. (DEIR, p. 7-5.)

Lastly, placing the parking garage within the footprint of the existing surface parking lot close to the Medical Center and Hospital is important for servicing the existing and proposed Project site. Moving the parking garage offsite would create additional transportation demand creating additional traffic and safety impacts. (DEIR, p. 7-5.)

Regarding tribal cultural resources, there is no reason to believe potential impacts would be any different than those associated with the Project site if the proposed Project were to be constructed elsewhere. (DEIR, p. 7-5.)

For these reasons, an alternative site for the expansion of the hospital and parking structure was rejected as being infeasible and would not result in reduced impacts compared to the Project. (DEIR, p. 7-5.)

D. ALTERNATIVES CARRIED FORWARD FOR FURTHER ANALYSIS

The proposed alternatives to the Project were selected for review in the EIR because of their potential to avoid or substantially lessen certain project impacts, or because they were required under CEQA Guidelines (e.g., the No Project alternative). The proposed Project and alternatives are described in more detail in the Final EIR and Appendices thereto.

The three alternatives considered for the proposed Project are:

Alternative 1: No Project. Pursuant to CEQA Guidelines Section 15126.6(e)(3)(B), the No Project Alternative for a development project on identifiable property is the circumstance under which the proposed Project does not proceed, and the discussion of the No Project Alternative must compare the environmental effects from the Project Site remaining in its existing state, versus the environmental effects that would occur if the proposed Project is approved. Accordingly, under the No Build Alternative, the Hospital Expansion site and Off-Site Areas 1 and 2 would remain in their existing condition and expansion of the existing medical facility as well as the construction of the parking structure would not occur. (DEIR, pp.7-5 – 7-9.)

Alternative 2: Reduced Intensity Alternative. Since the intent of the Alternatives analysis is to explore alternatives to the Project that would lessen the significant impacts from the Project, the

focus of Alternative 2 – Reduced Intensity Alternative would be to attempt to reduce the project VMT. Under the Reduced Intensity Alternative, the proposed Project would instead entail the construction of facilities half the size of the Proposed Project. Specifically, Alternative 2 would include reducing the size of the Hospital Tower and Diagnostics and Treatment buildings by half and not constructing the parking garage (refer to **Table 7 B – Alternative 2 – Reduced Intensity Alternative**) in order to reduce VMT impacts by approximately half of the proposed Project. Under this Alternative, **Table 7 C – Project vs. Alternative 2 Net Daily VMT Change**, of the DEIR shows that the VMT generated would be approximately half of the Project VMT of 9,316 Daily VMT which would be 4,658 Daily VMT. The number of new hospital beds envisioned for this Alternative would also be reduced by approximately half from the Proposed Project. The off-site parking lots proposed by the Project would also not occur under this Alternative 2. (DEIR, pp. 7-10 – 7-13.)

Alternative 1: No Project/No Development

Description

The two sections included in the EIR discussing potential significant impacts are Transportation and Tribal Cultural Resources. Therefore, the comparative analysis for Alternative 1 was based on these two sections only. (DEIR, p. 7-6.)

Transportation

The Project will result in new employees being added to the Kaiser Permanente Riverside Medical Center due to the expansion of services from increasing demand for medical services through the region. If the Project were not approved, and Alternative 1 No Project/No Expansion is implemented, there could still be new employee trips generated throughout the region to other Kaiser Permanente locations because the services are still needed. However, these employee trips would not be to the Riverside location under the No Project/No Expansion Alternative Impacts within the City under the No Project/No Expansion would be less than the Project and would not be significant within the City. However, within the region, without the Project, patient VMT would not decrease as the patients would have to be served elsewhere. Employee trips would still occur at other Kaiser Permanente facilities. Therefore, the No Project/No Expansion Alternative would likely result in less impact from VMT when compared to the Project given the City's impact threshold of significance that focuses on VMT within the City; however, Alternative 1 not decrease VMT impacts in the region due to the need for patients to drive elsewhere for services not provided at the Kaiser Permanente Riverside Medical Center and the need for employees to serve those patients in the other locations. (DEIR, p. 7-6.)

Tribal Cultural Resources

The Alternative 1-No Project condition would not involve the City making a discretionary action, and no physical construction would occur, therefore, AB52 Tribal Consultation would not be triggered. Therefore, this Alternative would not result in any impacts to existing or unknown tribal cultural resources as the existing medical center and hospital would stay in operation. (DEIR, p. 7-6.)

Relationship to Project Objectives

Alternative 1 would not meet any of the Project Objectives, and certainly not the basic objectives of the Project. Section 15126.6(f)(1) of the *CEQA Guidelines* states that site suitability and economic viability are among the factors that may be taken into account when addressing the feasibility of alternatives. Alternative 1 is not suitable for the social or economic conditions for the City as the region overall is experiencing population demand for more medical services than can currently be served at the existing Riverside location. With the No Project, Alternative 1, no expansion of facilities would occur at the Riverside location, which could create the need to accelerate the expansion of other regional Kaiser facilities elsewhere. The No Project, Alternative 1, would result in no VMT impacts within the City, as existing trips within the City would not exceed the City's threshold of significance. However, regional trips by Kaiser patients, and therefore VMT, would increase as patients would need to drive a greater distance to various other facilities throughout the region. Employee VMT would continue at existing levels. VMT would likely remain the same at the Project location and result in no net change in VMT impacts within the City. Regional VMT would increase. Therefore, the No Project Alternative 1 fails to meet the basic Project Objectives and is therefore infeasible. (DEIR, p. 7-9.)

Finding

The City Council rejects Alternative 1 (No Project, Site Remains Vacant) as a project alternative on the basis that Alternative 1 does not fulfill any of the project objectives. CEQA does not require a lead agency to select an alternative which does not meet most of the project objectives (State CEQA Guidelines section 15126.6).

Alternative 2: Reduced Intensity Alternative

Description

The two sections included in the EIR discussing potential significant impacts are Transportation and Tribal Cultural Resources. Therefore, the comparative analysis for Alternative 2 was based on these two sections only. (DEIR, p. 7-10.)

Transportation

Alternative 2 would reduce the project scope by half, resulting in reduction in the Project's VMT generated by new employees. Daily VMT generated under the Reduced Intensity Alternative would be approximately half of the Project's Daily VMT of 9,316, and thus would be 4,658 Daily VMT. However, the reduction would not reduce the amount of employee VMT required to reduce the Project's VMT impact to a less than significant level. Therefore, the resultant VMT from employees under this Alternative would not be below the City's VMT Threshold of no net change from existing conditions. (DEIR, p. 7-10.)

Furthermore, because certain patients would still need to travel outside of Riverside for services, the reduced service expansion would not meet patient needs that would otherwise be provided by the Project. Therefore, the level of patient VMT decrease achieved by the Project would not be attained and employee VMT would still occur in order to service those patients elsewhere. Thus, regional VMT (as opposed to VMT within Riverside) could be as high as or higher than with the Project. (DEIR, pp. 7-10 – 7-11.)

Tribal Cultural Resources

A reduction in the size of the Project buildings would not change the requirement for AB 52 consultation on the new facilities, though the new facilities would be smaller than the Project. Therefore, it is expected that impacts to tribal cultural resources would be the same for Alternative 2 as for the Project. (DEIR, p. 7-11.)

Relationship to Project Objectives

Under the Reduced Intensity Alternative, the Project size (i.e. reduction in square footage of the building expansions and no parking garage) would be reduced by approximately half in order to try to reduce the Project VMT impacts by half. **Table 7-D – Alternative 2 (Reduced Intensity Alternative)** Ability to Meet Project Objectives of the DEIR identifies the Project objectives and whether or not Alternative 2 meets each objective. (DEIR, p. 7-11.) Because Alternative 2 (Reduced Intensity Alternative) would reduce the new building square footage by approximately half so that roughly half of the VMT would be produced in comparison to the proposed Project, this alternative would still result in increased employee trips compared to no project conditions and create a significant VMT impact. This alternative would not reduce the Project's significant and unavoidable impacts to VMT to a less than significant level. (DEIR, pp. 7-11 – 7-13.)

Although Alternative 2 meets six out of the twelve Project Objectives, these objectives would be met to a lesser degree than the proposed Project because of the smaller project that would be envisioned. Since VMT would be generated by the employees at the Riverside location, no matter the size, even a smaller footprint of the buildings under Alternative 2 would still create VMT impacts that would exceed the City's standard of no net increase of VMT. Therefore, since the purpose of the Project is to accommodate jobs and provide for medical services to be centrally located instead of having Kaiser patients drive to separate facilities across the region, Alternative 2 does not meet the basic Project Objectives, and does not reduce the significant impacts to less than significant levels. For these reasons, Alternative 2 is rejected as infeasible. (DEIR, p. 7-13.)

Finding

The City Council rejects Alternative 2 as a viable Project alternative on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) inability to avoid environmental impacts, (2) failure to meet the proposed Project objectives, and (3) infeasibility.

E. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

According to Section 15126.6(e)(2) of the CEQA Guidelines, an EIR is required to identify the environmentally superior alternative, which is the alternative having the potential for the fewest significant environmental impacts, from among the range of reasonable alternatives that are evaluated in an EIR.

Section 15126.6(e)(2) of the *CEQA Guidelines* requires the identification of the environmentally superior alternative. Of the alternatives evaluated above, Alternative 1 (No Project, No Build) is the environmentally superior alternative because the Project site would stay in its existing condition. Since no expansion of the hospital would occur, Alternative 1 would eliminate the significant and unavoidable impacts to VMT as a result of increased employee traffic from the proposed Project, however this Alternative would not reduce employee traffic either. However, Alternative 1 would also increase the amount of VMT by Kaiser patients as they would need to drive a greater distance to various other facilities throughout the region. (DEIR, p. 7-14.)

The *CEQA Guidelines* also require the identification of another environmentally superior alternative if the No Project Alternative is the environmentally superior alternative. (DEIR, p. 7-14.)

Alternative 2 (Reduced Intensity Alternative) is environmentally superior to the proposed Project because this alternative would reduce impacts to VMT by roughly half and would include half of the physical improvements as the Project. However, Alternative 2 would also not include the parking garage, which would not increase the parking for the Kaiser patients accessing the Riverside location. Alternative 2 does meet six out of the twelve Project objectives; however, it does not meet the need to increase the services offered at one site in response to the increase in population in the City and the growing needs for more of the hospital facilities at one location. (DEIR, p. 7-14.)

Alternative 2 does reduce the employee VMT impacts, however the tradeoff would be that the VMT of Kaiser patients traveling to the various Kaiser facility locations throughout the region would increase. The demand for hospital services is not expected to decrease and limiting the number of facilities at this location in order to reduce employee VMT would be offsetting the VMT impacts to other locations. Therefore, although Alternative 2 is environmentally superior to the Project, as stated above, Alternative 2 is rejected as infeasible because (among other reasons) it still creates VMT impacts elsewhere. (DEIR, pp. 7-14 – 7-15.)

X. FINDINGS REGARDING NO NEED FOR RECIRCULATION

The Final EIR includes the comments received on the Draft EIR and responses to those comments. The focus of the responses to comments is on the disposition of significant environmental issues as raised in the comments, as specified by CEQA Guidelines §15088(b), as well as to provide clarification regarding environmental issues raised. The Final EIR also incorporates information obtained after publication of the Draft EIR and revisions made for clarification and to provide additional detail.

CEQA Guidelines §15088.5 provides that recirculation of an EIR for additional public review and comment is only required in limited circumstances where new or substantially increased significant impacts are identified; where a new feasible mitigation measure or alternative is needed to reduce or avoid significant impacts but is not adopted; or where the EIR circulated for review was so fundamentally inadequate that environmental review was precluded. However, CEQA Guidelines §15088.5 confirms that “recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.” It is for those reasons that recirculation is the exception, not the rule. (*Laurel Heights Improvements Ass’n of S.F. v. Regents of Univ. of Cal.* (1993) 6 Cal. 4th 112, 1132.)

Here, the contents of the Final EIR merely clarify and amplify the already-adequate discussions and mitigation measures presented in the Draft EIR, and do not identify or demonstrate any new significant impacts or substantially increased environmental impacts. Similarly, no new mitigation measures for new significant impacts or alternatives are necessary. Thus, recirculation is not required under CEQA Guidelines §15088.5.

Therefore, the City of Riverside City Council finds that responses to comments made on the Draft EIR merely clarify, amplify or make insignificant modifications to the analysis presented in the document and do not trigger the need to recirculate per CEQA Guidelines §15088.5(b). Revisions made to the Draft EIR are shown throughout the Final EIR in ~~strike through~~ and underline text to denote deletions and additions, respectively.

XI. STATEMENT OF OVERRIDING CONSIDERATIONS

Where a proposed project may result in significant impacts on the environment, and it is infeasible to reduce impacts to a less than significant level through project alternatives or mitigation measures, CEQA allows a public agency to approve the project only if the benefits of the project outweigh the unavoidable adverse environmental effects.

Section 15093 of the CEQA Guidelines provides the following:

CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered “acceptable.”

As discussed in more detail in the EIR and as summarized in Section VII above, the Project will result in significant unavoidable impacts related to Project VMT, which, despite the implementation of mitigation measures, would remain significant since the Project’s net VMT would still be higher than the net total VMT of the City without the Project.

The City identified two alternatives (the No-Project Alternative and the Reduced Intensity Alternative) that can avoid or reduce this significant unavoidable impact; however, both have been determined to be infeasible for the specific economic, social, environmental, technological, legal or other considerations set forth in Section IX.D., above. Under CEQA, “the decision makers may reject as infeasible alternatives that were identified in the EIR as potentially feasible.” (San Diego Citizenry Group v. County of San Diego (2013) 219 Cal.App.4th 1, 18.)

The City certifies that it has considered the information on alternatives provided in the EIR and in the record, and finds that, as described in the EIR and for the reasons identified in Section IX above, there are no feasible alternatives that would avoid the significant and unavoidable impacts associated with Project VMT.

A. OVERRIDING CONSIDERATIONS

The City finds that notwithstanding the disclosure of the above significant and unavoidable impact, there are specific overriding economic, social, technological, and other reasons for approving the proposed Project. Those reasons are as follows:

1. The Project will supply much-needed healthcare facilities and services to meet current and projected population growth in the City and the region. As a result of the Project, a greater number of Kaiser members will have increased access to medical care, and both Kaiser members and City residents will have increased access to emergency services closer to home.
2. The Project will provide expanded medical facilities in an already urbanized area where public services are available, including utilities, a well-developed network of roadways and where public transit is immediately adjacent to the site.

3. New practices and standards of sustainability, relying on both current and future technologies, are applied to the Project and will enable the most efficient use of resources. These include sustainable green building design features developed by the Leadership in Energy and Environmental Design (LEED) to meet and exceed the LEED Gold performance standards.

4. The Project will reduce the need for Kaiser members to travel greater distances to other medical facilities to receive care, thereby reducing the vehicle miles traveled across the region.

5. The Project will maximize the number of single-occupancy in-patient hospital rooms, including ICU rooms, in order to improve patient comfort, care, and health outcomes.

6. The Project will produce approximately 746 new full-time jobs, not including jobs during construction. Benefits and wages to employees will boost the economic vitality of the City and the region.

The City finds that each of the specific economic, legal, social, technological, environmental, and other considerations separately and independently outweigh the significant, adverse impacts and serve as an overriding consideration independently warranting Project approval. In addition, the City finds that each of the above benefits of the Project separately serve to override and outweigh the Project's significant unavoidable environmental impacts. Therefore, the significant unavoidable environmental impacts associated with the Project are considered acceptable.

B. CONCLUSION

As the CEQA Lead Agency for the proposed action, the City has reviewed the Project description and the EIR and fully understands the Project proposed by the applicant. Based on the entire record before the City, and having considered the unavoidable adverse impacts of the Project, the City hereby determines that all feasible mitigation measures have been adopted to reduce the potentially significant impacts identified in the EIR, and that no additional feasible mitigation is available to further reduce significant impacts. The City finds that economic, social, technological, and other considerations of the Project outweigh the unavoidable adverse impacts described above. Further, the City finds that each of the separate benefits of the Project is hereby determined to be, in itself and independent of the other Project benefits, a basis for overriding all unavoidable environmental impacts identified in the EIR and in these Findings. In making this finding, the City has balanced the benefits of the Project against its unavoidable environmental impacts and has indicated its willingness to accept those risks.

XII. MITIGATION MONITORING AND REPORTING PROGRAM

The City of Riverside finds that a Mitigation Monitoring and Reporting Program (MMRP) for the Project has been prepared for the proposed Project and hereby adopts the MMRP concurrently with these Findings of Fact and Statement of Overriding Considerations, and adopts the mitigation measures within the MMRP as conditions of Project approval (Public Resources Code, §21081.6(a)(1)).

The purpose of the MMRP is to ensure the implementation, in accordance with CEQA requirements, of the mitigation measures adopted by the City and under its control.

CEQA requires that a reporting or monitoring program be adopted for the conditions of project approval that are necessary to mitigate or avoid significant effects on the environment (Public Resources Code 21081.6). The MMRP for the proposed Project has been prepared in compliance with the requirements of Section 21081.6 of the California Public Resources Code and Sections 15091(d) and 15097 of the CEQA Guidelines. The MMRP is designed to ensure compliance with adopted mitigation measures during project implementation. For each mitigation measure recommended in the Final EIR, specifications are made in the MMRP that identify the action required and the monitoring that must occur. In addition, a responsible agency is identified for verifying compliance with individual conditions of approval contained in the MMRP.

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EXHIBIT B
MITIGATION MONITORING AND REPORTING PROGRAM

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