

RESOLUTION NO.

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF RIVERSIDE, CALIFORNIA, CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE CANYON SPRINGS HEALTHCARE CAMPUS SPECIFIC PLAN AND AMENDMENT TO THE CANYON SPRINGS BUSINESS PARK SPECIFIC PLAN 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 TDA Investment Group for the future development of a healthcare campus, adoption of the Canyon Springs Healthcare Campus Specific Plan for said development, a Rezoning, a General Plan Amendment and a Specific Plan Amendment to remove the existing property from the Canyon Springs Business Park Specific Plan, (“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 March 2, 2016, the City prepared and distributed a Notice of Preparation (“NOP”) to all appropriate responsible and trustee agencies and to all organizations and individuals requesting notice, stating that an EIR would be prepared for the Project; and

WHEREAS, on March 2, 2016, the NOP was sent to the State Clearinghouse (SCH No. 2016031001); 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 July 8, 2017, in accordance with the provisions of section 15085 of the State CEQA Guidelines; and

1 WHEREAS, copies of the Draft EIR were also sent to various public agencies,
2 organizations and individuals, made available at the City's Planning Division, the Riverside Main
3 Library, Orange Terrace Library, and on the City's website, and a Notice of Availability ("NOA")
4 of the Draft EIR was published in the Riverside Press Enterprise, a newspaper of general
5 circulation, mailed to a list of interested parties, and posted with the Riverside County Clerk's
6 Office; and

7 WHEREAS, the NOC and the NOA provided a 45-day public review period commencing
8 on July 8, 2017, and ending on August 22, 2017; and

9 WHEREAS, the City received written and oral comments from the public and responsible
10 agencies on the 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, as well as those received after the public review period,
13 were evaluated by the City as the Lead Agency in accordance with Section 15088 of the State
14 CEQA Guidelines; and

15 WHEREAS, the City Planning Commission held a duly noticed hearing on the Draft EIR
16 on September 7, 2017, and made certain recommendations to the City Council; and

17 WHEREAS, the Final Environmental Impact Report ("FEIR") dated November 2017, for
18 the Project consists of a Draft EIR dated July 2017, comments and recommendations received on
19 the Draft EIR, responses to comments on the Draft EIR, and list of persons, organizations and
20 public agencies commenting on the Draft EIR; and

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

1 requirements of section 15130 of the State CEQA Guidelines; (f) a discussion of growth inducing
2 impacts; (g) a discussion of significant irreversible environmental changes; (h) a discussion of
3 energy conservation; and (i) a list of all federal, state and local agencies, other organizations and
4 private individuals consulted in preparing the FEIR and the firm preparing the FEIR; and

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

8 WHEREAS, the City Council held a duly noticed hearing on the FEIR on November 14,
9 2017, at which time additional written and oral testimony was received; and

10 WHEREAS, the City Council has been presented with and is familiar with the information
11 in the administrative record, including the Staff Reports and the written and verbal testimony
12 submitted thereon, and has reviewed and considered the information in the FEIR for completeness
13 and compliance with the CEQA Regulations, has independently reviewed and analyzed the FEIR
14 and has duly heard and considered the Staff Reports and all written and oral arguments presented
15 at its meeting of November 14, 2017; and

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

26 WHEREAS, approval of the Project will result in significant effects which are identified
27 in the FEIR that cannot be avoided or substantially lessened; and
28

1 WHEREAS, the City has stated in writing the specific reasons to support its action to
2 approve the Project, despite its significant environmental impacts, based on the FEIR and other
3 information in the record, including in the Findings/SOC set forth in Exhibit "A" attached hereto;
4 and

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

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

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

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

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

26 NOW, THEREFORE, IT IS RESOLVED by the City Council of the City of Riverside,
27 California, and making the following findings, as follows:
28

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

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

4 (a) The FEIR for the Project has been completed and processed in compliance with the
5 requirements of CEQA;

6 (b) The FEIR was presented to the City Council, and the City Council, as the decision
7 making body for the City, reviewed and considered the information contained in
8 the FEIR and the administrative record as a whole, which includes, but is not
9 limited to, staff reports, testimony and information received, and scientific and
10 factual data presented in evidence during the review process, prior to approving the
11 Project; and

12 (c) The FEIR reflects the City's independent judgment and analysis.

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

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

20 Section 5: Potential environmental effects have been studied and, except as stated in
21 Section 8 below, there is no substantial evidence in the record, as a whole, that supports any
22 argument that the Project, as designed and mitigated, may cause a significant effect on the
23 environment. No facts, reasonable assumptions predicated on facts, testimony supported by
24 adequate factual foundation, or expert opinion supported by facts has been submitted that refute
25 the conclusions reached by the FEIR, studies, data and reports. Nor does anything in the record
26 alter the environmental determination, as presented, based upon investigation and independent
27 assessment of those studies, data and reports. No new significant impacts have been raised by any
28

commenting individual or entity, nor has any significant new information been added to the FEIR that would require recirculation under State CEQA Guidelines section 15088.5.

Section 6: The FEIR dated November 2017, for the Project reflects the independent judgment of the City based upon the findings and conclusions stated in the FEIR, staff reports, and in consideration of testimony and information received, and scientific and factual data presented in evidence during the review process.

Section 7: The City Council Finds that the FEIR dated November 2017, has fully examined the environmental impacts of the Project and, based on the information in the administrative record, including the analysis in the FEIR, has determined that the impacts on aesthetics, agricultural and forestry resources, air quality (except for operational VOC, NOx and CO), biological resources, cultural/paleontological resources, energy use/conservation, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation/traffic (except it would conflict with applicable plans, policies or ordinances regarding freeway segments), and utilities and service systems either have no impact, are less than significant or are potentially significant but that with mitigation the impacts are reduced to less than significant based on the Findings/SOC set forth in Exhibit “A” attached hereto and incorporated herein by reference, as well as the findings and analysis contained in the FEIR (collectively “Findings”). The Findings are supported by substantial evidence contained therein as well as in the record, and as such, said Findings are hereby adopted by the City Council.

Section 8: The City Council finds that the FEIR dated November 2017, has fully examined the environmental concerns associated with the Project and, based on the information in the administrative record, including the analysis in the FEIR, has determined that the following significant impacts, identified in the FEIR, cannot be mitigated to a level of insignificant: air quality (VOC, NOx and CO emissions during Project operations) and transportation/traffic (conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for freeway segments). As explained in the Findings/SOC attached hereto as Exhibit “A” and incorporated herein by reference, the City Council finds pursuant to Public Resources Code section

1 21081(a)(3) that specific economic, legal, social, technological or other considerations make
2 infeasible additional mitigation measures or alternatives that would substantially lessen such
3 impacts. The City Council further finds, pursuant to Public Resources Code section 21081(a)(1)
4 and as explained in the Findings/SOC (Exhibit "A") that changes or alterations have been
5 incorporated into the Project which mitigate or avoid those significant impacts identified in the
6 FEIR to the fullest extent feasible.

7 Section 9: With the exception of the impacts identified in Section 8 above, the City Council
8 finds that, the Project, including all mitigation measures, conditions, permits and approvals will
9 not have any other significant adverse unmitigated impacts on the environment. Potential
10 environmental effects have been studied and there is no substantial evidence in the record, as a
11 whole, that supports any argument that the Project, as designed and mitigated, would cause a
12 significant effect on the environment, except as to the impacts identified in Section 8. No facts,
13 reasonable assumptions predicated on facts, testimony supported by adequate factual foundation,
14 or expert opinion supported by facts has been submitted that refute the conclusions reached by the
15 FEIR, studies, data and reports. Nor does anything in the record alter the environmental
16 determination, as presented, based upon investigation and independent assessment of those studies,
17 data and reports

18 Section 10: The City Council finds that alternative project locations were considered and
19 rejected from further consideration as set forth in attached Exhibit "A" Findings/SOC. The City
20 Council further finds that five (5) alternatives, including the No Project Alternative, were identified
21 and analyzed in the FEIR and all were rejected as failing to meet most of the Project objectives, as
22 introducing new/worse significant environmental impacts as compared to the Project, and/or as
23 infeasible, due to specific economic, legal, social technological and other considerations. These
24 grounds are contained in the administrative record, including the FEIR, the Findings/SOC set forth
25 in Exhibit "A" attached hereto and incorporated herein by reference, and the written and verbal
26 testimony. Specifically:

- 27 (a) Alternative – No Project. This Alternative was rejected because it fails to
28 implement any of the Project objectives and would be not be developed. The Project

1 site would be greatly underutilized and the likelihood of a perpetual undeveloped
2 site is not feasible nor realistic.

3 (b) Alternative 1 – Buildout Consistent with Canyon Springs Business Park Specific
4 Plan. This Alternative was rejected and determined not to be feasible because it
5 would only meet one of the Project objectives and it would result in greater
6 environmental impacts to air quality and traffic/transportation than the Project. It
7 would also not reduce significant and unavoidable environmental impacts of the
8 Project.

9 (c) Alternative 2 – Alternative Site Location in City of Moreno Valley. This
10 Alternative was rejected and determined not to be feasible because although it
11 would reduce impacts to hazard and hazardous materials, it would result in greater
12 environmental impacts to aesthetics, air quality, biological resources, geology and
13 soils, GHG emissions, hydrology and water quality, noise, public services and
14 recreation than the Project. It would also not reduce significant and unavoidable
15 environmental impacts of the Project.

16 (d) Alternative 3 – Alternative Location in the City of Riverside. This Alternative
17 would not meaningfully reduce the significant and unavoidable impacts of the
18 Project. Although Alternative 3 implements all Project objectives, it would lead to
19 increased environmental impacts.

20 (e) Alternative 4 – Reduced Project Alternative. Although Alternative 4 has reduced
21 impacts to aesthetics, air quality, biological resources, cultural resources, geology
22 and soils, GHG emissions, hazards and hazardous materials, hydrology and water
23 quality, noise, population and housing, public services, recreation,
24 transportation/traffic, utilities and service systems, and energy conservation, impacts
25 to air quality and transportation/traffic would remain significant and unavoidable.
26 Further although Alternative 4 includes a reduction in environmental impacts, it does
27 not meet all of the Project objectives
28

1 Section 11: The FEIR dated November 2017, for the Project has been completed and
2 processed in compliance with the requirements of the CEQA Regulations (both state and local),
3 and based on the entirety of the administrative record is hereby certified.

4 Section 12: The City Council has balanced the benefits of the adoption of the Project
5 against its unavoidable environmental impacts and has determined that for the reasons set forth
6 below, the economic, legal, social, technological and other benefits of the Project outweigh the
7 unavoidable adverse environmental effects which have been identified in the Findings/SOC
8 discussed in Section 8 of this Resolution and in Exhibit “A” attached hereto and the adverse
9 environmental effects are therefore considered acceptable. In making its determination, the City
10 Council has indicated its intention to approve the Project and hereby adopts the Statement of
11 Overriding Considerations contained in Exhibit “A” attached hereto and incorporated herein by
12 reference, which sets forth the considerations made by the City Council. Some of the benefits of
13 implementing and approving the Project are summarized as follows:

14 (a) Creates both temporary and permanent on-site jobs and will indirectly support local
15 and regional jobs. Additionally, construction spending will create a one-time stimulus to the local
16 and regional economies. Once the proposed Project is completed, the facility will ultimately spur
17 the creation of both local and regional jobs, and there would be additional output and earnings to
18 the local and regional economies.

19 (b) Contributes towards maximizing employment opportunities in the City.

20 (c) New jobs associated with the Project are expected to include health-related and
21 office-based occupations. Both health and office-based occupations have the potential to pay
22 relatively high wages, thereby contributing to the provision of jobs for a variety of income levels.

23 (d) The Project would have a positive fiscal impact on the City through construction
24 and development of the Project, as well as throughout the life of the Project.

25 (e) The medical office and professional space included in the Project will serve the
26 ambulatory needs of the community. Many of the people in this area are forced to travel outside
27 of Riverside to obtain these services. Based on the demand for healthcare in this area, the Project
28 will improve access to care and improve the population’s overall health.

1 (f) The Project site is currently undeveloped. The development of the Project would
2 ensure the site is properly utilized by development that meets the healthcare needs of the City and
3 surrounding community.

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

7 Section 13: The City Council further finds that the Project will provide numerous benefits
8 to the City, as stated in Section 12 above, which outweigh its unavoidable environmental impacts
9 and therefore adopts the Statement of Overriding Considerations set forth more fully Exhibit "A"
10 attached hereto and incorporated herein by reference.

11 Section 14: Specific environmental, economic, social, legal, technical and other
12 considerations and benefits derived from the development of the Project override and make
13 infeasible any alternative to the Project or further mitigation measures beyond those incorporated
14 into this Project.

15 Section 15: The City Council finds that all significant environmental impacts from
16 implementation of the Project have been identified in the FEIR and, with the implementation of
17 the mitigation measures set forth in the Mitigation Monitoring and Reporting Program contained
18 in Exhibit "B" attached hereto and incorporated herein by reference, will be mitigated to a less-
19 than-significant level, with the exception of the impacts identified in Section 8 above. The City
20 Council hereby adopts the Mitigation Monitoring and Reporting Program for the Project to
21 implement the policies, goals and implementation measures identified in the FEIR as necessary to
22 preclude the need for further mitigation measures. Said Mitigation Monitoring and Reporting
23 Program, contained in the FEIR and attached hereto as Exhibit "B", is hereby incorporated as part
24 of the approval of the City Council for the adoption of the Project.

25 Section 16: The City Council hereby finds that the locations of documents and other
26 materials which constitute the record of proceedings upon which its decision is based are the
27 Community & Economic Development Department, Planning Division and the City Clerk's Office
28

1 located at 3900 Main Street, Riverside, California 92522, and the custodian of such records shall
2 be the Community & Economic Development Director and the City Clerk, respectively.

3 ADOPTED by the City Council this _____ day of _____, 2017.

4
5
6 _____
7 WILLIAM R. BAILEY, III
8 Mayor of the City of Riverside

9 Attest:

10 _____
11 COLLEEN J. NICOL
12 City Clerk of the City of Riverside

13 I, Colleen J. Nicol, City Clerk of the City of Riverside, California, hereby certify that the
14 foregoing resolution was duly and regularly introduced at a meeting of the City Council on the
15 ____ day of _____, 2017, by the following vote, to wit:

16 Ayes:

17 Noes:

18 Abstain:

19 Absent:

20 IN WITNESS WHEREOF I have hereunto set my hand and affixed the official seal of
21 the City of Riverside, California, this ____ day of _____, 2017.

22
23 _____
24 COLLEEN J. NICOL
25 City Clerk of the City of Riverside

26 CA 17-1554
27 10/30/17
28

EXHIBIT “A”

CEQA FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS

1.0 PROJECT BACKGROUND

The Canyon Springs Healthcare Campus Specific Plan and Amendment to the Canyon Springs Business Park Specific Plan (Project) was proposed by the City of Riverside (City) to guide future development on the Canyon Springs Healthcare Campus and define the extent, scale, and location of future development on the Canyon Springs Healthcare Campus. Additionally, the Canyon Springs Healthcare Campus Specific Plan will allow for the construction of a hospital and medical office buildings (MOBs) with associated hospital-related facilities, as well as a senior housing, independent living, assisted living, and skilled nursing facility to improve access to healthcare for a growing population. (Draft Environmental Impact Report (DEIR), p. 2-17)

The 50.85-acre Project site consists of three separate, non-contiguous, previously graded areas located within the Canyon Springs Business Park Specific Plan in Riverside, California, approximately 0.2 mile east of Interstate 215 (I-215) and approximately 0.3 mile south of State Route 60 (SR-60). The Project site is generally located west of Day Street and north of Eucalyptus Avenue. The term “Project site” references the entire three separate, non-contiguous areas. (DEIR, p. 2-1)

Site A: The northwest 10.45-acre semi-rectangular shaped area (senior housing site) consisting of four Assessor’s Parcel Numbers (APNs) (291-440-047, 291-450-051, 291-450-052, and 291-450-053) is bounded by Corporate Centre Place and Campus Parkway to the north, Valley Springs Parkway to the west, vacant office zoned land to the east, and Riverside County Assessor office buildings and vacant office zoned land to the south.

Site B: The northeast 10.27-acre irregular-shaped area (independent living, assisted living, and skilled nursing facility site) consisting of four APNs (291-440-042, 291-440-043, 291-440-044, and 291-440-045) is bounded by two multistory office buildings to the north, Canyon Park Drive to the west, Day Street to the east, and Gateway Drive to the south. A 100-foot-wide Metropolitan Water District water pipeline easement diagonally traverses this site.

Site C: The main 30.13-acre irregular-shaped area (hospital, MOBs, and parking structures site) consisting of 14 APNs (291-090-038, 291-090-039, 291-090-040, 291-090-041, 291-440-018, 291-440-033, 291-440-036, 291-440-048, 291-440-049, 291-440-050, 291-450-054, 291-450-055, 291-450-056, and 291-450-057) is bounded by Gateway Drive to the north, Valley Springs Parkway to the west, Day Street and a Riverside Medical Clinic building to the east, and the City of Moreno Valley limit, south of which are 10 single-family homes and Edgemont Elementary School, a Riverside County Flood Control detention basin, and a MOB to the south fronting Eucalyptus Avenue.

The General Plan Land Use Designation for the Project site is C – Commercial (City of Riverside 2007). The Canyon Springs Business Park Specific Plan was originally approved by Riverside County in 1984 and has been amended multiple times since its annexation to the City. The intent of the Canyon Springs Business Park Specific Plan was to represent a logical infill of development into an area where urban services and utilities were available or could be provided. The Canyon Springs Business Park Specific Plan serves as a guideline to develop a regionally oriented mixed-use development that includes commercial, office (including medical office), industrial, entertainment, and recreational uses. The Canyon Springs Business Park Specific Plan consists of 10 Planning Areas. The Project site encompasses all of Planning Area 7 and portions of Planning Areas 8, 9, and 10. (DEIR, p. 2-2)

In order to implement the goals of the Project, an Amendment to the Canyon Springs Business Park Specific Plan and implementation of the new Canyon Springs Healthcare Campus Specific Plan are proposed to streamline future development by establishing future allowable uses and a cohesive set of design guidelines that will provide City staff, the future Canyon Springs Healthcare Campus operator, and the public with a clear understanding of how growth and development will occur. (DEIR, p. 2-17) The Canyon Springs Business Park Specific Plan is proposed to be amended to remove the Project site from the specific plan area and create a new Canyon Springs Healthcare Campus Specific Plan. (DEIR, p. 2-19) The new Specific Plan will allow City staff to expedite the permitting processes for future development. (DEIR, p. 2-17)

The applicant may proceed with approval and development of one MOB (MOB 5) under the existing Canyon Springs Business Park Specific Plan, but such development will occur contemporaneously or following certification of the EIR and approval of the proposed Canyon Springs Healthcare Campus Specific Plan. In the event that an application for MOB 5 is submitted in advance of the certification of the EIR and approval of the proposed Canyon Springs Healthcare Campus Specific Plan, the application shall be reviewed for consistency with both the existing Canyon Springs Business Park Specific Plan and the proposed Canyon Springs Healthcare Campus Specific Plan, with the most restrictive standard from each Specific Plan applied to the application. (DEIR, p. 2-20)

Implementation of the Project would also require the approval of the following land use cases by the City of Riverside City Council:

1. General Plan Amendment (Planning Case P16-0497) to amend the land use designation from C- Commercial to CSHCSP - Canyon Springs Healthcare Campus Specific Plan.
2. Specific Plan and Specific Plan Amendment (Planning Case P14-0294) to remove the 50.85 acre Project Site from the CSBPSP - Canyon Springs Business Park Specific Plan and adopt the CSHCSP – Canyon Springs Healthcare Campus Specific Plan in order to streamline future development by establishing future allowable uses and a cohesive set of design guidelines that will provide City staff, the future Canyon Springs Healthcare Campus operator, and the public with a clear understanding of how growth and development will occur.

3. Rezone (Planning Case P14-0297) rezone the subject site from CR-SP – Commercial Retail and Specific Plan (Canyon Spring Business Park) Overlay Zones and O-SP – Office and Specific Plan (Canyon Springs Business Park) Overlay Zones to CSHCSP - Canyon Springs Healthcare Campus Specific Plan Zone.

Pursuant to the California Environmental Quality Act (Pub. Resources Code § 21000 et seq.) (CEQA), specifically Public Resources Code section 21067, and the State CEQA Guidelines (Cal. Code Regs. §15000 et seq.), specifically State CEQA Guidelines section 15367, the City is the lead agency for the Project. Pursuant to CEQA and the State CEQA Guidelines, the City determined that an EIR should be prepared in order to analyze all potential adverse environmental impacts of the Project and reasonable alternatives to the Project.

The City issued the initial Notice of Preparation (NOP) of a DEIR for the Project on March 2, 2016 and circulated the NOP for a 30-day public review period, ending March 31, 2016. In the NOP, the City solicited comments from various public agencies, other entities, and members of the public.

The City then prepared a DEIR and on July 8, 2017 initiated a 45-day public review and comment period on the DEIR (July 8, 2017 through August 22, 2017), and released the DEIR to the public.

The DEIR considered five alternative project scenarios:

- No Project Alternative: describes the circumstances under which the Project does not proceed and the site is left in its existing condition;
- Alternative 1, Buildout Consistent with Canyon Springs Business Park Specific Plan: build out of the Project area would be consistent with the permitted uses pertaining to the existing Canyon Springs Business Park Specific Plan.
- Alternative 2, Alternative Site Location in City of Moreno Valley: describes the construction of the proposed healthcare campus at the 54.22-acre site located north of SR-60 in the City of Moreno Valley, approximately 0.6 mile northeast of the Project site.
- Alternative 3, Alternative Site Location in the City of Riverside: describes the construction of the proposed healthcare campus at the 64.37-acre area site located west of SR-60 and south of Central Avenue (Assessor's Parcel Number 253-270-043).
- Alternative 4, Reduced Project Alternative: describes scaled down development of the site by reducing the number of beds in the hospital from 280 licensed beds to 100 licensed beds, reducing the square footage of the MOB's from 370,000 square feet to 75,000 square feet, reducing the number of dwelling units in the senior housing facility from 234 to 99 dwelling units, and reducing the number of beds in the independent living/memory care, assisted living, and skilled nursing facility from 290 to 99 licensed beds.

The DEIR was available for review at: Riverside City Hall, Community & Economic Development Department, Planning Division, located at 3900 Main Street, 3rd Floor, Riverside, California 92522; the Riverside Main Public Library, located at 3581 Mission Inn Avenue, Riverside, CA 92501; and, the Riverside Public Library, Orange Terrace Branch, at 20010-B Orange Terrance Parkway, Riverside, CA 92508. In addition, the DEIR was posted on the City's website at <http://www.riversideca.gov/planning/>. Written comments that were received both during and after the public review period were from a variety of public agencies and organizations. The FEIR contains copies of the comments and provides responses to those comments.

2.0 INCORPORATED DOCUMENTS/RECORDS OF PROCEEDINGS

The following information is incorporated by reference and made part of the record supporting these findings:

- All Project plans and materials including supportive technical reports for the Project;
- The DEIR and appendices and FEIR and all documents relied upon or incorporated by reference;
- All documents and materials making up the City Planning Commission staff report for this Project heard on September 7, 2017.
- All documents and materials making up the City Council staff report for this Project heard on November 14, 2017.
- The mitigation monitoring and reporting program prepared for the Project;
- City of Riverside General Plan 2025;
- Final Environmental Impact Report (FEIR) for the City of Riverside General Plan 2025 (State Clearinghouse Number 2004021108; certified by the City in November 2007) (General Plan 2025 FEIR) and all Addendums;
- Findings and Statement of Overriding Considerations (SOCs) for the General Plan 2025 FEIR;
- Title 18 of the Riverside Municipal Code;
- Title 19 of the Riverside Municipal Code;
- Title 20 of the Riverside Municipal Code;
- All records of decision, resolutions, staff reports, memoranda, maps, exhibits letter, synopses of meetings, summaries, and other documents approved, reviewed, relied upon,

or prepared by any City commissions, boards, officials, consultants, or staff relating to the Project;

- Any documents expressly cited in these findings, in addition to those cited above; and
- Any other materials required for the record of proceedings by Public Resources Code section 21167 .6, subdivision (c).

Pursuant to CEQA Guidelines Section 15091(e), the documents and other materials that constitute the record of proceedings upon which the City has based its decision are located in and may be obtained from the Planning Division of the Community & Economic Development Department. The City Clerk is the custodian of records for all matters before the City Council.

3.0 INDEPENDENT JUDGEMENT FINDING

The EIR for the Project reflects the City's independent judgment. The City has exercised independent judgment in accordance with Public Resources Code Section 21082.1(c)(3) in retaining its own environmental consultant, directing the consultant in the preparation of the EIR, as well as reviewing, analyzing and revising material prepared by the consultant.

4.0 ENVIRONMENTAL IMPACT FINDINGS

The following findings of fact are based on information contained within the DEIR and FEIR, which have been deemed adequate and consistent with CEQA, and include information received during the public review process. This section provides a summary of the significant environmental effects of the Project that are discussed in the EIR, and provides written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding.

City staff reports, the EIR, written and oral testimony at public meetings or hearings, these facts and findings and other information in the administrative record, serve as the basis for the City's environmental determination. These findings are supported by substantial evidence in the record of proceedings before the City as summarized below. Further explanation of these environmental findings and conclusions can be found in the DEIR and FEIR, and these findings hereby incorporate by reference the discussion and analysis in those documents supporting the FEIR's determinations regarding mitigation measures and the Project's impacts and mitigation measures designed to address those impacts. In making these findings, the City ratifies, adopts, and incorporates in these findings the determinations and conclusions of the DEIR and FEIR relating to environmental impacts and mitigation measures except to the extent any such determinations and conclusions are specifically and expressly modified by these findings.

These findings are for the Project as defined in the DEIR. As evaluated in the DEIR, the Project includes construction and operation of a Healthcare Campus on three separate sites within the Canyon Springs Business Park Specific Plan area. The healthcare campus will encompass up to 1.6 million square feet of buildings, collectively. The No Project Alternative, as well as

Alternatives 1, 2, 3, and 4, are considered alternatives that were considered in the DEIR and FEIR, and rejected by the City Council as set forth in Section 5.0, below, of these Findings.

The following environmental impacts of the Project are: (1) less than significant and do not require mitigation; (2) potentially significant but will be avoided or reduced to a level of insignificance through the identified Mitigation Measures; or (3) significant and unavoidable and cannot be mitigated to a level of less than significant.

4.1 FINDINGS REGARDING NO IMPACTS OR LESS THAN SIGNIFICANT IMPACTS NOT REQUIRING MITIGATION

Consistent with Public Resources Code section 21001.2 and section 15128 of the State CEQA Guidelines, the EIR focused its analysis on potentially significant impacts and limited discussion of other impacts for which it can be seen with certainty there is no potential for significant adverse environmental effects. State CEQA Guidelines section 15091 does not require specific findings to address environmental effects that an EIR identifies as "no impact" or as a "less than significant impact." Nevertheless, the City Council hereby finds that the Project would have either no impact or a less than significant impact to the following resource areas:

A. Aesthetics

1. Scenic Resources

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

Finding: Less than significant impact. (DEIR, p. 4.1-38 — 4.1-42)

Explanation: While the Project site is visible from M Peak and segments of the M trail, proposed development will not substantially affect existing available views. The Project site is located within the Sycamore Canyon/Canyon Springs Neighborhood, typified by a mixture of commercial retail shopping centers featuring big-box retailers, two- to four office developments, and industrial warehouses and distribution centers. Therefore, as viewed from Box Springs Mountain Reserve, development of the Project site with a three- to five-story healthcare campus will be consistent with the existing urban character of the immediate surrounding area. Further, proposed development on the Project site will not substantially obstruct or interrupt available views from elevated vantage points in the reserve (DEIR, p. 4.1-38).

Due to presence of elevated terrain in the southeastern portions of Sycamore Canyon Wilderness Park, views of Project components may be visible to recreationists. However, given the distance from the trail to the Project site, visible development on the Project site will occupy a small portion of views available from the trail and will appear compatible with office and regional commercial development located in the Canyon Springs Business Park Specific Plan. In addition, development of the Project site will not screen or obstruct available views from the trail to local scenic resources including Box Springs Mountain and mountainous terrain encircling Lake Perris. As viewed from trails in Sycamore Canyon Wilderness Park, development on the Project site will not be visually prominent or display substantially different characteristics as existing development in the Canyon Springs Business Park

Specific Plan. Further, development of the Project will not obstruct views currently available from the trails to local scenic features in the landscape (DEIR, p. 4.1-38 — 4.1-41).

Although the City of Riverside does not identify SR-60 as a Scenic Route, the City of Moreno Valley identified the entire portion of the SR-60 within the City of Moreno Valley as a scenic route, extending from north of Moreno Valley Mall to Theodore Street. The City of Moreno Valley General Plan notes that SR-60 is a scenic corridor that provides fleeting views of major scenic resources, including the Badlands, the Foothills, the Mount Russell & Foothills area, and Box Springs Mountains. Due to the Project's proximity to SR-60 and scenic resources identified in the Moreno Valley General Plan, the proposed development will not substantially obstruct or interrupt existing views to major scenic resources identified in the Moreno Valley General Plan available to SR-60 motorists, the Project will not result in a substantial adverse effect on a scenic vista along SR-60. As such, impacts to scenic resources would be less than significant (DEIR, p.4.1-41--4.1-42).

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

Finding: No Impact (DEIR, p. 4.1-42)

Explanation: There are no officially designated or eligible state scenic highways from which views of the Project site are currently available. The Project site does not support historic buildings or rock outcroppings. The City of Moreno Valley identifies SR-60 as a Scenic Route; however, SR-60 is not designated as an eligible or officially designated state scenic highway by Caltrans. Therefore, because the Project will not substantially damage scenic resources within a state scenic highway, no impact to state scenic highways will occur as a result of Project development (DEIR, p. 4.1-42).

2. Visual Character

Threshold: Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Finding: Less than significant impact. (DEIR, p. 4.1-42 – 4.1-49)

Explanation: The Specific Plan outlines specific criteria including, but not limited to, uses, floor area ratios, setbacks, landscape buffers, building design guidelines, landscape guidelines, and signage guidelines to ensure the Project is compatible with the surrounding developed areas. Building setbacks, landscaping, and design features identified in the Specific Plan will be incorporated into Project design to reduce the apparent scale of structure and break up perceived building mass. Further, colors, exterior materials, and architectural details found on future buildings will be complimentary to existing development in the surrounding area. Also, detailed plans for development within the Canyon Springs Healthcare Campus will require separate City review and approval to ensure compliance with the development standards specified in the Specific Plan. Therefore, the Project will not degrade or significantly impact the existing visual character

of the area or quality of the Project site and its surroundings. Impacts are considered less than significant. No mitigation is required. (DEIR, p. 4.1-49)

3. Light and Glare

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

Finding: Less than significant impact. (DEIR, p. 4.1-49 – 4.1-50)

Explanation: The Project site is located in a developed area with existing sources of nighttime lighting. Currently there are sources of nighttime light and glare from the existing office, commercial, big box retail, and residential uses, as well as from street lights. Construction of the Project will occur during daytime and early evening hours and will not generally require the use of lighting. However, during fall and winter seasons when the hours of daylight are shorter, evening construction activities may require the use of mobile/portable lighting. In these instances, the use of mobile/portable lighting will be required to comply with the City's lighting design and development standards (i.e., Section 19.556.020 of the City's Municipal Code) that include the use of directed, oriented, and shielded lighting that prevents light from shining onto adjacent properties, onto public rights-of-way and into driveway areas. Mobile/portable lighting will be a temporary and potentially, seasonal source of lighting that ceases upon completion of construction. Therefore, lighting associated with construction activities will not adversely affect nighttime views in the area (DEIR, p. 4.1-49 – p. 4.1-50).

During operations, new sources of light will be generated associated with the proposed uses including: security lighting, illuminated walkways, building entrance and identification lighting, surface parking area lighting, parking structure lighting, driveway lighting, and interior lighting. Chapter 7 of the Specific Plan requires compliance with the minimum and maximum light intensities described in Section 19.590.070 of the Riverside Municipal Code. Chapter 8 of the Specific Plan establishes design guidelines for the installation of lights. Pursuant to the development standards and design guidelines pole lighting will be directed and shielded to prevent light from shining onto the adjacent properties, including the single-family residences located south of Site C, adjacent to Eucalyptus Avenue. A visual buffer will be provided by landscaping along the perimeter of the Project site which will help prevent lighting from shining onto adjacent properties. Although the lighting proposed by the Project will increase lighting on the Project site compared to current conditions, the lighting will not result in substantial light or glare that will adversely affect nighttime views in the surrounding area. The Project site is located in an urban developed area with existing sources of nighttime lighting. Also, as part of the administrative design review process for each phase of development the Project will include a photometric study designed to comply with the requirements and policies of the Specific Plan. In terms of glare, trees will also help screen daytime glare generated by reflective surfaces of Site C building exteriors from adjacent properties and perimeter roadways. As such, operational impacts related to light and glare are considered less than significant. No mitigation is required (DEIR, p. 4.1-50).

B. Agricultural and Forestry Resources

1. Farmland Conversion

Threshold: Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance 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. (Initial Study, p. 25).

Explanation: The Project site is designated “Urban and Built-Up Land” by the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program and as depicted in Figure OS-2 of the City’s General Plan (GP) 2025. The DOC defines “Urban and Built-Up Land” as occupied structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. Since the site is not located on any Farmland designations, no conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use would occur. As such, no impacts would occur (Initial Study, p. 25).

Threshold: Would the project 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. (Initial Study, p. 26).

Explanation: Changes to the existing environment that could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use would not occur. No impacts would result. (Initial Study, p.26).

2. Agricultural Zoning

Threshold: Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Finding: No Impact. (Initial Study, p. 25).

Explanation: The City’s Land Use Zoning Map and General Plan Land Use Map indicate that no portion of the Project site is located within an area that is zoned for agricultural use. Further, there are no Williamson Act contracts on the Project site. As such, no impacts to an agricultural use or Williamson Act contract would occur (Initial Study, p. 25).

3. Forestland Zoning and Loss of Forest Land

Threshold: Would the project conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?

Finding: No Impact. (Initial Study, p. 25).

Explanation: No forest land, timberland, or Timberland Production areas (as defined in the Public Resources Codes (PRC) 12220(g) and 4526 or Government Code (GC) 51104(g)) are located within or adjacent to the Project site. Therefore, the Project would not conflict with existing zoning for forest land, timberland, or Timberland Production areas, or result in the loss or conversion of forest lands to non-forest uses, as none exist. No impacts would occur (Initial Study, p. 25).

Threshold: Would the project result in the loss of forest land or conversion of forest land to non-forest uses?

Finding: No Impact. (Initial Study, p. 26).

Explanation: The Project site is currently vacant and undeveloped and contains no forest land. Therefore, implementation of the Project would not result in the loss of forest land or conversion of forest land to non-forest use. No impacts would occur (Initial Study, p. 26).

C. Air Quality

1. Odors

Threshold: Would the project create objectionable odors affecting a substantial number of people?

Finding: Less than significant impact. (Initial Study, p. 27).

Explanation: Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment and to architectural coatings associated with building painting during construction. Such odors are temporary and generally occur at magnitudes that would not affect substantial numbers of people. The Project would not result in the creation of an operational use that is commonly associated with odors. Impacts would be less than significant (Initial Study, p. 27).

D. Biological Resources

1. Sensitive Species and Habitats

Threshold: Would the project 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 impact. (Initial Study, p. 28).

Explanation: The Project site is already graded and in a developed area. A site visit was conducted on September 16, 2015, and a Multiple Species Habitat Conservation Plan (MSHCP) consistency analysis and biological resource evaluation (Appendix A of the Initial Study) was prepared for the Project. Based on the site visit and the biological resource evaluation (Appendix A of the Initial Study), there were no candidate or sensitive species identified in local or regional plans, policies,

or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS) that were observed on site, due to the disturbed nature (Project site has been disturbed with evidence of recent discing) of the Project site. The only special-status species determined to have the potential to occur in the Project survey area are burrowing owls (Initial Study, p. 28). See Section 4.2-B2 of this document for a discussion of potential impacts to burrowing owls.

There are ornamental trees lining the streets of the Project area. A small percentage of these ornamental trees would be removed with the construction of some of the access driveways as part of the Project. As such, minimal disturbance to nests or nesting behavior is expected as a result of the Project. However, since no candidate, sensitive, or special-status species identified in local or regional plans, policies, or regulations, or by CDFW or USFWS were observed on site or are expected to occur as noted in the MSHCP consistency analysis and biological resource evaluation (Appendix A of the Initial Study), potential impact to nesting of bird species would be less than significant (Initial Study, p. 28).

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

Finding: Less than significant impact. (Initial Study, p. 28).

Explanation: The Project site is already graded and in a developed area. Based on the site visit and the MSHCP consistency analysis and biological resource evaluation prepared for the Project (Appendix A of the Initial Study), no riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS was observed on site, due to the disturbed nature of the Project site. Impacts would be less than significant (Initial Study, p. 28).

2. Wildlife Movement

Threshold: 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: Less than significant impact. (Initial Study, p. 29).

Explanation: The Project site is currently vacant and undeveloped but generally surrounded by existing development on all sides. Therefore, the site does not function as a regional wildlife corridor or habitat linkage. Additionally, as stated in the MSHCP consistency analysis and biological resource evaluation (Appendix A of the Initial Study), there is no USFWS-designated critical habitat for listed wildlife species within the Project study area. Therefore, impacts would be less than significant (Initial Study, p. 29).

3. Local Policies or Ordinances

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

Finding: No impact. (Initial Study, p. 29).

Explanation: There are no general plan policies related to protection of biological resources applicable to the Project, nor is there a City tree preservation policy that would affect the Project. The City does have an Urban Forestry Policy Manual, but it does not relate to the ornamental landscaping on the Project site. Therefore, the Project is not subject to any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. No impacts would occur (Initial Study, p. 29).

E. Cultural Resources

1. Historical Resources

Threshold: Would the project cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?

Finding: No Impact. (Initial Study, p. 30).

Explanation: A Negative Cultural Resources Inventory and Paleontological Sensitivity Study was prepared to determine if historical resources are located on the Project site. As part of that assessment, a records search was conducted at the Eastern Information Center (EIC) on July 22, 2015. The EIC record search indicated that no cultural resources have been previously identified in the Project area. One previously recorded cultural resource has been recorded in the 1 mile surrounding record search area. This historic resource consists of a segment of the 1880s Atchison, Topeka, and Santa Fe railroad also known as the Burlington Northern Santa Fe Railroad or the San Jacinto Valley railway. The rail-line has been mapped along the western side of Interstate 215, west (outside) of the Project area. Pedestrian inspection of this area on July 9, 2015, did not identify any extant portion of rail, associated rail facilities, or associated refuse (within or outside of the Project area). Additionally, no structures or other features are represented within the Project area on the 1942 Riverside 15-minutes USGS maps, nor on the 1901 Elsinore 30-minute topographic maps. Since no built-environment historical resources were identified on the Project site, no impacts to historic resources would occur (Initial Study, p. 30).

2. Human Remains

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

Finding: Less than significant impact. (Initial Study, p. 31-32).

Explanation: The site is not known to be an informal/formal cemetery. Due to past grading activities on the Project site, it is highly unlikely that human remains are present. In the unlikely event that human remains are discovered, state and local laws require that the Riverside County coroner be notified. The Project will be required to comply with PRC 5097.98 should any unknown human remains be discovered during site disturbance. Additionally, Sections 7050.5, 7051, 5052, and 7054 of the Health and Safety Code collectively address the illegality of interference with human burial remains and the disposition of Native American burials in archaeological sites. These laws protect such remains from disturbance, vandalism, or inadvertent destruction, and establish procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including the treatment of remains prior to, during, and after evaluation, and reburial procedures. The Project design features include compliance with these code sections. Impacts would be less than significant. (Initial Study, p. 31-32).

F. Geology and Soils

1. Geology Related Hazards

Threshold: Would the project expose people or structures to 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; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; and/or (iv) landslides?

Finding: Less than significant impact. (Initial Study, p. 32-33).

Explanation: Although the Project site is not within an Alquist-Priolo Earthquake Fault Zone, the City is located in a region with several active fault lines. The Project site is located approximately 6 miles from the San Jacinto Fault Zone and approximately 5 miles from the County fault zone, the closest mapped fault zones to the City of Riverside. CHJ Consultants, who conducted a Feasibility-level Geotechnical Investigation for the Project, noted that there was no evidence of active faulting was observed on, or adjacent to, the Project site (Appendix C of the Initial Study). For these reasons, the potential for fault rupture is low.

CHJ Consultants noted in their Feasibility-level Geotechnical Investigation Report that moderate to severe seismic shaking of the Project site can be expected during the lifetime of the Project but that the potential for liquefaction at the Project site is low due to the generally dense nature of the native soils underlying the Project site. There are no known areas prone to landslides at the site, nor is the site in the path of any known or potential landslides. Additionally, the Feasibility-level Geotechnical Investigation Report concluded that the potential for landslides is considered very low due to the relatively flat-lying topography of the Project site (Appendix C of the Initial Study) (Initial Study, p. 32-33).

A Specific Plan has been prepared for the Project, which provides guidelines for design and construction in conformance with the California Building Code (CBC) and California Office of Statewide Health and Planning Department (OSHDP) standards. The OSHDP's Facilities Development Division will review and approve the plans and specifications of all buildings subject

to OSHPD review to ensure compliance with the provisions of the CBC, Title 24, California Code of Regulations. Proper engineering design and construction in conformance with CBC and OSHPD standards would ensure that impacts related to geologic hazards would be less than significant (Initial Study, p. 32-33).

2. Soils

Threshold: Would the project result in substantial soil erosion or the loss of topsoil?

Finding: Less than significant impact. (Initial Study, p. 33).

Explanation: Construction activities such as excavation and grading may have the potential to cause soil erosion or the loss of topsoil. Short-term erosion effects during the construction phase of the Project would be prevented through required implementation of a stormwater pollution prevention plan (SWPPP), through compliance with the National Pollutant Discharge Elimination System (NPDES) program, and through the incorporation of best management practices (BMPs) intended to reduce soil erosion. The SWPPP would include standard construction methods such as temporary detention basins to control on-site and off-site erosion. The SWPPP is required by the City during plan review and approval of Project improvement plans; therefore, with implementation of an approved SWPPP, impacts resulting from erosion during construction operations would be less than significant. A network of storm drains and gutters would be provided throughout the site, along with landscaped areas and groundcovers; therefore, soil erosion is not anticipated to be an issue upon buildout of the Project. Impacts would be less than significant (Initial Study, p. 33).

Threshold: 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 impact. (Initial Study, p. 33)

Explanation: The potential for liquefaction at the Project site is low, and the Project site is not located in an area with soils identified as having a high shrink-swell potential. The Project site is not considered to be susceptible to instability, nor is it located on a site that is unstable. The Feasibility-level Geotechnical Investigation Report concluded that the potential for landslides or lateral spreading is considered very low due to the relatively flat-lying topography of the Project site (Appendix C of the Initial Study). Furthermore, the Feasibility-level Geotechnical Investigation Report stated that the Project site is underlain at relatively shallow depths by dense older alluvium and granitic bedrock, which are not considered susceptible to subsidence effects; therefore, CHJ Consultants concluded that the potential for subsidence effects at the Project site is considered very low (Appendix C of the Initial Study). Impacts would be less than significant (Initial Study, p. 34).

Threshold: Would 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 impact. (Initial Study, p. 34).

Explanation: According to the Feasibility-level Geotechnical Investigation Report prepared by CHJ Consultants, the Project site contains silty and clayey sands and may have expansive properties. However, Figure PS-3 of the City's GP 2025 indicates that the Project site is not located in an area with soils that have a high shrink-swell potential, thereby substantially reducing the potential for adverse impacts related to being located on expansive soils. Additionally, a majority of the area surrounding the Project site have been developed with multi-story buildings. New structures being proposed by the Project would be designed to CBC standards to anticipate impacts associated with expansive soils. Furthermore, the OSHPD's Facilities Development Division will review and approve the plans and specifications of all buildings subject to OSHPD review to ensure compliance with the provisions of the CBC, Title 24, California Code of Regulations. Impacts would be less than significant (Initial Study, p. 34).

Threshold: Would the project 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: Less than significant impact. (Initial Study, p. 34-35).

Explanation: No septic tanks exist on the Project site. There are existing sewer pipelines along Valley Springs Parkway, Gateway Drive, Corporate Centre Place, and Day Street. The overall sewer flow with implementation of the Project would result in only an approximately 0.07% increase, which would be an insignificant increase. As such, impacts would be less than significant (Initial Study, p. 34-35).

G. Greenhouse Gas Emissions

1. Policy Consistency

Threshold: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases (GHGs)?

Finding: Less than significant. (DEIR, p. 4.5-33 – 4.5-36).

Explanation:

Consistency with AB 32

Assembly Bill (AB) 32 requires California to reduce its GHG emissions to 1990 levels by 2020. The City Climate Action Plan (CAP) determined that this was equal to 15% below 2010 levels. The Scoping Plan, approved by the California Air Resources Board (CARB) on December 12, 2008, provides a framework for actions to reduce California's GHG emissions pursuant to AB 32 and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. As such, the Scoping Plan is not directly applicable to specific projects. Although the Scoping Plan may not be appropriate for use in determining the significance of individual projects, there are several state regulatory measures aimed at the identification and reduction of GHG

emissions under the Scoping Plan. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high-Global Warming Potential GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels, among others. The Project will comply with applicable regulations adopted in furtherance of the Scoping Plan to the extent required by law and will not conflict with or obstruct implementation of AB 32 (DEIR, p. 4.5-33 – 4.5-34).

Consistency with SB 375

Senate Bill (SB) 375 provides CEQA relief for residential and mixed-use projects that are consistent with an approved Sustainable Communities Strategy (SCS) or Alternative Planning Strategy. The Southern California Association of Governments (SCAG) is the metropolitan planning agency for the Project area. On April 7, 2016, SCAG adopted the 2016–2040 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS). Targets for the SCAG region in the updated plan includes an 8% per capita reduction in GHG emissions from automobiles and light trucks by 2020, an 18% reduction by 2035, and a 21% reduction by 2040 compared with 2005 levels. As described in the *Canyon Springs Healthcare Campus and Senior Living Supplemental SB 375 Evaluation* included in Appendix H of the DEIR, the Canyon Springs Business Park Specific Plan (CSBPSP) is consistent with all planning documents, including the RTP/SCS and SB 375. The Project is located within the CSBPSP and primarily consists of land uses permitted by the CSBPSP. Although the proposed residential uses are not permitted uses within the CSBPSP, the development of residences will not result in more intense uses, in terms of regional transportation planning, than the office uses that would have been permitted on those sites otherwise. Therefore, the Project will also be consistent with the RTP/SCS and SB 375 (DEIR, p. 4.5-35).

Consistency with City of Riverside CAP

For purposes of this analysis, the applicable threshold utilized for determining significance is whether or not the Project is consistent with the City CAP. The 28.38% reduction is consistent with the target reduction percentage of 15% based on the City's supporting AB 32. Additionally, the Project will be consistent with SB 375. An evaluation of the Project's overall GHG emissions, including all emission sectors indicates that the Project is consistent with the applicable threshold adopted by the lead agency, and consistent with the overall reduction targets set forth by AB 32 and applicable Scoping Plan measures. Consequently, impacts would be less than significant (DEIR, p. 4.5-35 – 4.5-36).

H. Hazards and Hazardous Materials

1. Transport

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

Finding: Less than significant impact. (Initial Study, p. 36).

Explanation: Relatively small amounts of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, and solvents would be used during construction of the Project. These materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Use of these materials for their intended purpose would not pose a significant risk to the public or environment (Initial Study, p. 36).

During operation, it is assumed that routine landscaping and building maintenance, and the proposed uses of the Project, would involve the transport, use, or disposal of hazardous materials on or off site. Pursuant to the State of California Medical Waste Management Act of 1990, the future Canyon Springs Healthcare Campus operator would be required to prepare a medical waste management plan (MWMP) for submittal to the Riverside County Department of Environmental Health Hazardous Materials Management Division. The MWMP will describe the types and amounts of medical waste generated and how the waste would be disposed. The future Canyon Springs Healthcare Campus operator must also prepare a County-required hazardous materials business plan (HMBP). The future Canyon Springs Healthcare Campus operator will be required to comply with the provisions of the California Fire Code, as amended by the City of Riverside, the Riverside County Department of Environmental Health, and any additional element as required in the California Health and Safety Code, Article 1, Chapter 6.95 for the business emergency plan. Both the federal and state governments require all businesses that handle more than the specified amount of hazardous materials to submit a business plan to a regulating agency. The HMBP would be reviewed and approved by the City's Fire Department and the Riverside County Department of Environmental Health Hazardous Materials Management Division. Additionally, Caltrans' Office of Hazardous Materials Safety prescribes strict regulations for the safe transport of hazardous materials, as described in Title 40, 42, 45, and 49 of the Code of Federal Regulations, and implemented by Title 17, 19, and 27 of the CCR. Preparation of an MWMP and HMBP would ensure the safe routine transport, use, and disposal of hazardous materials. Impacts would be less than significant (Initial Study, p. 36).

2. Upsets and Accidents

Threshold: 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?

Finding: Less than significant impact. (Initial Study, p. 36–37).

Explanation: During construction activities, hazardous substances such as fuels for machinery and vehicles, new and used motor oils, cleaning solvents, paints, and storage containers and applicators containing such materials would be stored, used, and generated on the Project site. To reduce the risk of accidental release of hazardous materials during construction activities at the site, the future Canyon Springs Healthcare Campus operator would prepare and implement during all construction activities a hazardous substance management, handling, storage, disposal, and emergency response plan. A hazardous materials spill kit would be maintained on site for small spills. Additionally, the future Canyon Springs Healthcare Campus operator would monitor all contractors for compliance with applicable regulations, including regulations regarding hazardous materials, hazardous wastes, and disposal. Hazardous materials shall not be disposed of or released on the ground, in the

underlying groundwater, or any surface water. Totally enclosed containment shall be provided for all trash. All construction waste, including trash and litter, garbage, other solid waste, petroleum products, and other potentially hazardous materials, would be removed to a waste facility permitted to treat, store, or dispose of such materials (Initial Study, p. 37).

During operations, the future of Canyon Springs Healthcare Campus operator will be required to comply with the provisions of the California Fire Code, as amended by the City of Riverside and any additional element as required in the California Health and Safety Code, Article 1, Chapter 6.95 for the Business Emergency Plan. Both the federal and state governments require all businesses that handle more than specified amount of hazardous materials to submit a business plan to a regulating agency. Pursuant to the State of California Medical Waste Management Act of 1990, the future Canyon Springs Healthcare Campus operator would be required to prepare a MWMP for submittal to the Riverside County Department of Environmental Health Hazardous Materials Management Division. The future Canyon Springs Healthcare Campus operator would also be required to prepare an HMBP that includes basic information about the location, types, quantities, and health risks of hazardous materials stored, used, or disposed of at the site, as well as information about employee training and emergency response plans. Preparation and implementation of the MWMP and HMBP would ensure hazardous materials are not released into the environment. Impacts would be less than significant (Initial Study, p. 37).

3. Schools

Threshold: 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?

Finding: Less than significant impact. (Initial Study, p. 37–38).

Explanation: Edgemont Elementary School is located immediately adjacent to the southern boundary of the hospital, MOBs, and parking structure site. Implementation of the Project phases would include acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. As part of the Project, prior to construction of all phases, the future Canyon Springs Healthcare Campus operator would prepare/update a hazardous substance management, handling, storage, disposal, and emergency response plan to be followed during construction that would ensure adherence to the construction specifications and applicable regulations regarding hazardous materials and hazardous waste, including disposal, and would ensure that construction of the Project would not create a significant hazard to the public or the environment, including nearby schools (Initial Study, p. 37).

The future Canyon Springs Healthcare Campus operator would be required to prepare an MWMP and an HMBP prior to receiving a certificate of occupancy for each phase of the Project. The operator would also be required to comply with the provisions of the California Fire Code, as amended by the City of Riverside, the Riverside County Department of Environmental Health, and the California Health and Safety Code. Compliance with these applicable plans and regulations would ensure that operation of the Project would not create a significant hazard to the public or the environment, including nearby schools. Impacts would be less than significant (Initial Study, p. 37–38).

4. Cortese List Sites

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

Finding: Less than significant impact. (Initial Study, p. 38–39).

Explanation: According to Government Code, Section 65962.5(a), there are no hazardous materials or waste sites located on the Project site or near the Project site. Nearby properties contain leaking underground fuel tanks (LUSTs) and California Department of Toxic Substances Control (DTSC) cleanup sites as obtained from Geotracker and as depicted on the DTSC EnviroStor map database. All LUST sites have been completed and cases are closed, and the DTSC cleanup site requires no action. One ENVIROSTOR facility (drycleaner with soil and soil vapor tetrachloroethylene (PCE) and trichloroethylene (TCE) contamination) is located within one-half mile to one mile of the Project site; however, CHJ concluded that there is no potential impact to the Project site due to the distance of these businesses from the Project site. One soil contamination LUST site with a closed case status (1998 and 2014) was identified within one-eighth mile east of the Project site; one groundwater contamination LUST facility with a case closed status (2013) within one-eighth mile northeast of the Project site was identified; one additional LUST case between one-eighth and one-fourth mile of the Project site and three additional LUST cases between one-fourth and one-half mile of the Project site were identified. Each of these cases has a closed status. The closest monitoring well to the Project site had a history of non-detect results. Due to the distance, status, and/or monitoring data, CHJ Consultants determined that the area LUST cases do not have the potential to impact the Project site (Appendix E of the Initial Study). No evidence has been found to indicate that the Project site currently has, or in the past has had, significant problems associated with hazardous waste, hazardous materials, or petroleum products. Impacts would be less than significant (Initial Study, p. 38–39).

5. Airport Hazards

Threshold: For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

Finding: No impact. (Initial Study, p. 39).

Explanation: There are no private airstrips in the Project vicinity. No impact would occur (Initial Study, p. 39).

6. Emergency Plans

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

Finding: Less than significant impact. (Initial Study, p. 39).

Explanation: The Project will comply with the City's Emergency Operations Plan (EOP). A traffic control plan has been prepared that would outline any lane closures or lane detours during construction activities. Operation of the Project would not interfere with the City's EOP as all access driveways would remain in operation throughout Project buildout. The proposed site plan, including the access driveways, would be reviewed and approved by the City's Fire department during plan check review. Impacts would be less than significant (Initial Study, p. 39).

7. Wildland Fires

Threshold: Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Finding: Less than significant impact. (Initial Study, p. 40).

Explanation: The Project site is not within a fire hazard area and is surrounded by development. Impacts would be less than significant (Initial Study, p.40).

I. Hydrology and Water Quality

1. Water Quality Standards and Water Runoff

Threshold: Would the project violate any water quality standards or waste discharge requirements?

Finding: Less than significant impact. (DEIR, p. 4.7-17–4.7-23).

Explanation: Construction activities could result in water quality degradation if runoff entering receiving waters contains pollutants in sufficient quantities to exceed water quality objectives defined in the Basin Plan or total maximum daily loads (TMDLs) established under CWA Section 303(d). The only TMDL applicable to the Project site relates to bacteria, which is not a pollutant typically generated by construction activities. Impacts from construction-related activities will generally be short term and of limited duration in any one location. Further, the Project applicant is required to obtain coverage under the Construction General Permit (SWRCB Order 2009-0009-DWQ, as amended), which pertains to pollution from grading and Project construction. Coverage under the Construction General Permit requires a qualified individual to prepare a SWPPP to address the potential for construction-related activities to contribute to pollutants within the Project's receiving waterways. The SWPPP must describe the type, location, and function of stormwater BMPs to be implemented, and must demonstrate that the combination of BMPs selected are adequate to meet the discharge prohibitions, effluent standards, and receiving water limitations contained in the Construction General Permit.

During operations of the Project, runoff from building rooftops, walkways, parking lots, and landscaped areas can contain non-point-source pollutants such as oil, grease, heavy metals, pesticides, herbicides, fertilizers, and sediment. Under proposed conditions, the surface soils and weeds that are now exposed to stormwater runoff will be stripped and replaced with engineered fills

that meet geotechnical specifications, prepared soils that meet landscape needs, and most of the site will be developed with structures and parking lots. The site will become about 66% impervious due to 1,464,831 square feet (33.6 acres) of buildings, pedestrian paths, parking lots, and loading/unloading zones. The remainder will consist of landscaping and bioretention areas. The stormwater drainage system will consist of roof downspouts, drain pipes, curb gutters, and other features that will collect stormwater runoff and convey it to stormwater BMPs such as permeable pavers and bioretention features. Compliance with the Municipal Separate Storm Sewer System (MS4) Permit would be required, which would incorporate source control measures, low impact development (LID) controls, and treatment control measures into the Project's design to reduce potential impacts to water quality. The preliminarily approved Water Quality Management Plan (WQMP) also describes source control features to prevent pollutants from entering stormwater runoff. Since the City's Public Works Department will condition the Project to implement the structural and non-structural BMPs outlined above and in the preliminarily approved WQMP, including any required revisions in the Final WQMP, and since the Project is required to prepare a SWPPP, the potential impacts associated with violations of water quality standards or waste discharge requirements would be less than significant (DEIR p. 4.7-17–4.7-23).

2. Groundwater Supplies

Threshold: Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?

Finding: Less than significant. (DEIR, p. 4.7-23–4.7-24).

Explanation: The Project will be serviced by the Eastern Municipal Water District (EMWD). Based on the Water Supply Assessment conducted for the Project by EMWD, groundwater is not being proposed to serve the Project. This means that the Project's 215 acre-feet per year water demand will not be derived from groundwater sources, and thus, there will be no impact on the local groundwater level or aquifer depletion. Further, service connection fees paid by the applicant will be used, at least in part, to support EMWD's groundwater management programs and regulatory obligations to avoid groundwater overdraft and other undesirable effects on the groundwater basin.

Although the Project will include a substantial increase in impervious surface on site, the existing soils on site are not conducive to groundwater recharge, as shown by percolation testing. The preliminary WQMP has included bioretention features which will allow some infiltration of runoff water in design storm events. The San Jacinto Groundwater Basin is 293 square miles in size and has 3,070,000 acre-feet of groundwater storage capacity. Considering that the site is not a major recharge area, the Project will have a negligible effect on groundwater recharge. As such, the Project will not substantially deplete groundwater supplies or interfere with groundwater recharge, and will have a negligible effect on groundwater recharge. Therefore, impacts will be less than significant (DEIR, p. 4.7-23–4.7-24).

3. Existing Drainage Patterns and Runoff

Threshold: 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, in a manner which would result in substantial erosion or siltation on- or off-site?

Finding: Less than significant impact. (DEIR, p. 4.7-24).

Explanation: The Project will not have any direct effects on a stream or river as none occur on site. The Project site is relatively flat-lying, with ground slopes limited to an average of less than 2%. As this will not substantially change with the Project, there will be little to no change in general drainage patterns across the site. General sheet flow conditions will be maintained, and the site will be designed with bioretention features and permeable pavement to ensure runoff from regular rain events are retained on site. As discussed in Threshold 1, above, the Project will avoid erosion or siltation from low-volume, high-frequency rain events, including the water quality BMPs and LID practices that will be used to capture and infiltrate the runoff. Since the City's Public Works Department will condition the Project to implement the structural and non-structural BMPs outlined above and in the preliminary WQMP, and since the Project is required to prepare a SWPPP, the potential impacts associated with substantial erosion or siltation on or off site will be less than significant (DEIR, p. 4.7-24).

Threshold: 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 substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site?

Finding: Less than significant impact. (DEIR, 4.7-25–4.7-26).

Explanation: As discussed above, the Project will not have any direct effects on a stream or river as none occur on site, and there will be little to no change in general drainage pattern across the site. However, the increase in impervious areas created could increase the volume and rate of stormwater runoff during high intensity storms, such as those with a 2-year or higher recurrence interval. As indicated in the preliminary WQMP, the time of concentration will be 8% to 25% sooner, and the runoff volume will be approximately 86% higher compared to existing conditions for a 2-year, 24-hour rain event. This is considered to be a “hydrologic condition of concern” under the Riverside County MS4 permit and the Riverside County Flood Control and Water Conservation District (RCFCWCD) WQMP Template. However, the volumes of water for which BMPs have been designed were increased to capture this amount thereby mitigating the increase in runoff attributable to the 2-year 24-hour storm event for the whole site. Therefore, the Project design (additional LID BMPs) adequately addresses this potential hydrologic condition of concern (DEIR, p. 4.7-25).

For higher intensity storm events, such as the 10-year or 100-year year storm events, the Project will likewise increase the rate, volume, and arrival time of runoff due to development. There are two off-site detention basins adjacent to the Project, which are available to capture flood flows associated with a 100-year storm. One is a desilting basin, and the other is a flood control basin operated by the RCFCWCD. Inadequate information exists regarding the hydrologic modeling

assumptions used to size the off-site basins, so it is unknown whether the basins will be large enough to capture the Project-related increase to flood flows. Therefore, this analysis assumes that off-site basins were sized based on pre-developed conditions on the Project site (DEIR, p. 4.7-25).

Consequently, the Project will include detention facilities, in addition to the water quality BMPs described above, to ensure the Project does not increase peak flows relative to pre-Project conditions. The Hydrology and Drainage Study included in Appendix J of the DEIR estimated the Project-related increase in the 100-year, 3-hour storm event, as it is the storm scenario that typically yields the largest volume requirements. According to these calculations, the required storage volume will be accomplished through installation of underground storage facilities that will be designed to tie into off-site storm drain facilities, including the two off-site basins described above. These preliminary calculations provide information sufficient to determine the Project can be built in a manner that will not increase the rate or amount of surface runoff in a manner that will result in flooding or erosion on or off site. Integration of on-site detention basins into the Project design will ensure no net increase in the rate or volume of runoff received by the off-site flood control facilities. With these design features and required compliance with City of Riverside Municipal Code Chapter 14.12, Project impacts will be less than significant (DEIR, p. 4.7-25–4.7-26).

Threshold: Would the project create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Finding: Less than significant impact. (DEIR, p. 4.7-26–4.7-27).

Explanation: As discussed above, the Project will include the detention facilities necessary to prevent any increases in the rate or volume of stormwater runoff leaving the site. Further, there are no additional sources of polluted runoff not already addressed above. Therefore, the Project's impacts on the capacity of existing or planned stormwater drainage systems or additional sources of polluted runoff will be less than significant (DEIR, p. 4.7-26–4.7-27).

4. Otherwise Degrade Water Quality

Threshold: Would the project otherwise substantially degrade water quality?

Finding: Less than significant impact. (Initial Study, p. 41).

Explanation: There are no other sources or characteristics of the Project that would substantially degrade water quality. Impacts would be less than significant (Initial Study, p. 41).

5. Flood Hazards

Threshold: Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

Finding: Less than significant impact. (Initial Study, p. 41).

Explanation: The majority of the Project site is outside of the 100 year floodplain, with a small portion of the southeast portion of Site C (near the proposed MOB 5) within an “area of 0.2% annual chance flood.” This area has a 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile, and areas protected by levees from 1% annual chance flood. Additionally, according to Figure 5.8-2, Flood Hazard Areas, in the City’s General Plan, only the southeast portion of Site C is located within a flood hazard area. However, no housing is proposed in this area, or within the 100-year flood hazard area. Impacts would be less than significant (Initial Study, p. 41).

Threshold: Would the project place within a 100-year flood hazard area structures that would impede or redirect flood flows?

Finding: Less than significant impact. (Initial Study, p. 42).

Explanation: As discussed above, the majority of the Project site is not located within the 100-year floodplain. A small portion of the southeast portion of Site C (near the proposed MOB 5) is located within “area of 0.2% annual chance flood.” This area has a 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile, and areas protected by levees from 1% annual chance flood. Additionally, according to Figure 5.8-2, Flood Hazard Areas, in the City’s General Plan, only the southeast portion of Site C (near the proposed MOB 5) is located within a flood hazard area. Given a 1% annual chance of flooding, the likelihood of placing MOB 5 within a 100-year flood hazard area is minimal. In addition, the design of storm drain utilities would conform to the Riverside County Flood Control requirements for regional systems, thus alleviating potential flooding at the MOB 5 area. Impacts would be less than significant (Initial Study, p. 42).

6. Dam or Levee Failure

Threshold: Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of a failure of a levee or dam?

Finding: Less than significant impact. (Initial Study, p. 42).

Explanation: As discussed above, the majority of the Project site is not located within the 100-year floodplain. A small portion of the southeast portion of Site C (near the proposed MOB 5) is located within “area of 0.2% annual chance flood.” This area has a 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile, and areas protected by levees from 1% annual chance flood. Additionally, according to Figure 5.8-2, Flood Hazard Areas, in the City’s General Plan, only the southeast portion of Site C (near the proposed MOB 5) is located within a flood hazard area. The Project site is not within a dam hazard zone. The site would therefore not be impacted due to a failure of a levee or dam. Given a 1% annual chance of flooding, the likelihood of exposing people or structures to a significant risk of loss, injury, or death involving flooding at the MOB 5 area is minimal. In addition, the design of storm drain utilities would conform to the Riverside County Flood Control requirements for regional systems, thus

alleviating potential flooding at the MOB 5 area. Impacts would be less than significant (Initial Study, p. 42).

7. Inundation

Threshold: Would the project [expose people or structures to a significant risk or loss, injury, or death involving] inundation by seiche, tsunami, or mudflow?

Finding: No impact. (Initial Study, p. 42).

Explanation: The site is located approximately 46 miles east of the Pacific Ocean, and approximately 3 miles southwest of the created lake in the Sunnymead Ranch community, the closest water body. Due to the lack of adjacent waterbodies to the Project site, there is no risk of seiche, tsunamis, or mudflow. There would be no impacts (Initial Study, p. 42).

J. Land Use and Planning

1. Divide a Community

Threshold: Would the project physically divide an established community?

Finding: Less than significant impact. (Initial Study, p. 42–43).

Explanation: The development of a new hospital, MOBs, central energy plant, parking structures, senior living facility, independent living facility, assisted living facility, skilled nursing facility, and other hospital-related facilities and infrastructure within an area surrounding by existing development would not divide the existing community surrounding the site. Nearby residential areas exist to the south and southeast of the Project area. The Project would not divide an established community. The Project would be consistent with the proposed Specific Plan guidelines that are intended to enhance the public's access to the healthcare campus. As such, impacts would be less than significant (Initial Study, p. 42–43).

K. Mineral Resources

1. Known and Locally Important Resources

Threshold: 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?

Finding: No impact. (Initial Study, p. 43).

Explanation: The Project lies within Mineral Resource Zone 3 as depicted on Figure OS-1 of the City's GP 2025, indicating that the area contains known or inferred mineral occurrences of undetermined mineral resources significance. The Project site has been previously disturbed by rough grading activities. Based on the Mineral Resource Zone 3 designation and given that the site has been graded and is surrounded by existing development (e.g., commercial shopping center,

MOBs, office buildings, residential development, school), the Project is not likely to result in the loss of a known mineral resource. No impacts would occur (Initial Study, p. 43).

Threshold: 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?

Finding: No impact. (Initial Study, p. 44).

Explanation: See response above (Initial Study, p. 44).

L. Noise

1. Groundborne Vibration or Noise Levels

Threshold: Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Finding: Less than significant impact. (DEIR, p. 4.9-39 – 4.9-41).

Explanation: The Project's construction activities most likely to cause vibration impacts are heavy construction equipment and trucks. The Project's vibration impacts were estimated using the vibration assessment methodology published by the Federal Transit Administration (FTA). The construction of the Project is not expected to generate vibration levels exceeding the FTA maximum acceptable vibration standard. Further, impacts at the location of the closest sensitive receiver are unlikely to be sustained during the entire construction period, but will rather only occur during the times that heavy construction equipment is operating adjacent to the Project site perimeter. Moreover, construction at the Project site will be restricted to daytime hours consistent with City requirements, thereby eliminating potential vibration impacts during the sensitive nighttime hours. Impacts were determined to be less than significant (DEIR, p. 4.9-39 – 4.9-41).

2. Permanent Ambient Noise

Threshold: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Finding: Less than significant impact. (DEIR, p. 4.9-41 – 4.9-48).

Explanation: To quantify the Project's traffic noise impacts on the surrounding areas, the changes in traffic noise levels on 24 roadway segments surrounding the Project site were calculated based on the changes in the average daily traffic volumes. The Project will have a less than significant impact on noise levels at roadway segments in the Project area under existing conditions, Year 2016 conditions, and General Plan 2025 Buildout conditions.

As such, impacts to permanent ambient noise would be less than significant (DEIR, p. 4.9-41 – 4.9-48).

3. Temporary Ambient Noise

Threshold: Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Finding: Less than significant impact. (DEIR, p. 4.9-48).

Explanation: Construction noise is exempt under the Riverside Municipal Code. Once the Project is operation, there will not be temporary or periodic noise generating characteristics of the Project. Therefore, impacts to temporary or periodic increase in ambient noise levels would be less than significant (DEIR, p. 4.9-48).

4. Airport Noise

Threshold: 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 expose people residing or working in the project area to excessive noise levels?

Finding: Less than significant impact. (Initial Study, p. 45).

Explanation: The Project site is located within Zone D – Fight Corridor Buffer of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (LUCP). However, the Project site is not located within the community noise equivalent level (CNEL) noise impact area of the LUCP. Thus, impacts would be less than significant (Initial Study, p. 45).

Threshold: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Finding: No impact. (Initial Study, p. 45).

Explanation: The Project is not located in the vicinity of a private airstrip. No impacts will result (Initial Study, p.45).

M. Population and Housing

1. Substantial Growth and Displacement

Threshold: Would the project induce substantial 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)?

Finding: Less than significant impact. (Initial Study, p. 45-46).

Explanation: Although the proposed senior housing facility would provide housing for seniors, it does not generate a substantial population growth as seniors in the surrounding community would generally move from one area to the senior housing facility at the senior housing site as the facility

would provide amenities and resources specific for the senior-aged population. The Project would enhance the jobs/housing balance of the City by providing up to approximately 2,450 new permanent jobs at full buildout. Therefore, the Project would not generate substantial population growth. Existing infrastructure systems are adequate to serve the Project and therefore no improvements to infrastructure are needed to serve the Project. Consequently, the Project would provide hospital emergency medical services (EMS) for community disaster preparedness, medical check-ups and services at the MOBs, and provide resources and services for those with medical needs at the independent facility, assisted living facility, and skilled nursing facility, within the Riverside community and Inland Empire region. Impacts would be less than significant (Initial Study, p. 45-46).

Threshold: Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Finding: No impact. (Initial Study, p. 46).

Explanation: The Project site does not currently support any housing; therefore, substantial numbers of existing housing would not be displaced and the construction of replacement housing elsewhere would not be necessary as a result of the Project. No impact would occur (Initial Study, p. 46).

Threshold: Would the Project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Finding: No impact. (Initial Study, p. 46).

Explanation: The Project site does not currently support any housing; therefore, substantial numbers of people would not be displaced, necessitating the construction of replacement housing elsewhere, as a result of the Project. Therefore, no impacts are expected (Initial Study, p. 46).

N. Public Services

1. Governmental Facilities

Threshold: 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 fire protection services?

Finding: Less than significant impact. (DEIR, p. 4.10-5 – 4.10-7).

Explanation: The City of Riverside Fire Department (RFD) operates three fire stations in the vicinity of the Project site. Although the Project will create increased demand for fire protection, emergency medical, prevention, and rescue fire services that will be manifested by an increased number of emergency and public service calls, development of the Project site was previously

considered and analyzed as part of the Canyon Springs Business Park Specific Plan Project and the City of Riverside General Plan 2025 Project (2007). The Canyon Springs Business Park Specific Plan envisioned a medical campus along its southern boundary, which encompasses a portion of Site C. The Project site and surrounding area is designated for commercial use in the General Plan. In addition to previous evaluations and consideration of hospital and office uses on site, Project buildings will be constructed in compliance with the most current iteration of the California Building Code and applicable RFD requirements. The Project will be designed to meet safety equipment standards, provide adequate emergency access, and will include fire hydrants and fire sprinklers with appropriate water flows. Fire hydrants and fire sprinklers will aid in initial response to fires occurring in Project buildings. Two of the stations in the vicinity include an aerial ladder truck, and these apparatuses will respond to calls at the Project site and currently respond to calls from multistory development in the surrounding developed area. Because fire stations with aerial ladder trucks are located in the vicinity and Project buildings will be constructed in compliance with the most current iteration of the California Building Code and applicable RFD requirements, new or physically altered government facilities will not be required to accommodate the Project. Therefore, Project impacts to fire protection services will be less than significant (DEIR, p. 4.10-6 – 4.10-7).

Threshold: 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: police protection; schools; parks; and/or other public facilities?

Finding: Less than significant impact. (Initial Study, p. 46-47).

Explanation:

Police Services

Project components such as the senior housing and independent facility, assisted living, and skilled nursing facility, would generate housing for the “age-restricted group” and those needing medical assistant living; however, these groups of people would likely come from the surrounding community, and thus, would not substantially increase population in Riverside requiring the need for additional police services. In the event of medical emergencies, police officers along with emergency medical technicians could transport those individual(s) to the hospital on-site. Additionally, the Project would result in approximately 2,450 new permanent jobs on the Project site; however, the Project is not expected to substantially increase emergency calls to the City’s Police Department as typical land uses requiring more police services generally include commercial and industrial uses, and residential development. Therefore, it is anticipated that the Project site can be adequately served by existing police services in the City. Priority 1 calls are typically of a life-threatening nature, such as a robbery in process or an accident involving bodily injury (City of Riverside 2007c). Police officers strive to respond within 7 minutes to Priority 1 calls. The Project is not expected to result in new facilities that would be needed to serve the Project. Therefore, impacts would be less than significant (Initial Study, p. 46-47).

Schools

The proposed senior housing is not anticipated to result in a substantial increase in demand for schools as the proposed use would be geared towards the aging population; thus, not requiring educational facilities or services. The other Project components do not propose residential uses and, therefore, would not be expected to result in an increased demand for schools. Impacts would be less than significant (Initial Study, p. 47).

Parks

The proposed senior housing and assisted living are not anticipated to result in a substantial increase in demand for parks. The other Project components do not propose residential uses and, therefore, are not expected to result in an increased demand for parks. Thus, no deterioration of existing facilities would occur. Nonetheless, the Riverside Municipal Code requires applicable fees to be paid to mitigate the potential impact to park development and open space needs generated by the Project. Impacts would be less than significant (Initial Study, p. 47).

Other Public Facilities

No other public facilities or services other than police and fire protection are anticipated to serve the Project. Impacts would be less than significant (Initial Study, p. 47).

O. Recreation

1. Existing and New Facilities

Threshold: 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?

Finding: Less than significant impact. (Initial Study, p. 47-48).

Explanation: The proposed senior housing and assisted living are not anticipated to substantially increase the use of existing parks or recreational facilities. The other Project components would not include residential type uses or businesses that would increase the use of existing parks or recreational facilities. Thus, no deterioration of existing facilities would occur. Nonetheless, the Riverside Municipal Code requires applicable fees to be paid to mitigate the potential impact to park development and open space needs generated by the Project. Impacts are less than significant (Initial Study, p. 47-48).

Threshold: 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?

Finding: Less than significant impact. (Initial Study, p. 48).

Explanation: The Project does not include recreational facilities or require the construction or expansion of recreational facilities. The Riverside Municipal Code requires applicable fees to be paid to mitigate the potential impact to park development and open space needs generated by the Project. Therefore, impacts would be less than significant (Initial Study, p. 48).

P. Transportation and Traffic

1. Applicable Plans, Ordinances, and Policies

Threshold: Would the project conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Finding: Less than significant impact to Existing with Project Conditions (Roadway Segment Capacity and Freeway Merge/Diverge Analysis); Cumulative Conditions (Freeway Merge/Diverge Analysis, Roadway Segment Capacity Analysis, and Traffic Signal Warrants Analysis); General Plan Buildout (Roadway Segment Capacity Analysis and Traffic Signal Warrants Analysis); Progression Analysis along Eucalyptus Avenue and Day Street; Site Access and Circulation; and Bicycle, Pedestrian, and Transit Circulation (DEIR, p. 4.11-43–4.11-77).

Explanation:

Existing with Project Conditions

Roadway Segment Capacity Analysis

The study area roadway segments are anticipated to continue to operate at acceptable level of service (LOS). The roadway segment capacities are approximate figures only, and are used to assist in determining the roadway functional classification (number of through lanes) needed to meet vehicle demand. Review of the peak hour intersection analysis results indicate an acceptable LOS for both study area intersections and roadway segments (DEIR, p. 4.11-43 – 4.11-44).

Freeway Merge/Diverge Analysis

The I-215 southbound on-ramp at Eucalyptus Avenue will continue to operate at an unacceptable LOS under Existing With Project Conditions. Other than this ramp, there are no new ramp locations anticipated to exceed acceptable LOS. Even though the LOS is below the Caltrans standard, because the existing LOS is maintained and does not deteriorate, the impact is considered less than significant (DEIR, p. 4.11-45).

Cumulative Conditions

Freeway Merge/Diverge Analysis

There are no new ramp locations anticipated to exceed acceptable LOS, other than those identified under Existing Conditions (the I-215 southbound on-ramp at Eucalyptus Avenue will remain at an unacceptable LOS). Even though the LOS is below the Caltrans standard, because the LOS grade

is maintained from Without Project Conditions and does not deteriorate, the impact is considered less than significant (DEIR, p. 4.11-62–4.11-63).

Roadway Segment Capacity Analysis

Two study area roadway segments are anticipated to exceed the daily segment LOS thresholds in Cumulative Without Project Conditions: Eastridge Avenue – Eucalyptus Avenue, between I-215 and Valley Springs Parkway; and Day Street, south of Cottonwood Avenue. The addition of Project trips will not cause any additional roadway segments to exceed the daily segment LOS thresholds. For Cumulative without and With Project Conditions, roadway segments that are estimated to exceed the daily volume thresholds are further reviewed based on the more detailed peak hour intersection analysis, which explicitly account for factors that affect the roadway during peak periods. Review of the peak hour intersection analysis results indicate that the mitigations identified under Cumulative Conditions provide an acceptable LOS for both study area intersections and roadway segments (DEIR, p. 4.11-59 – 4.11-60).

Traffic Signal Warrants Analysis

Two unsignalized intersections are anticipated to meet traffic signal warrants in Existing With Project Conditions. There are no additional intersections anticipated to meet traffic signal warrants in Cumulative without and With Project Conditions (DEIR, p. 4.11-60).

General Plan Buildout

Roadway Segment Capacity Analysis

One study area roadway segment is anticipated to exceed the daily LOS threshold in General Plan Buildout Without Project Conditions: Day Street, south of Cottonwood Avenue. Two additional roadway segments are anticipated to exceed the daily LOS threshold in in General Plan Buildout With Project Conditions: Eastridge Avenue-Eucalyptus Avenue, between I-215 and Valley Springs Parkway and Day Street, south of Cottonwood Avenue. Review of the peak hour intersection analysis results indicate that the mitigations identified under General Plan Buildout With Project Conditions provide acceptable LOS for both study area intersections and roadway segments (DEIR, p. 4.11-68).

Traffic Signal Warrants Analysis

There are no new intersections anticipated to meet traffic signal warrants under General Plan Buildout Conditions, in addition to the intersections identified under Existing With Project Conditions (DEIR, p. 4.11-68).

Progression Analysis along Eucalyptus Avenue and Day Street

A traffic signal progression analysis was conducted for the following locations under Cumulative With Project Conditions and General Plan Buildout With Project Conditions, with the identified intersection improvements, to evaluate vehicular queuing by considering the signal timing and physical spacing of intersections: Eastridge Avenue-Eucalyptus Avenue, between Box Springs Boulevard and Valley Springs Parkway; and Day Street, between SR-60 Westbound ramps and Cottonwood Avenue. The turn lane queues at these locations are anticipated to clear efficiently and the turn bay pocket lengths provide adequate storage (DEIR, p. 4.11-74).

Site Access and Circulation

The Project site will provide access from Day Street, Corporate Centre Place, Valley Springs Parkway, Gateway Drive, and Canyon Park Drive. Regional access to the Project site will be provided by the I-215 freeway via Eucalyptus Avenue and the SR-60 freeway via Day Street. The roadways adjacent to the site - Valley Springs Parkway, Gateway Drive, Corporate Centre Place, Canyon Park Drive, and Day Street - are built to their ultimate cross-sections. Section 4.11.5 of the DEIR, Project Elements that Can Reduce Impacts, describes a number of improvements that will be constructed as part of the Project. Additionally, on-site signing and striping shall be implemented in conjunction with detailed construction plans for the Project site. With the incorporation of these Project elements, impacts to site access and circulation will be less than significant (DEIR, p. 4.11-77).

Bicycle, Pedestrian, and Transit Circulation

Implementation of the Project will not conflict with the applicable Bicycle Master Plans nor will it disrupt bicycle, pedestrian or transit circulation or planned facilities. The Project will include new sidewalks and crosswalks to improve pedestrian circulation on and adjacent to the Project site. The Project also includes a bus stop on the northbound side of Valley Springs Parkway south of the intersection with Gateway Drive. The bus stop will be ADA (Americans with Disabilities Act) compliant with an 8-foot by 5-foot boarding pad across the area that would otherwise be a landscaped buffer. Amenities will include a bench and a garbage can. The Project will improve circulation and access for pedestrians and transit users and will not conflict with any applicable plans for bicyclists, pedestrians and transit. Therefore, there is no impact associated with bicycle, pedestrian and transit circulation (DEIR, p. 4.11-77).

2. Traffic Hazards

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

Finding: Less than significant impact. (Initial Study, p. 49).

Explanation: All intersections, circulation improvements, and access to the Project site would be designed consistent with City roadway standards and would not create a hazard for vehicles, bicycles, or pedestrians entering or exiting the site. The Project does not include any other Project elements that could potentially create a hazard to the public. Access to the Project site would be designed according to City standards and would not create sharp curves or dangerous intersections. Further, the overall layout of the on-site circulation would not create an unsafe vehicle-pedestrian conflict points. Curb return radii will be confirmed by City Fire Department and Public Works staff during plan check review to ensure dimensions are adequate for passenger cars, ambulances, service/delivery trucks, and trash trucks. The alignment, spacing, and throating of the Project driveways is adequate and the circulation around the buildings is adequate with sufficient site distance along the drive aisles. As such, the Project would not increase hazards due to a design features or incompatible uses. Impacts would be less than significant.

3. Emergency Access

Threshold: Would the project result in inadequate emergency access?

Finding: Less than significant impact. (Initial Study, p. 49-50).

Explanation: Access to the Project site would be designed according to City standards and all applicable emergency access standards. Based on review of the preliminary site plan, the overall layout would not create any unsafe vehicle-pedestrian conflict points and the driveway throating is sufficient such that access to parking spaces is not impacted by internal vehicle queuing/stacking. Curb return radii will be confirmed by City staff during plan check review to ensure dimensions are adequate for passenger cars, ambulances, service/delivery trucks, and trash trucks. Project traffic is not anticipated to cause significant queuing/stacking on the Project driveways. The alignment, spacing, and throating of the Project driveways is adequate and circulation around the buildings is adequate with sufficient site distance along the drive aisles (Initial Study, p. 49-50).

The Project would provide adequate access to the Project site, including access for emergency vehicles. Construction activities during all phases that may temporarily restrict vehicular traffic would be required to implement adequate and appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures in accordance with the City's Emergency Operations Plan (EOP). Operation of the Project would not interfere with the City's EOP as driveways off of the roadways mentioned above would be made accessible for emergency vehicles. The Project applicant would be required to design, construct, and maintain structures, roadways, and facilities to comply with applicable local, regional, state, and/or federal requirements related to emergency access and evacuation plans. The proposed site plan, including the access driveways, would be reviewed and approved by the City's Fire Department during plan check review. Adherence to these requirements would ensure that potential impacts related to this level are less than significant (Initial Study, p. 50).

4. Alternative Transportation

Threshold: Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Finding: Less than significant impact. (Initial Study, p. 50).

Explanation: Implementation of the Project would not affect the bus stops at the Moreno Valley Mall, located less than a mile east of the Project site, and would not impact any bicycle facilities as none exists. Pedestrian facilities (e.g., sidewalks) along the roadways of the Project site have already been constructed and would not be impacted by the Project. The Specific Plan would incorporate guidelines that show pedestrian connectivity through the non-contiguous Project parcels. Thus, impacts to alternate modes of transportation would be less than significant (Initial Study, p. 50).

Q. Utilities and Service Systems

1. Water and Wastewater Treatment Facilities

Threshold: Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Finding: Less than significant. (Initial Study, p. 50).

Explanation: Wastewater facilities would be provided by the City of Riverside Public Works sewer system. Wastewater from the site would be treated at the City's Wastewater Treatment Plant located at the Regional Water Quality Control Plant. The primary sources of pollutants to storm water from the Project are construction activities and runoff from roofs and parking lots. The City's Public Works Department would review the Project to ensure that the Project is in compliance with the City's Wastewater Integrated Master Plan. Pursuant to the General Plan, the Regional Water Quality Control Plan has adequate planned capacity to meet the wastewater needs of all future Riverside residents and businesses. Since the Project would discharge its wastewater to a facility that is legally required to meet wastewater standards, impacts would be less than significant (Initial Study, p. 50).

Threshold: Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Finding: Less than significant. (Initial Study, p. 51-52).

Explanation: The Project would be required to connect to existing water and wastewater infrastructure to provide the necessary construction and water/sewer needs for the Project. The Project would connect to existing water and sewer lines adjacent to the Project site. A sewer flow study was prepared by Rick Engineering Company, dated January 2016 (revised February 2016) (Appendix D of the Initial Study). The Project site is located within the City's sewer system and ties into the Tequesquite Trunk Sewer. As part of the City's Wastewater Integrated Master Plan, a Trunk Sewer Study was prepared by PBS&J in 2003 and updated in 2014 by MWH Americas Inc. and Carollo Engineers Inc., which determined a projected average daily flow of 40 mgd for the City's sewer system.

Rick Engineering reviewed the Project and determined that the Project would generate approximately 26,869 gpd (0.04 cfs). The overall sewer flow with implementation of the Project would result in only an approximately 0.07% increase, which would result in an insignificant increase. Additionally, the City's Public Works Department would review the Project to ensure that the Project is in compliance with the City's Wastewater Integrated Master Plan. Impacts would be less than significant (Initial Study, p. 51-52).

Threshold: 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?

Finding: Less than significant impact. (Initial Study, p. 52-53).

Explanation: The Project site is located within the City's Public Works sewer service area. Wastewater from the Project site is currently treated at the City's Wastewater Treatment Plant located at the Regional Water Quality Control Plant and will continue to be treated at the City's Wastewater Treatment Plant with implementation of the Project (Initial Study, p. 52).

A sewer flow study was prepared by Rick Engineering Company dated January 2016 (revised February 2016) (Appendix D of the Initial Study). The Project site is located within the City's sewer system and ties into the Tequesquite Trunk Sewer. As part of the City's Wastewater Integrated Master Plan, a Trunk Sewer Study was prepared by PBS&J in 2003 and updated in 2014 by MWH Americas Inc. and Carollo Engineers, Inc., which determined a projected average daily flow of 40 mgd for the City's sewer system.

Rick Engineering reviewed the Project and determined that the overall sewer flow with implementation of the Project would result in only approximately 0.07% increase, which would result in an insignificant increase. Therefore, the City would have adequate capacity to serve the Project's projected wastewater demands. Impacts would be less than significant (Initial Study, p. 52-53).

2. Storm Water Drainage Facilities

Threshold: Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Finding: Less than significant impact. (Initial Study, p. 52).

Explanation: The Project would connect to the existing stormwater drainage facilities to provide the necessary drainage for the Project. The Project would also be required to comply with all rules, regulations, and other requirements of the City for use of stormwater facilities. A preliminary water quality management plan has been prepared for the Project. As outlined in this report, low impact development features such as bioretention and biotreatment best management practices would be implemented on site. Further detailed analysis would be performed to identify the exact locations of these retention facilities. Implementation of these best management practices would be in conformance with all applicable regulations such as the MS4 Permit, and would not create any significant environmental effects. Therefore, impacts would be less than significant. (Initial Study, p. 52).

3. Solid Waste

Threshold: Would the project comply with federal, state, and local statutes and regulations related to solid waste?

Finding: Less than significant (Initial Study, p. 53).

Explanation: The Project will comply with all state and local statutes or regulations related to solid waste generation, storage, and disposal, including the California Integrated Waste Management Act as amended and the City of Riverside Municipal Code, Title 6, Health and Sanitation. There are no federal regulations or statutes related to solid waste that apply to the Project. Impacts will be less than significant (Initial Study, p. 53).

4.2 FINDINGS REGARDING LESS THAN SIGNIFICANT IMPACTS AFTER THE INCORPORATION OF MITIGATION

The City Council hereby finds that feasible Mitigation Measures have been identified in the EIR that will avoid or substantially lessen the following potentially significant environmental impacts to a less than significant level. The potentially significant impacts, and the Mitigation Measures that will reduce them to a less than significant level, are as follows:

A. Air Quality

1. Sensitive Receptors

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

Finding: Less than significant impact. (DEIR, p.4.2-33 – 4.2-37).

Explanation: As described in Appendix H of the DEIR, SCREEN3 was used to calculate localized pollutant concentrations for construction and operational activity. Receptors were conservatively assumed to be located at about 25 meters (82 feet) south of the Project boundary for emissions of carbon monoxide (CO), coarse particulate matter (PM₁₀), and fine particulate matter (PM_{2.5}). For emissions of nitrogen dioxide (NO₂), discrete receptors were placed at 20, 50, 70, 100, 200, 500, 1,000, 2,000, 3,000, 4,000, and 5,000 meters from the fence line of the Project site to account for the change in oxides of nitrogen (NO_x) to NO₂ conversion as a function of distance (DEIR, p. 4.2-33).

Construction

Construction activities will not generate emissions in excess of any Localized Significance Thresholds (LSTs), as established by the South Coast Air Quality Management District (SCAQMD). This impact would be less than significant. In addition, **MM-AQ-1** would be required during construction to reduce regional emissions and will also reduce localized emissions (DEIR p. 4.2-33 – 4.2-34).

Operations

Unmitigated on-site operations will not generate emissions in excess of any SCAQMD LSTs. This impact will be less than significant (DEIR, p.4.2-34 – 4.2-35).

CO Hotspots

At buildout of the Project, the highest average daily trips on a segment of road would be 54,000 daily trips on Eucalyptus Avenue, east of I-215, which is below the daily traffic volumes that would be expected to generate CO exceedances as evaluated in the SCAQMD's 2003 Air Quality Management Plan (AQMP). There is no reason unique to the South Coast Air Basin (SCAB) meteorology to conclude that the CO concentrations along the Eucalyptus Avenue segment would exceed the 1-hour CO standard if modeled in detail, based on the studies undertaken for the 2003 AQMP. Based on the above considerations, localized CO impacts will be less than significant (DEIR, p. 4.2-35–4.2-36).

Health Risk Assessment

A Health Risk Assessment (HRA) was developed (included as Appendix H to the DEIR) in order to evaluate Project-related impacts to sensitive receptors (residential, schools) and adjacent workers as a result of exposure to particulate emissions from diesel-fueled engines (DPM) from heavy-duty diesel trucks accessing the Project site, routine emergency diesel generator testing, and from exposure to toxic air contaminants (TACs) from combustion of helicopter fuel. The SCAQMD has established that emissions of TACs are considered significant if an HRA shows an increased cancer risk of greater than 10 in 1 million). The incremental cancer risk at the nearby maximally exposed residential, worker, and school child receptors would be approximately 3.6, 0.6, and 0.4 in one million, respectively, which would not exceed the SCAQMD threshold of 10 in 1 million; therefore, impacts will be less than significant. The incremental noncancer risk at the nearby maximally exposed residential, worker, and school child receptors would each be approximately 0.002 in 1 million, which would not exceed the SCAQMD threshold of 1.0 in 1 million; therefore, impacts will be less than significant (DEIR, p. 4.2-36–4.2-37).

The following mitigation measure will be implemented:

MM-AQ-1 During construction activity, all construction equipment (≥ 150 horsepower) shall be California Air Resources Board (CARB) Tier 3 Certified or better. Additionally, during grading activity, total horsepower-hours per day for all equipment shall not exceed 24,608 horsepower-hours per day, and the maximum disturbance (actively graded) area shall not exceed 6 acres per day.

B. Biological Resources

1. Wetlands

Threshold: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Finding: Less than significant with mitigation. (DEIR, p. 4.3-14 – 4.3-15)

Explanation: Although no wetlands are present on Sites A and C, based on the review of historical aerial photographs, there is evidence of a possible definable bed and bank on Site B. Therefore, a jurisdictional delineation study was prepared for a drainage within Site B. The study determined

that this drainage qualifies as waters of the United States and falls under the jurisdiction of the U.S. Army Corps of Engineers (ACOE). Approximately 0.02 acres (253 linear feet) of ACOE jurisdiction (non-wetland waters) is located within the boundaries of Site B. The jurisdictional delineation is included in Appendix E of the DEIR. The ACOE regulates discharges of dredged or fill materials into waters of the United States, including wetlands, pursuant to Section 404 of the Clean Water Act (CWA). Mitigation measure **MM-BIO-1** shall be incorporated to ensure that the Project applicant obtains a CWA Section 404 permit prior to impacts occurring within ACOE-jurisdictional areas. The field investigation determined that no areas of the drainage within Site B exhibited wetland parameters as established by the ACOE (hydrophitic vegetation, hydric soil, and wetland hydrology). As such, no jurisdictional wetland features occur within Site B. Impacts related to wetlands will be less than significant. During the time of the field investigation, isolated or Rapanos conditions within the boundaries of Site B were not observed. Therefore, the Regional Water Quality Control Board (RWQCB) jurisdictional limit follows that of the ACOE and totals approximately 0.02 acres (253 linear feet). Therefore, mitigation measure **MM-BIO-1** shall be incorporated to ensure that the Project applicant obtains a RWQCB CWA Section 401 Water Quality Certification prior to impacts occurring within jurisdictional areas. The jurisdictional delineation study also determined that the drainage within Site B is considered a CDFW streambed. Implementation of **MM-BIO-1** would ensure that the Project applicant complies with Section 1602 of the California Fish and Game Code, including entering into a Streambed Alteration Agreement, if requested by CDFW, prior to impacts occurring within CDFW-jurisdictional areas. Upon implementation of **MM-BIO-1**, impacts related to waters of the state will be less than significant with mitigation incorporated (DEIR, p. 4.3-14–4.3-15).

The following mitigation measures will be implemented:

MM-BIO-1 Prior to issuance of grading permit on Site B, the Project developer/applicant shall obtain a Clean Water Act Section 404 permit, obtain a Regional Water Quality Control Board Clean Water Act Section 401 Water Quality Certification, and comply with Section 1602 of the California Fish and Game Code, including execution of a Streambed Alteration Agreement, if requested by the California Department of Fish and Wildlife (CDFW). All conditions of approval by these regulatory permitting agencies shall be adhered to by the Project.

2. Habitat Conservation Plans

Threshold: Would the project 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 with mitigation. (DEIR, p. 4.3-16 – 4.3-4.3-19)

Explanation: The Project site is located within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) area, and within the plan area of the SKR HCP (Stephens' Kangaroo Rat Habitat Conservation Plan).

Western Riverside County Multiple Species Habitat Conservation Plan

Although the Project site is located within the MSHCP Plan Area, it is not located in the Criteria Area. Since the Project site is not located in the Criteria Area, there are no conservation requirements for the Project site. The Project site is, however, still subject to review for consistency with Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pool), Section 6.1.3 (Protection of Narrow Endemic Plant Species), Section 6.3.2 (Additional Survey Needs and Procedures), and Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface) of the MSHCP.

Consistency with MSHCP Section 6.1.2

There are no riparian resources pursuant to Section 6.1.2 of the MSHCP on the Project site. The Project site supports one drainage feature that traverses Site B. This drainage is an unnamed, ephemeral drainage feature that flows north to south across Site B. The unnamed, ephemeral drainage does not contain biological functions and values that contribute to downstream habitat values, nor does it lead or connect to other downstream drainages that support covered species inside the MSHCP Conservation Area. Therefore, the drainage on site is not considered a riparian or riverine area pursuant to the MSHCP. No indicators of ponding or vernal pool plant species were observed during the site visit. No topographic low points or indicators of ponding are present on historic aerial photographs or topographic maps. Despite the presence of an ephemeral drainage previously described, the soils present within Site B include Cieneba rocky sandy loam, Monserate sandy loam, and Hanford coarse sandy loam, which are all well-drained soils not associated with vernal pools. Based on the soils present, the field visit, and a historical aerial photograph review, the Project site was determined not to support vernal pools or fairy shrimp habitat. Therefore, the Project demonstrates compliance with Section 6.1.2 of the MSHCP (DEIR, p. 4.3-16 – 4.3-17).

Consistency with MSHCP Section 6.1.3

Section 6.1.3 of the MSHCP sets forth survey requirements for certain narrow endemic plants. The Project site is not located within the Narrow Endemic Plant Species Survey Area and therefore will not conflict with Section 6.1.3 of the MSHCP (DEIR, p. 4.3-17).

Consistency with MSHCP Section 6.3.2

The Project is located within an MSHCP Additional Survey Area for burrowing owl. A habitat assessment for burrowing owls was conducted to identify suitable habitat for burrowing owl. No burrowing owls or potential signs of burrowing owl (e.g., owl pellets, prints, molting feathers, abundant insect remains) were detected during the burrowing owl habitat assessment. Because suitable nesting habitat (burrows) exists, mitigation measure **MM-BIO-2** shall be incorporated so that a focused burrow survey is conducted prior to commencement of construction to determine if burrowing owls are present. Additionally, in accordance with the MSHCP, all project sites containing burrows or suitable habitat, whether owls were found or not, require preconstruction surveys that are to be conducted within 30 days prior to ground-disturbing activities for projects within the MSHCP Plan Area. Further, the entire Project site provides suitable habitat for nesting birds. Direct impacts to migratory birds must be avoided in accordance with the Migratory Bird Treaty Act and California Fish and Game Code. If ground-disturbing activities occur during the avian nesting season, preconstruction survey and avoidance measures, if nesting birds are present, must be conducted. Per mitigation measure **MM-BIO-3**, a pre-activity nesting bird survey will be implemented if activities are scheduled to occur during the avian

nesting season (from February 1 to August 30). With implementation of **MM-BIO-2** and **MM-BIO-3**, the Project would comply with Section 6.3.2 of the MSHCP (DEIR, p. 4.3-17–4.3-18).

Consistency with MSHCP Section 6.1.4

MSHCP Section 6.1.4 addresses the need for certain projects to incorporate measures to address urban/wildland interfaces in or near the MSHCP Conservation Area. The Project site is not located within a Criteria Cell and is not located within or next to any MSHCP Conservation Areas that will require the need for implementation of Urban/Wildland Interface Guidelines. Thus, the Project would not conflict with Section 6.1.4 of the MSHCP. In addition, as part of MSHCP compliance, pursuant to the provisions of Ordinance No. 6709, the Project applicant will be required to pay the Local Development Mitigation Fee at the time building permits are issued (DEIR p. 4.3-18).

Stephens' Kangaroo Rat Habitat Conservation Plan

The Project site is located in the plan area of the SKR HCP, which is implemented by the Riverside County Habitat Conservation Authority. The City is a Permittee to the SKR HCP. The Project site is located outside the SKR Management Areas of the HCP. As a result, impacts related to SKR fees are considered to be less than significant (DEIR p. 4.3-18).

The following mitigation measures will be implemented:

MM-BIO-2 In accordance with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), potentially suitable habitat to support burrowing owl is present within the Project site. Prior to the initiation of grading and construction activities, a qualified biologist shall conduct focused surveys for burrowing owl in accordance with the Burrowing Owl Survey Instructions for the MSHCP Area (dated March 29, 2006), which includes four site visits during the burrowing owl breeding season (March 1–August 31).

Preconstruction clearance surveys for burrowing owl shall be conducted within 30 days of the commencement of site disturbance to determine whether burrowing owl is present at the site. Preconstruction surveys shall include suitable burrowing owl habitat within the Project footprint and an appropriate buffer as required in the most recent guidelines and where legal access to conduct the survey exists. If burrowing owls are not detected during the clearance survey, no additional mitigation is required.

If burrowing owl is detected, occupied burrowing owl burrows shall not be disturbed during the nesting season (February 1–August 31) unless a qualified biologist approved by CDFW verifies through noninvasive methods that either the birds have not begun egg-laying and incubation or that juveniles from the occurred burrows are foraging independently and capable of independent survival. A 500-foot nondisturbance buffer (where no work activities may be conducted) will be maintained between Project activities and nesting burrowing owls during the nesting season, unless otherwise authorized by CDFW. If burrowing owl is detected during the nonbreeding season (September 1–January 31) or confirmed to not be nesting, a 160-foot nondisturbance buffer will be maintained between the Project

activities and occupied burrow. If disturbance of burrowing owl cannot be avoided, passive or active relocation of burrowing owls will be implemented. Relocation will be conducted by a qualified biologist in accordance with procedures set forth by the MSHCP. Relocation of occupied burrows will be conducted outside the breeding season (February 1–August 31), pursuant to the California Fish and Game Code and the Migratory Bird Treaty Act.

MM-BIO-3 In order to avoid potential impacts to nesting birds in conformance with the Migratory Bird Treaty Act and California Fish and Game Code during all phases of the Project, a qualified biologist will conduct a nesting bird survey within 1 week prior to the commencement of any ground-disturbing activities from February 1 to August 31, which covers the breeding season for most birds that may occur in the Project area. If active nests are not observed, no further mitigation is required. However, if an active bird nest is found, the nest will be flagged and mapped on the construction plans along with an appropriate buffer, which will be determined by a qualified biologist based on the biology of the species. The nest area will be avoided until the nest is vacated and the juveniles have fledged or the nest is determined to be inactive (no eggs or young). The nest area will be demarcated in the field with flagging and stakes or construction fencing for avoidance.

C. Cultural Resources

1. Archaeological Resources

Threshold: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Finding: Less than significant with mitigation. (DEIR, p. 4.4-23 – 4.4-29)

Explanation: A cultural records search was prepared for the Project. The area covered in the search included the Project site and the surrounding one mile. Although 77 cultural resources have been previously recorded within a 1-mile radius of the Project area, none of these resources are located within the actual Project's area of potential effect (APE).

Native American coordination for the Project was initiated on July 9, 2015, independent of consultation efforts under AB 52 and SB 18. Responses have been received from Agua Caliente Band of Cahuilla Indians' Tribal Historic Preservation Office, Morongo Band of Mission Indians, and Pauma Band of Luiseno Indians, the Pala Tribal Historic Preservation Office, Rincon Band of Luiseno Indians, as well as a second response from the Agua Caliente Band of Cahuilla Indians. The Agua Caliente Band of Cahuilla Indians requested a condition to be included regarding discovery of human remains; the Morongo Band of Mission Indians requested that standard development conditions were provided for discovery of human remains and discovery of Native American cultural resources; the Pala Tribal Historic Preservation Office has no objection to the Project as currently planned but defers to tribes in closer proximity to the Project area. All tribes responding to outreach have requested that they be notified and included in further discussions should yet-identified cultural resources be encountered.

Since the Project includes the creation of a new Canyon Springs Healthcare Campus Specific Plan and an Amendment to the Canyon Springs Business Park Specific Plan, a SB 18 consultation process was initiated by the City with the tribes listed by the Native American Heritage Commission (NAHC) for the Project. Additionally, in accordance with AB 52, agency-to-agency consultation by the City was conducted by sending a formal notice to inform California Native American tribes that have requested such notice of a project application within a geographic area with which the tribe is traditionally and culturally affiliated.

The Pechanga Band of Luiseño Indians requested consultation pursuant to AB 52, and the Soboba Band of Luiseño Indians requested consultation pursuant to SB 18, with the City. The Pechanga tribe provided recommendations regarding monitoring of the Project site during construction, but did not identify any known tribal resources within the Project site. The Soboba tribe also provided a list of potential mitigation measures and monitoring recommendation for the Project. Both tribes identified that the Project is proposed to be located within an area identified to have the potential to contain cultural resources; therefore, mitigation measures **MM-CUL-1** through **MM-CUL-4** have been identified for the Project in order to reduce impacts to archaeological resources to less than significant. These mitigation measures would be required for the Project as a condition of approval.

Two pedestrian field surveys were performed for the Project, one encompassing three sites where major ground disturbing activities would occur, and one encompassing the entire Specific Plan area. No archaeological resources were observed within either pedestrian field survey. Nonetheless, mitigation measures **MM-CUL-1** through **MM-CUL-4** will be incorporated in case unknown resources are discovered and in consideration of the Pechanga Band of Luiseño Indians' and Soboba Band of Luiseño Indians' concerns related to work in the Project site. Therefore, impacts are considered less than significant with mitigation incorporated.

The following mitigation measures will be implemented:

MM-CUL-1 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 interested tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and interested 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.

MM-CUL-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 interested 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, tribes, 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-CUL-4**.

MM-CUL-3 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. **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
2. **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. For purposes of conflict resolution, if more than one Native American tribe or band is involved with the project and cannot come to an agreement as to the disposition of cultural materials, they shall be curated at the Western Science Center or Riverside Metropolitan Museum 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 interested tribes.

MM-CUL-4 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.

2. Paleontological Resources

Threshold: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Finding: Less than significant with mitigation. (DEIR, p. 4.4-29).

Explanation: The County of Riverside General Plan Paleontological Sensitivity map indicates that the Project site is of High Sensitivity for paleontological resources. This sensitivity classification is based on geologic units with the potential to encounter paleontological resources at depths of 4 feet or greater below the surface. Given the potential High Paleontological Sensitivity on the

Project site, mitigation measure **MM-CUL-1** through **MM-CUL-4** will be incorporated. Therefore, impacts are considered less than significant with mitigation incorporated. Mitigation measures **MM-CUL-1** through **MM-CUL-4** are discussed in their entirety above.

D. Greenhouse Gas Emissions

1. GHG Generation

Threshold: Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Finding: Less than significant after the incorporation of mitigation. (DEIR, p. 4.5-29 – 4.5-33).

Explanation: The Project will result in approximately 3,751 metric tons of CO₂ equivalent (MT CO₂E) for total construction, which amortized over 30 years will be approximately 125 MT CO₂E per year. GHG emissions generated during construction of the Project will be short-term in nature, lasting only for the duration of the construction period, and will not represent a long-term source of GHG emissions. Because the SCAQMD has not yet proposed or adopted a GHG threshold for construction, the amortized construction emissions are added to the operational emissions and considered in the operational emissions analysis. The total amount of Project-related GHG emissions when accounting for applicable regulatory developments that will reduce GHG emissions from direct and indirect sources combined will total approximately 25,863 MT CO₂E. Construction **MM-AQ-1** and operational measures **MM-AQ-2** through **MM-AQ-6** are incorporated into the estimated Project-generated mitigated GHG emissions to the extent the measures reduce GHG emissions. This results in a 28.38% reduction from the baseline scenario. Thus, with implementation of regulatory developments, the Project's GHG reduction will exceed the City's reduction target of 15%. Since the City CAP was developed consistent with the reduction goals of AB 32 and the Project will be consistent with the City CAP, the Project will also be consistent with AB 32. The 28.38% reduction is consistent with the target reduction percentage of 15% below 2010 levels based on the City's CAP analysis supporting AB 32. Therefore, impacts related to GHG emissions are considered less than significant with mitigation incorporated. Mitigation measure **MM-AQ-1** is contained in their entirety in Section 4.2-A1 of this document. Mitigation Measures **MM-AQ-2** through **MM-AQ-6** are contained in the entirety in Section 4.3-A1 of this document.

E. Hazards and Hazardous Materials

1. Airport Hazards

Threshold: 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 for people residing or working in the project area?

Finding: Less than significant with mitigation. (DEIR, p.4.6-15 – 4.6-17).

Explanation: The Project site is located within Zone D, Flight Corridor Buffer, of the March ARB/Inland Port Airport Land Use Compatibility Plan (LUCP). The Project would not conflict

with the uses allowed in Zone D. A helistop/helipad is proposed on the rooftop of the hospital and there could be the potential for a wireless communication facility permitted on top of parking structures. Depending on the specific locations and top elevations (above mean sea level) for wireless communications antennae, per **MM-HAZ-2**, the Project applicant will submit plans to the Federal Aviation Administration (FAA) if the notification criteria in Part 77 of the Federal Aviation Regulations (FAR) are met. Further, mitigation measure **MM-HAZ-3** will reduce the risk of bird-aircraft strikes for March Air Reserve Base (March ARB) or other aircraft transiting the vicinity of the Project site. Regarding the proposed hospital building on Site C, which is the tallest building within the Project by at least 40 feet, based on the distance from the runway, FAA review will be required for any portion of the hospital structure exceeding 1,664 feet AMSL, which will correspond with a maximum building height on the hospital site of approximately 106.4 feet. In the event Project construction or operation requires the use of cranes or other equipment that will exceed 1,676 feet AMSL at Site A, 1,669 feet AMSL at Site B, and/or 1,664 feet above mean sea level (AMSL) at the hospital, MOB 1, 2, or Parking Structure 2 areas of Site C, or 1,660 feet AMSL at the MOB 3, 4, 5 or Parking Structure 1 areas of Site C, mitigation measure **MM-HAZ-1** requires the applicant to notify the FAA.

March ARB has three noise contours: 65 dB CNEL, 60 dB CNEL, and 55 dB CNEL, with 65dB CNEL representing the highest noise exposure contour which is found closer to the airport runway. The Project site is located within Zone D, which is within or near the 55 CNEL contours.

The Project will be reviewed by the Riverside County Airport Land Use Commission (ALUC) for consistency with the LUCP, as required. The Project applicant will be required to submit a FAA Form 7460-1 to the FAA to ensure compliance with the FAA standards and airspace obstruction-clearance criteria per Part 77 of the FAA regulations. Additionally, the Project applicant will need to go through the March ARB, the ALUC, the Riverside City Council, and the Caltrans Division of Aeronautics for review and approval of the proposed rooftop helistop. Based on California's Public Utilities Code, the Project requires specific approval by the Riverside City Council before Caltrans' Division of Aeronautics can permit the helistop. Mitigation measures **MM-HAZ-1**, **MM-HAZ-2**, and **MM-HAZ-3** shall be incorporated so that all conditions of approval from the FAA, March ARB, the ALUC, Riverside City Council, and Caltrans Division of Aeronautics are included as part of the Project to ensure safety for patients, seniors, visitors, physicians, or staff residing or working on the Project site. As a result, impacts are considered less than significant with mitigation incorporated.

The following mitigation measures will be implemented:

MM-HAZ-1 A minimum of 45 days prior to submittal of an application for a building permit, the Project developer/applicant shall inform the City of Riverside Planning Division and Building and Safety Division if any Project-related vertical structures or construction equipment will exceed 1,664 feet above mean sea level (AMSL). Prior to construction, if it is determined that any Project-related vertical structures or construction equipment will exceed 1,664 AMSL, then at the beginning of construction, the Project developer/applicant shall submit a Federal Aviation Administration (FAA) Form 7460-1 to the FAA to ensure compliance with the FAA standards and air space obstruction-clearance. If FAA Form 7460-1 is required to be filed, the City shall not issue a building permit until the FAA issues

a determination stating that the proposed construction will not be a hazard to air navigation.

MM-HAZ-2 The Project developer/applicant shall submit applicable applications, plans and fees for the proposed helipad/helistop to the March Air Reserve Base (March ARB), Riverside County Airport Land Use Commission (ALUC), City of Riverside Planning Division, and California Department of Transportation (Caltrans) Division of Aeronautics for review and approval. All conditions of approval from FAA, March ARB, and Riverside County ALUC shall be adhered to by the Project.

MM-HAZ-3 The following additional March ARB-required risk-reduction Project design features shall be incorporated into Project design:

- **Reduce bird attractants at the Project site.** To avoid increasing the risk of bird-aircraft strikes for March ARB or other aircraft transiting the vicinity of the Project site, the following measures shall be taken:

Project Design: When possible, the Project shall incorporate passive bird exclusion designs into the structural design. Windows, ledges, roof edges, air vents and other features shall be designed to prevent roosting if possible, by incorporating angles of 45 degrees or more. For problem areas such as flat roofs where it is difficult to create slopes, the Project developers shall install a physical barrier to perching such as bird spikes, bird netting, or bird wire. The Project operator shall maintain these physical barriers to remove accumulated debris and ensure they continue to function. Installation of bird exclusion devices shall be by an experienced specialist, and any installation shall comply with the Migratory Bird Treaty Act, Endangered Species Act, California Endangered Species Act, and any other applicable federal, state, or local regulations.

The Project developer and operator shall ensure that stormwater drainage does not allow for ponding of water on site or adjacent to the Project site.

Project Construction: During construction, all trash shall be disposed of in enclosed bins. Feeding of birds by workers on the Project site shall be prohibited. The prohibition of bird feeding shall be part of the construction personnel training directive as a requirement of daily working conditions. The construction contractor shall be responsible for monitoring and enforcing this requirement.

Project Landscaping: The Project shall avoid the creation of large areas of turf grass or open water. When selecting landscaping trees, bushes, or other ornamental landscaping, the Project shall avoid planting any that produce fruit. Bird perching on Project landscaping shall be monitored by Project operators, and any landscaping that attracts substantial numbers of birds shall be removed and replaced with another variety.

- The take-off and landing patterns from the proposed helicopter operations shall be designed in a way to avoid conflicts with March ARB's flight operations.
- The helistop shall be designed per FAA criteria with dimensions of 65 feet x 65 feet to serve the larger Sikorsky UH-60 Blackhawk helicopter for response to mass casualty events, especially if and when the hospital achieves trauma center status.
- Proposed flight paths shall be to and from the southwest and to and from the northwest for noise-abatement reasons, as well as to minimize potential conflicts with March Air Reserve Base/Inland Port Airport fixed-wing traffic.

F. Land Use and Planning

1. Plans, Policies, or Regulations

Threshold: Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the airport land use plan, or zoning ordinance) adopted for the purpose of avoiding mitigating an environmental effect?

Finding: Less than significant with mitigation. (DEIR, p. 4.8-13 -- 4.8-31).

Explanation:

Project-Level and Program-Level Elements

To ensure consistency between the Specific Plan and the City's General Plan 2025, the General Plan will be amended concurrently with the adoption of the Specific Plan to incorporate and recognize that the "Canyon Springs Healthcare Campus Specific Plan" land use designation replaces the commercial zoning and "Canyon Springs Business Park Specific Plan" designations for that area. The DEIR includes a consistency analysis of the Project with General Plan. Upon implementation of mitigation measures in the categories of air quality (**MM-AQ-1** through **MM-AQ-6**), cultural resources (**MM-CUL-2** and **MM-CUL-4**), noise (**MM-NOI-1**), transportation/traffic (**MM-TRAF-1** through **MM-TRAF-12**), and utilities and service systems (**MM-UTL-2** and **MM-UTL-3**), the Project would be consistent with applicant General Plan policies, and impacts would be less than significant with mitigation incorporated.

Mitigation measure **MM-AQ-1** is contained in its entirety in Section 4.2-A1 of this document. Mitigation Measures **MM-AQ-2** through **MM-AQ-6** are contained in their entirety in Section 4.3-A1 of this document. Mitigation measures **MM-TRAF-1** through **MM-TRAF-12** are contained in their entirety in Section 4.2-H1 of this document. Mitigation measure **MM-NOI-1** is contained in its entirety in Section 4.2-G1 of this document. Mitigation measures **MM-UTL-2** and **MM-UTL-3** are contained in their entirety in Section 4.2-I2 of this document. Mitigation measures **MM-CUL-2** and **MM-CUL-4** are contained in their entirety in Section 4.2-C1 of this document (DEIR, p. 4.8-13 –4.8-30).

Encroachment Permits

The Project is adjacent to the RCFCWCD Canyon Springs Basin and overlies the Department of Water Resources (DWR) right-of-way for the Santa Ana Pipeline. The applicant's contractor

would be required to obtain all necessary encroachment permits prior to construction and would also be required to comply with all applicable encroachment permit guidelines and any permit conditions. Upon obtaining the required permits and complying with the stipulations of the permits, the Project would comply with the land use adjacency regulations associated with RCFCWCD and DWR rights-of-way, easement, or facilities. Impacts are considered less than significant (DEIR, p. 4.8-30).

Municipal Code Consistency

Title 19, Zoning Code, the Zoning Map will be amended concurrent with adoption of Specific Plan to include a Canyon Springs Healthcare Campus Specific Plan Zone to replace the existing CR SP – Commercial Retail and Specific Plan (CSBPSP) Overlay Zones and O SP – Office and Specific Plan (*Canyon Springs Business Park Specific Plan*) Overlay Zones. The Specific Plan also complies with Chapter 19.820, Specific Plan/Specific Plan Amendments, of the City of Riverside Zoning Code (DEIR, p. 4.8-30).

As such, the Project will be consistent with the applicable plans, policies, and regulations related to land use upon adoption of the proposed amendments to the General Plan 2025 and Zoning Map; therefore, impacts are considered less than significant with mitigation (DEIR, p. 4.8-31).

Threshold: Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Finding: Less than significant with mitigation. (DEIR, p. 4.8-31).

Explanation: A discussion of the Project's consistency with any applicable habitat conservation plan or natural community conservation plan is addressed in Section 4.2-B1. As discussed in this Section, with implementation of mitigation measures **MM-BIO-2** and **MM-BIO-3** impacts would be less than significant (DEIR, p. 4.3-16 – 4.3-19, p. 4.8-31). Mitigation measures **MM-BIO-2** and **MM-BIO-3** and are contained in their entirety in Section 4.2-B2 of this document.

G. Noise

1. Noise Exposure

Threshold: Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Finding: Less than significant with mitigation. (DEIR, p. 4.9-19 – 4.9-39).

Explanation:

Short-Term Construction Noise Impacts

Noise impacts originating from the construction of the Project were evaluated against standards established under a City's Municipal Code. Project construction will be limited to the hours of 7:00 a.m. to 7:00 p.m. on weekdays and 8:00 a.m. to 5:00 p.m. on Saturdays, with no activities

allowed on Sundays or federal holidays, consistent with the Section 7.35.010 of the City of Riverside Municipal Code. Section 7.35.020 of the City of Riverside Municipal Code exempts construction noise for construction activities that occur in compliance with the provisions of Section 7.35.010 of the City of Riverside Municipal Code. Thus, impacts would be less than significant (DEIR, p. 4.9-19 – 4.9-20).

Long-Term Operational Noise Impacts

To estimate the potential stationary-source noise impacts, reference noise level measurements were collected from similar types of activities to represent the noise levels expected with the development of the Project. Projected noise levels assume the worst-case noise environment with parking structure and parking lot vehicle movements, mechanical equipment (rooftop heating, ventilation and air conditioning (HVAC)), emergency backup generators (central energy plant), helicopter activities, and other ancillary uses all operating simultaneously. In reality, these noise level impacts will vary throughout the day (DEIR, p. 4.9-20 – 4.9-21).

Emergency vehicle-related noise sources (e.g., sirens, horns), are exempt from the California Vehicle Code. Reference noise level measurements were collected to represent noise levels from parking structure vehicle movement, parking lot vehicle movement, rooftop HVAC equipment, emergency backup generators, and helicopter activities (including typical helicopter activities and trauma helicopter activities) (DEIR, p. 4.9-22 – 4.9-28).

Project Composite Operational Noise Levels

Using the reference noise levels for these sources, as well as Project-related noise level increases that will be expected to be generated by the Project, as well as the Project-related noise level increases that will be experienced at each of the sensitive receiver locations, were calculated. The calculations account for the distance attenuation provided due to geometric spreading when sound from a localized stationary source (i.e. point source) propagates uniformly outward in a spherical pattern. Project composite operational noise levels without helicopter activities are expected to range from an L₅₀ percentile of 39.1 dBA to 47.0 dBA at the nearby sensitive receiver locations during the daytime and nighttime hours and would not exceed allowable limits. Project composite operational noise levels with typical helicopter activity are expected to range from an L₅₀ percentile of 39.8 dBA to 47.5 dBA at the nearby sensitive receiver locations during the daytime and nighttime hours and would not exceed allowable limits. Project composite operational noise levels, with trauma helicopter activities, are expected to range from an L₅₀ percentile of 43.1 dBA to 53.6 dBA at the nearby sensitive receiver locations during the daytime and nighttime hours. Nighttime operational noise levels that include trauma helicopter activity could exceed the nighttime adjusted limit of 50 dBA L_{eq} at receivers R1, R3, and R4, resulting in a potentially significant operational noise impact. **MM-NOI-1** will address this potentially significant impact by requiring the final Project design plans, including as necessary, helicopter operations restrictions, flight pattern adjustments, and other means to achieve compliance with applicable regulations (DEIR, p. 4.9-28 – 4.9-34).

Project Operational Noise Level Compliance

The Riverside Municipal Code Section 7.25.010(B) directs that the allowable exterior noise exposure limit for each land use may be adjusted upward, if the ambient noise level already exceeds the

prescribed limit. The ambient measured noise level in the nighttime period was 46.7 dBA L_{eq} , which effectively raises the nighttime exterior noise exposure limit to 50 dBA L_{eq} .

Project operational noise levels without helicopter activities will satisfy the daytime and nighttime exterior noise level standards at the nearby sensitive receiver locations with the proposed 8-foot-high noise barrier. Additional attenuation is provided by the Project buildings which will be located between some noise sources and the receiver locations, with roof heights of up to 52 feet. Consequently, noise levels under this scenario will not exceed adopted applicable standards.

Operational noise levels with typical helicopter activity will also satisfy the daytime and nighttime City of Riverside exterior noise level standards at the nearby sensitive receiver locations with the proposed 8-foot-high noise barrier. Noise levels under this scenario will not exceed adopted applicable standards.

The Project's operational noise levels with trauma helicopter activities are anticipated to exceed the nighttime City of Riverside exterior noise level standards at receiver locations R3 and R4. Therefore, the Project-related emergency helicopter noise impacts are considered potentially significant, but will be reduced to a less than significant level via mandatory adherence to all the requirements Federal, State, Regional, and Local Agencies (see mitigation measure **MM-NOI-1** for agencies included). Trauma activity will only occur intermittently and does not represent the typical, daily operations at the Project site.

Project Noise Contribution

The Project will contribute operational stationary-source noise level increases of up to 5.5 dBA L_{50} (daytime) and 3.2 dBA L_{50} (nighttime) at nearby receiver locations. The daytime Project-related operational noise level increases of 5.5 dBA L_{50} at receiver location R1 and up to 5.0 dBA L_{50} at receiver location R3 result in combined exterior noise levels of 55.0 dBA L_{50} at R1, and 54.6 dBA L_{50} at R3, respectively. As such, the combined Project and ambient noise levels will remain below the City of Riverside Municipal Code noise level standards for community support land uses (60 dBA L_{50} for R1) and residential uses (55 dBA L_{50} for R3); therefore, the Project-related operational noise level contributions to the ambient noise levels at nearby sensitive receiver locations will be less than significant at receiver locations R1 and R3. Further, nighttime operational noise level increases with the Project are shown to be less than significant at all receiver locations with mitigation. In the absence of an 8-foot-high noise barrier, which has been included in the quantification of Project noise levels, the Project could result in potentially significant daytime and nighttime increases in ambient noise levels in the Project vicinity. As such, mitigation measure **MM-NOI-1** must be incorporated as part of the Project. With the incorporation of mitigation measure **MM-NOI-1**, the Project's operational stationary-source noise will not result in a substantial temporary/periodic, or permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project, and there will be a less than significant impact.

The Project will experience some background traffic noise impacts from the Project's internal streets; however, due to the distance, topography and low traffic volume/speed, traffic noise from these roadways will not make a significant contribution to the noise environment. As such, on-site traffic noise impacts will be less than significant.

The following mitigation measure will be implemented:

MM-NOI-1 Operational Noise Mitigation Measures

- Prior to certificate of occupancy for the proposed Hospital, Medical Office Building 3, Medical Office Building 4, or Parking Structure 1, whichever may be constructed first, the Project Applicant shall construct the proposed 8-foot-high perimeter wall (as shown on Figure 4.9-2) to reduce the operational noise levels at the adjacent sensitive receiver locations.
- Prior to certificate of occupancy for the proposed Hospital, the Project shall demonstrate compliance with the requirements of all federal, state, regional, and local agencies. At a minimum, such agencies include the Federal Aviation Administration, the Riverside County Airport Land Use Commission, the March Air Reserve Base/Inland Port Airport, the State of California Heliport Permitting process, and the City of Riverside Entitlement process.

H. Transportation and Traffic

1. Applicable Plans, Ordinances, and Policies

Threshold: Would the project conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Finding: Less than significant with mitigation Existing with Project Conditions for Intersection Operations Analysis; Cumulative Conditions for Intersection Operations; and General Plan Buildout for Intersection Operations Analysis (DEIR, p. 4.11-38 – 4.11-77).

Explanation:

Existing with Project Conditions

Intersection Operations Analysis

Based on a comparison of Existing Conditions to Existing With Project Conditions, the Project is anticipated to cause one intersection, Valley Springs Parkway/Eucalyptus Avenue (#4), to change from an acceptable LOS D to unacceptable LOS F during the PM peak hour. As such, the Project's potential to directly impact the intersection of Valley Springs Parkway/Eucalyptus Avenue is considered significant. Mitigation measure **MM-TRAF-1** shall be incorporated to reduce the peak hour delay and improve LOS to D or better for Existing With Project Conditions. With the implementation of mitigation measure **MM-TRAF-1**, impacts to traffic conditions at the Valley Springs Parkway/Eucalyptus Avenue intersection under the Existing With Project scenario will be less than significant (DEIR, p. 4.11-41).

Cumulative Conditions

Intersection Operations

For Cumulative With Project Conditions, the addition of Project trips will result in significant impacts at six locations: I-215 SB Ramps / Eucalyptus Avenue (LOS F and E – AM and PM peak hour, respectively), Valley Springs Parkway / Eucalyptus Avenue (LOS F – AM and PM peak hours), Day Street / Cottonwood Avenue (LOS E – PM peak hour), Day Street / Bay Avenue (LOS F – AM and PM peak hours), Day Street / Alessandro Boulevard (LOS E – AM and PM peak hours), and Memorial Way / Towngate Drive (LOS E – PM peak hour). In addition of implementing mitigation measure **MM-TRAF-1**, the incorporation of mitigation measures **MM-TRAF-2** through **MM-TRAF-7** will reduce off-site impacts associated with the development of the Project to less than significant levels for Cumulative With Project Conditions. Impacts will be less than significant with mitigation incorporated (DEIR, p. 4.11-57 – 4.11-58).

General Plan Buildout

Intersection Operations Analysis

The General Plan Buildout Without Project scenario includes traffic as forecasted from the City of Riverside General Plan 2025 traffic model, the City of Moreno Valley traffic model, and Riverside Transportation Analysis Model (RivTAM). Under General Plan Buildout With Project Conditions, the addition of Project traffic will result in a significant impact to seven intersections: I-215 ramps/Eastridge Avenue-Eucalyptus Avenue; I-215 southbound ramps/Eucalyptus Avenue (LOS F – AM peak hour; LOS E – PM peak hour), Valley Springs Parkway/Eucalyptus Avenue (LOS F – AM and PM peak hours), Day Street/Eucalyptus Avenue (LOS E – PM peak hour), Day Street/Cottonwood Avenue (LOS E – AM peak hour; LOS F – PM peak hour), Day Street/Bay Avenue (LOS F – AM and PM peak hours), Day Street/Alessandro Boulevard (LOS E – AM peak hour; LOS F – PM peak hour), and Memorial Way/Towngate Drive (LOS E – AM and PM peak hours). In addition to mitigation measures **MM-TRAF-1** through **MM-TRAF-7**, the implementation of mitigation measures **MM-TRAF-8** through **MM-TRAF-12** will reduce off-site traffic impacts associated with development of the Project to less than significant levels for General Plan Buildout With Project Conditions. Impacts will be less than significant with mitigation incorporated (DEIR, p. 4.11-65 – 4.11-66).

The following mitigation measures will be incorporated:

Existing With Project Conditions

MM-TRAF-1 Valley Springs Parkway/Eucalyptus Avenue (#4): Prior to opening the Project for operation, the Project developer/applicant shall pay for and install two five-section signal heads as well as modify the signal phasing such that there is an overlap phase for the existing dual right turn lanes on the southbound approach. The Project applicant will enter into an agreement with the City of Moreno Valley to complete these improvements.

Cumulative With Project Conditions

MM-TRAF-2 I-215 Southbound Ramps/Eucalyptus Avenue (#3): Prior to opening the Project for operation, the Project developer shall pay the Project's fair share of the cost for the installation of a traffic signal, and construct the traffic signal, to serve the southbound right turn only off-ramp and westbound through traffic. This configuration will be similar to the existing I-215 northbound right turn only off-ramp / Eucalyptus Avenue intersection design.

MM-TRAF-3 Valley Springs Parkway/Eucalyptus Avenue (#4): Prior to opening the Project for operation, the Project developer shall pay the Project's fair share of the cost to modify striping to provide a second left turn lane, in addition to the existing two through lanes on the northbound approach. The Project applicant will enter into an agreement with the City of Moreno Valley to complete these improvements if required by the City.

MM-TRAF-4 Day Street/Cottonwood Avenue (#13): Prior to opening the Project for operation, the Project developer shall pay the Project's fair share of the cost to widen Day Street to provide a separate right turn lane, in addition to the existing left turn lane and one through lane on the northbound approach. The Project applicant will enter into an agreement with the City of Moreno Valley to complete these improvements if required by the City.

MM-TRAF-5 Day Street/Bay Avenue (#14): Prior to opening the Project for operation, the Project developer shall pay the Project's fair share of the cost to complete the following improvements:

- Northbound approach: Install a traffic signal and widen Day Street to provide a second through lane.
- Southbound approach: Widen Day Street to provide a second through lane.

The Project applicant will enter into an agreement with the City of Moreno Valley to complete these improvements if required by the City.

MM-TRAF-6 Day Street/Alessandro Boulevard (#15): Prior to opening the Project for operation, the Project developer shall pay the Project's fair share of the cost to modify striping and the existing raised median to provide a second left turn lane, in addition to the existing three through lanes on the eastbound approach. The Project applicant will enter into an agreement with the City of Moreno Valley to complete these improvements if required by the City.

MM-TRAF-7 Memorial Day/Towngate Drive (#16): Prior to opening the Project for operation, the Project developer shall pay the Project's fair share of the cost to implement signal modifications for protected/permitted operations for both the

north/south movements and the east/west movements as well as modify the intersection to include the following geometrics:

- Southbound approach: Convert the existing second through lane to provide a dedicated right turn lane with overlap phasing, in addition to the existing left turn lane and one through lane.
- Eastbound approach: Retain existing two through lanes and defacto right turn lane.
- Westbound approach: Retain existing two through lanes and defacto right turn lane.

General Plan Buildout Conditions

MM-TRAF-8 Day Street/Eucalyptus Avenue (#12): Prior to opening the Project for operation, the Project developer shall pay fees for the TUMF program which includes modification of this intersection to provide a dedicated right turn lane with overlap phasing on the northbound approach. The Project applicant will enter into an agreement with the City of Moreno Valley to complete these improvements if required by the City.

MM-TRAF-9 Day Street/Cottonwood Avenue (#13): Prior to opening the Project for operation, the Project developer shall pay the Project's fair share of the cost to complete the following improvements:

- Eastbound approach: Widen Cottonwood Avenue to provide a separate right turn lane, in addition to the existing left turn lane and one through lane.
- Westbound approach: Provide overlap phasing for the existing right turn lane.

The Project applicant will enter into an agreement with the City of Moreno Valley to complete these improvements if required by the City.

MM-TRAF-10 Day Street/Alessandro Boulevard (#15): Prior to opening the Project for operation, the Project developer shall pay the Project's fair share of the cost to complete the following improvements:

- Northbound approach: Modify striping to provide a second through lane, in addition to the existing left turn lane and through lane.
- Southbound approach: Widen Day Street to provide a dedicated right turn lane.
- Westbound approach: Modify striping and existing raised median to provide a second left turn lane and widen Alessandro Boulevard to provide a third receiving lane.

The Project developer will enter into an agreement with the City of Moreno Valley to complete these improvements if required by the City.

MM-TRAF-11 Valley Springs Parkway/Driveway 5 (#23): Prior to opening the Project for operation, the Project developer shall pay for and install a traffic signal. Intersection geometries will be constructed as described in Section 4.11.5, *Project Design Features that Will Reduce Impacts*.

MM-TRAF-12 Canyon Park Drive – Driveway 7/Gateway Drive (#25): Prior to opening the Project for operation, the Project developer shall pay for and install a traffic signal. Intersection geometries will be constructed as described in Section 4.11.5, *Project Design Features that Will Reduce Impacts*.

2. Air Traffic Patterns

Threshold: 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?

Finding: Less than significant with mitigation. (DEIR, p. 4.11-79 – 4.11-80).

Explanation: The Project site is located within Zone D – Flight Corridor Buffer of the LUCP. The City will review the Project plans prior to plan check approval to ensure that there are no features on the Project site that will result in a heightened attraction to birds, thereby causing a change in air traffic patterns that results in a substantial safety risk. The Project is also located within a sector of March ARB Class C airspace. There are three different kinds of flight paths for March ARB. All three flight paths are clear of the Project site and will not interfere with helicopter flight paths. Further, pilots operating to and from the Canyon Springs Healthcare Campus hospital helistop will be in radio contact with March ARB Air Traffic Control. Air Traffic Control will provide traffic coordination including appropriate separation between fixed wing and helicopter traffic. Per mitigation measure **MM-TRAF-13**, prior to design approval, the Project plans will be submitted and approved by the March ARB Air Traffic Control. These plans and a subsequent letter of agreement will define specific flight paths and communication procedures. Further regulatory procedures are included in mitigation measure **MM-TRAF-14**. As such, with implementation of **MM-TRAF-13** and **MM-TRAF-14**, impacts would be less than significant.

The following mitigation measures will be incorporated:

MM-TRAF-13 Prior to approval of entitlements for the helistop by the City of Riverside Planning Commission and City Council, the developer/applicant shall submit plans to the March ARB Air Traffic Control for review and approval of plans related to the proposed helistop location and proposed helicopter flight path alignments to ensure no conflicts occur between the proposed helicopter flight paths and March ARB flight operations. A copy of the approved plans from March ARB Air Traffic Control shall be submitted to the City of Riverside Planning Division. A letter of agreement shall be developed between March ARB Air Traffic Control and the Canyon Springs Healthcare Campus operator. The letter of agreement will define specific flight paths and communication procedures for helicopter operations to and

from the hospital. The Canyon Springs Healthcare Campus operator will require all helicopter operators using the helistop to sign the letter of agreement.

MM-TRAF-14 Prior to approval of entitlements for the helistop by the City of Riverside Planning Commission/City Council, the following agency actions will be required with regards to the design, construction, and operation of the helistop:

- An FAA Form 7460-1 will be submitted.
- An airspace study by FAA staff per Part 157, Notice of Landing Area Proposal, of the Federal Aviation Regulations (FARs). This study results in an “airspace determination letter.”
- Project review and finding of consistency with the March ARB/Inland Port Airport Land Use Compatibility Plan by Riverside County Airport Land Use Commission as required by California Public Utilities Code.
- Application for and receipt of Heliport Site Approval Permit from Caltrans Division of Aeronautics authorizing heliport construction.
- After construction of the helipad a final inspection and approval of a Heliport Permit authorizing flight operations by Caltrans Division of Aeronautics.

I. Utilities and Service Systems

1. Water Supply

Threshold: Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Finding: Less than significant with mitigation. (DEIR, p. 4.12-10 – 4.12-12).

Explanation: The Project will be served by EMWD. A Water Supply Assessment (WSA) Report was prepared by EMWD to satisfy the requirements under SB 610, Water Code Section 10910 et seq., and SB 221, Government Code Section 66473.7 that adequate water supplies are, or will be, available to meet the water demand associated with the Project. As described in the WSA, the estimated demand for the Project is 216 acre feet per year (AFY). The estimated demand for the Project exceeds the projected demand accounted for in the 2010 Urban Water Management Plan (UWMP), and will therefore, exceed the projected demand estimated in the WSA (DEIR, p. 4.12-10 – 4.12-11). Mitigation measure **MM-UTL-1** will require the Project developed to meet with EMWD staff to develop a plan of service, detailing water, wastewater, and recycled water requirements to serve the Project. Additionally, mitigation measure **MM-AQ-3** will require the installation of water efficient devices and landscaping. With implementation of these mitigation measures, impacts would be less than significant.

The following mitigation measures will be incorporated:

MM-UTL-1 The developer/applicant of the Project shall be required to meet with Eastern Municipal Water District (EMWD) staff to develop a plan of service, which shall detail water, wastewater, and recycled water requirements to serve the Project.

Mitigation measure **MM-AQ-3** is discussed in its entirety in Section 4.3-A1 of this document.

2. Solid Waste

Threshold: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Finding: Less than significant with mitigation. (DEIR, p. 4.12-12 – 4.12-13).

Explanation: The City has authorized commercial hauling services to Athens Services, Burrtec, and CR&R Waste Services. Solid waste is collected and taken to the Robert A. Nelson Transfer Station, which is owned by the County of Riverside and operated under a 20-year franchise by Burrtec. Burrtec then transfers the waste to the Badlands Landfill, El Sobrante Landfill, or Lamb Canyon Landfill. These three landfills have a total combined remaining capacity of 69.1 million tons (DEIR, p. 4.12-12).

In regards to construction waste, the RCWMD will require the completion and submittal of a waste recycling plan to the RCWMD for approval prior to issuance of building permits for the Project site, which will be required as a Condition of Approval and is therefore included as mitigation measure **MM-UTL-2**. The waste recycling plan will identify and estimate the materials to be recycled during construction and demolition activities, and will specify where and how the recyclable materials will be stored on site. A waste recycling report that demonstrates that the Project recycled a minimum of 50% of its construction and demolition waste will then be approved by the RCWMD prior to issuance of occupancy permits (DEIR, p. 4.12-12).

All non-hazardous solid waste generated from the Project site (e.g., plastic/glass bottles and jars, paper, newspaper, metal containers, and cardboard) will be recycled per local and state regulations previously mentioned, with a goal of 75%, in compliance with the Integrated Waste Management Act. Remaining non-hazardous solid waste will be disposed of at one of the Riverside County landfills; hazardous waste will be disposed of in compliance with all applicable federal, state, and local laws. The RCWMD will review building plans and ensure that proper space is set aside to allow for the collection and storage of recyclable materials prior to issuance of building permits, which has been included as mitigation measure **MM-UTL-3**, to ensure that there is adequate space for recycling on the Project site (DEIR, p. 4.12-13).

If a recycling rate of 75% is assumed, 4 tons per day will be sent to an area landfill during Project operation. This amount represents approximately 0.02% of the total maximum permitted capacity (26,054 tons/day) of the three local landfills. As such, solid waste generated and disposed of in nearby landfills during operation of the Project is expected to be within the permitted capacity of the landfills. Mitigation measures **MM-UTL-2** and **MM-UTL-3** will ensure adequate space is allotted for recycling on site. Impacts will be less than significant (DEIR, p. 4.12-13).

The following mitigation measures will be incorporated:

MM-UTL-2 Prior to issuance of building permits, the developer/applicant shall complete a Construction Waste Recycling Plan and submit the plan to the Riverside County

Waste Management Department (RCWMD) for approval. The plan shall identify and estimate the materials to be recycled during construction and demolition activities and shall specify where and how the recyclable materials will be stored on the Project site. Compliance with the plan shall be a requirement in all construction contracts. The RCWMD-approved plan shall be attached to all construction plans and distributed to all construction contractors. Once construction is complete, the developer/applicant shall be responsible for preparing a Waste Recycling Report that demonstrates that the Project recycled a minimum of 50% of its construction and demolition waste. The waste recycling report must be submitted to, and approved by, the RCWMD prior to issuance of occupancy permits.

- MM-UTL-3** Prior to issuance of building permits, the developer/applicant shall submit building plans to the Riverside County Waste Management Department (RCWMD) and obtain approval from the RCWMD for compliance with the Riverside County Design Guidelines for Refuse and Recyclables Collection and Loading Areas, which include specifications for recyclable storage space, location and access, signage, protection and security, compatibility, and overall compliance with federal, state, and local laws.

J. Energy Conservation

1. Energy Consumption

Threshold: Would the project result in wasteful, inefficient, or unnecessary consumption of energy?

Finding: Less than significant with mitigation. (DEIR, p. 4.13-14 – 4.13-17).

Explanation:

Electricity

Electricity consumption associated with the Project is based on the California Emissions Estimator Model (CalEEMod) outputs presented in the *Canyon Springs Healthcare Campus & Senior Living Greenhouse Gas Analysis*, included in Appendix H of the DEIR. Electricity consumption rates were customized to adjust for Title 24 requirements rather than using default electricity consumption rates for the SCAQMD. According to these estimations, the Project would consume approximately 21,168,564 kilowatt hours per year during Project operation (DEIR, p. 4.13-14 – 4.13-15).

Natural Gas

Natural gas consumption associated with the Project is based on the CalEEMod outputs presented in the *Canyon Springs Healthcare Campus & Senior Living Greenhouse Gas Analysis* (Appendix H of the DEIR). Natural gas consumption rates were customized to adjust for Title 24 requirements rather than using default natural gas consumption rates in the

SCAQMD. According to these estimations, the Project would consume approximately 90,323,210 kilo-British Thermal Units per year during operation (DEIR, p. 4.13.-15 – 4.13-15).

Petroleum

Petroleum fuel consumption associated with the Project is a function of the vehicle miles traveled as a result of Project construction and operations. According to the traffic impact analysis (included as Appendix L to the DEIR), the Project would result in 18,528 trip ends (DEIR, p. 4.13-16). Vehicle trips associated with the Project are expected to use less petroleum due to advances in fuel economy over time (DEIR, p. 4.13-16 – 4.13-17).

The Canyon Springs Healthcare Campus will incorporate transportation demand management (TDM) measures in order to help achieve the required vehicle reduction targets from the City's TDM Regulations. Although there are no statewide mandatory energy requirements for hospitals, Title 24, Part 6 would be applicable to other land uses associated with the Project, including but not limited to the senior facility and medical office building. Implementation of mitigation measures **MM-AQ-2**, **MM-AQ-3**, and **MM-AQ-4** would ensure that the Project would not otherwise result in wasteful, inefficient, or unnecessary consumption of electricity, natural gas, and petroleum. With implementation of these mitigation measures, impacts would be less than significant (DEIR, p. 4.13-17). Mitigation measures **MM-AQ-2**, **MM-AQ-3**, and **MM-AQ-4** are discussed in their entirety in Section 4.3-A1 of this document.

2. Energy Standards and Regulations

Threshold: Would the project conflict with existing energy standards and regulations?

Finding: Less than significant with mitigation. (DEIR, p. 4.13-17 – 4.13-18).

Explanation: There are no statewide mandatory energy requirements for hospitals, as these occupancies are exempt from Title 24, Part 6, of the CCR. Title 24, Part 6 would be applicable to other land uses associated with the Project, including but not limited to the senior facility and medical office building. Implementation of mitigation measure **MM-AQ-2** would require that the proposed facilities are designed to achieve 5% efficiency beyond the 2016 California Building Code Title 24 requirements for nonresidential uses. Upon implementation of mitigation measure **MM-AQ-2**, the Project will voluntarily reduce energy consumption beyond what is required by the state and will also be consistent with existing energy standards and regulations. Impacts would be less than significant with mitigation incorporated (DEIR, p. 4.13-17 – 4.13-18). Mitigation measure **MM-AQ-2** is discussed in its entirety in Section 4.3-A1 of this document.

3. Demand on Local and Regional Energy Supplies

Threshold: Would the project place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity?

Finding: Less than significant with mitigation. (DEIR, p. 4.13-18 – 4.13-19).

Explanation: The City receives electricity primarily from Riverside Public Utilities, Electric Division. Typical electrical energy use for the year 2025, upon buildout of the General Plan, would be approximately 4,824,478 megawatt hours (MWh) per year for the entire City, including unincorporated communities north and south of the City. According to CalEEMod estimates (Appendix H of the DEIR), implementation of the Project will result in an electricity demand of 21,169 MWh per year, which is 0.44% of the City's estimated energy use for 2025. Therefore, the Project will not significantly exceed energy demands as projected by the City's Final General Plan 2025 EIR. In addition, mitigation measure **MM-AQ-2** would be implemented to ensure the Project will not result in wasteful, inefficient, or unnecessary consumption of energy. Further, mitigation measure **MM-AQ-3** would be implemented to reduce electricity consumption associated with water usage (DEIR, p. 4.13-18).

Southern California Gas is the main provider of natural gas to the City. According to the City's Final General Plan 2025 EIR, typical natural gas usage for the year 2025, upon buildout of the General Plan, would be a net increase of approximately 41.39 million cubic feet per day, or 15.107 trillion BTU per year from existing natural gas usage for the entire City including unincorporated communities north and south of the City. According to CalEEMod estimations (Appendix H), the implementation of the Project will result in a natural gas demand of 90,323 million British thermal units (BTU) per year, which is 0.60% of the City's estimated energy use for 2025. Therefore, the Project will not exceed demands as projected by the City's Final General Plan 2025 EIR. Further, implementation of mitigation measure **MM-AQ-2** would ensure that the Project would not result in wasteful, inefficient, or unnecessary consumption of natural gas.

Upon buildout of the Project, a total of 18,528 trip ends will be generated. Vehicles traveling to and from the Project site would be the primary source of petroleum consumption. Although the Project would see an increase in vehicle trips, vehicles associated with the Project are expected to use less petroleum due to advances in fuel economy over time. Further, the Project will incorporate TDM measures in order to help achieve the required vehicle reduction targets from the City's TDM Regulations. To reduce vehicle miles traveled and petroleum consumption, implementation of mitigation measure **MM-AQ-4** would be implemented. As such, impacts related to energy supplies and capacity will be less than significant with incorporation of mitigation measures **MM-AQ-2**, **MM-AQ-3**, and **MM-AQ-4**. Mitigation measures **MM-AQ-2**, **MM-AQ-3**, and **MM-AQ-4** are discussed in detail in Section 4.3-A1 of this document.

4.3 FINDINGS REGARDING SIGNIFICANT AND UNAVOIDABLE IMPACTS

The City Council hereby finds that, despite the incorporation of Mitigation Measures identified in the EIR, the following impacts from the Project and related approvals cannot be fully mitigated to a less than significant level and a Statement of Overriding Considerations is therefore included herein:

A. Air Quality

1. Applicable Air Quality Plan

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

Finding: Significant and unavoidable after implementation of mitigation. (DEIR, p. 4.2-24 – 4.2-26).

Explanation: The Project site is located within SCAB under the jurisdiction of the SCAQMD, which is the local agency responsible for administration and enforcement of air quality regulations for the area. The SCAQMD has established criteria for determining consistency with the 2016 AQMP in Chapter 12, Sections 12.2 and 12.3 of the SCAQMD *CEQA Air Quality Handbook* (DEIR, p. 4.2-24).

Consistency Criterion No.1

Because the Project could result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, the Project will conflict with Consistency Criterion No. 1 of the SCAQMD *CEQA Air Quality Handbook*. Construction of the Project will result in a potentially significant impact to air quality related to NO_x only. Mitigation measure **MM-AQ-1** shall be incorporated during Project construction to reduce NO_x emissions to a less than significant level. However, Project emissions will exceed the SCAQMD operational thresholds for volatile organic compounds (VOCs), NO_x, and CO. Mitigation measures **MM-AQ-2** through **MM-AQ-6** will reduce on-road mobile source emissions, but not to a level of less than significant (DEIR, p.4.2-25).

Consistency Criterion No.2

Projects are considered consistent with, and would not conflict with or obstruct implementation of, the AQMP if the growth in socioeconomic factors (e.g., population, employment) is consistent with the underlying regional plans used to develop the AQMP (per Consistency Criterion No. 2 of the SCAQMD *CEQA Air Quality Handbook*). The future emissions forecasts incorporated in the 2016 AQMP, primarily based on demographic and economic growth projections provided by SCAG for their 2016 RTP/SCS, were used to estimate future emissions in the 2016 AQMP, which is generally consistent with the local plans (i.e., General Plans and Specific Plans); therefore, the AQMP is also generally consistent with local plans (DEIR, p. 4.2-25).

The previously approved CSBPSP is consistent with all planning documents, including the RTP/SCS and AQMP. The Project is located within the CSBPSP and primarily consists of land uses permitted by the CSBPSP, including medical office buildings. The hospital and residential uses (i.e., senior housing and the independent living/memory care, assisted living, and skilled nursing facility) to be developed under the Project are not permitted uses within the CSBPSP. The development of hospital and residential uses on the Project site would not result in more intense uses, in terms of regional transportation planning, than the commercial retail and office uses that would have been permitted on those sites under the CSBPSP. Accordingly, the Project will be

consistent with the growth assumptions in the RTP/SCS and the AQMP, and is therefore, consistent with the second criterion (DEIR, p. 4.2-25).

Conclusion

Although the Project will be consistent with the growth assumptions in the underlying regional plans used to develop the AQMP (Consistency Criterion No. 2), the Project could result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, and would conflict with Consistency Criterion No. 1. Therefore, impacts related to the Project's potential to conflict with or obstruct implementation of the applicable air quality plan will be significant and unavoidable, and a Statement of Overriding Considerations will be required should the City choose to approve the Project.

The following mitigation measures will be implemented:

MM-AQ-1 During construction activity, all construction equipment (≥ 150 horsepower) shall be California Air Resources Board (CARB) Tier 3 Certified or better. Additionally, during grading activity, total horsepower-hours per day for all equipment shall not exceed 24,608 horsepower-hours per day, and the maximum disturbance (actively graded) area shall not exceed 6 acres per day.

MM-AQ-2 Prior to the issuance of building permits, the Project developer/applicant shall submit energy usage calculations to the Planning Division showing that the Project is designed to achieve 5% efficiency beyond the 2016 California Building Code Title 24 requirements. Example of measures that reduce energy consumption include, but are not limited to, the following (it being understood that the items listed below are not all required and merely present examples; the list is not all-inclusive and other features that reduce energy consumption also are acceptable):

- Increase in insulation such that heat transfer and thermal bridging is minimized;
- Limit air leakage through the structure and/or within the heating and cooling distribution system;
- Use of energy-efficient space heating and cooling equipment;
- Installation of electrical hook-ups at loading dock areas;
- Installation of dual-paned or other energy-efficient windows;
- Use of interior and exterior energy-efficient lighting that exceeds then incumbent California Title 24 Energy Efficiency performance standards;
- Installation of automatic devices to turn off lights where they are not needed;
- Application of a paint and surface color palette that emphasizes light and off-white colors that reflect heat away from buildings;
- Design of buildings with "cool roofs" using products certified by the Cool Roof Rating Council, and/or exposed roof surfaces using light and off-white colors;
- Design of buildings to accommodate photo-voltaic solar electricity systems or the installation of photo-voltaic solar electricity systems;
- Installation of Energy Star-qualified energy-efficient appliances, heating and cooling systems, office equipment, and/or lighting products.

- MM-AQ-3** To reduce water consumption and the associated energy-usage, the Project shall be designed to comply with the mandatory reductions in indoor water usage contained in the incumbent California Green Building Code and any mandated reduction in outdoor water usage contained in the City's water-efficient landscape requirements. Additionally, the Project shall implement the following:
- Landscaping palette emphasizing drought-tolerant plants;
 - Use of water-efficient irrigation techniques;
 - U.S. Environmental Protection Agency (EPA) Certified WaterSense labeled or equivalent faucets, high-efficiency toilets, and water-conserving shower heads.
- MM-AQ-4** The Project shall reduce vehicle miles traveled and emissions by implementing the following measure:
- Pedestrian and bicycle connections shall be provided to surrounding areas consistent with the City's General Plan.
- MM-AQ-5** The Project developer/applicant shall encourage its tenants to use water-based or low volatile organic compound cleaning products by providing publicly available information from the Southern California Air Quality Management District, CARB, and EPA on such cleaning products.
- MM-AQ-6** Electric lawn equipment including but not limited to lawn mowers, leaf blowers and vacuums, shredders shall be used in lieu of conventional gas-powered equipment. This requirement shall be included in all Covenants, Conditions, and Restrictions for Project properties.

2. Violation of an air quality standard

Threshold: Would the project violate any air quality standard or contribute substantially to an existing air quality violation?

Finding: Significant and unavoidable after implementation of mitigation. (DEIR, p. 4.2-26 – 4.2-32).

Explanation: Construction and operation of the Project may result in emissions of criteria air pollutants from mobile, area, energy, and/or stationary sources, which may cause exceedances of federal and state ambient air quality standards or contribute to existing nonattainment of ambient air quality standards. The following discussion identifies potential short-term construction impacts and operational impacts that will result from implementation of the Project:

Construction Emissions

Construction of the Project will result in the addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and VOC off-gassing) and off-site sources (i.e., on-road haul trucks, vendor trucks, and worker vehicle trips). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and for dust, the prevailing weather conditions. Therefore, such emission levels

can only be approximately estimated with a corresponding uncertainty in precise ambient air quality impacts.

Pollutant emissions associated with construction activity were quantified using CalEEMod. The construction equipment mix and estimated hours of operation per day for the criteria air pollutant emissions modeling are based on consultation with the applicant. Construction emissions for construction worker vehicles and vendor trucks (e.g., delivery trucks) traveling to and from the Project site were based on CalEEMod default values.

Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM₁₀ and PM_{2.5} emissions. The Project will be required to comply with SCAQMD Rule 403 to control dust emissions generated during the building construction and grading activities. Internal combustion engines used by construction equipment, haul trucks, vendor trucks, and worker vehicles will result in emissions of VOCs, NO_x, CO, PM₁₀, and PM_{2.5}. The application of architectural coatings, such as exterior application/interior paint and other finishes, and application of asphalt pavement would also produce VOC emissions; however, the contractor is required to procure architectural coatings from a supplier in compliance with the requirements of SCAQMD's Rule 1113 (Architectural Coatings).

Daily construction emissions would not exceed the SCAQMD significance thresholds for VOC, NO_x, CO, sulfur oxides (SO_x), PM₁₀, or PM_{2.5} during construction with the incorporation of mitigation. Furthermore, construction-generated emissions would be temporary and would not represent a long-term source of criteria air pollutant emissions. With implementation of **MM-AQ-1**, construction of the Project will not violate any air quality standard or contribute substantially to an existing air quality violation, and impacts would be less than significant with mitigation incorporated.

Operational Emissions

Following the completion of construction activities, the Project will generate VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5} emissions from mobile sources, area sources, energy sources, helicopters, and stationary sources, including natural gas powered boilers with an estimated annual energy usage of 50,000,000 kilo British thermal units.

CalEEMod was used to estimate maximum daily mobile source emissions associated with Project vehicle trips based on trip-generation rates from the Traffic Impact Analysis. CalEEMod was also used to estimate emissions from the Project's area sources, which include consumer products, gas-powered landscape maintenance, and architectural coatings for maintenance of the buildings. The Project is required to comply with SCAQMD Rule 445, which prohibits the use of wood burning stoves and fireplaces in new development. Criteria pollutant emissions from energy sources (building energy consumption), which include natural gas appliances and space and water heating, were also estimated using CalEEMod. Combustion of natural gas for the large boilers of the Project was estimated outside of CalEEMod using a natural gas combustion emission factors. Air quality emissions associated with helicopter use at the Project site would result from landing and takeoff and travel during the helicopter routes.

The combined maximum daily area, energy, stationary, helicopter, and mobile source emissions would exceed the SCAQMD regional operational thresholds for VOC, NO_x, and CO without mitigation. The combined maximum daily area, energy, mobile, helicopter, and stationary source emissions will exceed the SCAQMD regional operational thresholds for VOC, NO_x, and CO even after implementation of **MM-AQ-2** through **MM-AQ-6**. Therefore, Project operational-source VOCs, NO_x, and CO emissions exceedances of applicable SCAQMD regional thresholds are therefore considered significant and unavoidable, and a Statement of Overriding Considerations will be required should the City choose to approve the Project. Mitigation measures **MM-AQ-1** through **MM-AQ-6** are described in their entirety above.

3. Cumulatively Considerable Increase of Criteria Pollutants

Threshold: Would the project 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Finding: Significant and unavoidable after implementation of mitigation. (DEIR, p. 4.2-32 – 4.2-33.)

Explanation: If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution to nonattainment status in SCAB. If a project does not exceed thresholds and is determined to have less than significant project-specific impacts, it may still contribute to a significant cumulative impact on air quality (DEIR, p. 4.2-32).

Project-generated construction emissions (after mitigation) will not exceed the SCAQMD emission-based significance thresholds for VOC, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}. In addition, operational emissions generated by the Project will not result in a significant impact regarding SO_x, PM₁₀, and PM_{2.5}; however, Project emissions would exceed the SCAQMD operational thresholds for VOC and NO_x (precursors to ozone (O₃)), and CO. Mitigation measures **MM-AQ-2** through **MM-AQ-6** will reduce Project-generated operational emissions; however, not to level of less than significant. Thus, operation of the Project would have a cumulatively considerable increase in emissions of VOC and NO_x, which are precursors to O₃ (DEIR, p. 4.2-33). Thus, this impact will be significant and unavoidable, and a Statement of Overriding Considerations will be required should the City choose to approve the Project. Mitigation measures **MM-AQ-2** through **MM-AQ-6** are described in their entirety above.

B. Transportation and Traffic

1. Applicable Plans, Ordinances, and Policies

Threshold: Would the project conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components

of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Finding: Significant and unavoidable for Existing with Project conditions (Freeway Segments,), Cumulative Conditions (Freeway Segments), and General Plan Buildout (Freeway Segments, and Freeway Merge/Diverge Analysis) (DEIR, p. 4.11-38 – 4.11-77).

Explanation:

Existing with Project Conditions

Basic Freeway Segment Analysis

Freeway segments are anticipated to operate at an acceptable LOS during the peak hours, with the addition of Project traffic, with the exception of the I-215 southbound segment, south of Eucalyptus Avenue, which will degrade from LOS E to LOS F during the PM peak hour. As such, the Project's impact is considered significant. While there are planned improvements for I-215, the most recent Caltrans Transportation Concept Report for I-215 forecasts that LOS will deteriorate to F even with these planned improvements. The Project will implement TDM measures. However, the complete mitigation of this impact is considered beyond the scope of the Project because of the inability of the City to approve freeway mainline operational and capacity improvements. Therefore, a Project's impact on the freeway segment will be significant and unavoidable, and a Statement of Overriding Considerations will be required should the City choose to approve the Project (DEIR, p.4.11-61).

Cumulative Conditions

Basic Freeway Segment Analysis

In comparison to the freeway mainline operations under Cumulative Without Project Conditions, there are no new freeway mainline segments anticipated to operate at an unacceptable LOS during the peak hours, with the exception of the I-215 southbound freeway mainline segment, south of Eucalyptus Avenue, which will degrade from LOS E to LOS F during AM peak hour. While there are planned improvements for I-215, the most recent Caltrans Transportation Concept Report for I-215 forecasts that LOS will deteriorate to F even with these planned improvements. The Project will implement TDM measures, however, the complete mitigation of this impact is considered beyond the scope of the Project because of the inability of the City to approve freeway mainline operational and capacity improvements. The Project will contribute to significant cumulative impacts, and operations of the highway are projected to remain at unacceptable levels due to a lack of feasible mitigations. Thus, the cumulative traffic increases are a significant cumulative impact, and the Project's incremental contribution to the increases will be cumulatively considerable. As such, a Statement of Overriding Considerations will be required should the City choose to approve the Project (DEIR, p. 4.11-61).

General Plan Buildout

Basic Freeway Segment Analysis

The basic freeway segments are anticipated to operate an acceptable LOS (e.g., LOS D or better) during the peak hours, with the exception of the I-215 southbound freeway mainline segment (between the off-ramp and on-ramp on Eucalyptus Avenue), which will operate at LOS E during the PM peak hour, and the I-215 southbound freeway mainline segment (south of Eucalyptus Avenue), which will operate at LOS E and F in the AM and PM peak hours respectively (DEIR, p. 4.11-70).

While there are planned improvements for I-215, the most recent Caltrans Transportation Concept Report for I-215 forecasts that LOS will deteriorate to F even with these planned improvements. Although the Project will implement TDM measures, the complete mitigation of deteriorating operations is considered beyond the scope of the Project because of the inability of the City to approve freeway mainline operations and capacity improvements. The Project will contribute to significant cumulative impacts, and operations of the highway are projected to remain at unacceptable levels due to a lack of feasible mitigations. Thus, the cumulative traffic increases are a significant cumulative impact, and the Project's incremental contribution to the increases will be cumulatively considerable. As such, a Statement of Overriding Considerations will be required should the City choose to approve the Project (DEIR, p. 4.10-70).

Freeway Merge/Diverge Analysis

There are no new ramp locations anticipated to exceed acceptable LOS, in addition to the ramp location identified as operating at an unacceptable LOS during the peak hours under Existing Conditions (the I-215 southbound on-ramp at Eucalyptus Avenue will remain at an unacceptable LOS). Thus, the Project will contribute to significant cumulative impacts, and operations of the highway are projected to remain at unacceptable levels due to a lack of feasible mitigations. Thus, the cumulative traffic increases are a significant cumulative impact, and the Project's incremental contribution to the increases will be cumulatively considerable. As such, a Statement of Overriding Considerations will be required should the City choose to approve the Project (DEIR, p. 4.11-72).

2. Congestion Management Plans

Threshold: Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Finding: Significant and unavoidable after implementation of mitigation. (DEIR, p. 4.11-78 – 4.11-79).

Explanation: The focus of the Riverside County Congestion Management Plan (CMP) is the development of an Enhanced Traffic Monitoring System in which real-time traffic count data can be accessed by the Riverside County Transportation Commission (RCTC) to evaluate the condition of the Congestion Management System, as well as meet other monitoring requirements at the State and Federal levels. RCTC's adopted minimum LOS threshold is LOS E. Therefore,

when a CMP street or highway segment falls to LOS F, a deficiency plan must be prepared. Preparation of a deficiency plan is the responsibility of the local agency where the deficiency is located.

As shown in Exhibit 2-1 of the 2011 CMP, the I-215 and SR-60 freeways are identified as Interstate and Highway CMP facilities, respectively. As such, any contribution to substantial deficiencies to these facilities will be considered a significant Project impact. The I-215 southbound freeway mainline segment, south of Eucalyptus Avenue, will deteriorate from LOS E during the PM peak hour in Existing Conditions to LOS F during the PM peak hour in Existing With Project Conditions. In Cumulative Conditions the same segment deteriorates from LOS D to LOS E in the AM peak hour with the Project, whereas the I-215 southbound segment between the ramps for Eucalyptus Avenue maintains LOS E. In General Plan buildout, the southbound I-215 segments between the ramps and south of Eucalyptus Avenue operate at unacceptable levels without the Project and continue to maintain the same LOS with the Project. In Cumulative and General Plan Buildout Conditions, the I-215 southbound on-ramp at Eucalyptus Avenue will remain at unacceptable LOS. Even though deficient LOS is maintained on I-215, south of Eucalyptus and the associated on-ramp, the Project increases volume and associated density, and therefore the Project's contribution to deficiencies is considered cumulatively considerable. As such, a Statement of Overriding Considerations will be required should the City choose to approve the Project.

Mitigation measure **MM-TRAF-2** would minimize potential impacts to CMP facilities. The Project applicant shall also participate in the funding of off-site improvements, including the City of Riverside's DIF and regional TUMF programs by paying applicable fees, supplemented by participation in additional intersection improvement costs, as needed. Payment into the regional fee program includes improvements to I-215. However, even with planned improvements to I-215, Caltrans' forecasts show the freeway operating at LOS F in 2035. Although the Project will implement TDM measures, the complete mitigation for deteriorating operations is considered beyond the scope of the Project because of the inability of the City to approve freeway mainline operational and capacity improvement. Thus, even with implementation of mitigation measures, the Project will contribute to significant cumulative impacts and the Project's incremental contribution to the increases will be cumulatively considerable. Mitigation measure **MM-TRAF-2** is described in its entirety in Section 4.2-1A of this document.

4.4 FINDINGS REGARDING CUMULATIVE IMPACTS

Consistent with CEQA's requirements, the EIR includes an analysis of cumulative impacts, which include the impacts of the Project plus all other pending or approved projects within the affected area for each resource. Where evaluation of potential cumulative impacts are located (e.g., noise, traffic, visual quality, biological, cultural resources, and public utilities) the analysis is based on a list of past, present, and probably future projects producing related or cumulative impacts. (See, DEIR, Table 5-1.)

A. Aesthetics

There are no related projects adjacent to the Project site that will introduce tall vertical forms comparable to those proposed as part of the Project that are capable of substantially affecting existing views to or from Sycamore Canyon Wilderness Park, Box Springs Mountain Reserve

including M Peak, or the segment of SR-60 through Moreno Valley between Day Street and Gilman Springs Road, identified as a scenic resource in the City of Moreno Valley General Plan. With the exception of four related projects, that will entail the construction of multistory structures, cumulative projects generally consist of low-profile (i.e., 1- to 2-story) retail, industrial, residential, and warehouse uses proposed in developed areas where similar uses are already established. Regarding cumulative impacts to views from M Peak, the four cumulative projects discussed above will not be situated in line with the Project, with the exception of the proposed multifamily apartment development located south of the Project site and along Eucalyptus Avenue (i.e., No. 25, the residential apartment development located at Edgemont Street and South of Eucalyptus Avenue). However, because the proposed multifamily apartment development will consist of several two-story structures, roughly 28 feet in height, that will be set back from adjacent residential land uses, the introduction of these structures will not substantially obstruct available views of M Peak, Box Springs Reserve, or other mountainous terrain to the north from view of residential land uses in the surrounding area (DEIR, p. 5-6 – 5-9).

There are no officially designated or eligible state scenic highways from which views of the Project site are currently available. Although the City of Moreno Valley General Plan identifies a portion of SR-60 as a scenic highway, due to existing development and the elevated vantage offered along SR-60 near the I-215 freeway, the Project site is not identifiable from existing surrounding development (DEIR, p. 5-9).

Although the Project will include multistory structures on the currently vacant Project site, building setbacks, landscaping, and design features identified in the Specific Plan will be incorporated into Project design to reduce the apparent scale of structure and break up perceived building mass. Related projects with new uses and structures would be distributed throughout the primarily urban and development cumulative study area and will not combine to impact the visual character of the area. Impacts to visual character tend to be site-specific and it is anticipated that the existing visual character that is potentially affected by related projects will also be subject to the same requirements of CEQA as the Project. Thus, cumulative impacts to visual character would be less than significant (DEIR, p. 5-10).

Considering that the cumulative projects listed in Table 5-1 are interspersed throughout the Riverside, Moreno Valley, and March ARB areas, the combination of light and glare from the Project and the projects in the surrounding vicinity will not adversely affect daytime or nighttime views. Further, considering that the cumulative projects considered in this analysis are distributed throughout a primarily urban and developed, 2-mile area centered on the Project site, the combination of new lighting elements and building materials on the Project site and the introduction (or continued operation) of these features in the surrounding area will not adversely affect daytime or nighttime views. Cumulative impacts to aesthetics would be less than significant (DEIR, p. 5-11).

B. Air Quality

The SCAB is the geographic extent for the analysis of cumulative impacts related to air quality. The SCAB has been designated as a federal nonattainment area for ozone (O₃) and fine particulate

matter (PM_{2.5}) and a state nonattainment area for O₃, coarse particulate matter (PM₁₀), and PM_{2.5}. Regional daily construction emissions during construction of the Project will not exceed the SCAQMD significance thresholds for VOC, CO, SO_x, PM₁₀, or PM_{2.5} without mitigation. Although unmitigated NO_x associated with Project construction activities would exceed the SCAQMD threshold, impacts would be reduced with the implementation of mitigation measure **MM-AQ-1**. Each related project will be subject to CEQA, and therefore, will require air quality analysis and, where necessary, the implementation of mitigation. Criteria air pollutant emissions associated with the construction activity of future projects will be reduced through implementation of control measures required by the SCAQMD. Cumulative PM₁₀ and PM_{2.5} emissions will be reduced because all future projects will be subject to SCAQMD Rule 403 (Fugitive Dust). Further, the Project would not exceed the SCAQMD localized significance thresholds (LSTs) during construction. Cumulative impacts to air quality will be less than significant with mitigation incorporated during construction (DEIR, p. 5-11 – 5-12).

Operational emissions generated by the Project will exceed the SCAQMD operational thresholds for VOC and NO_x (precursors to O₃), and CO. Mitigation measures **MM-AQ-2** through **MM-AQ-6** will reduce Project-generated operational emissions; however, not to a level of less than significant. If a project's emissions exceed the SCAQMD significance thresholds for a pollutant or a precursor to a pollutant the SCAB is in nonattainment of under the CAAQS and/or NAAQS, it will have a cumulatively considerable contribution to the SCAB's nonattainment status of that pollutant. As such, cumulative impacts to air quality would be significant and unavoidable (DEIR, p. 5-12).

C. Biological Resources

The Project site is located within the MSHCP. As discussed in Section 4.3 of the DEIR, the Project is consistent with the MSHCP. Consistency with the MSHCP results in the ability of the Project to rely on the MSHCP for mitigation related to cumulative biological impacts. Therefore, cumulative adverse effects on the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan will be less than significant (DEIR, p. 5-13).

A field survey was conducted at the Project site to determine the jurisdictional limits of “waters of the United States” and “waters of the State” at the Project site. **MM-BIO-1** ensures that impacts to jurisdictional waters would be less than significant. It is anticipated that if a related project would affect state or federal jurisdictional waters, it will be subject to the same permitting requirements as the Project. Thus, cumulative adverse effects on protected wetlands will be less than significant with mitigation incorporated (DEIR, p. 5-13).

The Project site and undeveloped parcels within a 500-foot buffer provide suitable habitat for burrowing owl. **MM-BIO-2** will minimize adverse impacts to burrowing owls. Further, in accordance with the MSHCP, all project sites within the MSHCP area containing burrowing owls, or suitable habitat for burrowing owls, require preconstruction surveys that are to be conducted within 30 days prior to ground-disturbance activities. The Project site could also provide habitat for nesting birds. However, species that are potentially affected by related projects will also be subject to the same requirements of CEQA as the Project (i.e., implementation of mitigation measure **MM-BIO-3**). As such, cumulative impacts to

burrowing owls and nesting birds will be less than significant with mitigation incorporated (DEIR, p. 5-13 – 5-14).

D. Cultural Resources

The geographic context for the analysis of cumulative impacts to cultural resources is limited to one mile of the Project site. No known resources are present within the Project area. Should unanticipated cultural resources be encountered, direct impacts will be appropriately addressed to the extent feasible by the defined mitigation and legal requirements of CEQA. Implementation of mitigation measures (**MM-CUL-1** through **MM-CUL-4**) will include resource evaluation and reporting of data that might contribute to the larger archaeological and historical record. This will appropriately mitigate for cumulative impacts to such resources, should they be encountered. Therefore, the Project will not contribute to any potential cumulative impacts, and cumulative impacts to cultural resources will be less than significant with mitigation incorporated (DEIR, p. 5-14 – 5-15).

E. Greenhouse Gas Emissions

The geographic extent of the cumulative contributions to GHGs and climate change is worldwide. However, since lead agencies are only able to regulate GHG emissions within their respective jurisdictions, the geographic extent is primarily contingent upon the area over which lead agencies have authority. Therefore, the geographic extent for the purposes of the Project is the SCAB (DEIR, p. 5-15).

Implementation of the Project will not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Related projects will also be required to demonstrate compliance with all applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions. The Project is consistent with the City's CAP and consistent with the CAP's targets to reduce GHG emissions. The Project will incorporate project design features that will conserve energy and potable water, consistent with the GHG reduction measures outlined in the City's CAP. The Project also complies with GHG reduction measures set forth by the state. Over time, compliance with several statewide GHG reduction measures will reduce the Project's overall GHG emissions associated with motor vehicles and electrical generation. Implementation of mitigation measures **MM-AQ-1** through **MM-AQ-6** will further reduce any potential GHG emissions impacts of the Project. As such, the Project will not result in a significant GHG impact and will not create a considerable contribution to a cumulative impact. Cumulative impacts to greenhouse gas emissions will be less than significant with mitigation incorporated (DEIR, p. 5-15 – 5-16).

F. Hazards and Hazardous Materials

The Project site is located within Zone D of the Riverside County Airport Land Use Compatibility Plan. Mitigation measures **MM-HAZ-1** through **MM-HAZ-3** will be incorporated to ensure that public airport proximity safety hazards for people working or residing at or near the Project site are in place. All related projects with potential hazards to flights will be required to submit plans to the FAA and will

be subject to the same regulations as the Project. Cumulative impacts will be less than significant with mitigation incorporated (DEIR, p. 5-16 – 5-17).

G. Hydrology and Water Quality

The geographic scope of cumulative effects on hydrology and water quality is typically the applicable watershed, whereby projects contributing flow to the same water bodies as the Project will be considered. The majority of the related projects are located on sites that are already fully covered or partially covered with impervious surfaces and where water was used previously (DEIR, p. 5-17).

The performance standards contained in the Stormwater Pollution Prevention Plan (SWPPP; i.e., construction general permit), the Stormwater Management Plan (i.e., Riverside County MS4 Permit), and Riverside Municipal Code Title 14 and Title 17, which the Project must meet, are designed to address the cumulatively significant impacts to the watershed resulting from changes in the timing, rate, and volume of runoff and increased pollutants loads caused by urbanization. Each related project will be required to comply with these regulations in order to reduce the impacts of higher pollutant loads in the overall Project area. Cumulative impacts to hydrology and water quality will be less than significant (DEIR, p. 5-17).

H. Land Use and Planning

The geographic extent for cumulative analysis as it relates to land use encompasses all projects in Table 5-1 and considers consistency with applicable policies of City of Riverside General Plan 2025, County of Riverside General Plan, City of Moreno Valley General Plan, or March Joint Powers Authority General Plan as applicable. In addition, as encroachment permits and municipal consistency were evaluated in Section 4.8 of the DEIR, these areas are also evaluated to determine if the Project, in combination with past, present, or future projects, will contribute to a cumulative impact (DEIR, p. 5-18).

As consistency with applicable General Plan policies, Municipal Code development standards and regulations, and the need to obtain permits, is determined on a project-by-project basis, related projects will (similar to the Project) be required to demonstrate compliance and/or obtain all required clearances. The Project was determined to result in less than significant impacts concerning potential conflicts with land use policies with the implementation of mitigation measures **MM-AQ-1** through **MM-AQ-6**, **MM-CUL-2** and **MM-CUL-4**, **MM-NOI-1**, **MM-TRAF-1** through **MM-TRAF-13**, **MM-UTL-2** and **MM-UTL-3**, and **MM-BIO-2** and **MM-BIO-3**. As such, cumulative impacts to land use and planning will be less than significant with mitigation incorporated (DEIR, p. 5-18).

I. Noise

The geographic extent for the analysis of cumulative impacts related to noise is generally limited to areas within approximately 0.25 mile of the Project components. This is because noise impacts are generally localized, mainly within approximately 500 feet from any noise source; however, it is possible that noise from different sources within 0.25 mile of each other could combine to create a

significant impact to receptors at any point between the projects. As such, the assessment of cumulative noise impacts considered noise sources associated with other projects in the immediate vicinity of the Project site, as listed in Table 5-1 of the DEIR. Four projects in Table 5-1 are located within 0.25 mile of the Project site (DEIR, p. 5-19).

Construction equipment anticipated for Project development includes only standard equipment that will be employed for any routine construction project of this scale. Construction hours will be limited to the hours as allowed per the City's Noise Code. Noise associated with construction of the Project would be exempt under Section 7.35.20 of the Riverside Municipal Code. As such, potential noise impacts during construction of the Project will be less than significant. The four projects on the cumulative projects list located within 0.25 mile of the Project site are each fairly limited in scale, compared to the Project. It is unlikely there will be substantial overlap between the limited construction duration needed for any of these four smaller projects, and each will be required to comply with construction noise restrictions at neighboring property lines. Consequently, even the combination of temporary noise from Project construction and construction noise from four smaller projects within 0.25 mile of the Project site is unlikely to exceed the City construction noise standards. In addition, related projects in the City of Riverside are exempt from construction noise under Section 7.35.20 of the Municipal Code. Project construction activities were found to not expose people to an excessive generation of ground-borne vibration. Other foreseeable projects within the vicinity of the Project site will not be close enough to create a combined excessive generation of ground-borne vibrations, as the closest cumulative project is located more than 100 feet away from the Project site, and most of the cumulative projects are located 1 to 2 miles away from the Project site. As such, construction noise will result in a cumulatively less than significant impact (DEIR, p. 5-19 – 5.20).

Composite operational noise levels of the health campus without trauma helicopter operations were found to have the potential to impact immediately adjacent properties to a limited extent and trauma helicopter operations were also found to result in potentially significant noise impacts on adjacent noise-sensitive properties. However, with implementation of mitigation measure **MM-NOI-1**, impacts to operational noise would be less than significant. Cumulative impacts are unlikely, as the Project and all cumulative projects are located in a highly urbanized area and all future projects will be required to adhere to the City's noise thresholds. As such, the Project, in conjunction with other reasonably foreseeable related projects, will not cumulatively increase noise levels during operation. As such, operational noise will result in a cumulatively less than significant impact with mitigation incorporated (DEIR, p. 5-20 –5-21).

J. Public Services

As related projects in the immediate surrounding area are likely to be served by the same fire stations as the Project, the geographic extent for the analysis of cumulative impacts associated with public services consists of the immediate surrounding area (DEIR, p. 5-21).

Implementation of the City of Riverside General Plan 2025 and build out of the Project site pursuant to the underlying land use designations of General Plan 2025 was determined to result in less than significant impacts to fire protection services primarily through the combined effects of

adherence to General Plan policies. Buildout of the City was considered in the General Plan 2025, and the General Plan 2025 Final EIR disclosed a need for four additional fire stations (some of which have already been built) throughout the City to maintain current levels of service and improve response times as development pursuant to the General Plan (including development of the Project site) proceeds through horizon year 2025. As such, development consistent with General Plan 2025 (including past, present, and future projects considered in the cumulative scenario) has been accounted for in City fire protection planning. Further, if the nearest available fire station is unable to respond to a service call from a related project in the cumulative study area, Riverside Fire Department will request mutual aid from the surrounding jurisdictions. The Project and related projects will be constructed in compliance with the current building code and local fire department requirements and will be designed to meet safety equipment standards, provide adequate emergency access, fire hydrants, water flows, and fire sprinklers. As such, new or physically altered government facilities will not be required to accommodate the Project and related projects considered in the cumulative scenario. Cumulative impacts to public services are less than significant (DEIR, p. 5-21 – 5-22).

K. Transportation and Traffic

The analysis of cumulative conditions for the transportation and traffic analysis includes both ambient growth in traffic as well as growth from specific known cumulative development projects. The geographic scope of projects included for analysis includes projects in the City of Riverside, the City of Moreno Valley, and the County of Riverside. The cumulative projects are expected to generate a combined total of 157,499 daily trips on a typical weekday, with 12,848 trips forecasted during the AM peak hour and 16,296 trips during the PM peak hour. Project-related trips were added to the study area intersections and roadways to determine cumulative impacts of the Project (DEIR, p. 5-22).

For Cumulative with Project conditions, the addition of Project trips will result in significant impacts at the following locations: (1) I-215 SB Ramps/Eucalyptus Avenue; (2) Valley Springs Parkway/Eucalyptus Avenue; (3) Day Street/Cottonwood Avenue; (4) Day Street/Bay Avenue; (5) Day Street/Alessandro Boulevard; (6) Memorial Way/Towngate Drive. Incorporation of mitigation measures **MM-TRAF-1** through **MM-TRAF-8** will reduce off-site impacts to less than significant levels for Cumulative with Project Conditions (DEIR, p. 5-23).

Under Cumulative Conditions, the I-215 southbound freeway mainline segment, south of Eucalyptus Avenue, will degrade from LOS E to LOS F during the AM peak hour. While there are planned improvements for I-215, the most recent Caltrans Transportation Concept Report for I-215 forecasts that LOS will deteriorate to F even with these planned improvements. The Project will implement TDM measures for freeway segments. However, the complete mitigation of this impact is considered beyond the scope of the Project because of the inability of the City to approve freeway mainline operational and capacity improvements. Thus, cumulative impacts with regard to this freeway mainline segment are considered a significant cumulative impact (DEIR, p. 5-23 – 5-24).

Under Cumulative Conditions, the I-215 southbound on-ramp at Eucalyptus Avenue will remain at an unacceptable LOS. However, there are no new ramp locations anticipated to exceed acceptable LOS. Even though the LOS at the I-215 southbound on-ramp at Eucalyptus Avenue is

below the Caltrans standard, because the LOS grade is maintained from without Project Conditions and does not deteriorate, the impact is considered less than significant (DEIR, p. 5-24).

For General Plan Buildout Conditions, the addition of Project traffic will result in significant impacts at the following locations: (1) I-215 ramps/Eastridge Avenue-Eucalyptus Avenue; I-215 southbound ramps/Eucalyptus Avenue; (2) Valley Springs Parkway/Eucalyptus Avenue; (3) Day Street/Eucalyptus Avenue; (4) Day Street/Cottonwood Avenue; (5) Day Street/Bay Avenue; (6) Day Street/Alessandro Boulevard; (7) Memorial Way/Towngate Drive. In addition to mitigation measures **MM-TRAF-1** through **MM-TRAF-8**, implementation of mitigation measures **MM-TRAF-9** through **MM-TRAF-11** will reduce off-site traffic impacts to less than significant levels for General Plan Buildout with Project Conditions (DEIR, p. 5-24).

Under General Plan Buildout Conditions, the I-215 southbound freeway mainline segment (between the off-ramp and on-ramp on Eucalyptus Avenue) will operate at LOS E during the PM peak hour, and the I-215 southbound freeway mainline segment (south of Eucalyptus Avenue) will operate at LOS E and F in the AM and PM peak hours, respectively. While there are planned improvements for I-215, the most recent Caltrans Transportation Concept Report for I-215 forecasts that LOS will deteriorate to F even with these planned improvements. Although the Project will implement TDM measures, the complete mitigation of deteriorating operations is considered beyond the scope of the Project because of the inability of the City to approve freeway mainline operational and capacity improvements. As such, the Project will contribute to significant cumulative impacts along the I-215 southbound freeway mainline segment, and operations of the highway are projected to remain at unacceptable levels due to a lack of feasible mitigation measures (DEIR, p. 5-24 – 5-25).

Under General Plan Buildout Conditions, the I-215 southbound on-ramp at Eucalyptus Avenue will remain at an unacceptable LOS. The Project's contribution to the existing deficiencies is considered cumulatively considerable due to increase in volume and density from the Project. As such, the Project will contribute to significant cumulative impacts, and operations of the I-215 freeway are projected to remain at unacceptable levels due to a lack of feasible mitigation measures (DEIR, p. 5-25).

In terms of site access and circulation, a number of improvements that can reduce impacts will be constructed as part of the Project. Additionally, on-site signing and striping shall be implemented in conjunction with detailed construction plans for the Project site. Cumulative impacts to site access and circulation are less than significant.

The Congestion Management Plan (CMP) identifies the I-215 and SR-60 freeways as Interstate and Highway CMP facilities, respectively. As such, any contribution to substantial deficiencies on these facilities will be considered a significant Project impact. Impacts to the I-215 are described above. Even though deficient LOS is maintained on I-215, south of Eucalyptus Avenue and the associated on-ramp, the Project increases volume and associated density, and therefore the Project's contribution to deficiencies is considered cumulatively considerable. As required by mitigation measure **MM-TRAF-2**, the Project Applicant will be required to install a traffic signal to serve the southbound right turn only off-ramp and westbound through traffic at the I-215

southbound ramps and Eucalyptus Avenue, and thus, will minimize potential traffic impacts to CMP facilities. Additionally, the Project Applicant shall participate in the funding of off-site improvements, including the City of Riverside's Development Impact Fee and regional Transportation Uniform Mitigation Fee programs by paying applicable fees, supplemented by participation in additional intersection improvement costs, as needed. Payment into the regional fee program includes improvements to I-215. However, even with planned improvements to I-215, Caltrans' forecasts show the freeway operating at LOS F in 2035. The Project will implement TDM measures. However, the complete mitigation of deteriorating operations is considered beyond the scope of the Project because of the inability of the City to approve freeway mainline operational and capacity improvements. Thus, even with implementation of mitigation measures, the Project would contribute to cumulative impacts, and operations of the highway are projected to remain at unacceptable levels due to a lack of additional feasible mitigation measures (DEIR, p. 5-26 – 5-27).

No impact to the applicable Bicycle Master Plans, bicycle, pedestrian or transit circulation or planned facilities would occur (DEIR, p. 5-26).

The Project site lies within a sector of March ARB Class C airspace. Pilots may not operate within this airspace without radio contact with March ARB Air Traffic Control. Therefore, pilots operating to and from the Canyon Springs Healthcare Campus hospital helistop will be in radio contact with March ARB Air Traffic Control. Additionally, Air Traffic Control will provide traffic coordination including appropriate separation between fixed wing and helicopter traffic. With the implementation of mitigation measures **MM-TRAF-13** and **MM-TRAF-14**, cumulative impacts to air traffic would be less than significant (DEIR, p. 5-27 – 5-28).

L. Utilities and Service Systems

Water Supplies

The Project will be served by the EMWD. The land use considered for the Project area in the UWMP demand projection was commercial-retail. The estimated demand for the Project exceeds the projected demand accounted for in the 2010 UWMP. Yet, with implementation of mitigation measures **MM-UTL-1** and **MM-AQ-3**, Project impacts to water supply will be reduced to less than significant levels. As such, cumulative impacts to water supplies are considered less than significant with mitigation incorporated (DEIR, p. 5-29).

Solid Waste

The amount of solid waste generated and disposed of in nearby landfills during operation of the Project is expected to be within the permitted capacity of the landfills. The Project will participate in the City's efforts to comply with the California Integrated Waste Management Act (Assembly Bill 939) under the California Public Resources Code and ensure that at least 75% of the waste stream is diverted away from the Badlands Landfill. The Project will not generate substantial amounts of solid waste and combine with surrounding projects to contribute to significant cumulative impacts; therefore, cumulative impacts to solid waste generation would be less than significant with mitigation incorporated (DEIR, p. 5-29 – 5-28).

M. Energy Conservation

The Project will result in an increased demand for energy resources. Hospitals, such as one of the Project's components, are not generally subject to energy-efficiency requirements such as those specified in Title 24 because they are required to comply with other state laws related to ventilation and air exchanges, resulting in increased energy needs. In order to partially offset these increased energy needs, the Project has incorporated sustainable features into the Project design to reduce its energy use. Further, to ensure that the Project does not result in wasteful, inefficient, or unnecessary consumption of electricity or natural gas, mitigation measure **MM-AQ-2** would be incorporated. In addition, **MM-AQ-3** will be implemented to reduce electricity consumption associated with water usage and **MM-AQ-4** will reduce vehicle miles traveled and petroleum consumption (DEIR, p. 5-30).

The Project will not exceed electricity, natural gas, or petroleum demands as projected by the City's General Plan 2025 Final Program EIR. Other projects within the vicinity need to be evaluated on an individual basis to determine their energy demands and whether they will exceed the City's projected demands. The Project will not have a cumulatively considerable effect on energy supplies due to the use of excessive amounts of electricity, natural gas, or petroleum, and cumulative impacts to energy conservation will be less than significant with mitigation incorporated (DEIR, p. 5-30).

4.5 FINDINGS REGARDING SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126.2(c) specifically requires that irretrievable commitments of resources should be evaluated to ensure that consumption of nonrenewable resources during the course of project construction or operation is justified.

In accordance with CEQA Guidelines Section 15126.2 (c):

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

CEQA Guidelines Section 15127 further clarifies:

The information required by Section 15126.2(c) concerning irreversible changes, need be included only in EIRs prepared in connection with any of the following activities:

- (a) The adoption, amendment, or enactment of a plan, policy, or ordinance of a public agency;

- (b) The adoption of a Local Agency Formation Commission of a resolution making determinations; or
- (c) A project which will be subject to the requirement for preparing an environmental impact statement pursuant to the requirements of the National Environmental Policy Act of 1969, 42 U.S.C. 4312-4347.

The proposed Project will involve construction and operation of a healthcare campus consisting of a hospital, hospital-related facilities, medical office buildings, parking structures, senior housing facility, and an independent living/memory care, assisted living, and skilled nursing facility. The Project site is currently undeveloped, so implementation of the Project would result in irreversible environmental changes at the Project site. Nevertheless, the Canyon Springs Healthcare Campus Specific Plan is proposed to allow the previously described uses on the Project site, as analyzed in Section 4.8 of the DEIR. Therefore, the irreversible changes are not considered significant (DEIR, p. 5-32).

Nonrenewable resources and energy sources, including fossil fuels, natural gas, and electricity, will be consumed during Project construction. Use of these energy sources will be considered a permanent commitment of resources. In addition, a variety of resource materials will be used during the construction process, including steel, wood, concrete, and fabricated materials. Once these materials and fuels are used for purposes of construction, the commitment of such materials and fuels will be considered irreversible. However, the Project will use “green” building materials, where feasible, to reduce impacts to nonrenewable resources. Further, the Project will incorporate energy efficient features in an effort to conserve energy over the life of its operation. Therefore, the Project will not result in long-term significant energy use (DEIR, p. 5-32).

Increased requirements of public services and utilities by the Project represent a permanent commitment of these resources. Service providers have adequate supplies of resources to supply the Project with the inclusion of applicable mitigation measures. The Project will consume more energy on a daily basis than is currently consumed on site. Once constructed, it is reasonable to assume that the facility will use nonrenewable energy resources, which will be an irreversible commitment of such resources; however, energy-saving measures are included as part of the Project and can be found in Section 4.13 of the DEIR and the Canyon Springs Healthcare Campus Specific Plan (DEIR, p. 5-32 – 5-33).

4.6 FINDINGS REGARDING GROWTH INDUCING IMPACTS

According to State CEQA Guidelines Section 15126.2 (d), a project may foster economic or population growth, or additional housing, either indirectly or directly, in a geographical area if it meets any one of the following criteria:

- A project would remove obstacles to population growth;
- Increases in the population may tax existing community service facilities, causing significant environmental effects; or

- A project would encourage and facilitate other activities that could significantly affect the environment.

The Project will involve a specific plan amendment and a new Canyon Springs Healthcare Campus Specific Plan that will guide development of three separate, non-contiguous, previously graded areas, totaling approximately 50.85 acres, over an approximately 10-year period. Overall, the Project will directly stimulate population growth through the addition of a senior housing facility and independent living/memory care, assisted living, and skilled nursing facility. However, it is anticipated that as the City's resident's age, they may move from one area of the City to potentially being located in the senior housing facility, independent living/memory care, assisted living, or skilled nursing facility, as needed, depending on medical needs. The Project will indirectly stimulate population growth through the addition of new jobs on the Project site. However, based on the analysis in the DEIR, the Project's growth will be minimal compared to the underlying growth projections of the SCAG 2012–2035 RTP/SCS. Therefore, the Project will not result in significant adverse secondary effects related to induced growth (DEIR, p. 7-2 – 7-3).

5.0 ALTERNATIVES TO THE PROJECT

5.1 Summary of Project Alternatives and Objectives

The State CEQA Guidelines (§ 15126.6 *et. seq.*) require that a reasonable range of alternatives to a project be evaluated, provided they 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. The CEQA Guidelines further require the analysis of the "No Project" Alternative, wherein the project would not be approved and implemented. A number of Project alternatives were considered but ultimately rejected for infeasibility or failure to lessen environmental effects.

The following alternatives to the Project were analyzed in the DEIR:

No Project Alternative

Alternative 1: Buildout Consistent with Canyon Springs Business Park Specific Plan

Alternative 2: Alternative Site Location in City of Moreno Valley

Alternative 3: Alternative Location in City of Riverside

Alternative 4: Reduced Project Alternative

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

- The proposed Canyon Springs Healthcare Campus Specific Plan (Specific Plan) will allow future development to be more streamlined by outlining future allowable uses and laying out a cohesive set of design guidelines that will provide City of Riverside staff, the future

Canyon Springs Healthcare Campus operator, and the public with a clear understanding of how growth and development will occur at the site.

- The overall goal of the proposed Specific Plan is to guide future development on the Canyon Springs Healthcare Campus and define the extent, scale, and location of future development on the Canyon Springs Healthcare Campus.
- The Specific Plan will allow for the construction of a hospital and MOB with associated hospital-related facilities, as well as a senior housing, independent living, assisted living, and skilled nursing facility to address an existing shortage of healthcare service capacity now available to residents in the surrounding area, as well as to improve access to healthcare for a growing population.
- In the event of a disaster, the Canyon Springs Healthcare Campus will provide another hospital facility that will serve Riverside and the surrounding communities.

5.2 Alternatives Considered and Rejected from Further Consideration

The CEQA Guidelines state that the EIR needs to examine in detail only the alternatives the lead agency determines could feasibly attain most of the basic objectives of the project. Further, the EIR should identify any alternatives that were considered by the lead agency but were rejected and briefly explain the reasons underlying the lead agency's determination. Among the factors used to eliminate alternatives from detailed consideration in the EIR are: failure to meet most of the basic project objectives; technical, legal, or economic infeasibility; and inability to avoid or lessen the significant environmental effects of the Project. (State CEQA Guidelines, § 15126.6(c)).

In addition to the five alternatives evaluated in the DEIR, several alternatives were considered, but were eliminated from further analysis.

1. Alternative Project Location

In accordance with State CEQA Guidelines, Section 15126.6(f)(2), the City identified feasible alternative off-site locations within the Project area that could be available for the proposed healthcare campus development. Per State CEQA Guidelines, Section 15126.6(f)(2)(A), the key question and first step in analysis of the off-site location is whether any of the significant effects of the Project will be avoided or substantially lessened by moving the Project to another location. The City reviewed 20 sites approximately 50 acres in size, within a 5-mile radius of the site, within the City of Riverside, the City of Moreno Valley, and the County of Riverside, including the area controlled by the March Joint Powers Authority. With the exception of Sites 2 and 10, these alternatives are not discussed in further detail and have been eliminated from further consideration. Sites 1, 3, 4, 5, 6, 7, 8, 9, 11, 12, 13, 14, 15, 16, 17, 18, 19 and 20 of the alternative sites considered were rejected because they provided insufficient space for the Project components; they were previously developed or entitled for development; the Project was incompatible with ALUC policies for the sites; or the sites had multiple owners (DEIR, p. 6-3 – 6.9).

5.3 Alternatives Carried Forward for Further Analysis

A. No Project Alternative

Description

Pursuant to State CEQA Guidelines Section 15126.6(e)(3)(B), the No Project Alternative for a development examines the environmental effects that will occur if the Project were not to proceed. The discussion of the No Project Alternative must compare the environmental effects from the Project site remaining in its existing state, versus the environmental effect that will occur if the Project is approved. Accordingly, under the No Project Alternative, the Project site will remain in its existing condition, and no development will occur (DEIR, p. 6-9 – 6-10).

Summary of Impacts

The following table presents a summary of the impacts associated with the No Project Alternative.¹

| Threshold | Impacts |
|------------------------------------|---|
| Aesthetics | The No Project Alternative will not result in any direct impacts to aesthetics since there will be no construction on the Project site, and as such, the Project site will remain vacant. Under the No Project Alternative, the Project site will be underutilized, but impacts to aesthetics will be less under this alternative compared to the Project (DEIR, p. 6-10 – 6-15). |
| Agriculture and Forestry Resources | The Project site is not located on any Farmland designations. No Williamson Act contracts, forest lands, timberland, or Timberland Production areas are located within or adjacent to the Project site. Under the No Project Alternative, the Project site will continue to be an undeveloped, vacant site. As such, similar to the Project, the No Project Alternative will also have no impact to agriculture and forestry resources (DEIR, p. 6-15). |
| Air Quality | No additional emissions will occur under the No Project Alternative since there would be no construction or operational activities on the Project site. Therefore, the No Project Alternative will have reduced air quality impacts when compared to the Project. Although air quality impact will be less than the Project for construction and long-term operations, the Project site will remain underutilized (DEIR, p. 6-15 – 6-16). |
| Biological Resources | The No Project Alternative will not result in any direct impacts to biological resources because there will be no construction involved. The existing biology on the Project site will remain as is, Drainage 1 will not be modified, and Project impacts will be avoided. Therefore, impacts to biological resources will be reduced under this the No Project Alternative when compared to the Project; however, the Project site will remain underutilized (DEIR, p. 6-16 – 6-17). |
| Cultural Resources | No construction will occur under the No Project Alternative, and therefore, no subsurface material that could potentially support or impact cultural or paleontological resources will be disturbed. As such, the No Project Alternative will have reduced impacts to cultural resources when compared to the Project; however, the Project site will remain underutilized (DEIR, p. 6-18). |
| Geology and Soils | The No Project Alternative will not involve any development and/or grading on the Project site. As such, there will be no on-site structures subject to seismic or other geotechnical events. Thus, impacts to geology and soils associated with the No Project Alternative will be less than that of the Project; however, the Project site will remain underutilized (DEIR, p. 6-18 – 6-19). |
| Greenhouse Gas Emissions | Due to the avoidance of short-term and long-term GHG Emissions, the No Project Alternative's impacts with regard to GHG Emissions will be less than that of the Project. There will be no direct construction-related GHG emissions impacts associated with the No Project Alternative because |

¹ Source: DEIR, p. 6-9 – 6-29.

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| | the Project site will remain in its current state and no construction will occur. The Project site will continue to operate as a vacant, undeveloped site, and GHG emissions will continue to be the same. Therefore, because no additional emissions will occur under the No Project Alternative, GHG impacts will be lessened when compared to the Project; however, the Project site will remain underutilized (DEIR, p. 6-19 – 6-20). |
| Hazards and Hazardous Materials | The No Project Alternative will not result in a potential increase in safety hazards related to transportation or accidental release of hazardous materials, since construction or operation of development at the Project site will not occur. In addition, there will be no potential safety hazards related to being located in close proximity to a public airport, as the Project site will remain vacant. Similarly, the No Project Alternative will not introduce employees, patients, and visitors to potential safety hazards related to a public airport since nothing will be built on the Project site. Therefore, the No Project Alternative will have reduced impacts related to hazards and hazardous materials when compared to the Project; however, the Project site will remain underutilized (DEIR, p. 6-20). |
| Hydrology and Water Quality | Under the No Project Alternative, existing conditions will not change, and the Project site will remain vacant. The No Project Alternative will not result in any direct impacts related to hydrology and water quality since no construction will occur, and there will be no increase in runoff from the Project site. In addition, no construction or development activities will take place that could generate an increase in potential pollutants. Therefore, the No Project Alternative will have reduced hydrology and water quality impacts when compared to the Project; however, the Project site will remain underutilized (DEIR, p. 6-21). |
| Land Use and Planning | Under the No Project Alternative, the Specific Plan will not be implemented and the commercial zoning and Canyon Springs Business Park Specific Plan designations for the Project site area will remain. The No Project Alternative will not be consistent with certain General Plan 2025 Goals that pertain to providing for continued growth within the General Plan Area. There is an existing shortage of healthcare service capacity currently available to residents in the General Plan Area, and access to healthcare is needed for the growing population. The No Project Alternative will not alleviate this shortage and will not allow for the development of other healthcare facilities to serve Riverside and the surrounding communities. Therefore, impacts with regard to land use and planning will be increased under the No Project Alternative when compared to the Project, and the Project site will remain underutilized (DEIR, p. 6-21 – 6-22). |
| Mineral Resources | Under No Project Alternative, no construction will occur, and impacts to mineral resources will not occur. Therefore, similar to the Project, there will be no impacts to mineral resources under the No Project Alternative; however, the Project site will remain underutilized (DEIR, p. 6-22). |
| Noise | Since there would be no construction on the Project site under the No Project Alternative, there would be no construction noise impacts. The No Project Alternative will avoid impacts related to operational stationary noise sources when compared to the Project because no new noise sources will be developed. There will also be no new traffic noise generated with the No Project Alternative. Therefore, the No Project Alternative will have reduced noise impacts when compared to the Project; however, the Project site will remain underutilized (DEIR, p. 6-22). |
| Population and Housing | The No Project Alternative will retain the Project site's existing conditions, and no development will occur. The No Project Alternative will not contribute to new employment positions or housing opportunities. Therefore, under the No Project Alternative, impacts to population and housing will be less when compared to the Project; however, the Project site will remain underutilized (DEIR, p. 6-23). |
| Public Services | The No Project Alternative will not result in any potential impacts to public services since no construction will occur and no permanent or temporary residents, staff, patients, and structures will be present on the Project site. The No Project Alternative will not require the need for new or additional public services and/or facilities. Therefore, the No Project Alternative will have reduced public services impacts when compared to the Project; however, the Project site will remain underutilized (DEIR, p. 6-24 – 6-25). |
| Recreation | The No Project Alternative will retain the Project site's existing conditions, and no residential uses or businesses will be provided that will increase the use of existing parks or recreational facilities. Also, no new recreational facilities will need to be expanded or constructed under the No Project Alternative. Since the use of recreational amenities will not occur under the No Project Alternative, impacts with regard to recreation will be less when compared to the Project; however, the Project site will remain underutilized (DEIR, p. 6-25 – 6-26). |

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| Transportation and Traffic | Because the No Project Alternative will not increase site-generated traffic above current levels, impacts to transportation/traffic will be less than that of the Project; however, the Project site will remain underutilized (DEIR, p. 6-26 – 6-27). |
| Utilities and Service Systems | Because the No Project Alternative will not involve any development that will increase traffic above current levels, impacts to utilities and service systems will be less than that of the Project; however, the Project site will remain underutilized (DEIR, p. 6-27). |
| Energy Conservation | The No Project Alternative will not increase the use of energy, natural gas, or petroleum. The No Project Alternative will also not require additional energy supplies because no construction will occur under this alternative. As such, impacts to energy consumption will be reduced when compared to the Project; however, the Project site will remain underutilized (DEIR, p. 6-28). |

Relationship to Project Objectives

The following table identifies the Project objectives and whether or not the No Project Alternative meets each objective.²

| Project Objective | Alternative Meets Objective? |
|---|--|
| 1. The proposed Canyon Springs Healthcare Campus Specific Plan will allow future development more streamlined by outlining future allowable uses, and laying out a cohesive set of design guidelines that will provide City staff, the future Canyon Springs Healthcare Campus operator, and the public with a clear understanding of how growth and development will occur at the site. | No. The current land use designation for the Project site will remain Commercial. The properties will still be subject to the provisions of the Canyon Springs Business Park Specific Plan within Planning Areas 7, 8, 9, and 10, and the different areas will continue to be zoned for commercial and office uses as they are in the Canyon Springs Business Park Specific Plan Overlay. There will be no design and development standards to help streamline the entitlement process as a healthcare campus will not be developed, and the Project site will remain vacant (DEIR, p. 6-28). |
| 2. The overall goal of the proposed Canyon Springs Healthcare Campus Specific Plan is to guide future development on the Canyon Springs Healthcare Campus and define the extent, scale, and location of future development on the Canyon Springs Healthcare Campus. | No. Under the No Project Alternative, the Canyon Springs Healthcare Campus will not be developed on the Project site, and the Specific Plan will not be implemented to guide future development. The Project site will remain vacant (DEIR, p. 6-29). |
| 3. The Canyon Springs Healthcare Campus Specific Plan will allow for the construction of a hospital and MOBs with associated hospital-related facilities, as well as a senior housing, independent living, assisted living, and skilled nursing facility to address an existing shortage of healthcare service capacity now available to residents in the surrounding area as well as to improve access to healthcare for a growing population. | No. No construction will take place as a result of the No Project Alternative, and therefore, this alternative will not develop hospital, MOBs, and associated hospital-related facilities or senior housing, independent living, assisted living, or skilled nursing facilities. None of the healthcare services and living facilities will be developed under the No Project Alternative, and the Project site will remain vacant (DEIR, p. 6-29). |
| 4. In the event of a disaster, the Canyon Springs Healthcare Campus will provide another hospital facility that will serve Riverside and the surrounding communities. | No. Under the No Project Alternative, a healthcare campus will not be designed or constructed to meet the varied and evolving healthcare demands for the City of Riverside and residents of the region. There will not be another hospital facility serving the City of Riverside, and the surrounding communities and the Project site will remain vacant (DEIR, p. 6-29). |

² Source: DEIR, p. 6-28 – 6-29

Finding: The City Council rejects the No Project Alternative as a Project alternative on the following ground, which provides sufficient justification for rejection of this alternative: the No Project Alternative will not meet any of the Project objectives. Therefore, the No Project Alternative is rejected from further consideration.

Facts and Supporting Information

While most environmental impacts would be reduced with the No Project Alternative, this Alternative would not meet any of the Project objectives. Therefore, this alternative has been eliminated from further consideration and is determined to be not feasible (DEIR, p. 6-29).

B. Alternative 1: Buildout Consistent with Canyon Springs Business Park Specific Plan

Description

Alternative 1 proposes to build out the Project area consistent with the permitted uses pertaining to the existing Canyon Springs Business Park Specific Plan. Under Alternative 1, the Project site, located within the existing Canyon Springs Business Park Specific Plan would be developed as a commerce center with retail commercial, office, and residential uses together with appropriate public, quasi-public, and private sectors. More specifically, Planning Area 7 would be developed as Regional Oriented Retail support commercial uses contained in a 16.4-acre site; Planning Area 8 would be developed as a Corporate Office/Health Club in an area totaling 30.0 acres; Planning Area 9 would contain 17.2 acres of Professional Office area; and Planning Area 10 would contain 23.7 acres of Medical Campus area.

Summary of Impacts

The following table presents a summary of the impacts associated with Alternative 1 (Buildout Consistent with Canyon Springs Business Park Specific Plan).³

| Threshold | Impacts |
|------------------------------------|---|
| Aesthetics | Under Alternative 1, the Project site will be developed with buildings that are consistent with the design guidelines and development standards of the Canyon Springs Business Park Specific Plan. This alternative will not include implementation of the design guidelines and development standards that are included as part of the Project; therefore, development of the Project area will be less controlled and impacts to scenic resources and visual quality will be more impactful than under the Project. As such, overall, impacts to aesthetics will be greater under Alternative 1 than under the Project (DEIR, p. 6-31 – 6-32). |
| Agriculture and Forestry Resources | The Project site is not located on any Farmland designations. No forest land, timberland, or Timberland Production areas (as defined in the Public Resources Codes 12220(g) and 4526 or Government Code 51104(g)) are located within or adjacent to the Project site. Under Alternative 1, the Project site will be developed with the uses allowed under the Canyon Springs Business Park Specific Plan, which includes commercial and office uses. As described above, the Project site does not have any designated agricultural use, timberland production areas and no Williamson Act preserves; therefore, Alternative 1 will have no impacts with regard to agriculture and forestry resources. As such, the impacts of developing Alternative 1 will be the same as developing the Project (DEIR, p. 6-32). |

³ Source: DEIR, p. 6-31 – 6-47.

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| Air Quality | Alternative 1 will still result in air emissions that will be generated during construction and operation. Construction of this alternative will still require grading, site preparation, and construction of facilities, all of which generate air emissions. Alternative 1 will allow for the development of multistory commercial and office buildings in Planning Areas 7, 8, 9, and 10. This development will be more intense than the development allowed under the Project. Therefore, more vehicle trips will be generated by Alternative 1. As such, air quality impacts under Alternative 1 will be greater, and likely significant and unavoidable, due to the number of vehicle trips and lack of feasible mitigation to reduce emissions from those trips. Impacts to air quality under Alternative 1 are considered slightly more compared to those under the Project and will still be significant and unavoidable. Alternative 1 will also require a Statement of Overriding Considerations (DEIR, p. 6-33). |
| Biological Resources | Under Alternative 1, construction of commercial and office facilities will occur, and depending on the location of these facilities on the Project site, similar mitigation measures will be required. Alternative 1 allows for the development of multistory commercial and office buildings in Areas 7, 8, 9, and 10, which is more intense than the development allowed under the Project (DEIR, p. 6-33 – 6-35). |
| Cultural Resources | Alternative 1 will allow for the development of multistory commercial and office buildings, along with surface parking lots and landscaping, in Areas 7, 8, 9, and 10. Under this alternative, the same amounts of grading and ground disturbance will occur, and site plans and building scale will be similar than those developed under the Project. Therefore, impacts to cultural resources will be the same under Alternative 1 when compared to the Project (DEIR, p. 6-35). |
| Geology and Soils | Alternative 1 allows for the development of multistory commercial and office buildings in Areas 7, 8, 9, and 10. This development will be more intense than the development allowed under the Project and could subject more people to seismic or other geotechnical events. However, similar to the Project, structures constructed under this alternative will be designed to CBC standards that will anticipate impacts associated with liquefaction, expansive soils, and other seismic events. Thus, impacts associated with Alternative 1 will be the same as that of the Project (DEIR, p. 6-35 – 6-36). |
| Greenhouse Gas Emissions | Similar to the Project, construction of facilities under Alternative 1 will result in construction-related GHG emissions, and the emissions will be short-term in nature, and thereby, will not represent a long-term source of GHG emissions. In addition, Alternative 1 will be required to implement similar mitigation measures (MM-AQ-1 through MM-AQ-6) that will reduce GHG operational emissions to a level that is consistent with the target reduction percentage in the City of Riverside's CAP. The commercial and office uses allowed under Alternative 1 will be more intense than the development allowed under the Project; therefore, due to the increase in size of the development, GHG emissions impacts under Alternative 1 will be more when compared to the Project (DEIR, p. 6-36 – 6-37). |
| Hazards and Hazardous Materials | Under Alternative 1, the same potential hazards related to people working or residing within close proximity of a public airport will exist and similar mitigation measures will be necessary to ensure that an FAA Form 7460-1 is submitted to the FAA to ensure compliance with FAA standards and that the March ARB, Riverside County ALUC, and Caltrans Division of Aeronautics processes for review and approval are followed. The development allowed under Alternative 1 will include development of more multistory commercial and office buildings in Planning Areas 7, 8, 9, and 10 in comparison to the Project. As such, this development will be slightly more intense than the development allowed under the Project. Accordingly, there will be an increased number of visitors, customers, and employees present on the Project site as compared to the Project. Therefore, impacts related to hazards and hazardous materials under Alternative 1 will be slightly increased when compared to the Project (DEIR, p. 6-37 – 6-38). |
| Hydrology and Water Quality | Alternative 1 will be required to comply with all applicable federal, state, and local regulations regarding water quality and hydrology. The increase in the development potential will not remove these requirements. Similar to the Project, a SWPPP will be required, and BMPs that are similar to those required for the Project will be implemented to reduce potential impacts. Therefore, Alternative 1 will have the same impacts on water quality and hydrology when compared to the Project (DEIR, p. 6-38). |
| Land Use and Planning | Under Alternative 1, the City General Plan 2025 will not be amended, and the Canyon Springs Business Park Specific Plan will remain. In addition, Alternative 1 will not require the rezoning of the Project site or amendment of the City Zoning Map. The Canyon Springs Business Park Specific Plan will be implemented and all of its associated development standards will remain. Therefore, Alternative 1 will have greater land use impacts when compared to the Project (DEIR, p. 6-38 – 6-39). |

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| Mineral Resources | Alternative 1 will allow for the development of commercial and office uses on the Project site. The surrounding land uses are incompatible with mining operations, and mining operations are unlikely to take place at the Project site because they are not economically viable. Therefore, impacts to mineral resources will be the same under Alternative 1 as the Project (DEIR, p.6-39). |
| Noise | Alternative 1 will allow multistory commercial and office buildings to be constructed on the Project site, which will draw new customers, patrons, visitors, and employees to the area. With the development of these facilities, new noise sources will be created, including additional traffic, mechanical equipment, and noise associated with parking facilities. These noise sources would likely be similar to the Project's noise sources, and will require similar mitigation (MM-NOI-1). However, since the Project includes additional noise sources that Alternative 1 would not, such as helicopters and emergency service sirens, the Project is anticipated to have slightly more operational noise impacts than Alternative 1. Therefore, development under Alternative 1 will have reduced noise impacts when compared to the Project (DEIR, p. 6-39 – 6-40). |
| Population and Housing | Alternative 1 will allow for the development of multistory office and commercial buildings on the Project site. The implementation of Alternative 1 will introduce increased levels of customers, patrons, employees, and structures to the currently vacant Project site, and will generate a large number of new permanent jobs at full buildout. This will generate population growth by drawing new employees to an area that needs housing. However, Alternative 1 does not contain new residential uses like the Project (for senior housing, assisted living, etc.). The Project will introduce permanent and temporary residents to the area along with a number of new permanent jobs (approximately 2,450). Therefore, under Alternative 1, impacts to population/housing will be slightly less than impacts created by the Project (DEIR, p. 6-40 – 6-41). |
| Public Services | The implementation of Alternative 1 will introduce increased levels of customers, employees, patrons, and structures to the currently vacant Project site, but will not introduce permanent and temporary residents to the site. The development permitted under Alternative 1 is more intense than the development allowed under the Project; however, the emergency access and safety equipment requirements required to handle the commercial and office development allowed under Alternative 1 will be less than the requirements for the residential development allowed under the Project. Overall, due to the lack of permanent residents under Alternative 1, this alternative will have reduced impacts to public services when compared to the Project (DEIR, p. 6-41 – 6-42). |
| Recreation | The implementation of Alternative 1 will entail the introduction of increased levels of customers, employees, patrons, and structures to the currently vacant Project site, but will not entail the introduction of permanent and temporary residents. Overall, due to the lack of permanent residents under Alternative 1, this alternative will have reduced impacts to recreation when compared to the Project (DEIR, p. 6-42 – 6-43). |
| Transportation and Traffic | Under Alternative 1, the development of commercial and office land uses permitted in Areas 7, 8, 9, and 10 will be more intense than the development of healthcare and residential uses allowed under the Project. Therefore, the amount of traffic coming and going from the Specific Plan area will be increased in proportion with the development allowed under Alternative 1. There will also be an increase in the number of employees, patrons, customers, and visitors the Specific Plan area could hold, which will lead to an increase in traffic. Alternative 1 will also contribute to cumulative traffic impacts that result in deficient freeway segments in the Congestion Management Plan, and similar mitigation measures (MM-TRAF-1 through MM-TRAF-14) will be required. Therefore, impacts to transportation/traffic under Alternative 1 are considered slightly increased when compared to transportation/traffic impacts created by the Project and will be significant and unavoidable. Alternative 1 will require a Statement of Overriding Considerations (DEIR, p. 6-43 – 6-44). |
| Utilities and Service Systems | Under Alternative 1, the development permitted in Areas 7, 8, 9, and 10 will include commercial and office land uses, which are more intense than the healthcare and residential development allowed under the Project. During construction, the amount of solid waste generated by Alternative 1 will be increased, since there will be more square footage of building constructed. Additionally, since Alternative 1 will have more square footage and more intense allowable uses, the amount of wastewater and solid waste generated, as well as water used during operation, will also be more. Therefore, Alternative 1 will have increased impacts on utilities and service systems when compared to the Project (DEIR, p. 6-44 – 6-45). |

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| Energy Conservation | Alternative 1 will also result in an increase in the amount of electricity, natural gas, and petroleum used during construction and operation when compared to the Project. Since Alternative 1 will increase the development potential allowed and generate even more traffic without the TDM strategies included in the Project, the amount of energy required will be more than the amount of energy required under the Project. Therefore, Alternative 1 will have increased impacts on energy consumption when compared to the Project (DEIR, p. 6-45 – 6-46). |
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Relationship to Project Objectives

The following table identifies the Project objectives and whether or not Alternative 1 meets each objective.⁴

| Project Objective | Alternative Meets Objective? |
|---|--|
| 1. The proposed Canyon Springs Healthcare Campus Specific Plan will allow future development more streamlined by outlining future allowable uses, and laying out a cohesive set of design guidelines that will provide City staff, the future Canyon Springs Healthcare Campus operator, and the public with a clear understanding of how growth and development will occur at the site. | No. Under Alternative 1, the current land use designation and zoning for the Project site will remain the same as that allowed in the Canyon Springs Business Park Specific Plan and the Canyon Springs Business Park Specific Plan Overlay. There will be no design and development standards to help streamline the entitlement process of a healthcare campus that includes healthcare services under Alternative 1 (DEIR, p. 6-46). |
| 2. The overall goal of the proposed Canyon Springs Healthcare Campus Specific Plan is to guide future development on the Canyon Springs Healthcare Campus and define the extent, scale, and location of future development on the Canyon Springs Healthcare Campus. | No. The construction that will take place as a result of Alternative 1 will include commercial, office, and MOB uses as envisioned in the Canyon Springs Business Park Specific Plan instead of the development of a healthcare campus. Thus, none of the healthcare facilities, such as the hospital, the senior housing and independent living assisted living, and skilled nursing facilities will be developed under Alternative 1 (DEIR, p. 6-48). |
| 3. The Canyon Springs Healthcare Campus Specific Plan will allow for the construction of a hospital and MOBs with associated hospital-related facilities, as well as a senior housing, independent living, assisted living, and skilled nursing facility to address an existing shortage of healthcare service capacity now available to residents in the surrounding area as well as to improve access to healthcare for a growing population. | No. Under Alternative 1, the Project site will be developed with commercial, office, and MOB uses as envisioned in the Canyon Springs Business Park Specific Plan. Commercial, office complexes, some medical offices, and a possible hospital could be developed with a Conditional Use Permit. The additional facilities such as senior housing, independent living, assisted living, and skilled nursing facilities will not be constructed, and the existing healthcare service capacity issues in the area will not be addressed. Healthcare access for the growing population will only be partially improved under Alternative 1 (DEIR, p 6-46). |
| 4. In the event of a disaster, the Canyon Springs Healthcare Campus will provide another hospital facility that will serve Riverside and the surrounding communities. | Yes. Under Alternative 1, the Project site is allowed to be developed with the commercial, office, and MOB uses envisioned in the Canyon Springs Business Park Specific Plan. The Canyon Springs Business Park Specific Plan does allow for a hospital use with a Conditional Use Permit, and as such, the development of a hospital could be designed or constructed to help serve evolving healthcare demands for the City of Riverside and residents of the region (DEIR, p. 6-46 – 6-47). |

⁴ Source: DEIR, p. 6-46 – 6-47.

Finding

The City Council rejects Alternative 1 as a Project alternative on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) Alternative 1 would not reduce or eliminate the significant and unavoidable impacts of the Project and would result in greater impacts to traffic/transportation and air quality; (2) Alternative 1 meets one of the Project's four objectives. Therefore, Alternative 1 is rejected from further consideration as infeasible.

Facts and Supporting Information

Alternative 1 (Buildout Consistent with Canyon Springs Business Park Specific Plan) includes an increase in the development potential that will result in an increase in environmental impacts to aesthetics, air quality, biological resources, GHG emissions, hazards and hazardous materials, land use, transportation/traffic, utilities and service systems, and energy conservation. In addition, Alternative 1 will not meet all of the Project objectives. By implementing the uses allowed under the Canyon Springs Business Park Specific Plan, the capacity to develop a long-range, comprehensively planned, advanced healthcare campus is greatly reduced. Therefore, this alternative has been eliminated from further consideration and is determined to be not feasible (DEIR, p. 6-47).

C. Alternative 2: Alternative Site Location in City of Moreno Valley

Description

The Project will construct the healthcare campus on the approximately 50.85-acre Project site located within the Sycamore Canyon/Canyon Springs Neighborhood of Riverside, California. In accordance with State CEQA Guidelines, Section 15126.6(f)(2), the City attempted to identify feasible alternative off-site locations within the Project area that could be available for the proposed healthcare campus development. After a review of 20 available open spaces of approximately 50 acres (similar to the Project site in size), a site where a hospital could be located was identified in the City of Moreno Valley (DEIR, p. 6-47).

Summary of Impacts

The following table presents a summary of the impacts associated with Alternative 2 (Alternative Site Location in City of Moreno Valley).⁵

| Threshold | Impacts |
|------------|--|
| Aesthetics | Alternative 2 will be located approximately 0.6 mile northeast of the Project site along SR-60. The Alternative 2 site is located approximately 11.5 miles from the portion of I-215 that is identified in the California Scenic Highway System, and views to the Alternative 2 site from this segment of I-215 will be prevented by distance, as well as intervening development and terrain. SR-60 is a state route designated by the City of Moreno Valley General Plan as a scenic route. Alternative 2 development will |

⁵ Source: DEIR, p. 6-48 – 6-66.

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| | <p>potentially obstruct or interrupt views from SR-60 to the Box Springs Mountains (located north of SR-60). Therefore, development on the Alternative 2 site, located north of SR-60, will potentially obstruct or interrupt existing views of the terrain available to east- and west-bound motorists (DEIR, p. 6-48 – 4-49).</p> <p>Development of the Alternative 2 site will be slightly more impactful to existing available views from the M Peak and segments of the M trail on the Box Springs Mountain Reserve. As viewed from Box Springs Mountain Reserve, development of the Alternative 2 site with a three- to five-story healthcare campus will be inconsistent with the existing urban character of the immediate surrounding area. Furthermore, proposed development on the Alternative 2 site will obstruct or interrupt available views from elevated vantage points in the reserve (DEIR, p. 6-49).</p> <p>Therefore, impacts to aesthetics from development under Alternative 2 are considered to be more impactful than development under the Project because Alternative 2 development will result in greater adverse effects on existing views and visual character than the Project (DEIR, p. 6-49).</p> |
| Agriculture and Forestry Resources | <p>Similar to the Project site, the Alternative 2 site is also designated “Urban and Built-up Land” by the California DOC Farmland Mapping and Monitoring Program. Since the Alternative 2 site is not located on a site with any Farmland designations, no conversion of Prime Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to non-agricultural use will occur under Alternative 2. In addition, the Moreno Valley Land Use Zoning Map and General Plan Land Use Map indicate that no portion of the Project site is located within an area that is zoned for agricultural use, and the site is zoned for Community Commercial under the City of Moreno Valley Municipal Code. There are also no Williamson Act or Timberland preserves on the Alternative 2 site. Since there are no impacts to Agriculture or Forestland under this alternative, the impacts of Alternative 2 as compared to the Project will be the same (DEIR, p. 6-49 – 6-50).</p> |
| Air Quality | <p>Alternative 2 will also result in air emissions that will be generated during construction and operation. Construction of Alternative 2 will still require grading, site preparation, and construction of facilities, all of which generate air emissions, but due to the slope of the site, the equipment will generate slightly more emissions during construction. Alternative 2’s development will be the same development allowed under the Project and the same mitigation measures will be implemented. Therefore, the amount of vehicle trips generated under Alternative 2 will be the same, and the air quality impacts under Alternative 2 will continue to be considered significant and unavoidable due to the number of vehicle trips and lack of feasible mitigation to reduce emissions from those trips. Project impacts and cumulative impacts to air quality under Alternative 2 are considered slightly more (due to developing on a sloping site) when compared to those air quality impacts created by the Project and will still be significant and unavoidable. Alternative 2 will require a Statement of Overriding Considerations (DEIR, p. 6-51).</p> |
| Biological Resources | <p>Like the Project site, the Alternative 2 site is currently vacant; however, under Alternative 2, construction of proposed facilities will occur on a site that has six unnamed drainage features flowing in a north to south direction. During an aerial analysis of maps, it was observed that the site likely contains two jurisdictional drainage features that meet the criteria to be considered jurisdictional. The potential jurisdictional features contain evidence of a noticeable change in soil and vegetation composition and what appears to be hydrologic connectivity to surrounding areas. Alternative 2’s components will need to be designed to avoid all potential jurisdictional areas on the site. Mitigation measures addressing potential direct and indirect impacts from grading activities during the bird breeding and nesting season may also be needed, as well as the installation of fencing and drainage controls to prevent water flow and sediment from entering jurisdictional areas on portions of the site. Therefore, Alternative 2 may be more impactful to wetlands, as defined by Section 404 of the Clean Water Act, directly, indirectly, and cumulatively. The drainage features will need a jurisdictional delineation to determine if they are considered waters of the United States and subject to the jurisdiction of the wetland agencies. If they are determined to be waters of the United States, they will require similar mitigation measures identified for the Project. In addition, two of these drainage features appear to be longer than 300 feet, and if the proposed construction impacts more than 300 linear feet (0.5 acre) of a feature found to be under the jurisdiction of the ACOE, Project Alternative 2 will not be covered under the Nationwide Permit program and will need to prepare an individual ACOE permit (DEIR, p. 6-33 – 6-35).</p> |

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| | <p>Like the Project site, the Alternative 2 site is also located within the MSHCP Area. Based on the conservation description provided on the MSHCP map, it is anticipated that MSHCP review will find that the Alternative 2 site will also have suitable habitat for burrowing owl and nesting birds and could create potential impacts to other covered species. Alternative 2 will also be subject to similar mitigation measures as those outlined in Section 4.3.6 for the Project. With mitigation, Alternative 2 will also be compliant with the MSHCP, and impacts will likely be considered less than significant (DEIR, p. 6-53).</p> <p>Overall, because of the additional drainage features on the Alternative 2 site, impacts to wetlands and other biological resources are considered to be greater under Alternative 2 than impacts under the Project (DEIR, p. 53).</p> |
| Cultural Resources | <p>Like the Project site, the Alternative 2 site is currently vacant. The site is also void of any historic buildings or rock outcroppings; therefore, like the Project, Alternative 2 will have no impact to historical resources. Given its close proximity to the Project site, many of the previously recorded cultural resources surrounding the Project site are likely to be within 1 mile of the Alternative 2 site, but an area search will be necessary to determine if any of these resources is located within the Alternative 2 APE. Like the Project, the Alternative 2 site is also located within a low archaeological sensitivity area, but a pedestrian field survey will be needed to determine if there are any archaeological resources on the Alternative 2 site or within an expanded APE. Under Alternative 2, the same amount of grading and ground disturbance will occur, and site plans and building scale will be similar to those of the Project. Therefore, under Alternative 2, the Project will be subject to the same mitigation measures as the Project to mitigate the potential impacts associated with the potential discovery of unknown resources. Additionally, as the Alternative 2 site is also located in an area of High Paleontological Sensitivity to encounter paleontological resources at depths of 4 feet or greater below the ground's surface, Alternative 2 will be subject to the same mitigation measures as the Project to mitigate impacts to paleontological resources. Therefore, Alternative 2 will be required to have the same mitigation measures as the Project, and it is anticipated that impacts to cultural resources under Alternative 2 will be the same as impacts created by the Project (DEIR, p. 6-53 – 6-54).</p> |
| Geology and Soils | <p>Similar to the Project, structures constructed under Alternative 2 will be designed to CBC standards that will anticipate impacts associated with liquefaction, expansive soils, and other seismic events. However, Alternative 2 allows development of a healthcare campus on a vacant site that is substantially more sloped than the Project site, and therefore, will be more susceptible to landslides and other seismic geotechnical events. Due to the sloped terrain of the Alternative 2 site, geotechnical impacts associated with Alternative 2 will be greater than that of the Project (DEIR, p. 6-54 – 6-55).</p> |
| Greenhouse Gas Emissions | <p>Alternative 2's development will be the same as the development allowed under the Project. However, due to the sloped area and thus sharper increase in elevation of the Alternative 2 site, the construction of the proposed facilities under Alternative 2 will require more grading and site preparation than needed to develop the Project. Although construction-related GHG emissions will still be short-term in nature and will not represent a long-term source of GHG emissions, construction-related GHG emissions will be slightly higher with the additional grading required on the sloped site under Alternative 2. Alternative 2 will be required to have similar mitigation measures to reduce GHG operational emissions. Therefore, with the implementation of similar mitigation measures as outlined in Section 4.5.6 of the DEIR, Alternative 2 will have similar operational GHG emissions that are less than significant. Overall, due to the additional grading and site preparation, it is anticipated that GHG emissions impacts under Alternative 2 will be slightly more than those impacts created by the Project (DEIR, p. 6-55 – 6-56).</p> |
| Hazards and Hazardous Materials | <p>Under Alternative 2, the site is located within Zone E of the March ARB/Inland Port, which is intended to encompass areas of low noise and low accident potential risk within the flight corridor buffer. Accident potential risk levels in this zone are low. The potential hazards that will exist on the Alternative 2 site are reduced from the potential hazards of the Project. Similar mitigation measures will be necessary to require that an FAA Form 7460-1 is submitted to the FAA to ensure compliance with FAA standards, and that the March ARB, Riverside County ALUC, and Caltrans Division of Aeronautics processes for review and approval are followed. Alternative 2's development permitted will be the same as the development allowed under the Project. Therefore, there will be the same amount of patients, visitors, and employees present on the Alternative 2 site when compared to the Project. Overall, impacts related to public airport</p> |

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| | proximity safety hazards under Alternative 2 will be slightly reduced when compared to impacts created by the Project (DEIR, p. 6-56 – 6-57). |
| Hydrology and Water Quality | Like the Project site, there are no waterbodies or streams on the Alternative 2 site, and stormwater on site and in surrounding areas are collected by drainage swales, inlets, and subsurface storm drains and delivered to off-site basins. Like the Project site, the Alternative 2 site has no impervious surfaces. The Alternative 2 site, however, does have a more substantial slope than the Project site and has as many as six drainage features on site; therefore, the site may be subject to more runoff than infiltration. The Alternative 2 site is not within a Federal Emergency Management Agency 100-year flood hazard area or a dam inundation area; however, given the substantial slope of the Alternative 2 site, the runoff created may exceed the capacity of the existing stormwater drainage systems and may require new systems. Under Alternative 2, the Project will also be required to comply with all applicable federal, state, and local regulations regarding water quality and hydrology and this alternative's development will be the same as the Project's development and will not remove these requirements. Similar BMPs, design features, and the required SWPPP will also be implemented to further reduce potential impacts. Therefore, Alternative 2 is expected to have a greater impact on water quality and hydrology than the impacts created by the Project (DEIR, p. 6-57). |
| Land Use and Planning | Under Alternative 2, the City of Moreno's General Plan will need to be amended to designate the commercial area as the Canyon Springs Healthcare Campus Specific Plan. This Alternative will also need a rezone for the property and would involve amending the City of Moreno Valley's Zoning Map to designate the area as Canyon Springs Healthcare Campus Specific Plan. This will allow the Specific Plan to be implemented and all of its associated development standards to be in place for the site. With the adoption of the proposed General Plan and Zoning Code amendments, the land use impacts of Alternative 2 will be the same as that of the Project (DEIR, p. 6-57 – 6-58). |
| Mineral Resources | The Alternative 2 site also lies within MRZ-3. Like the Project site, portions of the Alternative 2 site have also been previously disturbed and rough graded and are surrounding by existing development. Similar to the Project site, the land uses surrounding the Alternative 2 site are also incompatible with mining operations and it is unlikely that an economically viable mining operation could take place at the Alternative 2 site. Therefore, impacts regarding mineral resources are the same at the Alternative 2 site as they are at the Project site (DEIR, p. 6-58 – 6-59). |
| Noise | <p>Like the Project, construction at the Alternative 2 site will also be restricted to daytime hours consistent with City of Moreno Valley requirements, so vibration impacts will also be eliminated from sensitive nighttime hours. There are an increased number of off-site sensitive receptors located in close proximity to the Alternative 2 site than those located near the Project site. Depending on exactly where the proposed buildings are positioned on the Alternative 2 site, noise from operations will be readily audible to these sensitive receptors, and in addition to the standard policies and Project design features outlined for the Project, additional noise reduction measures may be required as conditions of approval for Alternative 2 building permits. Analysis of noise effects on noise sensitive land uses will need to be conducted by an acoustical specialist to provide additional mitigation measures that will reduce long-term operational noise levels associated with Alternative 2's operations (DEIR, p. 6-59).</p> <p>Alternative 2's frequency of emergency vehicle visits, helicopter visits, traffic associated with the proposed parking structures and surface parking lots, use of on-site stationary equipment, and additional traffic generated along adjacent roads will be the same as the Project's, and the mitigation measure (MM-NOI-1) outlined for the Project will be required for Alternative 2 as well. However, given the close proximity of additional sensitive receptors to the Alternative 2 site (i.e., single-family residences to the north and east, and Box Springs Elementary School to the north), additional analysis of the noise effects from operations will need to be conducted to determine their impact on the nearby sensitive receptors and determine if additional mitigation measures are needed to reduce operational noise levels. Therefore, Alternative 2 is expected to have greater noise impacts when compared to the Project (DEIR, p. 6-59 – 6-60).</p> |
| Population and Housing | Alternative 2 will allow the same development as the Project, and this alternative will contribute the same employment positions or housing opportunities as the Project. Alternative 2 will need to be evaluated in terms of the jobs/housing balance for the City of Moreno Valley, but since the development will not generate substantial population growth, it is anticipated that population growth will be less than |

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| | significant. Similar to the Project site, the Alternative 2 site does not currently support any housing; therefore, no housing or people will be displaced and the construction of replacement housing will not be necessary as a result of developing Alternative 2. Therefore, under Alternative 2, impacts to population/housing will be the same as the Project (DEIR, p. 6-60). |
| Public Services | The development allowed under Alternative 2 is the same as the development allowed under the Project; therefore, Alternative 2 will create an increased demand for public services that could be manifested by an increased number of emergency and public service calls. Development of the Project on the Alternative 2 site will continue to be designed in compliance with the current building code requirements; however, unlike the Project, development of the Alternative 2 site was not necessarily considered in the City of Moreno Valley's General Plan and will need to be designed in compliance with Moreno Valley Fire Department, Police Department, school district, recreation department, and other public service department requirements. An analysis of fire and police protection services will need to be conducted to determine whether additional stations, personnel, or equipment will be needed to maintain current levels of service and response times as development pursuant to the General Plan proceeds. The site will also need to be evaluated to determine if adequate emergency access can be provided. Therefore, because the General Plan did not necessarily contemplate development of the site, it is anticipated that new or physically altered government facilities will be required to accommodate the Project. As such, Alternative 2 is anticipated to have greater impacts to public services when compared to the Project (DEIR, p. 6-60 – 6-62). |
| Recreation | Alternative 2 will allow for the same development as the Project, and this alternative will contribute the same number of employment positions or housing opportunities as the Project. An analysis of recreational facilities will need to be conducted to determine whether additional recreational facilities or expansion of existing facilities will be required to be consistent with City of Moreno Valley's General Plan goals. It is anticipated that new or physically altered recreational facilities will be required to accommodate Alternative 2. As such, Alternative 2 is anticipated to have greater impacts to recreation when compared to the Project (DEIR, p. 6-62 – 6-63). |
| Transportation and Traffic | <p>Under Alternative 2, the development will be the same as the development allowed under the Project. Therefore, the amount of traffic coming and going to the Alternative 2 site will be the same as the amount of traffic generated under the Project. Like the Project site, the Alternative 2 site is currently vacant, and the number of new residents, patients, employees, and visitors to the Specific Plan area will lead to an increase in traffic in the surrounding area. Alternative 2 will likely have significant impacts to a number of intersections and roadway segments during Existing Plus Project traffic conditions and Cumulative (Opening Year – 2016) with Project traffic conditions, and will likely require the implementation of mitigation measures in the form of roadway or intersection improvements similar to the Project (DEIR, p. 6-64).</p> <p>Alternative 2 will also contribute to the existing and forecasted deficient freeway segments in the Congestion Management Plan; therefore, the Alternative 2 Project will contribute to these cumulative traffic impacts and will be considered cumulatively considerable and unavoidable like the Project. Therefore, impacts to transportation/traffic under Alternative 2 are considered to be the same as the significant and unavoidable transportation/traffic impacts created by the Project. Alternative 2 will require a Statement of Overriding Considerations (DEIR, p. 6-64).</p> |
| Utilities and Service Systems | Under Alternative 2, development will be the same as the development permitted under the Project. The estimated demand for Alternative 2 will be the same as the demand generated under the Project, and will require the same mitigation measures as the Project to minimize impacts to water demand to a level that is less than significant. During construction, the amount of solid waste generated by this alternative will be the same, since there will be the same square footage of building constructed. Additionally, since Alternative 2 will have the same square footage and the same intensity of uses, the amount of solid waste generated during Alternative 2's operation will be the same as that generated under the Project, and the same mitigation measures will be required. A review of the solid waste and recycling facilities in the City of Moreno Valley shows that there is existing capacity for the solid waste generated by developing Alternative 2. Therefore, Alternative 2 will have the same impacts on utilities and service systems as the Project (DEIR, p. 6-64 – 6-65). |
| Energy Conservation | Alternative 2 will have the same development as the development allowed in the Project, and will have the same increase in the amount of electricity, natural gas, and petroleum used during construction and |

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| | operation. The amount of energy required will be the same of required under the Project and will require the same mitigation measures (MM-AQ-2, MM-AQ-3, and MM-AQ-4) as required for the Project. An analysis of the City of Moreno Valley's regulations regarding TDM would need to be conducted to determine if the TDM strategies in the Specific Plan would help achieve vehicle reduction targets for Moreno Valley or if other strategies would be required; however, it is anticipated that with the implementation of similar mitigation measures and Project design features, Alternative 2 will have the same impacts on energy consumption when compared to the Project (DEIR, p. 6-65 – 6-66). |
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Relationship to Project Objectives

The following table identifies the Project Objectives and whether or not Alternative 3 meets each objective.⁶

| Project Objective | Alternative Meets Objective? |
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| 1. The proposed Canyon Springs Healthcare Campus Specific Plan will allow future development more streamlined by outlining future allowable uses, and laying out a cohesive set of design guidelines that will provide City staff, the future Canyon Springs Healthcare Campus operator, and the public with a clear understanding of how growth and development will occur at the site. | Yes. Alternative 2 will allow a future entitlement process that will be more streamlined by providing all stakeholders a specific plan that will outline future allowable uses and provide a cohesive set of design guidelines that will provide a clear understanding of how growth and development will occur at the Alternative 2 site (DEIR, p. 6-66). |
| 2. The overall goal of the proposed Canyon Springs Healthcare Campus Specific Plan is to guide future development on the Canyon Springs Healthcare Campus and define the extent, scale, and location of future development on the Canyon Springs Healthcare Campus. | Yes. Alternative 2 will provide the Canyon Springs Healthcare Campus Specific Plan, which will guide future development of a comprehensively planned, integrated healthcare campus on the Alternative 2 site. The Canyon Springs Healthcare Campus Specific Plan will include design guidelines that define the extent, scale, location, and future development of the Canyon springs Healthcare Campus on the Alternative 2 site (DEIR, p. 6-66). |
| 3. The Canyon Springs Healthcare Campus Specific Plan will allow for the construction of a hospital and MOB's with associated hospital-related facilities, as well as a senior housing, independent living, assisted living, and skilled nursing facility to address an existing shortage of healthcare service capacity now available to residents in the surrounding area as well as to improve access to healthcare for a growing population. | Yes. Under Alternative 2, development will be allowed for the construction of a hospital, MOB's, and associated hospital-related facilities, as well as senior housing, independent living, assisted living, and a skilled nursing facility. Alternative 2 will improve access to healthcare for a growing population in the City of Moreno Valley, City of Riverside, and the surrounding communities (DEIR, p. 6-66—6-67). |
| 4. In the event of a disaster, the Canyon Springs Healthcare Campus will provide another hospital facility that will serve Riverside and the surrounding communities. | Yes. Under Alternative 2, another healthcare campus facility will be designed and constructed to meet the healthcare demands for the City of Riverside and the surrounding communities in the event of a disaster (DEIR, p. 6-67). |

Finding

The City Council rejects Alternative 2 as a Project alternative on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) Although

⁶ Source: DEIR, p. 6-66 – 6-67.

Alternative 2 would have reduced impacts to hazards and hazardous materials, it would have increased environmental impacts related to aesthetics, air quality, biological resources, geology and soils, GHG emissions, hydrology and water quality, noise, public services and recreation; (2) Although Alternative 2 will meet all of the Project objectives, it will not reduce the Project's significant and unavoidable air quality and transportation/traffic impacts to less than significant levels.

Facts and Supporting Information

While Alternative 2 does meet all of the Project objectives and was found to have reduced impacts related to hazards and hazardous materials, it would have increased environmental impacts related to aesthetics, air quality, biological resources, geology and soils, GHG emissions, hydrology and water quality, noise, public services and recreation. Additionally, Alternative 2 will not reduce the Project's significant and unavoidable air quality and transportation/traffic impacts to less than significant levels (DEIR, p. 6-108). Thus, this alternative has been eliminated from further consideration.

D. Alternative 3: Alternative Location in City of Riverside

Description: In accordance with State CEQA Guidelines, Section 15126.6(f)(2), the City attempted to identify feasible alternative off-site locations within the Project area that could be available for the proposed healthcare campus development. After a review of 20 available open spaces of approximately 50 acres (similar to the Project site in size) around the City of Riverside, the City of Moreno Valley, and the area controlled by the March Joint Powers Authority, a site where a hospital could be located was identified in the City of Riverside (DEIR, p. 6-67).

Alternative 3 involves the construction of the proposed healthcare campus at the 64.37-acre area site located west of SR-60 and south of Central Avenue (Assessor's Parcel Number 253-270-043). This site is part of the Sycamore Canyon Wilderness Park and is approximately 1.9 miles west of the Project site in the City of Riverside. Under Alternative 3, the Project Applicant will lease or purchase the land from the City for construction of the Project (DEIR, p. 6-67 – 6-68).

Summary of Impacts

The following table presents a summary of impacts associated with Alternative 3 (Alternative Location in City of Riverside).⁷

| Threshold | Impacts |
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| Aesthetics | Alternative 3 is located approximately 1.9 miles west of the Project site, west of SR-60, and south of Central Avenue, within the Sycamore Canyon Wilderness Park. While the characteristics of local terrain suggests that views to the Alternative 3 site may be available from the Box Springs Mountain Reserve, with the exception of the highest locations of the M Peak and M Trail, views to the Alternative 3 site are not available from this area due to the presence of intervening development and landscaping that |

⁷ Source: DEIR, p. 6-67 –6-87.

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| | <p>obscure views to the Alternative 3 site. Therefore, as viewed from Box Springs Mountain Reserve, development of the Alternative 3 site with a healthcare campus with primarily three- to five-story buildings will not substantially obstruct or interrupt available views from elevated vantage points in the reserve (DEIR, p. 6-68 – 6-69).</p> <p>Given the scale of the proposed buildings, development on the Alternative 3 site may appear incompatible with the existing Sycamore Canyon Wilderness Park and the single-story residential development located north and east of the park. Furthermore, certain views of Sycamore Canyon from adjacent residential uses will be blocked by the development allowed under Alternative 3 and available views from some adjacent residences to parklands will be obstructed, depending on how the buildings are positioned on the site. Therefore, Alternative 3 development will result in more impacts to views than the Project (DEIR, p. 6-69).</p> <p>The nearest facility of the California Scenic Highway System, I-215 from SR-74 near Romoland to SR-74 near Perris, is located approximately 11 miles south of the Alternative 3 site. This segment of the Interstate is identified by Caltrans as an eligible state scenic highway. Views to the Alternative 3 site from this segment of I-215 are prevented by distance and intervening development and terrain, as the Alternative 3 site is located approximately 11.5 miles from that portion of I-215 (DEIR, p. 6-69).</p> <p>Since development of three- to five-story healthcare buildings will be inconsistent with the existing urban character of the immediate surrounding area, and existing views of the Sycamore Canyon Wilderness Park will be obstructed from adjacent residences, impacts to aesthetics under Alternative 3 are considered to have a greater impact when compared to the Project (DEIR, p. 6-69).</p> |
| Agriculture and Forestry Resources | <p>Similar to the Project site, the Alternative 3 site is also designated "Urban and Built-up Land" by the California DOC Farmland Mapping and Monitoring Program. The Alternative 3 site is not located on a site with any Farmland designations. No portion of the Alternative 3 site is located within an area that is zoned for agricultural use. There are also no Williamson Act or Timberland preserves on the Alternative 3 site. As such, since there are no impacts to Agriculture or Forestland under this alternative, the impacts of Alternative 3 as compared to the Project will be the same (DEIR, p. 6-69 – 6-70).</p> |
| Air Quality | <p>Alternative 3 will result in more air emissions than will be generated during construction of the Project. Construction of this alternative will require grading, site preparation, and construction of facilities on a site that has significant slopes. The sloped area will require additional grading, and therefore, will generate additional air emissions during construction. Alternative 3's development will be the same as the development allowed under the Project, and the same mitigation measures (MM-AQ-1 through MM-AQ-6) will be implemented. Therefore, the amount of vehicle trips generated will be the same and air quality impacts under Alternative 3 will continue to be considered significant and unavoidable due to the number of vehicle trips and lack of feasible mitigation to reduce emissions from those trips. Since additional air quality impacts will be generated during the construction of Alternative 3 (due to development on steep terrain), impacts to air quality under Alternative 3 are considered more when compared to those impacts created by the Project. Cumulative impacts generated by Alternative 3 will still be significant and unavoidable and will require a Statement of Overriding Considerations (DEIR, p. 6-70 – 6-71).</p> |
| Biological Resources | <p>Like the Project site, the Alternative 3 site is currently vacant; however, under Alternative 3, construction of proposed facilities will occur within Sycamore Canyon Wilderness Park. This park includes several unnamed drainage features, including a meandering drainage feature that flows from east to west across the Alternative 3 site. During an aerial analysis of maps, it was observed that the Alternative 3 site likely contains one jurisdictional drainage feature that meets the criteria to be considered jurisdictional. The potential jurisdictional feature contains evidence of a noticeable change in soil and vegetation composition and what appears to be hydrologic connectivity to other areas. Alternative 3 components will need to be designed to avoid all potential jurisdictional areas on the site. Mitigation measures addressing potential direct and indirect impacts from grading activities during the bird breeding and nesting season may also be needed, as well as the installation of fencing and drainage controls to prevent water flow and sediment from entering jurisdictional areas on portions of the site. Therefore, Alternative 3 may be more impactful to wetlands as defined by Section 404 of the Clean Water Act directly, indirectly and cumulatively. These features will need a jurisdictional delineation to determine if they are considered waters of the United States and subject to the jurisdiction of the wetland</p> |

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| | <p>agencies. If they are determined to be waters of the United States, they will require similar mitigation measures to that required for the Project. In addition, the drainage feature appears to be longer than 300 feet, and if the proposed construction impacts more than 300 linear feet (0.5 acre) of a feature found to be under the jurisdiction of the ACOE, Alternative 3 will not be covered under the Nationwide Permit program and will need to prepare an individual ACOE permit (DEIR, 6-73).</p> <p>Like the Project site, the Alternative 3 site is located within the MSHCP area and is subject to the same consistency review with MSHCP Sections as the Project. Based on the conservation description provided on the MSHCP map, it is anticipated that the MSHCP review will find that the Alternative 3 site will also have suitable habitat for rare local species. The Sycamore Canyon Wilderness Park provides vast areas of open space containing vital biological resources and wildlife habitat areas, including rare local species and species such as the SKR. The Alternative 3 site is located in SKR HCP, and in compliance with that plan, will need to pay the SKR mitigation fee. There are expected to be other local species on the Alternative 3 site; thus, the proposed development on the Alternative 3 site could create potential impacts to covered species. Alternative 3 may also be subject to mitigation measures such as payment of an MSHCP development mitigation fee and HCP fees for any impacted species, in order to be compliant with the MSHCP (DEIR, p. 6-73).</p> <p>Overall, because of the additional drainage features on the Alternative 3 site and the known potential for wildlife habitat areas being present on the site, impacts to biological resources are considered to be more impactful under Alternative 3 when compared to the Project (DEIR, p. 6-73).</p> |
| Cultural Resources | <p>Like the Project site, the Alternative 3 site is currently vacant; however, the site does have several natural features including rock outcroppings. Thus, Alternative 3 could have an impact to historical resources. The site has not been graded and has the potential to have cultural resources within the site or within 1 mile of the site, but an area search will be necessary to determine if any of these resources is located within the Alternative 3 APE. The Alternative 3 site is also located within a medium archaeological sensitivity area and a high geographically sensitive area; therefore, there is a greater likelihood that archaeological resources will be found in the Alternative 3 site. There will need to be an area study to determine if there are any archaeological resources on the Alternative 3 site or within the expanded APE. Alternative 3's development will be the same as the development allowed under the Project. However, the amount of grading and ground disturbance that will be required will be greater due to the slope of the existing terrain. Therefore, under Alternative 3, the Project will be subject to more mitigation than the Project at the Project site to mitigate potential impacts associated with ground disturbance and the potential discovery of unknown resources (DEIR, p. 6-74 – 6-75).</p> <p>The Alternative 3 site is located in an area of low paleontological sensitivity to encounter paleontological resources. Thus, no direct mitigation is required unless a fossil is encountered during site development. Should a fossil be encountered, Alternative 3 will be subject to the same mitigation measures (MM-CUL-1 through MM-CUL-4) when compared to the Project to mitigate potential impacts to paleontological resources (DEIR, p. 6-75).</p> <p>Overall, Alternative 3 will be required to have more mitigation measures than the Project for archeological resources and the same mitigation for paleontological resources. It is anticipated that impacts to cultural resources under Alternative 3 will be greater than those created by the Project (DEIR, p. 6-75).</p> |
| Geology and Soils | <p>Similar to the Project, structures constructed under Alternative 3 will be designed to CBC standards that will anticipate impacts associated with liquefaction, expansive soils, and other seismic events. Furthermore, the OSHPD Facilities Development Division will also review and approve the plans and specifications of the buildings allowed under Alternative 3 to ensure compliance with the provisions of the CBC (Title 24, California Code of Regulations). However, Alternative 3 allows for the development of a healthcare campus on a vacant site that is substantially more sloped than the Project site and that will be more susceptible to landslides and other seismic geotechnical events. Due to the sloped terrain of the Alternative 3 site, geotechnical impacts associated with Alternative 3 will be greater than those of the Project (DEIR, p. 6-75 – 6-78).</p> |

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| Greenhouse Gas Emissions | <p>The development allowed under Alternative 3 will be the same as the development allowed under the Project. Therefore, the construction of the proposed facilities under Alternative 3 will be similar to construction under the Project. However, although the Alternative 3 site is vacant, it has not been previously graded and will require a higher level of grading and site preparation when compared to the Project site. Construction-related GHG emissions will be higher for Alternative 3 than for the Project, but will still be short-term in nature and will not represent a long-term source of GHG emissions. Alternative 3 will be required to have similar mitigation measures (MM-AQ-1 through MM-AQ-6) to reduce GHG operational emissions to a level that is consistent with the target reduction percentage in the City of Riverside's CAP. Therefore, with the implementation of the mitigation measures outlined in Section 4.5.6 (MM-AQ-1 through MM-AQ-6), Alternative 3 will also have operational GHG emissions that are less than significant. Overall, it is anticipated that GHG emissions impacts under Alternative 3 will be slightly more than those created by the Project because of an increase in construction-related GHG emissions (DEIR, p. 6-76).</p> |
| Hazards and Hazardous Materials | <p>Like the Project site, the Alternative 3 site is located within Zone D – Flight Corridor Buffer of the March ARB/Inland Port ALUCP. The Alternative 3 site is not located within a designated APZ. Therefore, under Alternative 3, the same potential hazards will exist and similar mitigation measures will be required to ensure that an FAA Form 7460-1 is submitted to the FAA to ensure compliance with FAA standards, and that the March ARB, Riverside County ALUC, and Caltrans Division of Aeronautics processes for review and approval are followed. Alternative 3's development will be the same as the development allowed under the Project. Therefore, there will be the same amount of patients, visitors, and employees present on the Alternative 3 site when compared to the Project site. Therefore, impacts related to public airport proximity safety hazards under Alternative 3 will be the same when compared to the Project (DEIR, p. 6-67).</p> |
| Hydrology and Water Quality | <p>The Alternative 3 site is on a sloped area that has a sharper increase in elevation than the Project site. Like the Project site, there are no waterbodies or streams on the Alternative 3 site, and stormwater on site and in surrounding areas are collected by drainage swales, inlets, and subsurface storm drains and delivered to off-site basins. Like the Project site, the Alternative 3 site has no impervious surfaces. The Alternative 3 site, however, does have a more substantial slope than the Project site. In addition, an aerial analysis of maps of the Alternative 3 site shows that the site has at least two unnamed drainage features on site, including a meandering drainage feature that flows from east to west. Given the slope of the site and the presence of drainage features, the site may be subject to more runoff than infiltration. The Alternative 3 site is not within a Federal Emergency Management Agency 100-year flood hazard area or a dam inundation area; however, given the substantial slope of the Alternative 3 site, the runoff created may exceed the capacity of the existing stormwater drainage systems and may require new systems. Under Alternative 3, the Project will also be required to comply with all applicable federal, state, and local regulations regarding water quality and hydrology, and Alternative 3's development will be the same as the Project's development and will not remove these requirements. Similar BMPs, design features, and the required SWPPP will also be implemented to further reduce potential impacts. Therefore, Alternative 3 is expected to have a greater impact on water quality and hydrology than the impacts created by the Project (DEIR, p. 6-78).</p> |
| Land Use and Planning | <p>Under Alternative 3, the City of Riverside's General Plan will need to be amended to remove the current land use designation of Public Park and redesignate the now vacant area as the Canyon Springs Healthcare Campus Specific Plan. This loss of public park will be a significant land use impact and will need to be mitigated. This alternative will also need a rezone on the City of Riverside's Zoning Map to allow the existing R-1-8500 SP - Single-Family Residential and Specific Plan (Sycamore Canyon Business Park) Overlay Zones area to be rezoned as the Canyon Springs Healthcare Campus Specific Plan. This will allow the Specific Plan to be implemented and all of its associated development standards to be in place for the site, but an evaluation of the land uses will need to be conducted to determine if there are any impacts that require mitigation. With the adoption of the proposed General Plan and Zoning Code amendments, the land use impacts of Alternative 3 will be greater when compared to the Project, because development of the Alternative 3 site will result in loss of public park land (DEIR, p. 6-78 – 6-79).</p> |
| Mineral Resources | <p>Like the Project site, the Alternative 3 site also lies within MRZ-3. The Alternative 3 site is a public park site that is surrounded by residential development. Like the Project site, the land uses within and adjacent to the Alternative 3 site are also incompatible with mining operations, and it is unlikely that an economically viable mining operation could take place at the Alternative 3 site. As such, impacts</p> |

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| | regarding mineral resources are the same at the Alternative 3 site as they are at the Project site (DEIR, p. 6-79 – 6-80). |
| Noise | The Alternative 3 site is vacant like the Project site. There are additional off-site sensitive receptors located in close proximity to the Alternative 3 site than those located near the Project site. The Alternative 3 site has a residential area to the east, but aside from residences, the nearest other noise-sensitive receivers include nearby parks. The Sycamore Canyon Wilderness Park and the Sycamore Highlands Park are each located on or adjacent to the Alternative 3 site and will be potentially impacted by operational noise. Depending on exactly where the proposed buildings are positioned on the Alternative 3 site, operational noise may be readily audible to these sensitive receptors; therefore, additional noise reduction measures may be required in addition to the standard policies and design features outlined for the Project. The long-term operational noise associated with Alternative 3's operations will be the same as that generated by the Project and the mitigation measures outlined for the Project will also be necessary for Alternative 3. However, given the close proximity of additional sensitive receptors to the Alternative 3 site (i.e., single-family residences to the east and park areas to the north, west, and south), additional analysis of the noise effects from operations will need to be conducted to determine their impact on the nearby sensitive receptors and to determine if additional mitigation measures are needed to reduce operational noise levels. Therefore, development under Alternative 3 is anticipated to have greater noise impacts when compared to the Project (DEIR, p. 6-80 – 6-81). |
| Population and Housing | Alternative 3 will allow the same development as the Project, and this alternative will contribute the same employment positions and housing opportunities as the Project. The Alternative 3 site is currently a public park that has no housing that will be displaced or result in the need for replacement housing. The Alternative 3 site has not been mass graded, and the site's current use as a wilderness park means that the site has not been built with large amounts of infrastructure; therefore, the site is not expected to have adequate existing infrastructure systems to serve the Project's proposed uses and anticipated population increase. Improvements to infrastructure at the Alternative 3 site will be needed to serve the Project; therefore, impacts to population/housing under Alternative 3 will be greater than that of the Project (DEIR, p. 6-81). |
| Public Services | <p>The implementation of Alternative 3 will include the introduction of permanent and temporary residents and increased levels of staff, patients, customers, patrons, and structures to a currently vacant site. The development allowed under Alternative 3 is the same as the development allowed under the Project; therefore, Alternative 3 will create an increased demand for police protection, fire protection, emergency medical, fire prevention, and rescue fire services that could be manifested by an increased number of emergency and public service calls. Similar to the Project, development of the Alternative 3 site will be designed in compliance with the current building code, Riverside Fire Department requirements, and within safety equipment standards. Systems in the Project design will continue to aid in the initial response to fire events occurring in proposed structures. In addition, the buildout of the City was considered in the General Plan 2025, and two of the four stations identified in the General Plan 2025 Final Program EIR have been constructed by the City to maintain current levels and improved response times. Thus, new or physically altered fire facilities will not be required to accommodate the Project at the Alternative 3 site (DEIR, p. 6-82 – 6-82).</p> <p>Development of Alternative 3 will take place on land designated as Public Park. Adoption of the Specific Plan will reduce the park space in the City, and new park space will have to be found and developed to mitigate for this loss. Development of Alternative 3 will result in the need for new or physically altered park facilities. As such, Alternative 3 will result in greater impacts to public services when compared to the Project (DEIR, p. 6-83).</p> |
| Recreation | Alternative 3 will allow for the same development as the Project, and this alternative will contribute the same employment positions and housing opportunities as the Project. However, development of Alternative 3 will take place on land designated as Public Park. Adoption of the Specific Plan will reduce the park space in the City, and new park space will have to be found and developed to mitigate for this loss. Development of Alternative 3 will result in the need for new or physically altered park facilities. As such, Alternative 3 will result in greater impacts to recreation when compared to the Project (DEIR, p. 6-84). |

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| Transportation and Traffic | Under Alternative 3, the development will be the same as the development allowed under the Project. Therefore, the amount of traffic coming and going to the Alternative 3 site will be the same as the amount of traffic created by the Project. Like the Project site, the Alternative 3 site is currently vacant, and the number of residents, patients, employees, and visitors to the site will lead to an increase in traffic in the Alternative 3 site area. Alternative 3 will likely have significant impacts to a number of intersections and roadway segments during Existing Plus Project traffic conditions and Cumulative (Opening Year – 2016) with Project traffic conditions, and will likely require the implementation of mitigation measures in the form of roadway or intersection improvements, similar to the Project. In addition, the Alternative 3 site has not been mass graded, and the site's current use as a wilderness park means that the site has not been built with large amounts of infrastructure. Therefore, the site is not expected to have adequate existing infrastructure systems in terms of roads to serve the Project's proposed uses and anticipated population increase. Improvements to infrastructure at the Alternative 3 site will be needed to serve the Project. Alternative 3 will also contribute to the existing and forecasted deficiency of freeway segments in the Congestion Management Plan. The density of the Project may overwhelm on/off ramps to SR-60 and cause other infrastructure issues. Therefore, Alternative 3 will contribute to these cumulative traffic impacts and will be considered cumulatively considerable and unavoidable like the Project. Therefore, impacts to transportation/traffic under Alternative 3 are considered to be greater when compared to the Project. Alternative 3 will require a Statement of Overriding Considerations (DEIR, p. 6-85 – 86). |
| Utilities and Service Systems | <p>Under Alternative 3, the development will be the same as the development permitted under the Project. The estimated demand for Alternative 3 will be the same as the demand generated under the Project, and will require the same mitigation measures as the Project to minimize impacts to water demand to a level that is less than significant. The Alternative 3 site has not been mass graded, and the site's current use as a wilderness park means that the site has not been built with large amounts of infrastructure. Therefore, the site is not expected to have adequate existing water and/or wastewater infrastructure systems to serve the Project's proposed uses and anticipated population increase. Improvements to infrastructure at the Alternative 3 site will be needed to serve the Project; therefore, impacts to utilities and service systems will be greater under Alternative 3 than that of the Project (DEIR, p. 6-86 – 6-87).</p> <p>During construction, the amount of solid waste generated by Alternative 3 will be the same, since there will be the same square footage of building constructed. Additionally, since Alternative 3 will have the same square footage and the same intensity of uses, the amount of solid waste generated during Alternative 3's operation will be the same as that generated by the Project, and the same mitigation measures will be required (DEIR, p. 5-87).</p> <p>In summary, Alternative 3 will require improvements to water and wastewater infrastructure at the Alternative 3 site, and therefore will have increased impacts on utilities and service systems when compared to the Project (DEIR, p. 6-86 – 6-87).</p> |
| Energy Conservation | Alternative 3 will have the same development as the development allowed in the Project and will have the same increase in the amount of electricity, natural gas, and petroleum used during construction and operation. The amount of energy required under Alternative 3 will be the same as that required under the Project, and the same mitigation measures will be required under both scenarios. Therefore, under Alternative 3, impacts to energy consumption and capacity will be similar to the Project (DEIR, p. 6-87). |

Relationship to Project Objectives

The following table identifies the Project objectives and whether or not Alternative 3 meets each objective.⁸

⁸ Source: DEIR, p. 6-88.

| Project Objective | Alternative Meets Objective? |
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| 1. The proposed Canyon Springs Healthcare Campus Specific Plan will allow future development more streamlined by outlining future allowable uses, and laying out a cohesive set of design guidelines that will provide City staff, the future Canyon Springs Healthcare Campus operator, and the public with a clear understanding of how growth and development will occur at the site. | Yes. Alternative 3 will allow a future entitlement process that will be more streamlined by providing all stakeholders a specific plan that will outline future allowable uses and provide a cohesive set of design guidelines that will provide a clear understanding of how growth and development will occur at the Alternative 3 site (DEIR, p. 6-88). |
| 2. The overall goal of the proposed Canyon Springs Healthcare Campus Specific Plan is to guide future development on the Canyon Springs Healthcare Campus and define the extent, scale, and location of future development on the Canyon Springs Healthcare Campus. | Yes. Alternative 3 will provide the Canyon Springs Healthcare Campus Specific Plan that will guide future development of a comprehensively planned, integrated healthcare campus on the Alternative 3 site. The Canyon Springs Healthcare Campus Specific Plan will include design guidelines that define the extent, scale, location, and future development of the Alternative 3 site (DEIR, p. 6-88). |
| 3. The Canyon Springs Healthcare Campus Specific Plan will allow for the construction of a hospital and MOB with associated hospital-related facilities, as well as a senior housing, independent living, assisted living, and skilled nursing facility to address an existing shortage of healthcare service capacity now available to residents in the surrounding area as well as to improve access to healthcare for a growing population. | Yes. Under Alternative 3, there will be development of a hospital, MOB, and associated hospital-related facilities, as well as senior housing, independent living, assisted living, and a skilled nursing facility. Alternative 3 will improve access to healthcare for a growing population in the City of Riverside and the surrounding communities (DEIR, p. 6-88). |
| 4. In the event of a disaster, the Canyon Springs Healthcare Campus will provide another hospital facility that will serve Riverside and the surrounding communities. | Yes. Under Alternative 3, another healthcare campus facility will be designed and constructed to meet the healthcare demands for the City of Riverside and the surrounding communities in the event of a disaster (DEIR, p. 6-88). |

Finding

The City Council rejects Alternative 3 as a Project alternative on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) Alternative 3 would not meaningfully reduce the significant and unavoidable impacts of the Project; (2) Although Alternative 3 implements all Project objectives, it would lead to increased environmental impacts.

Facts and Supporting Information

Alternative 3 will result in the new construction of a healthcare campus and the objectives of the Project will be met, but this alternative is more impactful than the Project in terms of aesthetics, air quality, biological resources, cultural resources, geology and soils, GHG emissions, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation/traffic, and utilities and service systems (DEIR, p. 6-88). Alternative 3 was not able to reduce the Project's significant and unavoidable air quality impacts, and this alternative was also found to increase the significant and unavoidable impacts related to transportation/traffic (DEIR, p. 6-108).

E. Alternative 4: Reduced Project Alternative

Description

Alternative 4 will allow for the construction of the Project elements on the vacant Project site, but this alternative reduces the development allowed by reducing the following components:

- The number of beds in the hospital will be reduced from 280 licensed beds at Project buildout to 100 licensed beds.
- The total square footage in the MOB's will be reduced from 370,000 square feet at Project buildout to 75,000 square feet.
- The number of dwelling units in the senior housing facility will be reduced from 234 dwelling units at Project buildout to 99 dwelling units.
- The number of beds in the independent living/memory care, assisted living, and skilled nursing facility will be reduced from 290 licensed beds at Project buildout to 99 licensed beds.

Under this alternative, it is assumed that the height and/or footprint of the proposed new hospital, MOB's, senior housing facility, independent living/memory care, and assisted living facility will be reduced in size by approximately 25% because there will not be a need for as many hospital and assisted living center beds. Additionally, there will be fewer dwelling units in the senior adult housing area, and the total square footage of the MOB's will be reduced. By reducing the intensity of the use on the site, impacts under this alternative could be reduced compared to the Project (DEIR, p. 6-88 – 6-89).

Summary of Impacts

The following table presents a summary of the impacts associated with Alternative 4 (Reduced Project Alternative).⁹

| Threshold | Impacts |
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| Aesthetics | Under Alternative 4, the height and/or footprint of the proposed new hospital, MOB's, senior housing facility, and independent living/memory care, assisted living, and skilled nursing facility buildings will be reduced in size by approximately 25%. The development of a reduced project will allow the construction of buildings that are smaller and include less square footage. Therefore, impacts to views and visual character under Alternative 4 will be less than the Project. Overall, aesthetic impacts will be reduced under this alternative when compared to the Project (DEIR, p. 6-89 – 6-90). |
| Agriculture and Forestry | The Alternative 4 site is the same as the Project site. The Project site has no significant impacts with regard to agriculture and forestry resources; therefore, the impacts of developing Alternative 4 as compared to the Project will be the same (DEIR, p. 6-90 – 6-91). |
| Air Quality | Alternative 4 will generate fewer air emissions during construction and operation than the Project. Construction of Alternative 4 will require grading, site preparation, and construction of facilities, all of which generate air emissions; however, under Alternative 4, the height and/or footprint of the proposed new hospital, MOB's, senior housing facility, and independent living/memory care, assisted living, and skilled nursing facility buildings will be reduced in size by approximately 25%. The reduced development |

⁹ Source: DEIR, p. 6-89 – 6-105.

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| | <p>will generate fewer construction activities and will shorten the duration of construction (DEIR, p. 6-91 – 6-92).</p> <p>During Alternative 4's operation, there will be fewer on-road vehicles and less traffic drawn to the area as compared to the Project because fewer patients, visitors, and employees will visit the healthcare campus. Less traffic will create fewer operational emissions. Nevertheless, air quality impacts under Alternative 4 may be considered significant and unavoidable due to the number of vehicle trips and lack of feasible mitigation to reduce emissions from those trips, even though a reduction will occur (DEIR, p. 6-92).</p> <p>Air Quality impacts for Alternative 4 are considered reduced when compared to impacts created by the Project, but will likely still be significant and unavoidable and require a Statement of Overriding Considerations. In addition, the site will be underutilized under Alternative 4 (DEIR, p. 6-92).</p> |
| Biological Resources | <p>Under Alternative 4, construction of facilities will still occur, and similar mitigation measures will be required. Construction of Alternative 4 will require grading, site preparation, and development of facilities; however, under Alternative 4, the footprint of the proposed new hospital, MOBs, senior housing facility, and independent living/memory care, assisted living, and skilled nursing facility buildings will be reduced in size by approximately 25%. It is unclear whether, given the location of the identified drainage feature, they could be avoided either partially or in their entirety through the design of Alternative 4, or if the drainage features will be impacted to the same extent as the Project. The reduced development footprint of Alternative 4 buildings will likely reduce impacts to biological resources; therefore, there will be fewer biological resource impacts under this alternative when compared to the Project (DEIR, p. 6-92 – 6-93).</p> |
| Cultural Resources | <p>Under Alternative 4, construction of facilities will still occur, and similar mitigation measures will be required. Construction of Alternative 4 will require grading, site preparation, and development of facilities; however, under Alternative 4, the footprint of the proposed new hospital, MOBs, senior housing facility, and independent living/memory care, assisted living, and skilled nursing facility buildings will be reduced in size by approximately 25%. Depending on the configuration of Alternative 4's design, the structures developed might require smaller amounts of grading and ground disturbance, and there may be a smaller APE than the Project's APE. Therefore, impacts to cultural resources might be slightly reduced under Alternative 4 when compared to the Project (DEIR, p. 6-93 – 6-94).</p> |
| Geology and Soils | <p>Under Alternative 4, construction of facilities will still occur. Construction of Alternative 4 will require grading, site preparation, and development of facilities; however, under Alternative 4, the height and/or footprint of the proposed new hospital, MOBs, senior housing facility, and independent living/memory care, assisted living, and skilled nursing facility buildings will be reduced in size by approximately 25%. Depending on the configuration and height of Alternative 4's development, there will likely be smaller amounts of grading and ground disturbance and less erosion than under the Project, and the height of structures will likely be not as tall as the structures developed under the Project. In addition, there will be fewer permanent and temporary residents, as well as patients, staff, and visitors to the Project area. Fewer people at the site will mean that fewer people will be impacted by seismic or other geotechnical events. Therefore, geology and soils impacts associated with Alternative 4 will be less than that of the Project (DEIR, p. 6-94 – 6-95).</p> |
| Greenhouse Gas Emissions | <p>Similar to the Project, under Alternative 4, the construction of facilities will still occur, but construction-related GHG emissions will be shorter in duration, will continue to be short-term in nature, and will not represent a long-term source of GHG emissions. In addition, Alternative 4 will include similar mitigation measures that will reduce GHG operational emissions to a level that is consistent with the target reduction percentage in the City of Riverside's CAP. However, due to the decrease in size of the Project under Alternative 4, impacts will be reduced when compared to the Project (DEIR, p. 6-95 – 6-96).</p> |
| Hazards and Hazardous Materials | <p>Under Alternative 4, the same potential hazards will exist, and similar mitigation measures will be necessary to ensure that a FAA Form 7460-1 is submitted to the FAA to ensure compliance with FAA standards, and that the March ARB, Riverside County ALUC, and Caltrans Division of Aeronautics' processes for review and approval are followed. Alternative 4's development will be 25% less intense than the development allowed under the Project. Therefore, there will be a decreased number of patients, visitors, and employees present on the Project site compared to the Project. Therefore, impacts</p> |

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| | related to public airport proximity safety hazards under Alternative 4 will be slightly decreased when compared to the Project (DEIR, p. 6-96). |
| Hydrology and Water Quality | Like the Project, Alternative 4 will also be required to comply with all applicable federal, state, and local regulations regarding water quality and hydrology, and the reduction in the development potential will not remove these requirements. A SWPPP and similar BMPs will also be implemented to further reduce potential impacts. In addition, there will be less development on the Project site and fewer impervious surfaces. Therefore, Alternative 4 will be slightly less impactful to water quality and hydrology when compared to the Project (DEIR, p. 6-96 – 6-97). |
| Land Use and Planning | Under Alternative 4, the City General Plan 2025 will still be amended to designate the Specific Plan area as the Canyon Springs Healthcare Campus Specific Plan and replace the current land use designations. In addition, Alternative 4 will also require a rezone to designate the Canyon Springs Healthcare Campus Specific Plan and revise the current City Zoning Map. The Specific Plan will still include development standards for a healthcare campus and will still outline the slightly decreased future uses and layout. Since Alternative 4 will also require adoption of a General Plan and Zoning Code amendment, Alternative 4 will have the same land use impacts when compared to the Project (DEIR, p. 6-97 – 6-98). |
| Mineral Resources | Alternative 4 will allow for the development of the same types of uses as the Project, only on a smaller scale. Alternative 4 development will take place on the same site as the Project, which is surrounded by incompatible uses to mining operations and unlikely to be developed as a mining operation because it is not economically viable. Therefore, impacts to mineral resources will be the same under Alternative 4 as the Project (DEIR, p. 6-98). |
| Noise | Under Alternative 4, construction of a new hospital, MOBs, senior housing facility, and an independent living/memory care facility and skilled nursing facility will still occur; however, these facilities will be reduced in size by approximately 25%. The reduced project's operation will have fewer stationary noise sources and fewer on-road vehicles will be drawn to the area as compared to the Project because fewer patients, visitors and employees will visit the healthcare campus. Operational noise will be reduced under Alternative 4; therefore, noise impacts are considered reduced when compared to impacts created by the Project (DEIR, p. 6-98 – 6-99). |
| Population and Housing | The development allowed under Alternative 4 will allow for a smaller healthcare campus that will be 25% less intense than the development allowed under the Project. While the implementation of this alternative will include the introduction of permanent and temporary residents and increased levels of staff, patients, visitors, and structures to a currently vacant site, Alternative 4 will provide fewer permanent jobs at full buildout than the Project. This alternative will also require less new infrastructure to accommodate the proposed development. In summary, the population growth that will be generated by Alternative 4 will be lower than that of the Project; therefore, impacts to population/housing will be less under Alternative 4 than the impacts for the Project (DEIR, p. 6-99). |
| Public Services | Implementation of Alternative 4 will include the introduction of permanent and temporary residents and increased levels of staff, patients, visitors, and structures to a currently vacant site. However, the development allowed under Alternative 4 will be 25% less intense than the development allowed under the Project; therefore, Alternative 4 will create less demand for police and fire protection, emergency medical, fire prevention, rescue fire services, schools, and parks as compared to the Project. In addition, the development allowed under this alternative will result in fewer people in the area and fewer numbers of emergency and public service calls. Overall, the decreased development potential under Alternative 4 will have reduced impacts when compared to the Project (DEIR, p. 6-100 – 6-101). |
| Recreation | Alternative 4 will allow for the development of 25% smaller healthcare facilities on the Project site than the Project. The implementation of Alternative 4 will draw fewer staff, patients, and visitors to the area, and will not generate as many new permanent jobs at full buildout when compared to the Project. The population growth that will be generated by Alternative 4's new residents and employees will be substantially lower than that of the Project, and fewer people will be utilizing existing recreational facilities. Therefore, under Alternative 4, impacts to recreational facilities will be less than the impacts from the Project (DEIR, p. 6-101 – 6-102). |
| Transportation and Traffic | Implementation of Alternative 4 will also include the introduction of permanent and temporary residents and increased numbers of permanent jobs on a currently vacant site. This alternative will |

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| | <p>increase the traffic in the area and some mitigation in the form of road and intersection improvements may be necessary. However, the development permitted under Alternative 4 will be 25% less intense than the development allowed under the Project. Thus, the amount of traffic coming and going from the Project area will be reduced proportionately with the reduced development intensity (DEIR, p. 6-103).</p> <p>There will be a decrease in the number of residents, patients, staff, and visitors in the Project area, which will lead to a decrease in traffic. Even though a reduction in traffic will occur, Alternative 4 is still likely to contribute to cumulative traffic impacts that will result in deficient freeway segments in the Congestion Management Plan. Impacts to transportation/traffic under Alternative 4 are considered reduced when compared to the Project, but will likely still result in significant and unavoidable impacts to freeway segments. Alternative 4 will require a Statement of Overriding Considerations (p. 6-103).</p> |
| Utilities and Service Systems | Under Alternative 4, the development permitted will be less intense than the development allowed under the Project. During construction, the amount of solid waste generated by Alternative 4 will be reduced, since there will be less square footage of building constructed. Additionally, since Alternative 4 will have less square footage and less intense allowable uses, the amount of wastewater and solid waste generated, and water used, during operation will also be less. Therefore, Alternative 4 will have reduced impacts on utilities and service systems when compared to the Project (DEIR, p. 6-103 – 6-104). |
| Energy Conservation | Alternative 4 will also include an increase in the amount of electricity, natural gas, and petroleum used during construction and operation when compared to existing conditions; however, since Alternative 4 will reduce the development potential allowed, the amount of energy required will be less than the Project. Additionally, the amount of traffic coming and going from the Project area will be reduced under Alternative 4 proportionately with the reduced development intensity. There will be a decrease in the traffic from residents, patients, staff, and visitors, which will lead to a decrease in the amount of petroleum consumption that will occur. Therefore, Alternative 4 will have slightly reduced impacts on energy consumption when compared to the Project (DEIR, p. 6-104 – 6-105). |

Relationship to Project Objectives

The following table identifies the Project objectives and whether or not Alternative 4 meets each objective.¹⁰

| Project Objective | Alternative Meets Objective? |
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| 1. The proposed Canyon Springs Healthcare Campus Specific Plan will allow future development more streamlined by outlining future allowable uses, and laying out a cohesive set of design guidelines that will provide City staff, the future Canyon Springs Healthcare Campus operator, and the public with a clear understanding of how growth and development will occur at the site. | Yes. Under Alternative 4, the Canyon Springs Healthcare Campus Specific Plan will be implemented and will allow future development to be more streamlined by outlining future allowable uses and by providing design and development guidelines that will help provide a clear understanding of how growth and development will occur at the Project site (DEIR, p. 6-105). |
| 2. The overall goal of the proposed Canyon Springs Healthcare Campus Specific Plan is to guide future development on the Canyon Springs Healthcare Campus and define the extent, scale, and location of future development on the Canyon Springs Healthcare Campus. | Yes. Under Alternative 4, the Canyon Springs Healthcare Campus Specific Plan will be implemented and will guide future development on the campus by defining the extent, scale, and location of its development (DEIR, p. 6-105). |
| 3. The Canyon Springs Healthcare Campus Specific Plan will allow for the construction of a hospital and MOBs with associated hospital-related facilities, as well as a | No. Alternative 4 includes the development of a smaller hospital and MOBs, senior housing facility, and independent living/memory care, assisted living facility. The skilled nursing |

¹⁰ Source: DEIR, p. 6-105 – 6-106.

| Project Objective | Alternative Meets Objective? |
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| <p>senior housing, independent living, assisted living, and skilled nursing facility to address an existing shortage of healthcare service capacity now available to residents in the surrounding area as well as to improve access to healthcare for a growing population.</p> | <p>facility and some of the associated hospital-related facilities will not be constructed (DEIR, p. 6-105 – 6-106).</p> <p>Riverside County is one of the areas in California with the greatest need for expanded hospital, emergency, and physician services. Although the Alternative 4 shows a lower impact, it fails to address the lack of access to healthcare services for this area as well as Riverside County in general. As noted in the economic report prepared by Alfred Gobar Associates using conservative projections, there is a need for 412 general acute-care beds within a 5-mile radius of the Canyon Springs site. If the study area were increased, a greater demand for all health care services will be demonstrated. Of equal importance to the expanded hospital capacity will be the addition of emergency services for the area. The demographics of this trade area will indicate a higher-than-average risk for both heart attack and strokes. It has been well-documented that shorter “door to treatment” times have significant impact on the clinical outcomes of these patients. Improving access to emergency services will undoubtedly improve the overall health of people in this area. The Specific Plan also includes medical office and professional space. These spaces will serve the ambulatory needs of the community. There will be capacity for approximately 300–350 physicians, along with ambulatory surgery, imaging, and dialysis services. Many of the people in this area are forced to migrate outside of Riverside to obtain these services. Based on the demand for healthcare in this area, the Specific Plan is best suited to improve access to care and improve the population's overall health (DEIR, p. 6-106).</p> <p>The reduction in the size of the hospital will result in a continuation of the significant existing deficit in the provision of healthcare services in the area, and, as such, though it will help alleviate the shortfall, it will not help address the existing healthcare needs of the community when compared to the Project. Further, because an existing shortage will continue to exist, Alternative 4 will not add materially to improving access to healthcare for a growing population (DEIR, p. 6-106).</p> |
| <p>4. In the event of a disaster, the Canyon Springs Healthcare Campus will provide another hospital facility that will serve Riverside and the surrounding communities.</p> | <p>Yes. Under Alternative 4, the smaller healthcare campus will be designed and constructed to meet the varied and evolving healthcare demands for the City of Riverside and residents of the region, and will provide another hospital facility (DEIR, p. 6-106).</p> |

Finding

The City Council rejects Alternative 4 as a Project alternative on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) Although Alternative 4 has reduced impacts to aesthetics, air quality, biological resources, cultural resources, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality,

noise, population and housing, public services, recreation, transportation/traffic, utilities and service systems, and energy conservation, impacts to air quality and transportation/traffic would remain significant and unavoidable; (2) Although Alternative 4 includes a reduction in environmental impacts, the alternative will not meet all of the Project objectives.

Facts and Supporting Information

Alternative 4 was found to have reduced impacts related to aesthetics, air quality, biological resources, cultural resources, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, noise, population and housing, public services, recreation, transportation/traffic, utilities and service systems, and energy conservation. However, Alternative 4 does not meet all of the Project objectives (DEIR, p. 6-108). Further, air quality impacts under Alternative 4 may be considered significant and unavoidable due to the number of vehicle trips and lack of feasible mitigation to reduce emissions from those trips, even though a reduction will occur (DEIR, p. 6-92). Similarly, impacts to transportation/traffic under Alternative 4 are considered reduced when compared to the Project, but will likely still result in significant and unavoidable impacts to freeway segments (DEIR, p. 6-106).

5.4 Identification of No Project Alternative

The No Project Alternative is addressed to compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the Project is approved. "No project" can be interpreted as no development or maintaining the existing condition. This analysis is required pursuant to CEQA Guidelines Section 15126.6(e) and represents the analysis of No Project Alternative, above.

"No project" can also be interpreted as development under an adopted plan. CEQA Guidelines Section 15126.6(e)(3)(A) states:

When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the "no project" alternative will be the continuation of the existing plan, policy, or operation into the future. Typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed.

Alternative 1, as discussed above, represents development which would be reasonably expected to occur in the foreseeable future if development of the site were to proceed based on the plans and policies of the existing Canyon Springs Business Park Specific Plan.

5.5 Environmentally Superior Alternative

CEQA Guidelines section 15126.6(e)(2) requires that an EIR identify the "environmentally superior alternative" based on the evaluation of the project and its alternatives. Considerations relevant to the identification and discussion of the environmentally superior alternative include a proposal which contemplates less development than the proposed project and which correspondingly reduces most or all of the proposed project's adverse environmental impacts. Of

the alternatives evaluated above, the No Project Alternative is the environmentally superior alternative, because the Project would stay in its existing conditions.

When a No Project Alternative is identified as the environmentally superior alternative, the EIR must identify an environmentally superior alternative from the other alternatives. Alternative 4 (Reduced Project Alternative) will result in the least environmental impacts and based on this is considered the environmentally superior alternative. While Alternative 4 includes a reduction in the development potential that will result in a reduction of environmental impacts, Alternative 4 will not meet all of the Project objectives. Therefore, although Alternative 4 is feasible, it does not meet all of the Project objectives (DEIR, p. 6-108 – 6-109).

6.0 STATEMENT OF OVERRIDING CONSIDERATIONS

6.1 Significant and Unavoidable Impacts

Based on the information and analysis set forth in the EIR and the record of proceedings, implementation of the Project would result in the significant and unavoidable impacts identified below, and as such, a statement of overriding conditions must be adopted before the Project may be approved:

- **Air Quality:** The Project will exceed operational emissions thresholds for VOC, NO_x, and CO, even with feasible mitigation incorporated, and impacts are significant and unavoidable.
- **Traffic:** While there are planned improvements for I-215, the most recent Caltrans Transportation Concept Report for I-215 forecasts that LOS will deteriorate to F even with these planned improvements. Other potential mitigation measures for freeway segments include additional capacity enhancements, operational improvements, and measures to reduce the amount of traffic or encourage mode shifts such as TDM strategies and improvements to regional transit. The Project will implement TDM measures. However, the complete mitigation of this impact is considered beyond the scope of the Project because of the inability of the City to approve freeway mainline operational and capacity improvements. Therefore, the Project's impact on the freeway segment will be significant and unavoidable.

The City Council finds that it has imposed all feasible mitigation to reduce the Project's significant impacts to a less than significant level. The City Council further finds that, except for the Project, all other alternatives set forth in the DEIR are infeasible because they would prohibit the realization of the Project objectives. Further analyses would be required to determine the full impact of the alternatives should the City ever select another alternative as a project and as such, the other alternatives are hereby found to be infeasible.

6.2 Project Benefits

The Riverside City Council, (i) having independently reviewed the information in the FEIR and the record of proceedings; (ii) having made a reasonable and good-faith effort to eliminate or substantially lessen the impacts resulting from the Project to the extent feasible by adopting mitigation measures identified in the EIR and Mitigation Monitoring and Reporting Program (MMRP); and (iii) having balanced benefits of the Project against its significant and unavoidable environmental impacts, chooses to approve the Project despite its significant and unavoidable effects, because, in its view, specific economic, biological, social, technological, or other benefits of the Project render the significant effects acceptable in light of benefits.

The City Council finds that each of the following benefits is an overriding consideration, independent of the other benefits, that warrants approval of the Project notwithstanding the significant and unavoidable impacts. The Project would provide the following benefits:

- Address the lack of access to healthcare services for Riverside County and surrounding communities, one of the areas in California with the greatest need for expanded hospital, emergency, and physician services
- Improve access to emergency services to improve the overall health of people in this area.
- Provide medical office and professional space that will serve the ambulatory needs of the community.
- Improve access to care and improve the population's overall health by providing healthcare services in the Riverside area.
- Provide another hospital facility that will service Riverside and the surrounding communities in the event of a disaster.
- Enhance the jobs/housing balance of the City by providing up to approximately 2,450 new permanent jobs at full buildout.
- Provide additional property tax revenue to the City, which would contribute to the provision of public services.
- Provide new development that will assist the City in obtaining fiscal balance in the years and decades ahead. Once construction is completed, the facility will annually generate additional City revenue. This increased revenue from the development will be driven by indirect sales tax, property tax, and business license fees.

6.3 Overriding Considerations

The following discussion provides the support of overriding considerations, which are a result of infeasible mitigation measures or alternatives to avoid the significant and unavoidable impacts that would result from the Project.

Economic Reasons

The Project provides economic benefits in the form of: (1) new jobs; (2) use of local resources (e.g. locally available, high recycled-content, reused, obtained from renewable sources, containing low volatile organic compound (VOC) levels, and high performance glazing units with low emissivity coatings); (3) increased project development fees for the provision of public services and increased tax revenue once construction is complete.

Jobs

Temporary construction and long-term operational jobs created by the Project would result in increased spending throughout the region, including the City. During the construction phase of the Project, direct jobs, that would be created, further increase indirect jobs in the

City and in the economic region. Additionally, over the construction period, construction spending would add revenue to local and regional output. Construction spending would also increase local earnings and regional earnings. After construction, the development would create new on-site jobs as well as indirect jobs in the City and in the economic region.

The new jobs would be an increase over existing conditions where no employment opportunities currently exist. This increase in jobs would be an overall benefit to the local and regional economy.

The provision of additional jobs by maximizing employment on the Project site would support a better jobs-to-housing ratio and would reduce unemployment in the City.

New jobs associated with the Project are expected to include health-related and office-based occupations. Both health and office-based occupations have the potential to pay relatively high wages, thereby contributing to the provision of jobs for a variety of income levels. Additionally, as discussed previously, the Project would generate short-term construction-related and long-term operational jobs.

Local Materials

The use of sustainable materials and local resources for construction of the Project (e.g., locally available, high recycled-content, reused, obtained from renewable sources, containing low volatile organic compound (VOC) levels, and high performance glazing units with low emissivity coatings) is highly encouraged.

Tax Revenue

The Project would have a positive fiscal impact on the City through construction and development of the Project, as well as throughout the life of the Project. As noted above, the construction and development of the site would produce a temporary economic stimulus as a result of one-time construction-related spending in the form of one time development fees. These fees include city fees, school fees, sewer and water fees, transportation fees, and permit fees. In addition to one-time payment of fees, property taxes and indirect sales taxes would be collected during this time and paid to the City. During the operational phase of the Project (during which time the building is fully constructed and functional), additional revenues will be paid to the City in the form of property taxes, indirect sales tax, business license fees.

Need for Healthcare Services

Riverside County is one of the areas in California with the greatest need for expanded hospital, emergency, and physician services. As noted in an economic report prepared by Alfred Gobar Associates using conservative projections, there is a need for 412 general acute-care beds within a 5-mile radius of the Project site. If the study area were increased, a greater demand for all health care services would be demonstrated. Of equal importance

to the expanded hospital capacity will be the addition of emergency services for the area. The demographics of this trade area indicate a higher-than-average risk for both heart attack and strokes. It has been well-documented that shorter “door to treatment” times have significant impact on the clinical outcomes of these patients. Improving access to emergency services will undoubtedly improve the overall health of people in this area. The medical office and professional space included in the Project will serve the ambulatory needs of the community. Many of the people in this area are forced to travel outside of Riverside to obtain these services. Based on the demand for healthcare in this area, the Project will improve access to care and improve the population’s overall health.

Social Reasons

The Project site is currently undeveloped. The development of the Project would ensure the site is properly utilized by development that meets the healthcare needs of the City and surrounding community.

Legal Reasons

The Project will provide development consistent with municipal standards, codes, and policies. Specifically, the Project will participate in the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) through the payment of the Local Development Mitigation Fee at the time building permits are issued pursuant to the provisions of Ordinance No. 6709.

Conclusion

The City, after balancing the specific economic, social, and other benefits of the Project, has determined that the significant and unavoidable adverse environmental impacts identified may be considered "acceptable" due to the specific considerations listed above, which outweigh the unavoidable, adverse environmental impacts of the Project.

Accordingly, the City of Riverside adopts the above statement of overriding considerations, recognizing that significant and unavoidable air quality and traffic/transportation impacts would result from implementation of the Project. Having (i) adopted all feasible mitigation measures; (ii) rejected alternatives to the Project, as discussed above; and (iii) recognized all unavoidable significant impacts, the City hereby finds that each of the separate benefits of the Project, as stated herein, is determined to be unto itself an overriding consideration, independent of other benefits, that warrants approval of the Project and outweighs and overrides its unavoidable significant effects, and, thereby, justifies the approval of the Project.

EXHIBIT “B”

MITIGATION MONITORING AND REPORTING PROGRAM

CEQA requires the adoption of feasible mitigation measures to reduce the severity and magnitude of significant environmental impacts associated with project development. The Project's Draft Environmental Impact Report (Draft EIR) includes mitigation measures to reduce the potential environmental effects of the Project. CEQA also requires reporting on, and monitoring of, mitigation measures adopted as part of the environmental review process (Public Resources Code Section 21081.6). This mitigation monitoring and reporting program (MMRP), contained in Table 3-1 below, is designed to aid the City in its implementation and monitoring of measures adopted from the Project.

Pursuant to State *CEQA Guidelines* Section 15097, a written monitoring and reporting program has been compiled to verify implementation of adopted mitigation measures. "Monitoring" refers to the ongoing or periodic process of Project oversight provided by the "Responsible Party" listed in the following table. "Reporting" refers to written compliance review that will be presented to the decision-making body or authorized staff person identified in the table below. A report can be required at various stages throughout the Project implementation or upon completion of the mitigation measure. The following table provides the required information which includes identification of the potential impact, various mitigation measures, applicable implementation timing, agencies responsible for implementation, and the monitoring/reporting method for each mitigation measure identified.

The following list clarifies the meaning of each column in the following table:

- **Impact Category.** Identifies a potentially affected resource/environmental condition.
- **Mitigation Measure.** Those measures that will be implemented to minimize potential significant environmental impacts.
- **Monitoring Phase.** The phase of the Project during which the mitigation measure shall be implemented and monitored.
- **Implementation Timing.** The phase of the Project in which implementation and compliance will be monitored.
- **Responsible Party.** Identifies the entity responsible for monitoring implementation of the mitigation measure.
- **Method of Reporting/Monitoring.** Identifies mechanism by which implementation will be verified.

Throughout this chapter, references may be made to the “Project applicant,” “Project developer,” “Project developer/applicant,” “developer/applicant,” and “Project operator.” These all refer to the party that is responsible for the Project at the time the specific event or requisite activity is taking place.

Table 3-1
Mitigation Monitoring and Reporting Program

| Impact Category | Mitigation Measure | Implementation Timing | Responsible Monitoring Party | Monitoring/Reporting Method |
|-----------------|---|-----------------------------------|---|--|
| Air Quality | MM-AQ-1: During construction activity, all construction equipment (≥ 150 horsepower) shall be California Air Resources Board (CARB) Tier 3 Certified or better. Additionally, during grading activity, total horsepower-hours per day for all equipment shall not exceed 24,608 horsepower-hours per day, and the maximum disturbance (actively graded) area shall not exceed 6 acres per day. | Project construction | Community & Economic Development Department, Building & Safety Division and Public Works Department, Land Development Division. | Prior to the issuance of a grading permit by the City, the Project applicant/developer or their construction contractor shall submit evidence to the City that all construction equipment (≥ 150 horsepower) is CARB Tier 3 Certified or better. |
| Air Quality | MM-AQ-2: Prior to the issuance of building permits, the Project developer/applicant shall submit energy usage calculations to the Planning Division showing that the Project is designed to achieve 5% efficiency beyond the 2016 California Building Code Title 24 requirements. Example of measures that reduce energy consumption include, but are not limited to, the following (it being understood that the items listed below are not all required and merely present examples; the list is not all-inclusive and other features that reduce energy consumption also are acceptable): <ul style="list-style-type: none"> • Increase in insulation such that heat transfer and thermal bridging is minimized; • Limit air leakage through the structure and/or within the heating and cooling distribution system; • Use of energy-efficient space heating and cooling equipment; • Installation of electrical hook-ups at loading dock areas; • Installation of dual-paned or other energy-efficient windows; • Use of interior and exterior energy-efficient lighting that exceeds then incumbent California Title 24 Energy Efficiency performance standards; | Prior to building permit issuance | Construction contractor Community & Economic Development Department, Planning and Building & Safety Divisions | Energy usage calculations submitted to the City |

Table 3-1
Mitigation Monitoring and Reporting Program

| Impact Category | Mitigation Measure | Implementation Timing | Responsible Monitoring Party | Monitoring/Reporting Method |
|-----------------|--|-----------------------------------|---|-----------------------------|
| | <ul style="list-style-type: none"> • Installation of automatic devices to turn off lights where they are not needed; • Application of a paint and surface color palette that emphasizes light and off-white colors that reflect heat away from buildings; • Design of buildings with "cool roofs" using products certified by the Cool Roof Rating Council, and/or exposed roof surfaces using light and off-white colors; • Design of buildings to accommodate photo-voltaic solar electricity systems or the installation of photo-voltaic solar electricity systems; • Installation of Energy Star-qualified energy-efficient appliances, heating and cooling systems, office equipment, and/or lighting products. | | | |
| Air Quality | <p>MM-AQ-3: To reduce water consumption and the associated energy-usage, the Project shall be designed to comply with the mandatory reductions in indoor water usage contained in the incumbent California Green Building Code and any mandated reduction in outdoor water usage contained in the City's water-efficient landscape requirements. Additionally, the Project shall implement the following:</p> <ul style="list-style-type: none"> • Landscaping palette emphasizing drought-tolerant plants; • Use of water-efficient irrigation techniques; • U.S. Environmental Protection Agency (EPA) Certified WaterSense labeled or equivalent faucets, high-efficiency toilets, and water-conserving shower heads. | Prior to building permit issuance | Community & Economic Development Department, Planning and Building and Safety Divisions, Public Works Department, and Landscape and Tree Division | Approval of landscape plans |

Table 3-1
Mitigation Monitoring and Reporting Program

| Impact Category | Mitigation Measure | Implementation Timing | Responsible Monitoring Party | Monitoring/Reporting Method |
|----------------------|---|---|---|---|
| Air Quality | MM-AQ-4: The Project shall reduce vehicle miles traveled and emissions by implementing the following measure: <ul style="list-style-type: none"> Pedestrian and bicycle connections shall be provided to surrounding areas consistent with the City's General Plan. | Prior to building permit issuance | Community & Economic Development Department, Planning Division and Public Works Department, Traffic Division | Approval of plans showing locations of pedestrian and bicycle connections, consistent with the City's General Plan |
| Air Quality | MM-AQ-5: The Project developer/applicant shall encourage its tenants to use water-based or low volatile organic compound cleaning products by providing publicly available information from the Southern California Air Quality Management District, CARB, and EPA on such cleaning products. | Prior to issuance of a Certificate of Occupancy | Community & Economic Development Department, Planning Division Project developer/applicant | The Project applicant/developer shall submit the education materials to be provided to the tenants, for review and approval by the City. |
| Air Quality | MM-AQ-6: Electric lawn equipment including but not limited to lawn mowers, leaf blowers and vacuums, shredders shall be used in lieu of conventional gas-powered equipment. This requirement shall be included in all Covenants, Conditions, and Restrictions for Project properties. | Prior to issuance of a Certificate of Occupancy Project operation | Community & Economic Development Department, Planning Division And Code Enforcement Division Project developer/applicant | <p>The Project applicant/developer shall demonstrate to the City that the Covenants, Conditions, and Restrictions for Project properties include a requirement for tenants to use electric lawn equipment.</p> <p>Periodic inspections</p> |
| Biological Resources | MM-BIO-1: Prior to the issuance of grading permit on the Site B, the Project developer/applicant shall obtain a Clean Water Act Section 404 permit, obtain a Regional Water Quality Control Board Clean Water Act Section 401 Water Quality Certification, and comply with Section 1602 of the California Fish and Game Code, including execution of a Streambed Alteration Agreement, if requested by the California Department of Fish and Wildlife (CDFW). All conditions of approval by these regulatory permitting agencies shall be adhered to by the Project. | Prior to issuance of grading permit on Site B Project construction | Community & Economic Development Department, Planning Division U.S. Army Corps of Engineers | Prior to grading, the City will be provided with evidence of issuance of regulatory permits by the Army Corps of Engineers, the Regional Water Quality Control Board, and the California Department of Fish and Wildlife (as required) related to impacts to jurisdictional waters. |

Table 3-1
Mitigation Monitoring and Reporting Program

| Impact Category | Mitigation Measure | Implementation Timing | Responsible Monitoring Party | Monitoring/Reporting Method |
|----------------------|---|---|--|---|
| Biological Resources | <p>MM-BIO-2: In accordance with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), potentially suitable habitat to support burrowing owl is present within the Project site. Prior to the initiation of construction activities, a qualified biologist shall conduct focused surveys for burrowing owl in accordance with the Burrowing Owl Survey Instructions for the MSHCP Area (dated March 29, 2006), which includes four site visits during the burrowing owl breeding season (March 1–August 31).</p> <p>Preconstruction clearance surveys for burrowing owl shall be conducted within 30 days of the commencement of site disturbance to determine whether burrowing owl is present at the site. Preconstruction surveys shall include suitable burrowing owl habitat within the Project footprint and an appropriate buffer as required in the most recent guidelines and where legal access to conduct the survey exists. If burrowing owls are not detected during the clearance survey, no additional mitigation is required.</p> <p>If burrowing owl is detected, occupied burrowing owl burrows shall not be disturbed during the nesting season (February 1–August 31) unless a qualified biologist approved by CDFW verifies through noninvasive methods that either the birds have not begun egg-laying and incubation or that juveniles from the occurred burrows are foraging independently and capable of independent survival. A 500-foot nondisturbance buffer (where no work activities may be conducted) will be</p> | <p>Prior to grading and construction and during the burrowing owl breeding season (March 1–August 31)</p> <p>Prior to ground disturbance for each phase of the Project (within 30 days of ground disturbance)</p> | <p>Santa Ana Regional Water Quality Control Board</p> <p>CDFW</p> <p>Community & Economic Development Department, Planning and Building & Safety Divisions and Public Works Department</p> | <p>Focused Survey Report(s) and Preconstruction Survey Report(s) submitted to City for each phase of the Project.</p> |

Table 3-1
Mitigation Monitoring and Reporting Program

| Impact Category | Mitigation Measure | Implementation Timing | Responsible Monitoring Party | Monitoring/Reporting Method |
|----------------------|--|--|---|--|
| | maintained between Project activities and nesting burrowing owls during the nesting season, unless otherwise authorized by CDFW. If burrowing owl is detected during the nonbreeding season (September 1–January 31) or confirmed to not be nesting, a 160-foot nondisturbance buffer will be maintained between the Project activities and occupied burrow. If disturbance of burrowing owl cannot be avoided, passive or active relocation of burrowing owls will be implemented. Relocation will be conducted by a qualified biologist in accordance with procedures set forth by the MSHCP. Relocation of occupied burrows will be conducted outside the breeding season (February 1–August 31), pursuant to the California Fish and Game Code and the Migratory Bird Treaty Act. | | | |
| Biological Resources | MM-BIO-3: In order to avoid potential impacts to nesting birds in conformance with the Migratory Bird Treaty Act and California Fish and Game Code during all phases of the Project, a qualified biologist will conduct a nesting bird survey within 1 week prior to the commencement of any ground-disturbing activities from February 1 to August 31, which covers the breeding season for most birds that may occur in the Project area. If active nests are not observed, no further mitigation is required. However, if an active bird nest is found, the nest will be flagged and mapped on the construction plans along with an appropriate buffer, which will be determined by a qualified biologist based on the biology of the species. The nest area will be avoided until the nest is vacated and the juveniles have fledged or the nest is determined to be inactive (no eggs or young). The nest area will be demarcated in the field with flagging and stakes or construction fencing for avoidance. | One week prior to any ground disturbance between February 1 to August 31 | Community & Economic Development Department, Planning and Building & Safety Divisions and Public Works Department | Nesting Bird Survey Report submitted to City |

Table 3-1
Mitigation Monitoring and Reporting Program

| Impact Category | Mitigation Measure | Implementation Timing | Responsible Monitoring Party | Monitoring/Reporting Method |
|--------------------|---|---|---|---|
| Cultural Resources | MM-CUL-1: 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 interested tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and interested 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. | Prior to issuance of grading permit, if there are any changes to the project site design and/or proposed grades | Community & Economic Development Department, Planning Division and Public Works Department | Consultation logs showing the Project applicant/developer and the City's efforts to contact interested tribes and the outcome of any such consultations |
| Cultural Resources | MM-CUL-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 interested 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 | 30 days prior to issuance of a grading permit | Community & Economic Development Department, Planning Division Qualified Archaeological/ Paleontological Monitor Native American Monitors | Archaeological Monitoring Plan Evidence that a qualified archaeological/paleontological monitor has been retained shall be provided to the City |

Table 3-1
Mitigation Monitoring and Reporting Program

| Impact Category | Mitigation Measure | Implementation Timing | Responsible Monitoring Party | Monitoring/Reporting Method |
|--------------------|---|---------------------------------|---|---|
| | <p>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;</p> <p>c. The protocols and stipulations that the Applicant, tribes, 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;</p> <p>d. Treatment and final disposition of any cultural and paleontological resources, sacred sites, and human remains if discovered on the project site; and</p> <p>e. The scheduling and timing of the Cultural Sensitivity Training noted in mitigation measure MM-CUL-4.</p> | | | |
| Cultural Resources | <p>MM-CUL-3: 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:</p> <p>1. 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</p> <p>2. 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</p> | During grading and construction | <p>Community & Economic Development Department, Planning Division</p> <p>Project applicant/developer</p> <p>Landowner</p> <p>Qualified Archaeological Monitor</p> <p>Native American Monitors</p> | <p>Report prepared that documents the finding and disposition of any Native American cultural resources</p> <p>If resources are found and curated, a copy of the curation agreement shall be provided to the City</p> <p>Completed Phase IV Monitoring Report shall be submitted to the City.</p> |

Table 3-1
Mitigation Monitoring and Reporting Program

| Impact Category | Mitigation Measure | Implementation Timing | Responsible Monitoring Party | Monitoring/Reporting Method |
|-----------------|--|-----------------------|------------------------------|-----------------------------|
| | <p>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:</p> <p>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;</p> <p>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;</p> <p>c. For purposes of conflict resolution, if more than one Native American tribe or band is involved with the project and cannot come to an agreement as to the disposition of cultural materials, they shall be curated at the Western Science Center or Riverside Metropolitan Museum by default; and</p> <p>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</p> | | | |

Table 3-1
Mitigation Monitoring and Reporting Program

| Impact Category | Mitigation Measure | Implementation Timing | Responsible Monitoring Party | Monitoring/Reporting Method |
|---------------------------------|---|---|--|---|
| | 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 interested tribes. | | | |
| Cultural Resources | MM-CUL-4: 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. | Prior to grading | Community & Economic Development Department, Planning Division Qualified Archaeological Monitor Native American Monitors | Completed Phase IV Monitoring Report shall be submitted to the City. |
| Hazards and Hazardous Materials | MM HAZ-1: A minimum of 45 days prior to submittal of an application for a building permit, the Project developer/applicant shall inform the City of Riverside Planning Division and Building and Safety Division if any Project-related vertical structures or construction equipment will exceed 1,664 feet above mean sea level (AMSL). Prior to construction, if it is determined that any Project-related vertical structures or | 45 days prior to submittal of a building permit application | Community & Economic Development Department, Planning and Building & Safety Divisions Construction contractor | Copy of filed FAA Form 7460-1 (if needed) and determination from FAA that construction will not be a hazard to air navigation shall be submitted to the City. |

Table 3-1
Mitigation Monitoring and Reporting Program

| Impact Category | Mitigation Measure | Implementation Timing | Responsible Monitoring Party | Monitoring/Reporting Method |
|---------------------------------|---|---|---|---|
| | construction equipment will exceed 1,664 AMSL, then at the beginning of construction, the Project developer/applicant shall submit a Federal Aviation Administration (FAA) Form 7460-1 to the FAA to ensure compliance with the FAA standards and air space obstruction-clearance. If FAA Form 7460-1 is required to be filed, the City shall not issue a building permit until the FAA issues a determination stating that the proposed construction will not be a hazard to air navigation. | | | |
| Hazards and Hazardous Materials | MM-HAZ-2: The Project developer/applicant shall submit applicable plans and forms for the proposed helipad/helistop to the March Air Reserve Base (March ARB), Riverside County Airport Land Use Commission (ALUC), Riverside City Council, and California Department of Transportation (Caltrans) Division of Aeronautics for review and approval. All conditions of approval from FAA, March ARB, and Riverside County ALUC shall be adhered to by the Project. | Prior to issuance of a building permit | Community & Economic Development Department, Planning Division March ARB Riverside County ALUC Riverside City Council Caltrans Division of Aeronautics FAA | Helipad/helistop plan submittal to and approval from the following reviewing agencies: March ARB; Riverside County ALUC; City of Riverside; Caltrans Division of Aeronautics; and FAA. Final project plans and entitlements submitted to and approved by the City as per the City's Plan Check submittal requirements. Compliance with any conditions of approval provided by March ARB, Riverside County ALUC, Caltrans Division of Aeronautics, and FAA for the helipad/helistop. |
| Hazards and Hazardous Materials | MM-HAZ-3: The following additional March ARB-required risk-reduction Project design features shall be incorporated into Project design: <ul style="list-style-type: none"> • Reduce bird attractants at the Project site. To avoid increasing the risk of bird-aircraft strikes for March ARB or other aircraft transiting the vicinity of the Project site, the following measures shall be taken: | Prior to issuance of a building permit, project construction, project operation | Community & Economic Development Department, Planning and Building & Safety Divisions March ARB | Approval of landscape plans. Compliance to be verified by the City and by the March ARB during Design Review entitlement process, and during plan check. |

Table 3-1
Mitigation Monitoring and Reporting Program

| Impact Category | Mitigation Measure | Implementation Timing | Responsible Monitoring Party | Monitoring/Reporting Method |
|-----------------|--|-----------------------|------------------------------|--|
| | <p>Project Design: When possible, the Project shall incorporate passive bird exclusion designs into the structural design. Windows, ledges, roof edges, air vents and other features shall be designed to prevent roosting if possible, by incorporating angles of 45 degrees or more. For problem areas such as flat roofs where it is difficult to create slopes, the Project developers shall install a physical barrier to perching such as bird spikes, bird netting, or bird wire. The Project operator shall maintain these physical barriers to remove accumulated debris and ensure they continue to function. Installation of bird exclusion devices shall be by an experienced specialist, and any installation shall comply with the Migratory Bird Treaty Act, Endangered Species Act, California Endangered Species Act, and any other applicable federal, state, or local regulations.</p> <p>The Project developer and operator shall ensure that stormwater drainage does not allow for ponding of water on site or adjacent to the Project site.</p> <p>Project Construction: During construction, all trash shall be disposed of in enclosed bins. Feeding of birds by workers on the Project site shall be prohibited. The prohibition of bird feeding shall be part of the construction personnel training directive as a requirement of daily working conditions. The construction contractor shall be responsible for monitoring and enforcing this requirement.</p> <p>Project Landscaping: The Project shall avoid the creation of large areas of turf grass or open water. When selecting landscaping trees, bushes, or other ornamental landscaping, the Project shall avoid planting any that produce fruit. Bird perching on Project</p> | | Project applicant/developer | Periodic inspections during construction and operation |

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| Impact Category | Mitigation Measure | Implementation Timing | Responsible Monitoring Party | Monitoring/Reporting Method |
|-----------------|--|-----------------------------------|---|--|
| Noise | <p>landscaping shall be monitored by Project operators, and any landscaping that attracts substantial numbers of birds shall be removed and replaced with another variety.</p> <ul style="list-style-type: none"> The take-off and landing patterns from the proposed helicopter operations shall be designed in a way to avoid conflicts with March ARB's flight operations. The helistop shall be designed per FAA criteria with dimensions of 65 feet x 65 feet to serve the larger Sikorsky UH-60 Blackhawk helicopter for response to mass casualty events, especially if and when the hospital achieves trauma center status. Proposed flight paths shall be to and from the southwest and to and from the northwest for noise-abatement reasons, as well as to minimize potential conflicts with March Air Reserve Base/Inland Port Airport fixed-wing traffic. <p>MM-NOI-1: Operational Noise Mitigation Measures</p> <ul style="list-style-type: none"> Prior to certificate of occupancy for the proposed Hospital, Medical Office Building 3, Medical Office Building 4, or Parking Structure 1, whichever may be constructed first, the Project Applicant shall construct the proposed 8-foot-high perimeter wall (as shown on Figure 4.9-2) to reduce the operational noise levels at the adjacent sensitive receiver locations. Prior to certificate of occupancy for the proposed Hospital, the Project shall demonstrate compliance with the requirements of all federal, state, regional, and local agencies. At a minimum, such agencies include the Federal Aviation Administration, the Riverside County Airport Land Use Commission, the March Air Reserve Base/Inland Port | Prior to certificate of occupancy | <p>Community & Economic Development Department, Planning and Building & Safety Divisions</p> <p>Project applicant/developer</p> <p>FAA</p> <p>Riverside County ALUC</p> | <p>Plans submitted to the City showing the perimeter wall and demonstrating compliance with requirements from the FAA, the Riverside County ALUC, the March ARB/Inland Port Airport, the State of California Heliprot Permitting process, and the City of Riverside Entitlement process.</p> |

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| Impact Category | Mitigation Measure | Implementation Timing | Responsible Monitoring Party | Monitoring/Reporting Method |
|----------------------------|---|-----------------------------------|---|--|
| | Airport, the State of California Heliport Permitting process, and the City of Riverside Entitlement process. <ul style="list-style-type: none"> The proposed helipad shall be reviewed pursuant to the provisions of Riverside Municipal Code Title 19, Chapter 19.320. | | March ARB/Inland Port Airport State of California Heliport Permitting | |
| Transportation/ Traffic | MM-TRAF-1: Valley Springs Parkway/Eucalyptus Avenue (#4): Prior to opening the Project for operation, the Project developer/applicant shall pay for and install two five-section signal heads as well as modify the signal phasing such that there is an overlap phase for the existing dual right turn lanes on the southbound approach. The Project applicant will enter into an agreement with the City of Moreno Valley to complete these improvements. | Prior to certificate of occupancy | Public Works Department, Traffic Division Project applicant/developer City of Moreno Valley | Installation to be verified by the City of Riverside and the City of Moreno Valley |
| Transportation/ Traffic | MM-TRAF-2: I-215 Southbound Ramps/Eucalyptus Avenue (#3): Prior to opening the Project for operation, the Project developer shall pay the Project's fair share of the cost for the installation of a traffic signal, and construct the traffic signal, to serve the southbound right turn only off-ramp and westbound through traffic. This configuration will be similar to the existing I-215 northbound right turn only off-ramp / Eucalyptus Avenue intersection design. | Prior to certificate of occupancy | Public Works Department, Traffic Division Project applicant/developer Caltrans | Installation to be verified by the City of Riverside and Caltrans |
| Transportation/ Traffic | MM-TRAF-3: Valley Springs Parkway/Eucalyptus Avenue (#4): Prior to opening the Project for operation, the Project developer shall pay the Project's fair share of the cost to modify striping to provide a second left turn lane, in addition to the existing two through lanes on the northbound approach. The Project applicant will enter into an agreement with the City of Moreno Valley to complete these improvements if required by the City. | Prior to certificate of occupancy | Public Works Department, Traffic Division Project applicant/developer City of Moreno Valley | Payment of the fair share cost to be verified by the City of Riverside and the City of Moreno Valley. Applicant is required to provide the City of Riverside with documentation of payment to the City of Moreno Valley. |

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Mitigation Monitoring and Reporting Program

| Impact Category | Mitigation Measure | Implementation Timing | Responsible Monitoring Party | Monitoring/Reporting Method |
|----------------------------|--|-----------------------------------|---|---|
| Transportation/ Traffic | MM-TRAF-4: Day Street/Cottonwood Avenue (#13): Prior to opening the Project for operation, the Project developer shall pay the Project's fair share of the cost to widen Day Street to provide a separate right turn lane, in addition to the existing left turn lane and one through lane on the northbound approach. The Project applicant will enter into an agreement with the City of Moreno Valley to complete these improvements if required by the City. | Prior to certificate of occupancy | Public Works Department, Traffic Division Project applicant/developer City of Moreno Valley | If required, payment of the fair share cost to be verified by the City of Riverside and the City of Moreno Valley. Applicant is required to provide the City of Riverside with documentation of payment to the City of Moreno Valley. Evidence of an agreement with the City of Moreno Valley to complete the improvements (if required by the City of Moreno Valley). Applicant is required to submit the agreement to the City of Riverside. |
| Transportation/ Traffic | MM-TRAF-5: Day Street / Bay Avenue (#14): Prior to opening the Project for operation, the Project developer shall pay the Project's fair share of the cost to complete the following improvements: <ul style="list-style-type: none"> • Northbound approach: Install a traffic signal and widen Day Street to provide a second through lane. • Southbound approach: Widen Day Street to provide a second through lane. The Project applicant will enter into an agreement with the City of Moreno Valley to complete these improvements if required by the City. | Prior to certificate of occupancy | Public Works Department, Traffic Division Project applicant/developer City of Moreno Valley | If required, payment of the fair share cost to be verified by the City of Riverside and the City of Moreno Valley. Applicant is required to provide the City of Riverside with documentation of payment to the City of Moreno Valley. Evidence of an agreement with the City of Moreno Valley to complete the improvements (if required by the City of Moreno Valley). Applicant is required to submit the agreement to the City of Riverside. |
| Transportation/ Traffic | MM-TRAF-6: Day Street/Alessandro Boulevard (#15): Prior to opening the Project for operation, the Project developer shall pay the Project's fair share of the cost to modify striping and the existing raised median to provide a second left turn | Prior to certificate of occupancy | Public Works Department, Traffic Division | If required, payment of the fair share cost to be verified by the City of Riverside and the City of Moreno Valley. Applicant is required to |

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| Impact Category | Mitigation Measure | Implementation Timing | Responsible Monitoring Party | Monitoring/Reporting Method |
|----------------------------|---|-----------------------------------|---|--|
| | lane, in addition to the existing three through lanes on the eastbound approach. The Project applicant will enter into an agreement with the City of Moreno Valley to complete these improvements if required by the City. | | Project applicant/developer City of Moreno Valley | provide the City of Riverside with documentation of payment to the City of Moreno Valley. Evidence of an agreement with the City of Moreno Valley to complete the improvements (if required by the City of Moreno Valley). Applicant is required to submit the agreement to the City of Riverside. |
| Transportation/ Traffic | <p>MM-TRAF-7: Memorial Way/Towngate Drive (#16): Prior to opening the Project for operation, the Project developer shall pay the Project's fair share of the cost to implement signal modifications for protected/permitted operations for both the north/south movements and the east/west movements as well as modify the intersection to include the following geometrics:</p> <ul style="list-style-type: none"> • Southbound approach: Convert the existing second through lane to provide a dedicated right turn lane with overlap phasing, in addition to the existing left turn lane and one through lane. • Eastbound approach: Retain existing two through lanes and defacto right turn lane. • Westbound approach: Retain existing two through lanes and defacto right turn lane. <p>The Project applicant will enter into an agreement with the City of Moreno Valley to complete these improvements if required by the City.</p> | Prior to certificate of occupancy | Public Works Department, Traffic Division Project applicant/developer City of Moreno Valley | <p>If required, payment of the fair share cost to be verified by the City of Riverside and the City of Moreno Valley. Applicant is required to provide the City of Riverside with documentation of payment to the City of Moreno Valley.</p> <p>Evidence of an agreement with the City of Moreno Valley to complete the improvements (if required by the City of Moreno Valley). Applicant is required to submit the agreement to the City of Riverside.</p> |

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| Impact Category | Mitigation Measure | Implementation Timing | Responsible Monitoring Party | Monitoring/Reporting Method |
|----------------------------|--|-----------------------------------|---|---|
| Transportation/ Traffic | MM-TRAF-8: Day Street/Eucalyptus Avenue (#12): Prior to opening the Project for operation, the Project developer shall pay fees for the Transportation Uniform Mitigation Fee (TUMF) program which includes modification of this intersection to provide a dedicated right turn lane with overlap phasing on the northbound approach. The Project applicant will enter into an agreement with the City of Moreno Valley to complete these improvements if required by the City. | Prior to certificate of occupancy | Public Works Department, Traffic Division Project applicant/developer City of Moreno Valley | If required, payment of fees to be verified by the City of Riverside and the City of Moreno Valley. Applicant is required to provide the City of Riverside with documentation of payment to the City of Moreno Valley. Evidence of an agreement with the City of Moreno Valley to complete the improvements (if required by the City of Moreno Valley). Applicant is required to submit the agreement to the City of Riverside. |
| Transportation/ Traffic | MM-TRAF-9: Day Street/Cottonwood Avenue (#13): Prior to opening the Project for operation, the Project developer shall pay the Project's fair share of the cost to complete the following improvements: <ul style="list-style-type: none"> Eastbound approach: Widen Cottonwood Avenue to provide a separate right turn lane, in addition to the existing left turn lane and one through lane. Westbound approach: Provide overlap phasing for the existing right turn lane. The Project applicant will enter into an agreement with the City of Moreno Valley to complete these improvements if required by the City. | Prior to certificate of occupancy | Public Works Department, Traffic Division Project applicant/developer City of Moreno Valley | If required, payment of the fair share cost to be verified by the City of Riverside and the City of Moreno Valley. Applicant is required to provide the City of Riverside with documentation of payment to the City of Moreno Valley. Evidence of an agreement with the City of Moreno Valley to complete the improvements (if required by the City of Moreno Valley). Applicant is required to submit the agreement to the City of Riverside. |
| Transportation/ Traffic | MM-TRAF-10: Day Street/Alessandro Boulevard (#15): Prior to opening the Project for operation, the Project developer shall pay the Project's fair share of the cost to complete the following improvements: | Prior to certificate of occupancy | Public Works Department, Traffic Division | If required, payment of the fair share cost to be verified by the City of Riverside and the City of Moreno Valley. Applicant is required to |

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| Impact Category | Mitigation Measure | Implementation Timing | Responsible Monitoring Party | Monitoring/Reporting Method |
|----------------------------|--|---|---|--|
| | <ul style="list-style-type: none"> Northbound approach: Modify striping to provide a second through lane, in addition to the existing left turn lane and through lane. Southbound approach: Widen Day Street to provide a dedicated right turn lane. Westbound approach: Modify striping and existing raised median to provide a second left turn lane and widen Alessandro Boulevard to provide a third receiving lane. <p>The Project developer will enter into an agreement with the City of Moreno Valley to complete these improvements if required by the City.</p> | | <p>Project applicant/developer</p> <p>City of Moreno Valley</p> | <p>provide the City of Riverside with documentation of payment to the City of Moreno Valley.</p> <p>Evidence of an agreement with the City of Moreno Valley to complete the improvements (if required by the City of Moreno Valley). Applicant is required to submit the agreement to the City of Riverside.</p> |
| Transportation/ Traffic | MM-TRAF-11: Valley Springs Parkway/Driveway 5 (#23): Prior to opening the Project for operation, the Project developer shall pay for and install a traffic signal. Intersection geometries will be constructed as described in Section 4.11.5, Project Design Features that Will Reduce Impacts. | Prior to certificate of occupancy of Hospital Phase 1, Phase 2, Medical Office Building 3, Medical Office Building 4, or Parking Structure 1. | <p>Public Works Department, Traffic Division</p> <p>Project applicant/developer</p> | Installation to be verified by the City |
| Transportation/ Traffic | MM-TRAF-12: Canyon Park Drive – Driveway 7/Gateway Drive (#25): Prior to opening the Project for operation, the Project developer shall pay for and install a traffic signal. Intersection geometries will be constructed as described in Section 4.11.5, Project Design Features that Will Reduce Impacts. | Prior to certificate of occupancy of Medical Office Building 1, Medical Office Building 2, or Parking Structure 2. | <p>Public Works Department, Traffic Division</p> <p>Project applicant/developer</p> | Installation to be verified by the City |
| Transportation/ Traffic | MM-TRAF-13: Prior to design approval of the helistop by the City of Riverside Planning Department, the developer/applicant shall submit plans to the March ARB Air Traffic Control for review and approval of plans related to the proposed helistop location and proposed helicopter flight path | Prior to City approval of entitlements for the helistop | <p>Community & Economic Development Department, Planning Division</p> | <p>Review and approval of plans by the March ARB Air Traffic Control</p> <p>Evidence of the agreement between March ARB Air Traffic Control and</p> |

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| Impact Category | Mitigation Measure | Implementation Timing | Responsible Monitoring Party | Monitoring/Reporting Method |
|----------------------------|---|--|---|---|
| | alignments to ensure no conflicts occur between the proposed helicopter flight paths and March ARB flight operations. A copy of the approved plans from March ARB Air Traffic Control shall be submitted to the City of Riverside Planning Department. A letter of agreement shall be developed between March ARB Air Traffic Control and the Canyon Springs Healthcare Campus operator. The letter of agreement will define specific flight paths and communication procedures for helicopter operations to and from the hospital. The Canyon Springs Healthcare Campus operator will require all helicopter operators using the heli-stop to sign the letter of agreement. | | Project applicant March ARB Air Traffic Control | the Canyon Springs Healthcare Campus operator |
| Transportation/ Traffic | <p>MM-TRAF-14: Prior to heli-stop approval by the City of Riverside Planning Commission/City Council, the following agency actions will be required with regards to the design, construction, and operation of the heli-stop:</p> <ul style="list-style-type: none"> An FAA Form 7460-1 will be submitted. An airspace study by FAA staff per Part 157, Notice of Landing Area Proposal, of the Federal Aviation Regulations (FARs). This study results in an "airspace determination letter." Project review and finding of consistency with the March ARB/Inland Port Airport Land Use Compatibility Plan by Riverside County Airport Land Use Commission as required by California Public Utilities Code. Application for and receipt of Heliport Site Approval Permit from Caltrans Division of Aeronautics authorizing heliport construction. After construction of the heli-pad a final inspection and approval of a Heliport Permit authorizing flight operations by Caltrans Division of Aeronautics. | Prior to City approval of entitlements for the heli-stop | <p>Community & Economic Development Department, Planning Division</p> <p>FAA</p> <p>Riverside County ALUC</p> <p>Caltrans Division of Aeronautics</p> | <p>Submittal of FAA Form 7460-1</p> <p>Issuance of an airspace determination letter</p> <p>Review and consistency finding from the Riverside County ALUC</p> <p>Issuance of Heliport Site Approval Permit for heliport construction</p> <p>Issuance of a Heliport Permit for heliport operation</p> |

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| Impact Category | Mitigation Measure | Implementation Timing | Responsible Monitoring Party | Monitoring/Reporting Method |
|-------------------------------|---|--|--|---|
| Utilities and Service Systems | MM-UTL-1: The developer/applicant of the Project shall be required to meet with Eastern Municipal Water District (EMWD) staff to develop a plan of service, which shall detail water, wastewater, and recycled water requirements to serve the Project. | Prior to certificate of occupancy | Community & Economic Development Department, Planning Division Project applicant/developer | Submittal of utility plans to City. The applicant is required to provide the City with evidence of their meeting with the Eastern Municipal Water District. |
| Utilities and Service Systems | MM-UTL-2: Prior to issuance of building permits, the developer/applicant shall complete a Construction Waste Recycling Plan and submit the plan to the Riverside County Waste Management Department (RCWMD) for approval. The plan shall identify and estimate the materials to be recycled during construction and demolition activities and shall specify where and how the recyclable materials will be stored on the Project site. Compliance with the plan shall be a requirement in all construction contracts. The RCWMD-approved plan shall be attached to all construction plans and distributed to all construction contractors. Once construction is complete, the developer/applicant shall be responsible for preparing a Waste Recycling Report that demonstrates that the Project recycled a minimum of 50% of its construction and demolition waste. The waste recycling report must be submitted to, and approved by, the RCWMD prior to issuance of occupancy permits. | Prior to issuance of building permits, prior to certificate of occupancy permits | Community & Economic Development Department, Building and Safety Division Project applicant/developer RCWMD Construction contractor | Approval of the Construction Waste Recycling Plan Approval of the Waste Recycling Report Applicant is required to submit documentation to the City substantiating implementation of MM-UTL-2 . |

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| Impact Category | Mitigation Measure | Implementation Timing | Responsible Monitoring Party | Monitoring/Reporting Method |
|-------------------------------|--|---------------------------------------|---|--|
| Utilities and Service Systems | MM-UTL-3: Prior to issuance of building permits, the developer/applicant shall submit building plans to the Riverside County Waste Management Department (RCWMD) and obtain approval from the RCWMD for compliance with the Riverside County Design Guidelines for Refuse and Recyclables Collection and Loading Areas, which include specifications for recyclable storage space, location and access, signage, protection and security, compatibility, and overall compliance with federal, state, and local laws. | Prior to issuance of building permits | Community & Economic Development Department, Building and Safety Division Project applicant/developer RCWMD | Approval for compliance with the Riverside County Design Guidelines for Refuse and Recyclables Collection and Loading Areas Prior to the issuance of building permits, the City must verify approval of the applicant's building plans by the Riverside County Waste Management Department. |