CHAPTER 3
ENVIRONMENTAL EFFECTS FOUND NOT TO BE SIGNIFICANT

3.1 EFFECTS FOUND NOT TO BE SIGNIFICANT DURING PREPARATION OF THE INITIAL STUDY/NOTICE OF PREPARATION

The California Environmental Quality Act (CEQA) provides that an Environmental Impact Report (EIR) shall focus on the significant effects on the environment, discussing the effects with emphasis in proportion to their severity and probability of occurrence. Effects dismissed in an Initial Study (IS) as clearly insignificant and unlikely to occur need not be discussed further in the EIR unless information inconsistent with the finding in the IS is subsequently received.

Section 21100(c) of the California Public Resources Code states that an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were, therefore, not discussed in detail in the Draft EIR (California Public Resources Code, Section 21000 et seq.). Section 15128 of the State CEQA Guidelines adds, "Such a statement may be contained in an attached copy of an Initial Study" (14 CCR 15000 et seq.).

The IS and Notice of Preparation (NOP) (both provided in Appendix A) for the proposed Canyon Springs Healthcare Campus Specific Plan and Amendment to the Canyon Springs Business Park Specific Plan (Project) were circulated for a 30-day public review on March 2, 2016. The IS/NOP concluded that the Project will not result in potentially significant impacts to the following CEQA issue areas: Aesthetics, Agriculture & Forestry Resources, Geology & Soils, Mineral Resources, Population & Housing, and Recreation. As a result, these specific issue areas are discussed below and will not be discussed further within the body of the Draft EIR. However, based on the NOP comment letter received from the City of Moreno Valley regarding Aesthetics, this environmental topic has been included as a stand-alone section in the Draft EIR (refer to Section 4.1, Aesthetics).

- **Agricultural & Forestry Resources** – The Project site is designated "Urban and Built-Up Land" by the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (DOC 2015a) and as depicted in Figure OS-2, Agricultural Suitability, in the City's General Plan 2025 (City of Riverside 2007a). Since the Project site is not located on any Farmland designations, no conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use will occur. 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. The site is located within existing commercial and/or office zones. According to the DOC's Williamson Act Map (DOC 2016) and as depicted in Figure OS-3, Williamson Act Preserves, in the City's General Plan 2025 Open Space and Conservation Element,

there are no Williamson Act contracts on the Project site. Since the Project is not an agricultural land use and is not under a Williamson Act contract, no impacts to agricultural use or Williamson Act contract will occur. No forest land, timberland, or Timberland Production areas (as defined in California Public Resources Code, Sections 12220(g) and 4526, or California Government Code, Section 51104(g)) are located within or adjacent to the Project site; therefore, the Project will not result in the loss of forest land or conversion of forest land to non-forest use. As such, no impacts to agricultural resources will occur.

- **Geology & Soils –** The following Geology & Soils analysis is based on the Project specific geotechnical study titled *Feasibility-Level Geotechnical Investigation, Proposed Canyon Springs Healthcare Center*, prepared by CHJ Consultants, on September 30, 2015, and the *Response to Reviewer Comments and Updated Proposed Canyon Springs Healthcare Center*, prepared by CHJ Consultants, on May 17, 2016, both of which are included as Appendix B. The following issues related to Geology & Soils are found to be **less than significant** based upon the geotechnical study.

  Earthquake Fault

  According to Figure PS-1 of the City's General Plan 2025, the Project site is not located on or near an earthquake fault or fault zone (City of Riverside 2007a). The Project site is not within an Alquist-Priolo Earthquake Fault Zone (DOC 2015b). However, 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 Riverside County fault zone, the closest mapped fault zones to the City of Riverside (City). The geotechnical investigation performed for the Project site indicated that there was no evidence of active faulting observed on, or adjacent to, the Project site (Appendix B). Because the Project site is not located within a Fault Rupture Hazard Zone or within an Alquist-Priolo Earthquake Fault Zone, and due to the conclusion of the geotechnical investigation, the potential for fault rupture is low. The geotechnical investigation concluded that moderate to severe seismic shaking of the Project site can be expected during the lifetime of the Project (Appendix B). However, proper engineering design and construction in conformance with the California Building Code (CBC) and California Office of Statewide Health Planning and Development (OSHPD) standards will ensure that seismic ground shaking will be **less than significant**. A Specific Plan is being prepared for the Project to provide guidelines for Project design to ensure that the construction of the buildings meets CBC and OSHPD standards. Additionally, the OSHPD's Facilities Development Division will review and approve the plans and specifications of the proposed hospital building; medical office buildings (MOBs); independent living, assisted living, and skilled nursing facility; and related hospital facilities to ensure compliance with the provisions of the CBC, Title 24, California Code of Regulations (OSHPD 2011).

Liquefaction

Figure PS-2 of the *City of Riverside General Plan 2025* (General Plan 2025) depicts the Project site as being within low liquefaction zones (City of Riverside 2007a). Based on the 2015 geotechnical investigation, it was determined 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.

According to the geotechnical investigation, the Project site contains silty and clayey sands and may have expansive properties (Appendix B). However, Figure PS-3 of the City's General Plan 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 (City of Riverside 2007a). The liquefaction analysis indicated that the potential for liquefaction at the Project site is low.

To minimize potential post-construction soil movement from liquefaction, the Project will be constructed in accordance with the provisions of the Project's geotechnical study (Appendix B), CBC standards, and OSHPD standards. Impacts are considered **less than significant**.

Landslides

The Project site is not located in an area with steep slopes that could result in a landslide, as indicated on Figure 5.6-1 of the *Final Program Environmental Impact Report for the City of Riverside General Plan 2025* (General Plan 2025 Final Program EIR) (City of Riverside 2007b). Therefore, the Project site is not considered to be susceptible or located on a site that is unstable. The geotechnical investigation 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 B). Furthermore, the 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, it was concluded that the potential for subsidence effects at the Project site is considered very low (Appendix B). Impacts are considered **less than significant**.

Soil Erosion

Construction activities such as excavation and grading may have the potential to cause soil erosion or the loss of topsoil. The Project site is relatively flat, and minimal erosion is anticipated. Short-term erosion effects during the construction phase of the Project will be prevented through required implementation of a stormwater pollution prevention plan (SWPPP) through compliance with the National Pollutant Discharge Elimination System program and the incorporation of best management practices (BMPs) intended to reduce soil erosion. Additionally, the Project is required to adhere to applicable grading and building permit requirements, as detailed in Title 17 Grading Code of the City of

Riverside Municipal Code (City of Riverside 2017), and adherence to the City's standard conditions for grading and construction. Additionally, the Project's geotechnical study contains recommendations and addresses soil conditions to minimize potential impacts (Appendix B). With adherence to the erosion and sedimentation control plan in its SWPPP and the recommendations in the geotechnical study (Appendix B), and compliance with grading and building permit requirements, potential impacts related to substantial soil erosion or the loss of topsoil are considered **less than significant**.

Septic Tanks/Disposal Systems

No septic tanks exist on the Project site. The proposed development will be served by City sanitary sewers for the disposal of wastewater. There are existing sewer pipelines in Valley Springs Parkway, Gateway Drive, Corporate Centre Place, and Day Street. The main existing sewer collectors of 12-inch-diameter and 15-inch-diameter vitrified clay pipe are located in Valley Springs Parkway, which is where all the sewage from the Project site will collect before draining toward the 15-inch-diameter trunk sewer along Eucalyptus Avenue and Eastridge Avenue. A sewer flow study was prepared by Rick Engineering Company (2016). 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 million gallons per day for the City's sewer system for 2035 (City of Riverside 2014; Rick Engineering 2016). Given the current commercial land use designation, the Tequesquite Trunk Sewer study was based on future commercial development (City of Riverside 2008). Therefore, the future modeled flow along the 15-inch-diameter sewer line in Eastridge Avenue (Eucalyptus Avenue turns into Eastridge Avenue at I-215) is 2.65 cubic feet per second (cfs), and the 15-inch-diameter sewer pipe has a theoretical "full" flow of 4.74 cfs, resulting in a future pipeline being 56% full (City of Riverside 2008). Given these factors, the Project site with a commercial buildout will generate approximately 822,290 gallons per day (gpd) (Rick Engineering 2016). Rick Engineering reviewed the Project and determined that the hospital, assisted living facility, and senior housing components should be studied with a different criteria based on similar use rates rather than commercial rates, and assumed that the hospital and assisted living uses will be studied at a rate of 250 gpd per bed or unit (based on Eastern Municipal Water District's Sanitary Sewer System Planning and Design Criteria (EMWD 1993)) rather than the 0.010 cfs per acre or 6,462 gpd per acre (Rick Engineering 2016). The senior housing use was studied at an apartment rate based on 65 gpd per capita (assumed two capita per unit) (Rick Engineering 2016). Rick Engineering determined that the MOBs should be studied at a commercial use rate (6,462 gpd) for a more conservative rate (Rick Engineering 2016). The MOB rate found from the City of Los

Angeles Department of Public Works, Bureau of Sewer Generation Rates Table, dated March 2004, which showed MOBs at 250 gpd per 1,000 square feet.[1] The Project includes approximately 370,000 square feet of MOB space, which will generate approximately 249,750 gpd (with a 2.7 peaking factor that was applied). Since this result is lower than if a commercial use rate was used, the commercial use rate was chosen as a more conservative and reasonable rate (Rick Engineering 2016). A peaking factor of 2.7 was also added for a more conservative calculation. Based on the above factors, the Project will generate approximately 849,159 gpd, which will result in a sewer flow increase of approximately 26,869 gpd (0.04 cfs), an approximate 3% increase compared to a full commercial development on the Project site (Rick Engineering 2016). The overall sewer flow with implementation of the Project will result in only an approximately 0.07% increase, which will result in an insignificant increase. Therefore, impacts related to geology and soils are **less than significant.**

- **Mineral Resources –** The Project lies within Mineral Resource Zone 3 (MRZ-3) as depicted on Figure OS-1 of the City's General Plan 2025 (City of Riverside 2007a), 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 MRZ-3 designation and given that the Project 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 impact** will occur.

- **Population & Housing –** The Project site does not currently support any housing; therefore, substantial numbers of existing housing or people will not be displaced and the construction of replacement housing elsewhere will not be necessary as a result of the Project.

  Although the proposed senior housing facility will provide housing for seniors, it does not generate a substantial population growth. Seniors in the surrounding community will generally move from the surrounding area to the proposed senior housing facility, as the facility will provide amenities and resources specific for the senior-aged population.

  The Project will provide hospital emergency medical services for community disaster preparedness, medical check-ups and services at the MOBs, and provide resources and

[1] A MOB rate for medical office buildings developed in the City of Riverside could not be identified, and therefore, the MOB rate used by the City of Los Angeles Department of Public Works was compared to the commercial use rate used by the City of Riverside. It was determined that using the City of Los Angeles Public Works' MOB rate resulted in a lower generation of sewer flow than when using the City of Riverside's commercial use rate. Therefore, in order to provide a more conservative analysis, the City of Riverside's commercial use rate was applied to determine the Project's sewer flow. Additionally, a peaking factor of 2.7 was applied to add an extra factor of safety to the overall sewer flow analysis; a 2.7 peaking factor is on the high side for peaking factors.

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. Consequently, the Project will enhance the jobs/housing balance of the City by providing up to approximately 2,450 new permanent jobs at full buildout. Therefore, the Project will 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. Therefore, impacts related to population and housing are considered **less than significant**.

- **Recreation –** The Project consists of the development of a hospital, MOBs, a central energy plant, parking structures, hospital-related facilities, a senior housing facility, an independent living, an assisted living, and skilled nursing facility, and associated parking, landscaping, and infrastructure improvements (e.g., connect to existing water and wastewater infrastructure to provide the necessary construction and water/sewer needs for the Project). The proposed senior housing and independent living, assisted living, and skilled nursing facility are not anticipated to substantially increase the use of existing parks or recreational facilities since there are proposed open space areas immediately adjacent to these facilities that will provide on-site recreational activities. The hospital and MOBs will not include residential type uses or businesses that will increase the use of existing parks or recreational facilities. Thus, no deterioration of existing facilities will 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. Therefore, impacts related to recreation are **less than significant**.

Therefore, as stated in the IS/NOP, these topics are not addressed further in the Draft EIR.

3.2 EFFECTS FOUND NOT TO BE SIGNIFICANT AS PART OF THE ENVIRONMENTAL IMPACT REPORT PROCESS

Based on the analysis provided in Sections 4.1 through 4.13, Hydrology and Water Quality (refer to Section 4.7) was found to not have significant impacts, with no mitigation measures needed. The following issues related to Hydrology and Water Quality are found to be **less than significant** based upon the analysis provided in Section 4.7 of the Draft EIR:

Water Quality

Construction

Construction activities such as site clearing and grading, excavation, and trenching associated with construction of the Project are expected to result in land disturbance of up to 50.85 acres in incremental steps as phased construction of the area proceeds; however, for purposes of this analysis, it has been assumed that construction of all phases will occur concurrently. Because implementation of the Project will collectively require construction activities resulting in a land

disturbance of more than 1 acre, the Project applicant is required to obtain coverage under the Construction General Permit (State Water Regional Control Board Order 2009-0009-DWQ, as amended), which pertains to pollution from grading and Project construction. To obtain coverage under the Construction General Permit, the Project applicant must submit to the State Water Regional Control Board a Notice of Intent and associated permit registration documents, including a SWPPP and site plan, and must obtain a Waste Discharge Identification Number. As a condition of grading permit approval, the Project applicant is also required to provide the Notice of Intent and Waste Discharge Identification Number to the City, and must include the water quality BMPs on construction plans and drawings. In addition, all earthwork, grading, trenching, backfilling, and compaction operations must be conducted in accordance with Riverside Municipal Code, Public Utilities, Chapter 14.12, Title 17 of the code, and applicable general plan policies.

The BMPs required for coverage under the Construction General Permit and the erosion control provisions contained in City ordinances will require measures to prevent construction-related contaminants from reaching impaired surface waters and contributing to water quality impacts within the Edgemont Channel and downstream receiving waters, including Reach 3 of the Santa Ana River. For these reasons, water quality impacts resulting from construction-related activities and ground disturbances will be **less than significant**.

Post-Construction

The increase in impervious area created by the Project, as well as on-site activities and uses, could alter the types and levels of pollutants that could be present in Project site runoff associated with Project operation. Under existing conditions, stormwater that is not infiltrated moves as sheet flow towards the nearest storm drain or detention basin, and if rainfall is sufficiently intense and/or long-lasting, may begin to pond in various depressions on site. The Phase I Environmental Site Assessment found no environmental concerns associated past uses and conditions of the site (Appendix C). Significant runoff from the site during intense and/or long-lasting rain events is unlikely to contain elevated pollutant loads, other than possibly sediment or elevated turbidity.

With implementation of the Project, the Project 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 (Appendix C). 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.

The municipal separate storm sewer system permit requires the Project applicant to incorporate source control measures, low impact development controls, and treatment control measures into

the Project's design to reduce potential impacts to water quality. Appendix D includes detailed calculations that size each bioretention features according to the volume of stormwater runoff in each drainage management area (DMA) that will be produced in a design storm event (0.63 inches). Refer to Section 4.7.5 of this EIR for DMA discussion.

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 Water Quality Management Plan (WQMP) (Appendix D), 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 will be **less than significant** for all phases.

Groundwater Supplies

No phases of the Project include the use of on-site groundwater for its potable or irrigation water demands. Therefore, the Project will have no impact of the local groundwater table.

Regarding interference with groundwater recharge, the Project will include a substantial increase in impervious surface on the site. However, the existing soils on site are not conducive to groundwater recharge, as shown by percolation testing. The preliminary WQMP has included bioretention features that will allow some infiltration of runoff water in design storm events. In the context of the San Jacinto Groundwater Basin, which is 293 square miles in size and has millions of acre-feet of groundwater in storage, and considering that the site is not a major recharge area, the Project will have a negligible effect on groundwater recharge.

For these reasons, the Project will not substantially deplete groundwater supplies or interfere substantially with groundwater recharge; thus, impacts will be **less than significant.**

Erosion

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 pattern 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.

A delineation of jurisdictional waters, wetlands, and associated riparian habitat on the Project site was prepared for the Project to determine potential impacts from development of the site. The purpose of the delineation is to determine the extent of state and federal jurisdiction within the Project site potentially subject to regulation by the U.S. Army Corps of Engineers under Section 404 of the Clean Water Act, Regional Water Quality Control Board under Section 401 of

the Clean Water Act and Porter-Cologne Water Quality Act, and California Department of Fish and Wildlife under Section 1602 of the California Fish and Game Code. The jurisdictional delineation determined the Project site contains one unnamed stream within the study area that flows through the northeast section of the independent living, assisted living, and skilled nursing facility site (Site B). Currently, Site B receives stormwater flows from a storm drain that drains runoff from the parking lot directly adjacent to the north. Based on existing site conditions and current design plans, the Project will result in the placement of fill material within on-site jurisdictional areas on Site B.

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 (Appendix D), including any required revisions in the Final 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** for all phases.

Flooding

Currently, Site B receives storm water flows from a storm drain that drains runoff from the parking lot directly adjacent to the north (Appendix E). At the southern end of the Project site, there is another storm drain leading to an underground pipeline, which was created to capture runoff from the site (Appendix F). An inline detention basin is located immediately to the south of the southeastern parcel, which is where water from the Project site ultimately drains. When flows in this basin overflow, a concrete outlet leads across Eucalyptus Avenue and eventually flows to what is known as Sycamore Canyon.

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 (Appendix D). This is considered to be a "hydrologic condition of concern" under the Riverside County municipal separate storm sewer system permit and the Riverside County Flood Control and Water Conservation District WQMP Template. The volume of water for which BMPs have been designed in Area 2, 3, and 4 were increased to capture this amount, thereby mitigating the increase in runoff attributable to the 2-year 24-hour storm event. Therefore, the Project design (additional low impact development BMPs) adequately addresses this potential hydrologic condition of concern.

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 Riverside County Flood Control and Water Conservation District. However, 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.

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. According to Appendix D, 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. Though these are preliminary calculations, and the final design may necessitate refinements to determine exact storage requirements, Appendix D provides 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**.

Runoff

The Project will include detention facilities necessary to prevent any increases in the rate or volume of stormwater runoff leaving the site. Furthermore, 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.**

3.3 URBAN DECAY ANALYSIS

An Urban Decay Analysis was prepared by Alfred Gobar Associates (Appendix G) to address potential impacts regarding urban decay or deterioration that could be created by the Project and in response to the City of Moreno Valley's NOP comment letter, included as Appendix A. Urban decay is an environmental, economic, and social problem that may be caused by the abandonment of existing development (such as retail development) that could result from highly competitive new retail development. This abandonment can lead to higher vacancy rates and deferred maintenance of existing retail square footage by its owners, who no longer receive the level of rental income necessary to maintain their properties. This in turn can lead to lower property values, increased crime rates, a damaged business environment, and a continuing cycle of events that can cause a variety of economic and social problems for a municipality. A 2004 court ruling (Bakersfield Citizens for Local Control v. City of Bakersfield, Bakersfield 124 Cal.

App. 4th 1184) defined urban decay as "…a chain reaction of store closures and long-term vacancies, ultimately destroying existing neighborhoods and leaving decaying shells in their wake" (Appendix G). The Project does not consist of a "big-box" retail development where it will cause economic and social problems; rather, it will provide healthcare services in an area in need of these types of services.

The Urban Decay Analysis prepared for this Project concluded that the Project will not lead to urban decay and the associated environmental impacts commonly attributed to big-box retail. The Project is being based on the market condition analysis indicating that there is a shortage of healthcare service capacity to residents in the surrounding area. Demand for acute-care services offered at existing healthcare facilities continues to rise, but the area persistently remains underserved as described in the assessment of market conditions (Appendix G).

The following provides an explanation for the demand for healthcare services on the Project site:

1. Of the 58 counties that comprise the State of California, Riverside County recorded the highest percentage population growth between 2000 and 2010 and the fifth highest percentage (5.4%) population growth between 2010 and 2015, which was well above the corresponding population growth rates observed for Ventura County (3.0%), Los Angeles County (3.2%), San Bernardino County (3.4%), San Diego County (3.9%), Orange County (4.6%), and the overall state (3.9%) (Appendix G). The State of California Department of Finance (2014) is forecasting a population growth rate of 63.1% for Riverside County between 2015 and 2060 (from a population of 2,323,527 in 2015 to 3,678,439 in 2060). As a result, inland empire Riverside County is expected to have a substantial demand for development of new healthcare-related facilities to adequately serve this region's rapidly growing population (Appendix G).
2. Between 2010 and 2014, the supply of general acute care (GAC) beds throughout Riverside County expanded at a rate of only 50 new GAC beds per year, roughly one-half the rate of expansion observed for the adjoining counties of San Bernardino and San Diego (both with 99 new GAC beds per year) and less than one-third the rate of bed growth witnessed throughout Los Angeles County (183 new GAC beds per year) (Appendix G).
3. Despite comparatively high rates of population growth, Riverside County remains the most undersupplied county throughout Southern California relative to the supply of GAC beds per capita. In 2015, the bed-to-population ratio in Riverside County was only 1.66 GAC beds per 1,000 residents compared to Southern California at 2.52 GAC beds per 1,000 residents (Appendix G). Based on applying the Southern California ratio of 2.52 GAC beds for every 1,000 residents to Riverside County's January 1, 2015,

population of 1,308,441 residents, the County was undersupplied by approximately 1,985 GAC beds (Appendix G).

4. Between 2010 and 2014, the volume of GAC census days (patient days) witnessed throughout Riverside County expanded by 5,834 GAC census days or 0.9%. In addition to the highest percentage increase, Riverside County represented one of only two regions of Southern California to achieve an increase in GAC census days between 2010 and 2014, a period in which GAC census days throughout Southern California and the state declined by approximately 5% (Appendix G).

A hospital supply and demand analysis was conducted for all GAC hospitals within a 25-mile radius of the project site. A total of 19 hospitals within a Primary Trade Area (all Riverside County-based hospitals within the 25-mile radius along with the five most proximate San Bernardino County-based hospitals) together with an additional 11 hospitals within a Secondary Trade Area (the balance of San Bernardino County-based hospital facilities within the 25-mile radius surrounding the project site were included). Salient observations generated from this hospital investigation include the following:

1. Of the 30 GAC hospitals observed within a 25-mile radius surrounding the Project site, none are located within 5 miles of the Project site, establishing a potentially "at-risk" zone for site area residents requiring emergency medical services (Appendix G).
2. Of the 30 hospitals located within a 25-mile radius of the Project site, the closest hospital(s) offering access to a certified Segment Elevation Myocardial Infraction Center for heart attack patients and/or an accredited Neurology Stroke Receiving Center for stroke patients is Riverside Community Hospital, which is located in the City approximately 6 miles from the Project site. Riverside County Regional Medical Center, located approximately 5 miles east of the Project site, is one of the only two area-wide hospitals equipped for pediatric trauma patients (Appendix G).
3. Applying the most conservative Riverside County hospital bed coefficient of 1.66 GAC beds for every 1,000 site area residents to the 2015 5-mile site area population of 248,246 residents, indicates immediate demand support for at least 412 GAC hospital beds to be developed, expanding to as high as 625 GAC hospital beds utilizing a broader Southern California GAC beds per capita ratio (2.52). Population forecasts for the 5-mile trade area surrounding the Project site location target an estimated 257,726 site area residents by 2020, suggesting GAC bed capacity more closely approaching 428 beds over the near term (Appendix G).
4. The complete absence of hospital-based emergency medical services within a 5-mile radius surrounding the Project site is likely contributing to the above-average volumes of emergency room visits registered at each of the two closest site area hospitals: Riverside

County Regional Medical Center (87,554 emergency room visits recorded during 2014, the fourth highest volume of the 21 regional hospitals offering on-site emergency rooms) and Riverside Community Hospital (93,963 emergency room visits during 2014, the second highest reported volume of the 21 regional hospitals). The Riverside County Regional Medical Center's walk-out rate of 8.9% experienced during 2013 was the highest walk-out rate of any of the 21 hospitals recorded between 2009 and 2014. Although walk-out rates have improved at the Riverside County Regional Medical Center, it still appears challenged in its ability to sufficiently expedite the volume of emergency room visits that it receives, lending support for either an increase in its number of emergency medical service stations or assistance in the form of a new GAC hospital offering on-site emergency room services developed in the site area (Appendix G).

5. Despite the opening of two new hospital facilities in 2011, total patient day volume across the Primary Trade Area increased from 27.9% in 2013 to 29.7% in 2014, well above their corresponding representation of total licensed GAC beds throughout the Primary Trade Area during 2013 and 2014 of 22.5% and 23.2%, respectively. This implies above-average hospital performance in the immediate site area (Appendix G).
6. Riverside Community Hospital has maintained the second highest bed utilization rates (total beds and GAC beds) of the 24 more traditional hospital facilities for 2013 and 2014, while Riverside County Regional Medical Center has achieved the fourth highest bed utilization rates (total beds and GAC beds) for 2013 and 2014 (ranked fifth for GAC bed utilization in 2014) (Appendix G).
7. Outpatient visits for the two hospitals most proximate to the Project site have expanded at an annual rate of 2.1% (Riverside County Regional Medical Center) to 2.5% (Riverside Community Hospital) between 2009 and 2014, more than double the rate observed for hospital facilities throughout the Primary and Secondary Trade Areas—1.3% per year and 0.9% per year, respectively (Appendix G).

Alfred Gobar Associates (Appendix G) noted that the Project's GAC hospital represents less than one-half of available hospital capacity identified for the 50-mile trade area surrounding the Project site location, an immediate capacity for at least 412 GAC hospital beds, expanding to 428-plus beds by 2020 based on near-term population forecasts. Thus, the Project will help to alleviate the current undersupply that appears to be negatively impacting the delivery of healthcare services within the surrounding area. The Project's emergency services will improve the survival rate of area residents in need of critical care emergency services and help to alleviate current challenges faced at existing emergency rooms in the immediate site area, particularly operations at Riverside County Regional Medical Center. The development of the hospital is also not expected to impact Kaiser Permanente's plan to open an approximately 114-bed hospital facility in Murrieta (approximately 22 miles southeast of the Project site) in 2023. Similarly, the

development of the hospital is also not expected to impact potential future development of a hospital as a component of the contemplated March LifeCare facility. Documentation related to the March LifeCare facility states that its service area, which overlaps with a portion of the service area for the Project but is not coterminous, has a deficit of approximately 1,000 hospital beds, only a portion of which will be met by development of the Project, with the balance to be served by future development proposals, including the potential March LifeCare facility, among others. As noted by Alfred Gobar Associates (Appendix G), given the existing demand for additional hospital beds in the area and throughout Riverside County generally, no one facility will be able to meet the minimum requirements for this area, and ultimately, multiple facilities will need to be constructed in order to satisfy the population demands that exist today. As a result, the Project will not result in urban decay in the area; rather, it will provide healthcare services to an area in demand of these services.

3.4 REFERENCES

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