

## **CHAPTER 5 MANDATORY CEQA TOPICS**

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### **5.1 INTRODUCTION**

The State California Environmental Quality Act (CEQA) Guidelines set forth several general content requirements for a Draft Environmental Impact Report (EIR). Those applicable to the Canyon Springs Healthcare Campus Specific Plan and Amendment to the Canyon Springs Business Park Specific Plan (Project) include: cumulative impacts (Section 15130); unavoidable adverse impacts (Section 15126(b)); and, irreversible changes (Section 15126.2(c)). Growth-inducing impacts (Section 15126(d)) has been included as part of Chapter 7 of this Draft EIR. Section 15125(d) of the State CEQA Guidelines also requires an EIR to discuss any inconsistencies between the Project and applicable general and regional plans. This section addresses each of these general requirements.

The following is a guide to where most of these issues are discussed in this document:

- Significant Environmental Effects – throughout Chapter 4
- Mitigation Measures – Executive Summary and throughout Chapter 4
- Alternatives – Chapter 6
- Growth-Inducing Impacts – Chapter 7

### **5.2 CUMULATIVE IMPACTS ANALYSIS**

CEQA requires that an EIR examine the cumulative impacts associated with a project, in addition to project-specific impacts. The discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone (14 CCR 15130(b)).

As stated in the State CEQA Guidelines, an EIR “shall discuss cumulative impacts of a project when the project’s incremental effect is cumulatively considerable” (14 CCR 15130(a)). “Cumulatively considerable” means that “the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects as defined in Section 15130” (14 CCR 15065(c)). Section 15355 of the State CEQA Guidelines states that cumulative impacts occur from “the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.”

A cumulative impact is not considered significant if the impact can be mitigated to below the level of significance through mitigation, including providing improvements and/or contributing funds through fee-payment programs. The EIR must examine “reasonable options for mitigating or avoiding any significant cumulative effects of a proposed project” (14 CCR 15130(a)(3) and 15130(b)(5)).

### **5.2.1 Cumulative Analysis Setting**

The cumulative impact analysis for the Project is based on information contained in the City of Riverside (City) General Plan 2025 (City of Riverside 2007a) and the Final Program EIR for the City of Riverside General Plan 2025 (Final General Plan 2025 PEIR; City of Riverside 2007b).

### **5.2.2 Cumulative Forecasting Methodology**

Section 15130(b)(1)(A) of the State CEQA Guidelines allows for the preparation of a list of past, present, and reasonably anticipated future projects as a viable method of determining cumulative impacts. This discussion uses the following approach: an initial list and description of all related projects is presented, followed by a discussion of the effects that the project may have on each environmental category of concern, such as traffic, noise, etc. Consistent with CEQA (California Public Resources Code, Section 21000 et seq.), this discussion is guided by the standards of practicality and reasonableness.

#### **Cumulative Projects**

This section of the analysis provides a list of past, present, and reasonably foreseeable future projects that the City determined were most relevant to the Project. Several development proposals and City projects in proximity to the Project site have been submitted for consideration, or have been recently approved, such that together with the Project may result in an increase in construction-related environmental impacts. Table 5-1 presents the development proposals within a 2-mile radius of the Project site. A 2-mile radius captures the eastern portion of the City of Riverside, western portion of the City of Moreno Valley, and the March Air Reserve Base (ARB) to the extent that impacts may occur in this overall area. The projects listed in Table 5-1 serve as the foundation on which the cumulative analysis approach has been based. However, the geographic extent for cumulative analysis varies depending on each environmental issue area. For example, air quality impacts need to consider the entire South Coast Air Basin (SCAB), whereas noise and traffic impacts are localized within a 2-mile radius. The geographic extent for cumulative analysis of each environmental issue area is described below. Additionally, Figure 5-1 shows the cumulative projects on a map.

**Table 5-1  
Cumulative Projects**

No.	Cumulative Project	Location/Address	Description
1	6287 Day Street	6287 Day Street	Gas Station
2	2570 Canyon Springs Parkway	2570 Canyon Springs Parkway	Bank w/ Drive-Thru
3	6211 Valley Springs Parkway	6211 Valley Springs Parkway	Fast Food w/ Drive-Thru
4	5940-5980 Sycamore Canyon Boulevard	5940-5980 Sycamore Canyon Boulevard	Apartments – 257 Dwelling Units
5	SE Corner of Sycamore Canyon Boulevard and Box Springs Road	SE Corner of Sycamore Canyon Boulevard and Box Springs Road	Light Industrial
6	6465 Sycamore Canyon Boulevard	6465 Sycamore Canyon Boulevard	Health Club
7	2325 Cottonwood Avenue	2325 Cottonwood Avenue	High-Cube Warehouse
8	Alessandro Boulevard	NW Corner of Alessandro Boulevard and Old 215 Frontage Road	Commercial and Industrial Complex
9	2100 Alessandro Boulevard	2100 Alessandro Boulevard	Vocational School
10	NW corner of Alessandro Boulevard and San Gorgonio Drive (TM34707; Alessandro Business Park)	NW corner of Alessandro Blvd and San Gorgonio Drive	4 Industrial/Manufacturing Buildings
11	Alessandro Boulevard and San Gorgonio Drive	Corner of Alessandro Boulevard and San Gorgonio Drive	Fast Food w/ Drive-Thru
12	360 Alessandro Boulevard	630 Alessandro Boulevard	Bank w/ Drive-Thru
13	381 Alessandro Boulevard	381 Alessandro Boulevard	Auto Parts Store
14	14601 Dauchy Avenue - TM36370	14601 Dauchy Avenue	Residential – 10 Dwelling Units
15	TM32180	Moss Road and Sun Blossom Court	Single-Family Detached Residential – 9 Dwelling Units
16	18875 Moss Road	18875 Moss Road	Single-Family Detached Residential – 8 Dwelling Units
17	South of Clarke Street, west of Crystal View Terrace	South of Clarke Street, west of Crystal View Terrace	Single-Family Detached Residential – 3 Dwelling Units
18	18580 Van Buren Boulevard	18580 Van Buren Boulevard	Auto Repair Shop
19	N. of Van Buren Boulevard; W. of Wood Street	Wood Road and Van Buren Boulevard	Fast Food w/ Drive-Thru
20	19985 Van Buren Boulevard	19985 Van Buren Boulevard	Commercial Retail
21	Amstar/Kaliber Development	South of Alessandro Boulevard, West of Meridian Parkway	Office, warehousing, general light industrial, retail
22	Meridian Business Park North	West of Interstate-215, south of Alessandro Boulevard, north of Van Buren Boulevard, east of Plummer Street	Industrial Park
23	Freeway Business Center	Southwest corner of Old 215 Frontage Road and Alessandro Boulevard	High-Cube Warehouse
24	Airport Master Plan	March Air Reserve Base	Airport Use
25	Edgemont Street, South of Eucalyptus Avenue	Edgemont Street, South of Eucalyptus Avenue	Apartments
26	Moreno Valley/March Field Metrolink Station	SE corner of Old 215 Frontage Road and Alessandro Boulevard	Commuter Rail Station

**Table 5-1  
Cumulative Projects**

<b>No.</b>	<b>Cumulative Project</b>	<b>Location/Address</b>	<b>Description</b>
27	Komar Cactus Plaza	NE corner of Cactus Avenue and Elsworth Street	Hotel, Fast Food w/ Drive-Thru, Commercial
28	373K Industrial Facility	SW Corner of Newhope Drive and Elsworth Street	High-Cube Warehouse
29	Overton Moore Properties	NW Corner of Cactus Avenue and Frederick Street	High-Cube Warehouse
30	TR 32515	NE Corner of Pigeon Pass and Old Lake	Residential – 161 Dwelling Units
31	Harbor Freight Expansion	NE Corner of Cactus Avenue and Fredrick Street	High-Cube Warehouse
32	PA 09-0031	NE Corner of Alessandro Boulevard and Graham Street	Gas Station
33	Centerpointe Business Park	NE Corner of Cactus Avenue and Graham Street	General Light Industrial
34	Centerpointe Buildings 8 and 9	SW Corner of Heacock Street and Alessandro Boulevard	General Light Industrial
35	Centerpointe Business Park II	NW Corner of Cactus Avenue and Heacock Street	General Light Industrial
36	March Lifecare Campus Specific Plan	NE Corner of Meyer Drive and Riverside Drive	Medical Offices, Commercial Residential, Research & Education, Hospital, Institutional Residential
37	TR 33771/Creative Design Associates	SE Corner of Sunnymead Boulevard and Heacock Street	Residential – 12 Dwelling Units
38	TR 35663/Kha	SW Corner of Sunnymead Boulevard and Indian Street	Residential – 12 Dwelling Units
39	TR 31814/Moreno Valley Investors	City of Moreno Valley, East of Perris Boulevard and South of State Route 60	Residential – 60 Dwelling Units
40	TM 34748	SE Corner of Heacock Street and Gentian Avenue	Single-Family Detached Residential – 135 Dwelling Units
41	Moreno Valley Industrial Park	NE Corner of Iris Avenue and Heacock Street	General Light Industrial, High-Cute Warehouse
42	March Business Center	SE Corner of Iris Avenue and Heacock Street	General Light Industrial, Warehousing, High-Cube Warehouse
43	Indian Business Park	SW Corner of Iris Avenue and Indian Street	High-Cube Warehouse
44	TM 33810	SE Corner of Iris Avenue and Indian Street	Single-Family Detached Residential – 16 Dwelling Units
45	TM 34151	Corner of Emma Lane and Constellation Way	Single-Family Detached Residential – 37 Dwelling Units
46	Legacy Park / TR36760	NE Corner of Indian Street and Santiago Drive	Residential – 186 Dwelling Units
47	Moreno Valley Walmart	NW Corner of Perris Boulevard and Santiago Drive	Free Standing Discount Store, Gas Station/Market/Car Wash

**Table 5-1  
Cumulative Projects**

No.	Cumulative Project	Location/Address	Description
48	TM 34988	East of Perris Boulevard and South of Alessandro Boulevard	Condo/Townhomes – 251 Dwelling Units
49	TM 33417	Est of Perris Boulevard and South of Cactus Avenue	Condo/Townhomes – 10 Dwelling Units
50	TM 33607	NW Corner of Perris Boulevard and Delphinium Avenue	Condo/Townhomes – 54 Dwelling Units

Source: Appendix K.

### 5.2.3 Assessment of Cumulative Impacts

The cumulative development projects located nearest the Project site are the 6287 Day Street gas station project (located approximately 0.4 mile north of the Project site), the 2570 Canyon Springs Parkway drive-thru bank project (located approximately 0.6 mile northwest of the Project site), and the 6211 Valley Springs Parkway fast food drive-thru project (located approximately 0.7 mile northwest of the Project site). The geographic scope (or cumulative impact area) used for each environmental issue is different depending upon the potential area of effect. For example, the geographic scope for air quality is the South Coast Air Basin (Basin), while the geographic scope for cumulative aesthetics impacts is the viewshed, and the geographic scope for traffic/circulation is the intersections in the Project vicinity that could be affected by the cumulative projects. The appropriate scope is explained below in connection with each impact area.

#### 5.2.3.1 Aesthetics

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). Generally, land uses immediately adjacent to the Project site include medical office buildings, office buildings, governmental offices, single-family residential development, a school, and vacant, undeveloped parcels. Land uses in the surrounding area are varied and consist of commercial retail uses, industrial warehouse and office development, single- and multifamily residences, self-storage facilities, City and county facilities, and vacant/undeveloped parcels.

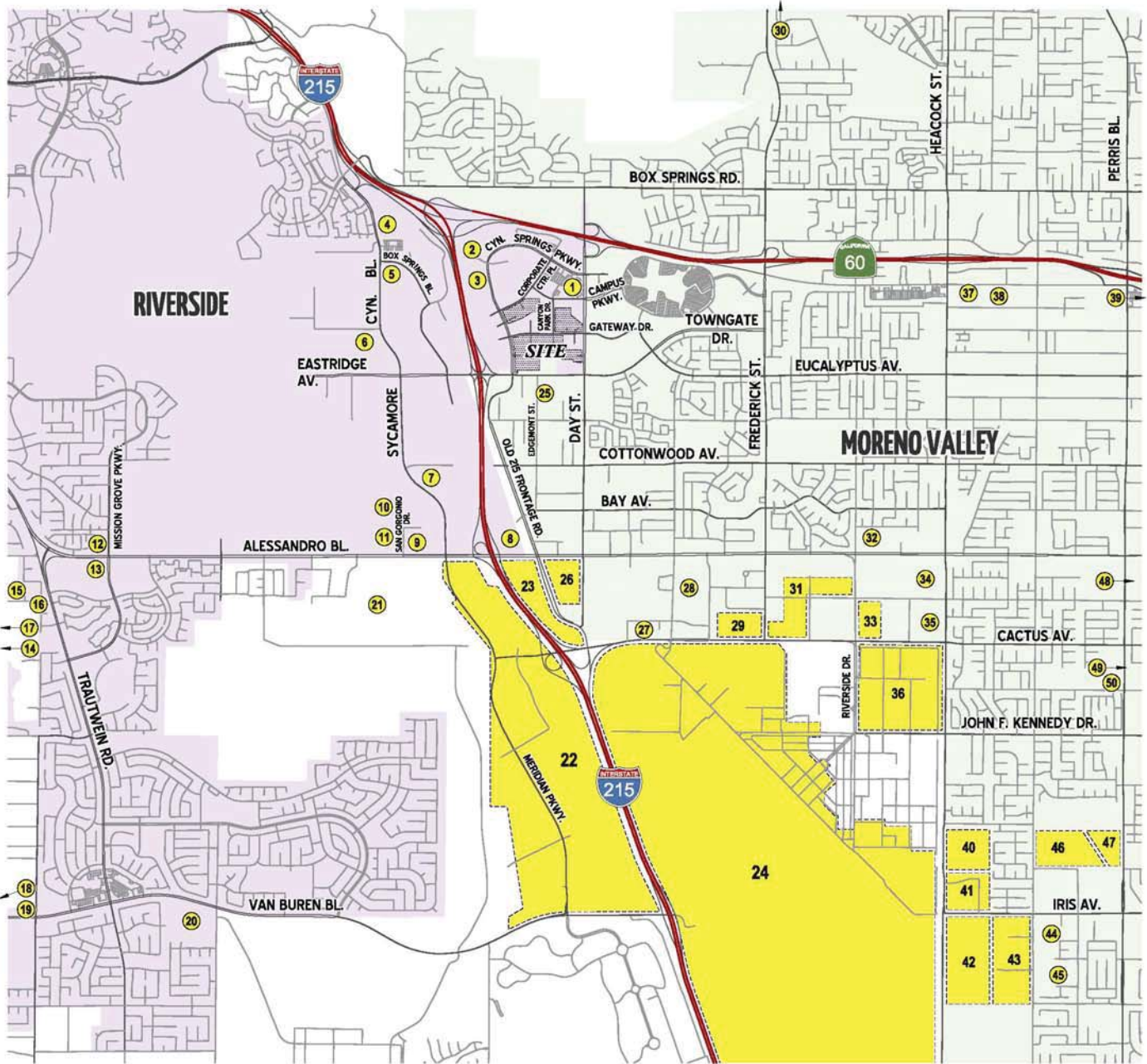
The geographic extent for this cumulative impact analysis includes specific projects located within a 2-mile radius of the Project site. This cumulative study area encompasses the majority of the Sycamore Canyon/Canyon Springs neighborhood, as well as portions of adjacent neighborhoods within the City of Riverside. The cumulative study area extends south and includes the unincorporated community of Edgemont and Riverside County (March Joint

Powers Authority) jurisdictional lands, and the westernmost portion of the City of Moreno Valley. Use of the cumulative study area is appropriate given the scale of the Project and land uses in the immediate vicinity; the presence of mountainous terrain to the northwest, north, and northeast that limits the extent of available views to these areas; and the relatively dense, suburban land use patterns of western Moreno Valley which effectively block views of the Project site from many neighborhoods.

Although the majority of the cumulative study area is urbanized, the hills and mountainous terrain to the north, east, and southeast provide opportunities for visual relief and scenic views. Views to these local scenic resources are available throughout the cumulative study area where open and relatively unobstructed viewing conditions are present. Located approximately 1 mile north of the Project site, Box Springs Mountain Reserve Park is the closest scenic resource. M Peak is located on the northwestern portion of the reserve, approximately 2.9 miles from the Project site, and is visible from the Project site and from the majority of the cumulative study area.

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 proposed multifamily apartment developments (No. 4, the residential development located at 5940-5980 Sycamore Canyon Boulevard, and No. 25, the residential apartment development located at Edgemont Street and South of Eucalyptus Avenue; both found in Table 5-1), a hotel development (No. 27, located at the northeast corner of Cactus Avenue and Elsworth Street), and medical campus uses (No. 36, located at the northeast corner of Meyer Drive and Riverside Drive) 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.





**LEGEND:**

(50) = CUMULATIVE DEVELOPMENT PROJECT ID  
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Regarding cumulative impacts to views from M Peak, the cumulative projects identified 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. The remaining projects considered (i.e., No. 4, the residential development located at 5940-5980 Sycamore Canyon Boulevard; No. 27, the hotel development located at the northeast corner of Cactus Avenue and Elsworth Street; and No. 36, the medical campus located at the northeast corner of Meyer Drive and Riverside Drive) part of the cumulative analysis are located northeast and southeast of the Project site and will either not be included in Project views due to intervening terrain (No. 4, the residential development located at 5940-5980 Sycamore Canyon Boulevard) or will be located in developed areas in which views to M Peak and surrounding terrain are currently obstructed by existing retail and industrial development (No. 27, the hotel development located at the northeast corner of Cactus Avenue and Elsworth Street) or tall and mature street trees (No. 36, the medical campus located at the northeast corner of Meyer Drive and Riverside Drive). Also, as viewed from Sycamore Canyon Wilderness Park and SR-60 through the City of Moreno Valley, the cumulative projects will be set back from trails and the highway such that existing views will not be substantially affected and will be generally indistinguishable from existing buildings of similar scale and character in the surrounding area. Thus, the majority of cumulative projects will not display substantially tall scale structures and will not be constructed in locations where their presence will create a significant cumulative impact to existing views to or from Sycamore Canyon Wilderness Park, trails within Box Springs Mountain Reserve including M Peak, or the segment of SR-60 between Day Street and Gilman Springs Road identified as a scenic resource in the City of Moreno Valley General Plan. Therefore, cumulative impacts to scenic vistas are considered **less than significant**.

There are no officially designated or eligible state scenic highways from which views of the Project site are currently available. However, the City of Moreno Valley General Plan identifies a portion of SR-60 between Day Street and Gilman Springs Road as a scenic highway. SR-60 is located approximately 0.35 mile north of the Project site. 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. 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 Project site (Caltrans 2016). Because the Project will not substantially damage scenic resources within a state scenic highway, **no cumulative impacts** to state scenic highways will occur as a result of Project development and the development of related projects.

Development of the Project will not substantially degrade the existing visual character and quality of the Project site and its surroundings. The Canyon Springs Healthcare Campus Specific Plan (Specific Plan) will outline specific criteria including, but not limited to, uses, floor area ratios, setbacks, landscape buffers, signage guidelines, building design guidelines, and landscape guidelines to ensure development of the Project is compatible with the surrounding developed areas. 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. Regarding related projects, these new uses and structures will 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. As such, related projects will also be subject to criteria such as uses, floor area ratios, setbacks, landscape buffers, signage guidelines, building design guidelines, and landscape guidelines to ensure development of related projects are compatible with the surrounding developed areas. Therefore, the Project together with related projects will not contribute to any potential cumulative impacts, and cumulative impacts on visual character are considered **less than significant**.

The Project will not create a new source of substantial light. The Project will create new sources of glare, although impacts will be less than significant. 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. Any new sources of light from the cumulative projects listed in Table 5-1 will be shielded and will comply with existing City regulations, as well as the Specific Plan's regulations (Dudek 2017). Per the Specific Plan, Chapter 8, all lights will be directed, oriented, and shielded to prevent light from shining onto adjacent properties, onto public rights-of-way, and into driveway areas in a manner that will obstruct drivers' vision, in accordance with Chapter 19.556 of the City's Municipal Code (City of Riverside 2010). Therefore, the introduction of new sources of substantial light and glare from the Project will have a **less than significant** impact with regard to the cumulative effects to day or nighttime views. The Project site is located in a developed area along the I-215 corridor in which existing sources of nighttime lighting and daytime glare occur. 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. Further, Chapter 8 of the Project's Specific Plan contains recommended exterior illuminance levels for outdoor use areas including the main hospital drive/drop off-area along Campus Drive, at the surface parking lot, and along landscape parkways, and the Applicant will install street trees and

prepare a photometric study to demonstrate that light trespass will not be significant. Therefore, the Project will have **less than significant** impacts with regards to the cumulative effects of lighting and glare.

In summary, cumulative impacts to aesthetics will be **less than significant**.

### 5.2.3.2 Air Quality

The SCAB is the geographic extent for the analysis of cumulative impacts related to air quality. In analyzing cumulative impacts from the Project, the analysis must specifically evaluate the Project's contribution to the cumulative increase in pollutants for which the SCAB is designated as nonattainment for selected air pollutants under the National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS). If the Project's emissions will exceed the South Coast Air Quality Management District (SCAQMD) significance thresholds, it will be considered to have a cumulatively considerable contribution to nonattainment status in the SCAB. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant (SCAQMD 2003).

The SCAB has been designated as a federal nonattainment area for ozone ( $O_3$ ) and fine particulate matter ( $PM_{2.5}$ ) and a state nonattainment area for  $O_3$ , coarse particulate matter ( $PM_{10}$ ), and  $PM_{2.5}$ . The nonattainment status is the result of cumulative emissions from various sources of air pollutants and their precursors within the SCAB including motor vehicles, off-road equipment, and commercial and industrial facilities. Construction and operation of the Project will generate volatile organic compounds (VOCs) and oxides of nitrogen ( $NO_x$ ) emissions (which are precursors to  $O_3$  and emissions of  $PM_{10}$  and  $PM_{2.5}$ ).

### Construction Emissions

As discussed in Section 4.2 Air Quality, regional daily construction emissions during construction of the Project will not exceed the SCAQMD significance thresholds for VOC,  $CO$ ,  $SO_x$ ,  $PM_{10}$ , or  $PM_{2.5}$  without mitigation. However, unmitigated  $NO_x$  associated with Project construction activities would exceed the SCAQMD threshold. With the implementation of mitigation measure **MM-AQ-1**, which requires 150 horsepower or greater off-road equipment to apply Tier 3 or better engines (certified by California Air Resources Board to reduce air quality emissions),  $NO_x$  emissions will be reduced to a less-than-significant level. Accordingly, cumulative impacts involving regional, daily construction emissions are considered **less than significant with mitigation incorporated**.

Cumulative localized impacts will potentially occur if a construction project were to occur concurrently with another off-site project in the area identified in Figure 5-1, Cumulative Projects Map. Table 5-1, Cumulative Projects, lists the development proposals within a 2-mile

radius of the Project site, which are shown on Figure 5-1, Cumulative Projects Map. With respect to the cumulative development projects, each of these projects will be required to evaluate whether development will result in significant air quality impacts. That said, future projects in the cumulative study area (identified in Figure 5-1, Cumulative Projects Map) 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 in the cumulative study area will be reduced through implementation of control measures required by the SCAQMD. Cumulative PM<sub>10</sub> and PM<sub>2.5</sub> emissions will be reduced because all future projects will be subject to SCAQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all construction sites in the SCAQMD. Furthermore, the Project analysis determined that the Project will not exceed the SCAQMD localized significance thresholds (LSTs) during construction. Cumulative impacts involving localized effects of construction emissions on sensitive receptors will, therefore, be **less than significant**.

In summary, cumulative impacts to air quality will be **less than significant with mitigation incorporated** during construction.

### **Operational Emissions**

Following the completion of construction activities, the Project will generate VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from mobile sources, area sources (including the use of consumer products, architectural coatings for repainting, and landscape maintenance equipment), and energy sources (including combustion of fuels used for space and water heating). As discussed in Section 4.2 Air Quality, operational emissions generated by the Project will not result in a significant impact regarding SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Project emissions will exceed the SCAQMD operational thresholds for VOC and NO<sub>x</sub> (precursors to O<sub>3</sub>), 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. As described above, 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. Accordingly, operation of the Project could result in a cumulatively considerable increase in emissions of VOC and NO<sub>x</sub>, which are precursors to O<sub>3</sub>. Thus, this impact will be **significant and unavoidable**. Thus, due to the operational emissions generated by the Project, cumulative impacts to air quality will be **significant and unavoidable**.

In summary, cumulative impacts to air quality will be **significant and unavoidable** during operation. A Statement of Overriding Considerations will be required should the City choose to approve the Project.

### 5.2.3.3 Biological Resources

The geographic extent for the analysis of cumulative impacts to biological resources is based on the map provided in Figure 5-1, Cumulative Projects Map, and the list provided in Table 5-1, Cumulative Projects. This list of cumulative projects accounts for development projects within a 2-mile radius of the Project site that may provide habitat for the same species as the habitat on the Project site. The Project site is generally surrounded by existing urban developed land uses including medical office buildings, governmental offices, single-family residences, a school, and vacant parcels. The Project site is located within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) area. As discussed in Section 4.3, 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**.

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” (including potential wetlands and vernal pools) at the Project site. One drainage feature (Drainage 1) was observed, which qualifies as waters of the United States and falls under the jurisdiction of the Army Corps of Engineers (ACOE), as well as waters of the state. Drainage 1 is also considered a California Department of Fish and Wildlife (CDFW) streambed. The mitigation proposed (**MM-BIO-1**) ensures that a Regional Water Quality Control Board (RWQCB) Clean Water Act Section 401 Water Quality Certification is obtained prior to impacts occurring within jurisdictional areas and complies with Section 1602 prior to impacts occurring within CDFW jurisdictional areas. It is anticipated that if a related project fits under the state or federal jurisdictional waters, it will be subject to the same requirements of CEQA as the Project. Thus, cumulative adverse effects on protected wetlands will be **less than significant with mitigation incorporated**.

A habitat assessment for burrowing owls was conducted for the Project site (Appendix F). It was determined that the Project site and undeveloped parcels within a 500-foot buffer provide suitable habitat for burrowing owl. Proposed mitigation measure (**MM-BIO-2**) will minimize adverse impacts to burrowing owls by incorporating a focused survey to determine if burrowing owls are present. Further, in accordance with the MSHCP, all project sites 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 for projects within the MSHCP. Cumulative impacts to burrowing owls will be **less than significant with mitigation incorporated**.

In addition, as described in Section 4.3, Biological Resources, the Project site could also provide habitat for nesting birds. The combined construction of projects within the 2-mile radius cumulative study area could deprive the affected species of a significant amount of habitable space. 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, determinations of impacts to nesting birds would be made for each related project on a case-by-case basis, and the effects of cumulative development on nesting birds will be mitigated to the extent feasible in accordance with CEQA and other applicable legal requirements. The cumulative impact to nesting birds will be **less than significant with mitigation incorporated**.

In summary, cumulative impacts to biological resources will be **less than significant with mitigation incorporated**.

#### **5.2.3.4 Cultural Resources**

The geographic context for the analysis of cumulative impacts to cultural resources is limited to one mile of the Project site. While no cultural resources have been identified within the Project area, a 1-mile buffer is considered to sufficiently represent the range of unanticipated prehistoric and built environment resources that might be encountered during construction. The cultural resources site records and literature search of the California Historical Resources Information System (CHRIS) at the Eastern Information Center (EIC) indicated that a relatively high number of previous technical studies have been conducted in this 1-mile search radius. In total, 43 cultural resource studies have been previously conducted within the Project area and a surrounding 1-mile radius. No cultural resources have been identified within the Project area through these previous technical studies, tribal outreach, or intensive pedestrian survey. These investigations resulted in identification of 77 cultural resources. These include 56 prehistoric resources, one multicomponent resource with both prehistoric and historic elements, and a total of 20 historic resources. The 56 prehistoric resources in the search buffer include five isolated artifacts, one habitation site and 21 bedrock milling sites; the 20 historic resources previously recorded include 14 historic residences, two railway sites, two artifact and/or trash scatters, one historic military resource, and one historic wall/fence feature site.

The cumulative impact to cultural resources is generally considered in terms of the informational value provided by built environment resources and archaeological sites based on their resource type, context and relationships to the surrounding landscape. The importance of this type of information is revealed through review of the larger historical and archaeological record which, in turn, is dependent on the contribution of shared data resulting from technical investigations. 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 this mitigation (**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.



In summary, cumulative impacts to cultural resources will be **less than significant with mitigation incorporated**.

#### **5.2.3.5 Greenhouse Gas Emissions**

As greenhouse gas (GHG) emissions and climate change are a global issue, any approved project regardless of its location has the potential to contribute to a cumulative global accumulation of GHG emissions (as opposed to the relatively temporary nature of pollutants related to air quality). In theory, the geographic extent of the cumulative contributions to GHGs and climate change is worldwide. However, lead agencies are only able to regulate GHG emissions within their respective jurisdictions; therefore, the geographic extent is primarily contingent upon the area over which lead agencies have authority. As such, the geographic extent for the purposes of the Project is the SCAB.

The SCAQMD has not adopted recommended numeric CEQA significance thresholds for GHG emissions for lead agencies to use in assessing GHG impacts of development projects. However, the California Natural Resources Agency adopted amendments to the State CEQA Guidelines on December 30, 2009, which became effective on March 18, 2010. These amended guidelines establish several new CEQA requirements concerning the analysis of GHGs, which were applied to the Project, and will be applied to other future related projects.

While the Project will result in emissions of GHGs during construction and operation, no guidance exists to indicate what level of GHG emissions will be considered substantial enough to result in a significant adverse impact on global climate. However, it is generally the case that an individual project is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory. Thus, GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective (CAPCOA 2008).

As indicated in Section 4.5, Greenhouse Gas Emissions, of this Draft EIR, the Project will result in an increase in GHG emissions relative to existing conditions. However, implementation of the Project will not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. Similar to the Project, related projects included in Table 5-1 will be required to demonstrate compliance with all applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions, such as the City of Riverside's Climate Action Plan (CAP) or the City of Moreno Valley's Energy Efficiency and Climate Action Strategy. 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. In addition to compliance with the City's CAP,

the Project complies with GHG reduction measures set forth by the State of California. Specifically, over time, compliance with several statewide GHG reduction measures will reduce the Project's overall GHG emissions associated with motor vehicles and electrical generation. Furthermore, implementation of mitigation measures identified for the reduction of potential air quality impacts (**MM-AQ-1** through **MM-AQ-6**) will further reduce any potential GHG emissions impacts of the Project. For these reasons, and as described in detail in Section 4.5, Greenhouse Gas Emissions, the Project will not result in a significant GHG impact and will not create a considerable contribution to a cumulative impact.

In summary, cumulative impacts to greenhouse gas emissions will be **less than significant with mitigation incorporated**.

#### **5.2.3.6 Hazards and Hazardous Materials**

The Project site is located approximately 1.6 miles north of the March ARB within Zone D – Flight Corridor Buffer of the March ARB LUCP (Mead & Hunt 2014). Zone D prohibits uses that will be hazards to flights, which include physical (e.g., tall objects), visual, and electronic forms of interference with the safety of aircraft operations, and land use development that may cause the attraction of birds. Man-made features must be designed to avoid heightened attraction of birds. No aspect of the Project will conflict with the uses allowed in Zone D. A helistop/helipad is proposed on the rooftop of the hospital, which will consist of an approximately 65-foot by 65-foot touchdown and liftoff area on an elevated metal landing pad with associated gurney ramp, safety net, wind cone, lighting, and painted markings. The helipad will be used to accommodate public service helicopters (as large as the Sikorsky Blackhawk, 64.8 feet in length) for community disaster preparedness, as well as EMS helicopters, which are significantly smaller helicopters that will make up the routine users. Furthermore, there is the potential for a wireless communication facility permitted on top of parking structures, as outlined in the Canyon Springs Healthcare Campus Specific Plan. Depending on the specific locations and top elevations (above mean sea level) for wireless communications antennae, the Project Applicant will submit plans to the Federal Aviation Administration (FAA) if the notification criteria in Part 77 of the Federal Aviation Regulations are met. Mitigation measures (**MM-HAZ-1** through **MM-HAZ-3**) are also incorporated to:

- Reduce bird-aircraft strikes for March ARB or other aircraft transiting the vicinity of the Project site;
- Ensure that a FAA obstruction evaluation review is performed to ensure the Project does not exceed FAR Part 77 height limits;
- Ensure applicable plans and forms are reviewed and approved by March ARB, Airport Land Use Commission, Riverside City Council, and CalTrans for Aeronautics; and

- Provide notice to all potential purchasers of the Project site property and tenants of buildings within vicinity of an airport.

These mitigation measures will 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. However, because none of the related projects listed in Table 5-1 will increase air traffic, cumulative impacts will be **less than significant with mitigation incorporated**.

In summary, cumulative impacts to hazards and hazardous materials will be **less than significant with mitigation incorporated**.

#### **5.2.3.7 Hydrology and Water Quality**

The geographic scope of cumulative effects on hydrology and water quality is typically the applicable watershed based, whereby projects contributing flow to the same water bodies as the Project will be considered. Groundwater basins typically serve localized areas; therefore, any cumulative impacts related to groundwater will generally be localized. Development of related projects may affect groundwater supply by (1) increased land use intensities resulting in increased water usage and/or (2) increased land use intensities resulting in increased impervious surfaces, to the extent that groundwater recharge is affected. The majority of the related projects are located in a highly developed, and mostly residential built-out area. This indicates that many of the projects are located on sites that are already fully covered or partially covered with impervious surfaces and where water was used previously.

Development of the Project site will generally maintain the size and topography of the existing watershed, and will not include substantial re-grading sufficient to alter drainage patterns. The pre- and post-Project watershed area will be the same, and stormwater will flow in the same general direction as described in Section 4.7.4. With respect to water quality, the Project's best management practices for water quality management during construction will eliminate a significant contribution to local water quality issues. During operation, adherence with regional standards will eliminate unlawful discharge quantities or poor water quality management practices from occurring on a cumulatively considerable scale as each Project component becomes operational. 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.

In summary, cumulative impacts to hydrology and water quality will be **less than significant**.

#### **5.2.3.8 Land Use and Planning**

Given that the analysis presented in Chapter 4.8, Land Use, focuses on the Project's consistency with the City of Riverside General Plan 2025, 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 General Plan 2025. In addition, as encroachment permits and municipal consistency were evaluated in Chapter 4.8, these areas are also evaluated to determine if the Project, in combination with past, present, or future projects, will contribute to a cumulative impact.

The Project is consistent with General Plan 2025 Goal LU-30 and associated policies that provide for the use of "Area Plans, Community Plans, or Specific Plans" as part of the General Plan 2025 to address detailed design, land use, and policy direction for a particular area within the City. Further, the Applicant's contractor will be required to obtain all necessary encroachment permits prior to construction and will also be required to comply with all applicable encroachment permit guidelines and any permit conditions. Lastly, to ensure consistency between the Canyon Springs Healthcare Campus Specific Plan and the City of Riverside Municipal Code, Title 19, Zoning Code, the Zoning Map will be amended concurrent with adoption of the Canyon Springs Healthcare Campus Specific Plan to include a Canyon Springs Healthcare Campus Specific Plan zone to replace the existing O SP – Office and Specific Plan (Canyon Springs Business Park Specific Plan) Overlay Zone and CR SP - Commercial Retail and Specific Plan (Canyon Springs Business Park) Overlay Zone designations for the Project area. 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 related to air quality (**MM-AQ-1** through **MM-AQ-6**), cultural resources (**MM-CUL-2** through **MM-CUL-4**), noise (**MM-NOI-1**), transportation/traffic (**MM-TRAF-1** through **MM-TRAF-13**), utilities and service systems (**MM-UTL-2** and **MM-UTL-3**), and biological resources (**MM-BIO-2** and **MM-BIO-3**). As such, the Project will have a **less than significant impact with mitigation incorporated** with regard to cumulative policy consistency impacts.

In summary, cumulative impacts to land use and planning will be **less than significant with mitigation incorporated**.

### 5.2.3.9 Noise

The compiled cumulative projects list is based upon an area encompassing a 2-mile radius from the Project site. A 2-mile radius captures the eastern portion of the City of Riverside, western portion of the City of Moreno Valley and the March Air Reserve Base to the extent that traffic noise-related impacts may occur along local roadways as a result of Project construction or operation. The Noise section of this Draft EIR (Section 4.9) evaluates traffic-related noise levels along roadway segments to which the Project will contribute traffic trips, including the comparison of general plan build-out traffic noise levels, with and without the Project (Appendix K). Additional traffic volume associated with construction and operation of the Project will result in traffic noise level increases that are **less than significant** in the context of potential cumulative developments under the general plan buildout scenario, located within 2 miles of the Project site (Appendix K).

Noise impacts related to Project construction and on-site operational noise sources, 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. At distances greater than 0.25 mile, construction noise will be briefly audible and steady construction noise from a project will generally dissipate into quiet background noise levels. 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. The four projects in Table 5-1 which are located within 0.25 mile of the Project site include the following (with corresponding listing number from Table 5-1):

1. Gas Station - 6287 Day Street
2. Bank with Drive-through - 2570 Canyon Springs Parkway
3. Fast Food with Drive-through - 6211 Valley Springs Parkway
4. Edgemont Street Apartments - Edgemont Street, South of Eucalyptus Avenue

### Construction

On-site noise-generating activities associated with the Project will include short-term construction and site clearing. Development activities related to Project construction will involve site grading, trenching, building construction, architectural coating, and paving. 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 (City of Riverside 2007). As

discussed in Section 4.9 (Noise) of this Draft EIR, noise associated with construction of the Project would be exempt under Section 7.35.20 of the Riverside Municipal Code. As such, because 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 construction activities allowed on Sundays or federal holidays, potential noise impacts during construction 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. At a distance of approximately 750 feet from the edge of construction, construction vibration levels are expected to be approximately 14.0 VdB, compared to the FTA maximum acceptable level of 80 VdB. 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.

In summary, construction noise will result in a cumulatively **less than significant impact**.

## **Operation**

Long-term operational noise associated with medical office buildings, assisted living facilities, independent living facilities, skilled nursing facilities, senior apartment facilities, and hospital operations includes noise from emergency vehicles (e.g., ambulance sirens, occasional helicopter arrivals and departures for trauma cases, etc.), proposed parking structures and surface parking, and other on-site noise generators (such as emergency standby generators and heating, ventilation, and air conditioning (HVAC) equipment). Long-term operational noises also include Project-generated traffic and overall traffic noise at the Project site. Noise from emergency vehicles will be relatively brief and periodic in nature and will cease once the emergency vehicles either enter or exit the Project area. Furthermore, as noted in Section 4.9



(Noise) of this Draft EIR, as per California Vehicle Code, Section 21055 and 27007, noise from emergency vehicles is not considered a CEQA impact.<sup>1</sup>

In addition to the use of emergency vehicles, the Project also proposes a helistop/heliport as part of hospital operations. 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. As per mitigation measure **MM-NOI-1**, a ground-level 8-foot-high solid wall along portions of the southern property boundary of the Project site will be implemented to adequately reduce noise levels to less than significant levels. Trauma helicopter operations were also found to result in potentially significant noise impacts on adjacent noise-sensitive properties; once the details of the helipad design are finalized, a helipad-specific noise study is required to be completed as part of the Conditional Use Permit approval process for the use. The submittal of a noise study for the helipad shall comply with Section 19.320 of the City of Riverside Municipal Code. Thus, adequate mitigation (**MM-NOI-1**) has been required for on-site operational noise, to avoid significant impacts upon vicinity noise-sensitive land uses. 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.

In summary, operational noise will result in a cumulatively **less than significant impact with mitigation incorporated**.

#### **5.2.3.10 Public Services**

Calls for fire protection services are typically responded to by the nearest available fire stations. 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.

As discussed in Chapter 4.10, Public Services, 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 and

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<sup>1</sup> Section 21055 of the California Vehicle Code states that emergency vehicles driven in response to an emergency or while engaged in rescue operations, with the sirens used when reasonably necessary, are considered exempt from California Vehicle Code regulations. Further, Section 27007 of the California Vehicle Code indicates that sound amplification systems which can be heard outside the vehicle from 50 or more feet are prohibited, unless that system is being operated to request assistance or warn of a hazardous situation. The exemption for emergency vehicle sirens is explicit when it states this section does not apply to authorized emergency vehicles or vehicles operated by gas, electric, communications, or water utilities.

payment of impact fees (Final General Plan 2025 PEIR, p. 5.13-31). Buildout of the City was considered in the General Plan 2025, and the General Plan 2025 Final Program 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. Lastly, and as with the Project, 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. Therefore, through adherence to applicable policies, through compliance with current building code and fire department requirements, and with mutual aid agreements in place, new or physically altered government facilities will not be required to accommodate the Project and related projects considered in the cumulative scenario. Therefore, the Project will result in **less than significant** impacts regarding a cumulative substantial adverse impact associated with the provision of new or physically altered fire protection facilities, or need for new or physically altered fire protection facilities in order to maintain acceptable service ratios, response times or other performance objectives.

In summary, cumulative impacts to public services will be **less than significant**.

#### **5.2.3.11 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 ambient growth rate is added to existing traffic volumes to account for area-wide growth not reflected by cumulative development projects. Traffic generated by the development of future projects that have been approved but not yet built and/or for which development applications have been filed and are under consideration by governing agencies was included and accounts for cumulative development traffic.

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 analysis includes 50 projects as identified in Table 4.11-22. 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, as summarized below.

## Cumulative Conditions

### *Intersection Analysis*

For Cumulative with Project conditions, Table 4.11-23 (in Section 4.11 Transportation/Traffic of this Draft EIR) shows that the addition of Project trips will result in significant impacts at the following locations:

- I-215 SB Ramps/Eucalyptus Avenue (Level of Service (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)
- Memorial Way/Towngate Drive (LOS E – PM peak hour)

In addition to implementing mitigation measure **MM-TRAF-1**, the incorporation of mitigation measures **MM-TRAF-2** through **MM-TRAF-8** will reduce off-site impacts associated with the development of the Project to **less than significant levels with mitigation incorporated** for Cumulative with Project Conditions.

### *Freeway Segment Analysis*

A freeway segment analysis was performed for 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 (Caltrans 2012). Other potential mitigation measures for freeway segments include additional capacity enhancements, operational improvements (ramp metering or express lanes), and measures that reduce the amount of traffic or encourage mode shifts such as Transportation Demand Management (TDM) strategies and improvements to regional transit. The Project will implement TDM measures as described in Section 4.11.5 of this Draft EIR. 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.

There are no new freeway mainline segments anticipated to operate at an unacceptable LOS during peak hours with the Project, aside from the I-215 southbound freeway mainline segment, south of Eucalyptus Avenue. 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 mitigation. Thus,

the cumulative traffic increases are considered a **significant cumulative impact**, and the Project's incremental contribution to the increases is **cumulatively considerable**.

### ***Freeway Merge/Diverge Analysis***

Ramp merge and diverge operations were also evaluated for cumulative conditions. 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**.

### **General Plan Buildout**

#### ***Intersection Analysis***

For General Plan Buildout Conditions, the addition of Project traffic will result in significant impacts at the following locations:

- 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 (#12) (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)
- Memorial Way/Towngate Drive (LOS E – AM and PM peak hours)

In addition to implementing mitigation measures **MM-TRAF-1** through **MM-TRAF-8** (specified for Existing with Project Conditions and Cumulative with Project Conditions), the implementation of mitigation measures **MM-TRAF-9** through **MM-TRAF-11** (specified for General Plan Buildout Conditions) will reduce off-site traffic impacts associated with development of the Project to **less than significant levels with mitigation incorporated** for General Plan Buildout with Project Conditions.

### ***Freeway Segment Analysis***

A freeway segment analysis was performed for 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 (Caltrans 2012). Other potential mitigation measures for freeway segments include additional capacity enhancements, operational improvements (ramp metering or express lanes), and measures that reduce the amount of traffic or encourage mode shifts such as TDM strategies and improvements to regional transit. The Project will implement TDM measures as described in Section 4.11.5 of this Draft EIR. 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.

Although all other basic freeway segments are anticipated to operate at an acceptable LOS (e.g., LOS D or better) during the peak hours with the Project, 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. Thus, the cumulative traffic increases are considered a **significant cumulative impact**, and the Project's incremental contribution to the increases is **cumulatively considerable**.

#### *Freeway Merge/Diverge Analysis*

Ramp merge and diverge operations were also evaluated for General Plan Buildout Conditions. Under General Plan Buildout 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. 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. Thus, the cumulative traffic increases are considered a **significant cumulative impact**, and the Project's incremental contribution to the increases is **cumulatively considerable**.

#### **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 Project site - Valley Springs Parkway, Gateway Drive, Corporate Centre Place, Canyon Park Drive, and Day Street - are built to their ultimate cross-sections.

As described in Section 4.11.5, 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. With the incorporation of these project elements, impacts to site access and circulation will be **less than significant**.

### **Congestion Management Plan**

As shown in Exhibit 2-1 of the 2011 Congestion Management Plan (CMP), the I-215 and SR-60 freeways are identified as Interstate and Highway CMP facilities, respectively. As such, any contribution to substantial deficiencies on these facilities will be considered a significant Project impact. In Cumulative Conditions the I-215 southbound freeway mainline segment, south of Eucalyptus Avenue, 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 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 (Caltrans 2012).

Other potential mitigation measures for freeway segments include additional capacity enhancements, operational improvements (ramp metering or express lanes), and measures that reduce the amount of traffic or encourage mode shifts such as TDM strategies and improvements to regional transit. The Project will implement TDM measures as described in Section 4.11.5 of this Draft EIR. 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.

Therefore, even with the implementation of mitigation measures, 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 additional feasible mitigation measures. Thus, the



cumulative traffic increases are a **significant cumulative impact**, and the Project's incremental contribution to the increases would be **cumulatively considerable**. Additionally, since the Project will cause a CMP facility to deteriorate below LOS E under Existing with Project Conditions, a deficiency plan will be prepared by the City.

### **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 its intersection with Gateway Drive. The bus stop will be ADA compliant with an 8-foot by 5-foot boarding pad across the area that will 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.

### **Air Traffic**

The 94-foot-tall hospital will have an approximately 65-foot by 65-foot (4,225-square-foot) rooftop helistop to accommodate emergency medical service (EMS) helicopters for rapid patient transport to and from other facilities with different medical specialties or capabilities. The frequency of helicopter landings on the Canyon Springs Healthcare Campus hospital is estimated at four to six helicopter landings per month. Should the Canyon Springs Healthcare Campus achieve trauma status, helicopter activities could be expected to increase to 8 to 30 landings per month (Appendix N).

Exhibit H-1 of Appendix N depicts March ARB flight paths and shows the three different kinds of flight paths. All are clear of the Project site. The closest point of the March ARB flight paths will be approximately 0.6 mile from the Project site. An analysis of flight arrival and departure patterns shows that March ARB flight paths will not interfere with helicopter flight paths.

The Project site lies within a sector of March ARB Class C airspace, which are different from the zones contained in the Land Use Compatibility Plan Policy documentation. 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.

Prior to approval of the helistop by the City of Riverside Planning Division, the applicant shall submit plans to the March ARB Air Traffic Control for review and approval of plans related to the

helistop location and helicopter flight path alignments to ensure there are no conflicts between the helicopter flight paths and March ARB flight operations (mitigation measure **MM-TRAF-13**). 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 will be developed between March ARB Air Traffic Control and Canyon Springs Healthcare Campus operator. The letter of agreement will define specific flight paths and communications procedures for helicopter operations to and from the hospital. The Canyon Springs Healthcare Campus operator will require that all helicopter operators using the helistop sign the letter of agreement.

Additionally, prior to approval by the Riverside Planning Commission/City Council, the following agency actions will be required for the proposed helistop (as per **MM-TRAF-14** in Section 4.11):

1. An FAA Form 7460-1 will be submitted.
2. 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.”
3. 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.
4. Application for and receipt of Heliport Site Approval Permit from Caltrans Division of Aeronautics authorizing heliport construction.
5. After construction of the helipad a final inspection and approval of a Heliport Permit authorizing flight operations by Caltrans Division of Aeronautics.

Since the Project uses are permitted within the March ARB/Inland Port Airport Land Use Compatibility Plan and mitigation measures **MM-TRAF-13** and **MM-TRAF-14** will be implemented, impacts would be **less than significant with mitigation incorporated**.

In summary, cumulative impacts will be **significant and unavoidable** with regards to the I-215 southbound freeway mainline segment, south of Eucalyptus Avenue. A Statement of Overriding Considerations will be required should the City choose to approve the Project. Cumulative impacts on area intersections, site access, circulation, and air traffic will be **less than significant with mitigation incorporated**. There will be **no cumulative impacts** on bicycle, pedestrian and transit circulation.

#### **5.2.3.12 Utilities and Service Systems**

The geographic extent for the analysis of cumulative impacts associated with utilities consists of the immediate surrounding area because utilities are provided by local

jurisdictions or districts. Cumulative impact analysis for utilities has been conducted using the related projects listed in Table 5-1.

### **Water Supplies**

The Project will be served by the Eastern Municipal Water District (EMWD). The EMWD has four sources of water supply: imported water purchased from the Metropolitan Water District (MWD), local potable groundwater, local desalted groundwater, and recycled water. A Water Supply Assessment Report was prepared by the EMWD to satisfy the requirements under Senate Bill 610 (SB 610), Water Code Section 10910 et seq., and Senate Bill 221 (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 (EMWD 2016; Appendix M). The estimated demand for the Project is 216 acre-feet per year. The land use considered for the Project area in the 2010 Urban Water Management Plan (UWMP) demand projection was commercial-retail. The estimated demand for the Project exceeds the projected demand accounted for in the 2010 UWMP.

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. Mitigation measure **MM-UTL-1** will require the developer of the Project to meet with EMWD staff to develop a Plan of Service (POS). The POS will detail 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. Implementation of mitigation measures **MM-UTL-1** and **MM-AQ-3** are required to ensure that the Project does not result in a cumulatively considerable impact to water supplies. As such, cumulative impacts to water supplies are considered **less than significant with mitigation incorporated**.

### **Solid Waste**

Solid waste will be taken to the Robert A. Nelson Transfer Station, which is then taken to the Badlands Landfill and other County landfills in the area. As discussed in Section 4.12, Utilities and Service Systems, of this Draft EIR, 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. Incorporation of mitigation measures **MM-UTL-2** and **MM-UTL-3**, will require the preparation of a recycling plan and subsequent review of building plans by the City, and will ensure adequate space is allotted for recycling on site. 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**.

In summary, cumulative impacts to utilities and service systems will be **less than significant with mitigation incorporated**.

### **5.2.3.13 Energy Conservation**

The cumulative analysis for energy conservation considers the projects listed in Table 5-1 and assesses the Project's compliance with the electricity, natural gas, and petroleum demands as projected by the City's General Plan 2025 Final Program EIR (City of Riverside 2007b).

The Project will result in an increased demand for energy resources, as discussed in Section 4.13, Energy Conservation, of this Draft EIR. 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 (refer to Section 4.13.4, Project Design Elements That Can Reduce Impacts, of this Draft EIR). To ensure that the Project does not result in wasteful, inefficient, or unnecessary consumption of electricity or natural gas, the implementation of mitigation measure **MM-AQ-2** will require that the proposed facilities are designed to achieve 5% efficiency beyond the 2016 California Building Code Title 24 requirements. In addition, to reduce electricity consumption associated with water usage, **MM-AQ-3** will be implemented. To reduce vehicle miles traveled and petroleum consumption, the implementation of mitigation measure **MM-AQ-4** will require that pedestrian and bicycle connections be provided to surrounding areas consistent with the City's General Plan.

The Project will not exceed electricity, natural gas, or petroleum demands as projected by the City's General Plan 2025 Final Program EIR (City of Riverside 2007b). 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.

In summary, cumulative impacts to energy conservation will be **less than significant with mitigation incorporated**.

### 5.3 SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL EFFECTS

State CEQA Guidelines Section 15126.2(b) further directs EIRs to address impacts from a project that will result in significant impacts, including those that cannot be mitigated below a level of significance. A summary of all the environmental issue areas and the resultant significance and listing of mitigation measures is found in the Executive Summary of this document. To summarize, the following issue areas will result in **significant impacts** even after mitigation measures have been incorporated, thus resulting in unavoidable impacts:

- **Air Quality.** The Project's proposed land use designation for the Project site increases the development intensities as reflected in the City's adopted General Plan. Therefore, the Project will be inconsistent with the South Coast Air Quality Management District (SCAQMD) 2012 Air Quality Management Plan (AQMP), and thus, will conflict with or obstruct implementation of the applicable air quality plan.

Air emissions related to operation will exceed the SCAQMD significance thresholds; and therefore, will be cumulatively considerable and expose sensitive receptors to pollutants. Although mitigation measures have been imposed, none can reduce these impacts to less than significant levels.

- **Traffic.** Mitigation measures have been incorporated to reduce potential impacts related to traffic and transportation. However, the Project will contribute to the existing and forecasted deficient freeway segments. Specifically, Caltrans forecasts that the LOS on the I-215 freeway will deteriorate to LOS F (from an acceptable LOS of D or better) even with the planned improvements. Thus, the Project would contribute to cumulative traffic impacts.

Neither Caltrans nor the State of California has adopted a fee program that can ensure that locally contributed impact fees will be tied to improvements to freeway mainlines, and only Caltrans has the jurisdiction over mainline improvements. Because Caltrans has exclusive control over state highway improvements, ensuring that fair share contributions to mainline improvements are actually part of a program tied to implementation of mitigation is within the jurisdiction of Caltrans.

### 5.4 SIGNIFICANT IRREVERSIBLE CHANGES

The intent of this section of this Draft EIR is to discuss primary and secondary impacts of the Project that will result in significant irreversible changes in the environment. State CEQA Guidelines Section 15126.2(c) identifies an impact will fall into this category if:

- The project will involve a large commitment of nonrenewable resources.
- The primary and secondary impacts of the project will generally commit future generations of people to similar uses.

- The project involves uses in which irreversible damage could result from any potential environmental incidents associated with the project.
- The proposed consumption of resources is not justified (e.g., the project results in wasteful use of energy).

Determining whether the Project may result in significant irreversible effects requires a determination of whether key resources will be degraded or destroyed in such a way that there will be little possibility of restoring them. Approval of the Project will cause irreversible environmental changes consisting of the following:

- The Project will irreversibly alter the Project site from a vacant site to 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. This will result in irreversible environmental changes at the Project site. Once construction occurs, reversal of the land to its original condition is highly unlikely. 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 (Land Use and Planning) of this EIR. Therefore, the irreversible changes are not considered significant.
- Construction of each of the Project components will result in the use of nonrenewable resources and energy sources, including fossil fuels, natural gas, and electricity. Fossil fuels will be used to power construction equipment, as well as delivery and construction employee vehicles. Construction equipment will also use electricity and natural gas. 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.
- Increased requirements of public services and utilities by the Project, representing a permanent commitment of these resources. Service providers have adequate supply of resources to supply the project with the inclusion of applicable mitigation measures, as described in Section 4.10 (Public Services) and Section 4.12 (Utilities and Service Systems) of the EIR.
- Once operational, the Project components will consume more energy on a daily basis than is currently consumed on site. A portion of the energy used will be provided by nonrenewable sources. 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 (Energy Conservation) of the Draft EIR and the Canyon Springs Healthcare Campus Specific Plan.

## 5.5 CONSISTENCY WITH REGIONAL AND LOCAL PLANS

Section 15125(d) of the State CEQA Guidelines also requires an EIR “to discuss any inconsistencies between the Project and applicable general plans, specific plans, and regional plans.” The regional plans applicable to the Project are: the General Plan 2025, Riverside County Airport Land Use Compatibility Plan, the MSHCP, and the Air Quality Management Plan (AQMP). In addition, the Project site is located within the Canyon Springs Business Park Specific Plan. The Project entails the construction of new permanent and temporary housing, but does not generate the need for replacement housing; therefore, discussion of a replacement housing plan is not required. The following table (Table 5-2) identifies the location in which each of these plans is discussed in the Draft EIR.

**Table 5-2**  
**Location in the Draft EIR in which Consistency with Regional Plans and Other Plans of Regional Significance is Discussed**

Plan	Location of Discussion
General Plan 2025	Appendix A
ALUCP	Section 2.5.3 (Project Description/Design Features and Construction Measures), Section 4.6.1 (Hazards and Hazardous Materials/Setting), Section 4.6.2 (Hazards and Hazardous Materials/Relevant Plans, Policies, and Regulations), Section 4.6.2 (Hazards and Hazardous Materials/Impact Analysis)
AQMP	Section 4.2.5 (Air Quality/Relevant Policies, Plans, and Ordinances), Section 5.3 (Mandatory CEQA Topics/Significant Unavoidable Environmental Effects)
Canyon Springs Business Park Specific Plan/ Canyon Springs Business Park Specific Plan Amendment	Section 1.1 (Introduction, Purpose and Scope), Section 2.3 (Project Description/Project Background/Need for Project/Proposed Project/Project Design Features), Section 3.1 (Effects Found Not to be Significant/Effects Found Not to be Significant During Preparation of the Initial Study/Notice of Preparation), Section 4 (Environmental Impact Analysis), Section 4.2 (Air Quality), Section 4.3 (Biological Resources), Section 4.4 (Cultural Resources), Section 4.6 (Hazards and Hazardous Materials), Section 4.5 (Greenhouse Gas Emissions), Section 4.10 (Public Services) Section 4.11.5 (Transportation and Traffic/Project Elements that Can Reduce Impacts), Section 4.12 (Utilities and Service Systems), Section 4.13 (Energy Conservation), Section 5.1 (Mandatory CEQA Topics/Introduction), Section 5.2 (Mandatory CEQA Topics/Cumulative Impacts Analysis) Section 5.3 (Mandatory CEQA Topics/Significant Irreversible Changes), Section 7.1 (Growth-Inducing Impacts)

**Table 5-2**  
**Location in the Draft EIR in which Consistency with Regional Plans and Other Plans of Regional Significance is Discussed**

<b>Plan</b>	<b>Location of Discussion</b>
City of Moreno Valley General Plan	Section 4.11.1 (Transportation and Traffic/Setting)
City of Moreno Valley Bicycle Master Plan	Section 4.11.1 (Transportation and Traffic/Setting), Section 5.2 (Mandatory CEQA Topics/Cumulative Impacts Analysis)
City of Riverside Climate Action Plan	Section 4.5.2 (Greenhouse Gas Emissions/Relevant Plans, Policies, and Ordinances), Section 4.5.3 (Greenhouse Gas Emissions/Thresholds of Significance)
City of Riverside Emergency Operations Plan (EOP)	Section 2.4.3 (Project Description/Project Characteristics/Project Design Features and Construction Measures)
City of Riverside Neighborhood Traffic Management Program	Section 4.11.2 (Relevant Regulations, Policies, and Ordinances)
Congestion Management Plan	Section 4.11.2 (Transportation and Traffic/Relevant Regulations, Plans, and Ordinances), Section 5.2 (Mandatory CEQA Topics/Cumulative Impacts Analysis)
County Drainage Area Management Plan	Section 4.7.2 (Hydrology & Water Quality/Relevant Regulations, Plans, Policies)
<i>Green Action Plan</i>	Section 4.13.2 (Energy Conservation/Relevant Plans, Policies, and Regulations)
MSHCP	Section 4.3 (Biological Resources), Section 5.2 (Mandatory CEQA Topics/Cumulative Impacts Analysis)
MWD Regional Urban Water Management Plan	Section 4.12.1 (Utilities and Service Systems/Setting)
NPDES	Section 2.5 (Project Description/Project Characteristics), Section 3.1 (Effects Found Not to be Significant)
Regional Transportation Plan	Section 4.5.2 (Greenhouse Gas Emissions/Relevant Plans, Policies, and Ordinances), Section 7.1 (Growth-Inducing Impacts)
Riverside County Hazardous Waste Management Plan	Section 4.6.2 (Hazardous Materials/Relevant Regulations, Plans, Policies)
Site Grading and Drainage Development Plan	Section 3.2 (Effects Found Not to be Significant as Part of the EIR Process)
Stephens' Kangaroo Rat Habitat Conservation Plan	Section 4.3.2 (Biological Resources/Relevant Regulations, Plans, and Ordinances), Section 4.8.4 (Land Use/Environmental Impact Analysis)
SWPPP	Section 3.2 (Effects Found Not to be Significant as part of the EIR Process), Section 4.7.2 (Hydrology & Water Quality/Relevant Regulations, Plans, Policies),
Urban Water Management Plan	Section 4.12.1 (Utilities and Service Systems/Setting)
Wastewater Integrated Master Plan	Section 3.1 (Effects Found Not to be Significant during Preparation of Initial Study/NOP)
Water Quality Control Plan for the Santa Ana River Basin (Santa Ana RWQCB Basin Plan)	Section 4.7.2 (Hydrology & Water Quality/Relevant Regulations, Plans, Policies)
Water Quality Management Plan (WQMP)	Appendix D; Section 3.2 (Effects Found Not to be Significant as Part of the EIR Process)
Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)	Section 4.3.1 (Biological Resources/Setting), Section 4.3.2 (Biological Resources/Relevant Regulations, Plans, and Ordinances), Section 4.8.4 (Land Use/Environmental Impact Analysis)

## 5.6 REFERENCES

- 14 CCR 15000–15387 and Appendices A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.
- California Public Resources Code, Sections 21000–21177. California Environmental Quality Act (CEQA), as amended.
- Caltrans (California Department of Transportation). 2012. “Transportation Concept Report for Interstate 205 – District 8.” September 2012.
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SCAQMD (South Coast Air Quality Management District). 2003. *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*. August 2003.  
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