

## **CHAPTER 6**

### **PROJECT ALTERNATIVES**

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#### **6.1 INTRODUCTION**

Pursuant to the State California Environmental Quality Act (CEQA) Guidelines, environmental impact reports (EIRs) are required to “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives” (14 CCR 15126.6(a)). The EIR “must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation” (14 CCR 15126.6(a)). This alternatives discussion is required even if these alternatives “would impede to some degree the attainment of the project objectives, or would be more costly” (14 CCR 15126.6(b)).

The inclusion of an alternative in an EIR does not constitute definitive evidence that the alternative is in fact “feasible.” The final decision regarding the feasibility of alternatives lies with the decision maker for a given project, who must make the necessary findings addressing the potential feasibility of an alternative, including whether it meets most of the basic project objectives or reduces the severity of significant environmental effects per CEQA (California Public Resources Code, Section 21081; see also 14 CCR 15091).

#### **6.2 PROJECT OBJECTIVES**

In developing the alternatives to be addressed in this chapter, consideration was given to the ability to meet the basic objectives of the Canyon Springs Healthcare Campus Specific Plan and Amendment to the Canyon Springs Business Park Specific Plan (Project) and eliminate or substantially reduce the identified significant environmental impacts. As stated in Chapter 2 of this Draft EIR, the Project objectives against which the alternatives were analyzed include the following:

- The proposed Canyon Springs Healthcare Campus Specific Plan (Specific Plan) will allow future development to be more streamlined by outlining future allowable uses and laying out a cohesive set of design guidelines that will provide City of Riverside staff, the future Canyon Springs Healthcare Campus operator, and the public with a clear understanding of how growth and development will occur at the site.
- The overall goal of the proposed Specific Plan is to guide future development on the Canyon Springs Healthcare Campus and define the extent, scale, and location of future development on the Canyon Springs Healthcare Campus.

- The Specific Plan will allow for the construction of a hospital and medical office buildings (MOBs) with associated hospital-related facilities, as well as a senior housing, independent living, assisted living, and skilled nursing facility to address an existing shortage of healthcare service capacity now available to residents in the surrounding area, as well as to improve access to healthcare for a growing population.
- In the event of a disaster, the Canyon Springs Healthcare Campus will provide another hospital facility that will serve Riverside and the surrounding communities.

Pursuant to the guidelines stated above, as well as the Project's objectives, a range of alternatives to the Project are considered and evaluated in this Draft EIR. These alternatives were developed by the City of Riverside (City) in the course of Project planning, environmental review, and public input. In order to summarize these Project alternatives, as suggested in State CEQA Guidelines Section 15126.6(d), a matrix has been prepared to summarize and compare the impacts of each Project alternative (see Section 6.7).

### **6.3 SUMMARY OF PROJECT'S SIGNIFICANT AND UNAVOIDABLE IMPACTS**

The analysis in Chapter 5 determined that even with the implementation of mitigation measures, significant environmental impacts will result from construction and operation of the Project. To satisfactorily provide the CEQA-mandated alternatives analysis, the alternatives considered must reduce any of the following Project-related significant unavoidable impacts:

- **Air Quality:** Obstruction of the implementation of the applicable air quality plan and long-term operation impacts related to long-term volatile organic compounds (VOCs), oxides of nitrogen (NO<sub>x</sub>), and carbon monoxide (CO) emissions in excess of the South Coast Air Quality Management District's (SCAQMD) regional significance thresholds – Project and cumulatively considerable impact.
- **Traffic:** Exceeding a level of service (LOS) on freeway segments on Interstate 215 – cumulatively considerable impact.

### **6.4 RATIONALE OF ALTERNATIVE SELECTION**

The State CEQA Guidelines Section 15126.6(a) requires that an EIR “describe a range of reasonable alternatives to the project, or to the location of the project, which will feasibly attain most of the basic objectives of the project but will avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” According to this section of the State CEQA Guidelines, “an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation.” An EIR

is not required to consider alternatives which are infeasible. The City, as Lead Agency, is responsible for selecting a range of Project alternatives for examination, and there is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the “rule of reason” (State CEQA Guidelines Section 15126.6 (a)). Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to an alternative (State CEQA Guidelines Section 15126.6 (f)(1)).

With respect to the selection of alternatives to be considered in an EIR, State CEQA Guidelines Section 15126.6(b) states “the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives will impede to some degree the attainment of the project objectives, or will be more costly.” That is, each alternative must be capable of avoiding or substantially lessening any significant effects of the Project.

The rationale for selecting the alternatives to be evaluated, and a discussion of the “no project” alternative are also required (State CEQA Guidelines, Section 15126.6(e)). The “no project” alternative could take two forms: (1) no change from the existing uses (vacant land) or (2) development pursuant to the approved Canyon Springs Business Park Specific Plan (i.e. no specific plan amendment, no general plan amendment, and no rezone required). Because the two “no project” alternatives are significantly different, both will be evaluated in this section (as the No Project Alternative and Alternative 1). The other alternatives evaluated in this Draft EIR were selected based on their ability to reduce or avoid significant air quality and traffic impacts.

## **6.5 ALTERNATIVES CONSIDERED BUT REJECTED**

The Project will allow for the construction of the Canyon Springs Healthcare Campus on the 50.85-acre Project site located within the City of Riverside’s Sycamore Canyon/Canyon Springs Neighborhood. The Canyon Springs Healthcare Campus will establish a new Specific Plan to guide future development at the proposed Canyon Springs Healthcare Campus and will also require a Specific Plan Amendment to the existing Canyon Springs Business Park Specific Plan to allow for creation of the Canyon Springs Healthcare Campus within the greater Canyon Springs Business Park Specific Plan area. The new Specific Plan and the Specific Plan Amendment will allow for a 375,000-square-foot, three-story, 234-unit senior “age-restricted,” multifamily housing facility; a 310,200-square-foot, three-story, 267-unit, 290-bed independent living and skilled nursing facility; 370,000 square feet of MOB uses; and 504,000 square feet of hospital uses (280 hospital beds).

In accordance with State CEQA Guidelines, Section 15126.6(f)(2), the City identified feasible alternative off-site locations within the Project area that could be available for the proposed healthcare campus development. Per State CEQA Guidelines, Section 15126.6(f)(2)(A), the key question and first step in analysis of the off-site location is whether any of the significant effects of the Project will be avoided or substantially lessened by moving the Project to another location. The City reviewed 20 sites approximately 50 acres in size, within a 5-mile radius of the site, within the City of Riverside, the City of Moreno Valley, and the County of Riverside, including the area controlled by the March Joint Powers Authority. The alternative sites that were reviewed are included in Table 6-1 and are depicted on Figure 6-1. The following discussion presents information on alternatives to the Project that were considered but rejected. With the exception of Sites 2 and 10, these alternatives are not discussed in further detail and have been eliminated from further consideration.

**Table 6-1**  
**Alternative Sites Reviewed for the Canyon Springs Healthcare Campus Specific Plan**

Site	Size	Number of Owners	Ownership	Agency	Zoning/ General Plan Designation	Airport Land Use	Distance from Project Site (miles)	Reason Why Site was Rejected
1	51.16	1	City of Riverside	City of Riverside	R-1-8500 Single-family Residential	Zone D	1.75	Site developed with Sycamore Canyon Wilderness Park
2	62.37	1	City of Riverside	City of Riverside	R-1-8500 Single-family Residential	Zone D	1.9	Site was carried forward for further analysis below
3	65	1	Riverside Co Reg Park & Open Space	City of Riverside	RC– Residential Conservation Zone	Zone E	4.24	Property contains significant slopes and inferior freeway access
4	67.19	1	UCR Riverside Land LLC	City of Riverside	RC- Residential Conservation Zone	Zone E	2.32	Property contains significant slopes and inferior freeway access
5	75.52	1	University of California	City of Riverside	PF-Public Facilities Zone	Zone D	3.74	Property is developed with University of California, Riverside West Campus
6	74.4	1	H&L Hawarden Group LTD.	City of Riverside	RC – Residential Conservation Zone	Zone D	4.11	Ownership considerations and inferior freeway access
7	97.27	1	Regents of University of California	City of Riverside	PF – Public Facilities Zone	Zone E	2.52	Property contains significant slopes and inferior freeway access

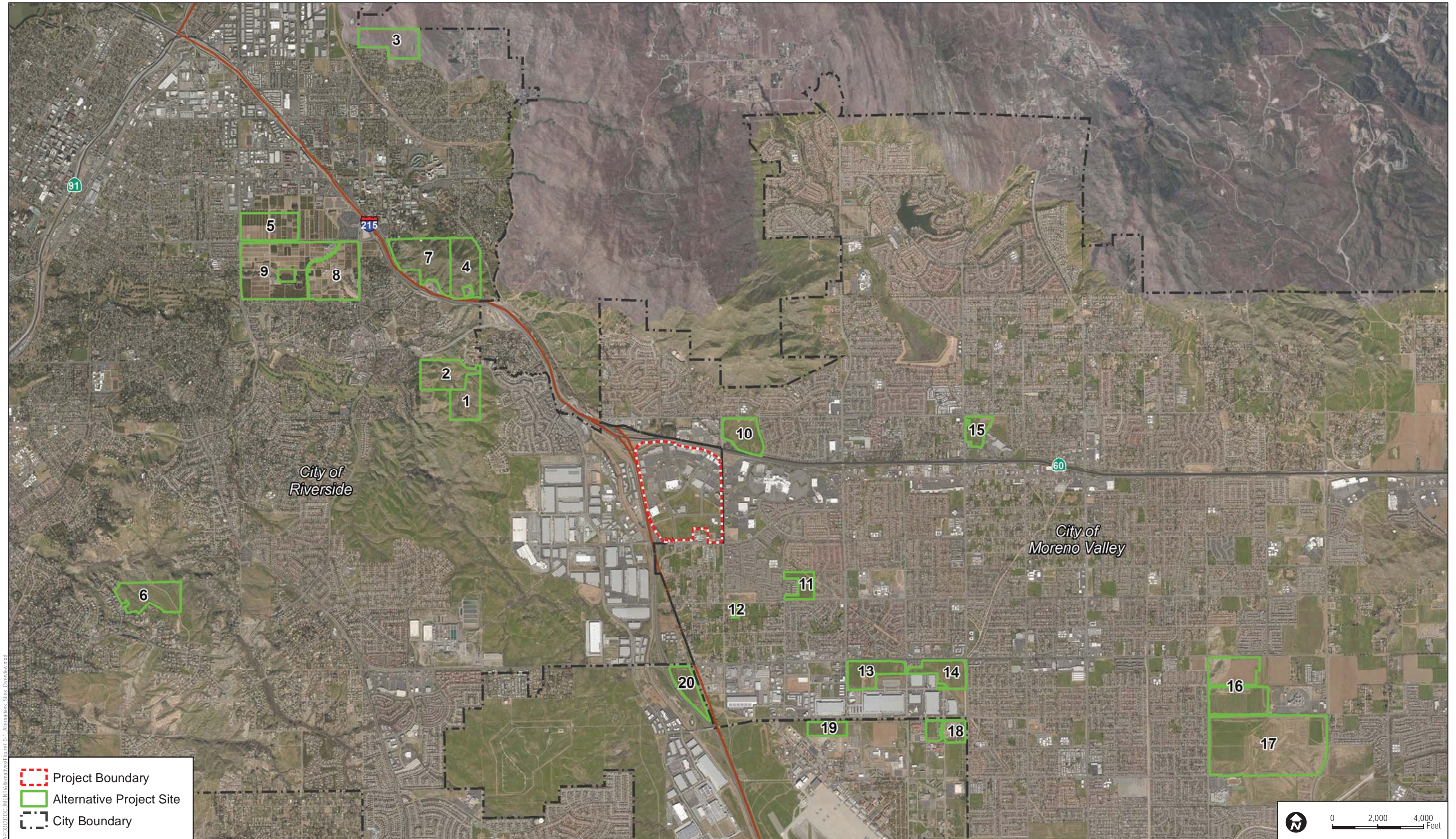
**Table 6-1**  
**Alternative Sites Reviewed for the Canyon Springs Healthcare Campus Specific Plan**

Site	Size	Number of Owners	Ownership	Agency	Zoning/ General Plan Designation	Airport Land Use	Distance from Project Site (miles)	Reason Why Site was Rejected
8	107	1	University of California	City of Riverside	PF – Public Facilities Zone	Zone E	3.07	Property is developed with University of California, Riverside Agriculture Resource Fields
9	174.9	1	University of California	City of Riverside	PF – Public Facilities Zone	Zone E	3.47	Property is developed with University of California, Riverside Agriculture Resource Fields
10	54.22	2	First national Bank of Iowa City, MW Investment Co (Fritz Duda & AA Webb JV entity purported to be landowner)	City of Moreno Valley	Commercial & Residential	Zone E	0.6	Site was carried forward for further analysis below
11	26.13	1	Bijj Dev Inc.	City of Moreno Valley	Residential	Zone D	1.2	Insufficient acreage
12	28	19	Multiple small owners of vacant lots and low density homes	City of Moreno Valley	Residential	Zone D	1.2	Too many ownerships
13	69.45	3	Moreno Valley Centerpointe, Prologis USLV NewCA 7 LLC, George Chumo	City of Moreno Valley	Commercial & Business Park Mixed Use	Zone D & E	2.25	Approved warehouse Projects
14	51.57	10	Multiple small owners and Oliger Riverside Ltd. Partnership	City of Moreno Valley	Business Park, Business Park Mixed Use, and Commercial	Zone E	2.5	Too many ownerships & approved warehouse Projects

**Table 6-1**  
**Alternative Sites Reviewed for the Canyon Springs Healthcare Campus Specific Plan**

Site	Size	Number of Owners	Ownership	Agency	Zoning/ General Plan Designation	Airport Land Use	Distance from Project Site (miles)	Reason Why Site was Rejected
15	43.29	5	City of Moreno Valley Festival Ltd, Zuppardo Mary Louise, Eastern Municipal Water District, Sunnymead Mutual Water Co.	City of Moreno Valley	Retail Commercial & Community Commercial	Outside Airport Influence Area Boundary	2.5	Too many ownerships
16	156	10	Multiple small owners as well as Riverside county and City of Moreno Valley	City of Moreno Valley	Residential, Medical, & Open Space	Outside Airport Influence Area Boundary	4.7	Proximity to existing County Hospital complex
17	286	5	Moreno Valley Prop (Highland Fairview)	City of Moreno Valley	Residential (Low-Medium Density)	Outside Airport Influence Area Boundary	4.95	Proximity to existing County Hospital complex
18	150	12	March Joint Powers Authority (options held by march Lifecare entity)	March Joint Powers Authority	Specific Plan – Medical Campus	Zone D	2.9	Ownership considerations and inferior freeway access
19	30	1	Meridian Park LLC (Lewis-Waypoint)	March Joint Powers Authority	Business Park	Zone C1	2.13	Insufficient acreage & Airport Land Use Commission incompatibility
20	39	1	Proficiency Capital	March Joint Powers Authority	Industrial	Zone B1	1.5	Airport Land Use Commission incompatibility





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As shown in Table 6-1, Sites 1, 3, 4, 5, 6, 7, 8, 9, 11, 12, 13, 14, 15, 16, 17, 18, 19 and 20 of the alternative sites considered were rejected because they provided insufficient space for the Project components; they were previously developed or entitled for development; the Project was incompatible with Airport Land Use Commission (ALUC) policies for the sites; or the sites had multiple owners. As such, these alternative sites are not discussed in further detail and have been eliminated from further consideration.

After the City's review, Sites 2 and 10 were identified as sites where the Project components could potentially be located. Site 2 is in the City of Riverside, and Site 10 is in the City of Moreno Valley (see Figures 6-2 and 6-3). These sites are discussed in further detail and are evaluated below as Alternatives 2 and 3 to the Project.

## **6.6 ALTERNATIVES UNDER CONSIDERATION**

This section of the Draft EIR presents the analysis of five alternatives in comparison to the potential environmental effects associated with the Project. In accordance with State CEQA Guidelines Section 15126.6(d), the discussion of the environmental effects of the alternatives may be less detailed than the discussion of the environmental effects of the Project. Following a description of each alternative is a discussion of potential impacts to each of the environmental topics evaluated in this Draft EIR, as well as the Initial Study (Appendix A to the Draft EIR).

The No Project (No Build) Alternative, which is a required element of an EIR pursuant to Section 15126.6(e)(3)(B) of the State CEQA Guidelines, examines the environmental effects that will occur if the Project were not to proceed. The other alternatives are discussed as part of the “reasonable range of alternatives” selected by the Lead Agency (City of Riverside). The alternatives addressed in this section are listed below, followed by a more detailed discussion of each:

- No Project Alternative
- Alternative 1 – Buildout Consistent with the Canyon Springs Business Park Specific Plan
- Alternative 2 – Alternative Location in the City of Moreno Valley (Site 10 in Table 6.1)
- Alternative 3 – Alternative Location in the City of Riverside (Site 2 in Table 6.1)
- Alternative 4 – Reduced Project Alternative

A comparison of the alternatives is presented in a matrix in Section 6.7.

### **6.6.1 No Project Alternative**

The discussion of the No Project Alternative must compare the environmental effects from the Project site remaining in its existing state, versus the environmental effect that will occur if the Project is approved. Accordingly, under the No Project Alternative, the Project site will remain

in its existing condition, and no development will occur. Neither the proposed Canyon Springs Healthcare Campus Specific Plan nor the Canyon Springs Business Park Specific Plan will take effect under the No Project Alternative. The land will remain vacant, and the healthcare campus needed to improve access to healthcare for a growing population will not be constructed. In addition, the City and surrounding communities will not be provided another hospital facility to serve its residents in the event of a disaster. This alternative will not meet the Project objectives; however, CEQA requires the No Project alternative to be analyzed.

### **Aesthetics**

As discussed in Section 4.1, Aesthetics, the Project will have less than significant impacts associated with scenic vistas from Sycamore Canyon Wilderness Park, viewpoints and trails within Box Springs Mountain Reserve, and State Route (SR-) 60, and as such, the Project will not substantially obstruct or interrupt existing views to identified major scenic resources.

The nearest designated state scenic highway by the California Department of Transportation (Caltrans) is Interstate 215 (I-215) located approximately 11 miles south of the Project site. The Project site is not visible from the designated portion of I-215 (Caltrans 2008). The Project site is vacant and does not support historic buildings or rock outcroppings. Therefore, the Project will not substantially damage scenic resources within a state scenic highway.

Impacts to visual character will also be less than significant with implementation of the Project. Viewers along perimeter streets and from surrounding properties will experience views of a developed hospital campus instead of the existing vacant site. The Specific Plan will identify design guidelines and development standards for the proposed buildings. With implementation of the design guidelines, the buildings' mass and scale will be controlled, and all architectural materials will be of high quality. The Specific Plan's landscaping guidelines will also ensure that development of the Project is compatible with the surrounding developed areas.

In addition, the Project will not have any significant impacts from lighting or glare. The Project site is located in a developed area with existing sources of nighttime lighting. Currently there are sources of nighttime light and glare from the existing office, commercial uses, big box retail, and residential uses, as well as from street lights. Although the Project will increase lighting on the Project site compared to current conditions, the Specific Plan outlines minimum and maximum light intensities for the Project area and establishes design guidelines for the installation of lights. Pursuant to the development standards and design guidelines, pole lighting will be directed, oriented, and shielded to prevent light from shining onto the adjacent properties. Additionally, a visual buffer will be provided by landscaping along the perimeter of the Project site. Therefore, the lighting from the Project will not result in substantial light or glare that will adversely affect nighttime views in the surrounding area.



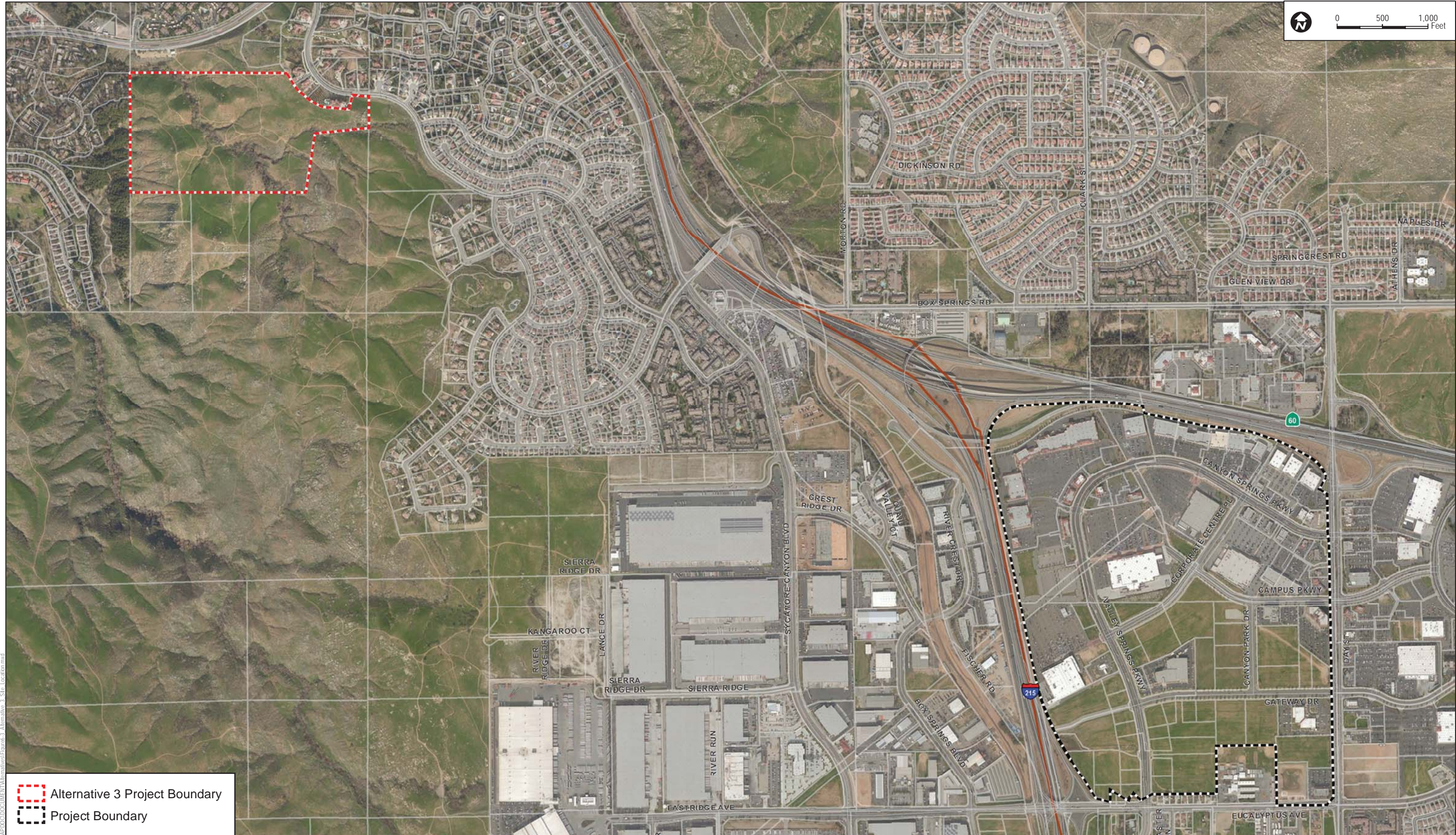


  Alternative 2 Project Boundary  
  Project Boundary



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	SOURCE: Google Aerial Imagery 2016, County of Riverside 2016	<b>FIGURE 6-3</b> Alternative 3 Site Location in the City of Riverside
	Canyon Springs Healthcare Campus Project	

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The No Project Alternative will not result in any direct impacts to aesthetics since there will be no construction on the Project site, and as such, the Project site will remain vacant. Under the No Project Alternative, the Project site will be underutilized, but impacts to aesthetics will be less under this alternative compared to the Project.

### **Agriculture and Forestry Resources**

The Project site is designated “Urban and Built-up Land” by the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (DOC 2015a) and as depicted in Figure OS-2 of the City’s General Plan 2025 (City of Riverside 2012a). Since the Project site is not located on any Farmland designations, no conversion of Prime Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to non-agricultural use will occur as a result of developing the Project. In addition, the City’s Land Use Zoning Map and General Plan Land Use Map indicate that no portion of the Project site is located within an area that is zoned for agricultural use (City of Riverside 2013). The Project site is located within commercial and/or office zones. According to the DOC’s Williamson Act Map (DOC 2016) and as depicted in Figure OS-3, Williamson Act Preserves in the City’s General Plan 2025 Open Space and Conservation Element, there are no Williamson Act contracts on the Project site (City of Riverside 2012a). Since the Project is not an agricultural land use and is not under a Williamson Act contract, no impacts to an agricultural use or Williamson Act contract will occur with the Project.

No forest land, timberland, or Timberland Production areas (as defined in the Public Resources Codes 12220(g) and 4526 or Government Code 51104(g)) are located within or adjacent to the Project site (City of Riverside 2012a). Therefore, the Project will not conflict with existing zoning for forest land, timberland, or Timberland Production areas, or result in the loss or conversion of forest lands to non-forest uses, as none exist. The Project site is currently vacant and undeveloped and contains no forest land. Therefore, implementation of the Project will not result in the loss of forest land or conversion of forest land to non-forest use.

Under the No Project Alternative, the Project site will continue to be an undeveloped, vacant site. As such, similar to the Project, the No Project Alternative will also have no impact to agriculture and forestry resources.

### **Air Quality**

As discussed in Section 4.2, Air Quality, the daily construction emissions will not exceed the SCAQMD’s significance thresholds for VOC, CO, sulfur oxides (SO<sub>x</sub>), coarse particulate matter (PM<sub>10</sub>), or fine particulate matter (PM<sub>2.5</sub>) during construction of the Project in any of the construction years. The Project, however, will exceed the daily construction emissions threshold for NO<sub>x</sub>. With implementation of MM-AQ-1, which requires off-road equipment engines that are Tier 3-certified or better by the California Air Resources Board, NO<sub>x</sub> emissions will be reduced

below the SCAQMD significance threshold, thus resulting in a less than significant air quality impact from construction emissions.

The Project's operational emissions will not exceed the SCAQMD's significance threshold for SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>. The Project, however, will exceed operational emissions thresholds for VOC, NO<sub>x</sub>, and CO, even with implementation of MM-AQ-2 through MM-AQ-6, and therefore, the Project's operational emissions will remain significant and unavoidable.

The localized significance threshold (LST) analysis shows that the Project construction and operational emissions will not exceed the applicable LSTs for nitrogen dioxide (NO<sub>2</sub>), CO, PM<sub>10</sub>, or PM<sub>2.5</sub>. As such, this impact is less than significant.

The Project will not result in on-road traffic volumes at affected intersections that result in a CO hotspot. This impact is less than significant.

The cancer risk and non-cancer risk at the nearby residents, workers, and school children will not exceed the SCAQMD threshold of 10 in 1 million or chronic hazard index of 1.0, respectively, and impacts are less than significant.

In summary, the Project will result in significant and unavoidable impacts related to an obstruction of the implementation of the applicable air quality plan and long-term operational impacts. Accordingly, the Project will also result in significant and unavoidable cumulatively considerable impacts and a Statement of Overriding Considerations will be required should the City choose to approve the Project.

No additional emissions will occur under the No Project Alternative since there would be no construction or operational activities on the Project site. Therefore, the No Project Alternative will have reduced air quality impacts when compared to the Project. Although air quality impact will be less than the Project for construction and long-term operations, the Project site will remain underutilized.

## **Biological Resources**

As discussed in Section 4.3, Biological Resources, the Project site supports one drainage feature, Drainage 1, which is an unnamed, ephemeral drainage feature that flows north to south across a portion of the Project site. Drainage 1 exhibits a surface hydrologic connection to downstream waters of the United States via the City's underground storm drain system and qualifies as waters of the United States, which falls under the jurisdiction of the U.S. Army Corps of Engineers (ACOE). Approximately 0.02 acre of ACOE jurisdiction is located within the boundaries of Site B. With the incorporation of mitigation measure MM-BIO-1, outlined in Section 4.3.6, impacts occurring within ACOE and Regional Water Quality Control Board (RWQCB) jurisdictional

areas are considered less than significant with mitigation incorporated. Drainage 1 is considered a California Department of Fish and Wildlife (CDFW) streambed with approximately 0.12 acre of jurisdictional streambed located within the boundaries of Site B. However, with implementation of the mitigation measures outlined in Section 4.3.6, the Project will comply with all the regulatory permits and associated conditions related to jurisdictional drainage features, and impacts are considered less than significant. No jurisdictional wetland features were found to occur within Site B, so impacts related to wetlands are considered less than significant.

The Project site is located within the Multiple Species Habitat Conservation Plan (MSHCP) Area, but is not located in the Criteria Area and does not have conservation requirements (County of Riverside 2003). The Project site is, however, subject to consistency review with MSHCP Sections. The MSHCP consistency review found that the Project site is located within a burrowing owl (*Athene cunicularia*) survey area as defined in Section 6.3.2 of the MSHCP. As such, to meet requirements in the MSHCP, a habitat assessment for burrowing owls was conducted on September 16, 2015, to identify suitable habitat for burrowing owl. No burrowing owls or potential signs of burrowing owl (e.g., owl pellets, prints, molting feathers, abundant insect remains) were detected during the burrowing owl habitat assessment. However, after conducting the habitat assessment, it was determined that the Project site and undeveloped parcels within a 500-foot buffer provide suitable foraging habitat and suitable nesting habitat where burrowing owl burrows were noted, particularly on the perimeter of the Project site, fence lines, dirt mounds, and berms lining roadways. A concrete drainage on the southern portion of the northeast section of Site B was also found to be suitable habitat for burrowing owl. With the incorporation of mitigation measures MM-BIO-2 and MM-BIO-3, outlined in Section 4.3.6, the Project will be compliant with MSHCP Section 6.3.2, and impacts are less than significant with mitigation incorporated.

In addition to being located within a burrowing owl survey area, the Project site is located in the plan area of the Stephens' Kangaroo Rat (SKR (*Dipodomys stephensi*)) Habitat Conservation Plan (HCP) (Riverside County Habitat Conservation Agency 1990). However, the Project site is outside of the SKR Management Areas of the HCP. As such, impacts related to SKR are considered to be less than significant.

In summary, the Project will be fully compliant with the MSHCP and fully covered for potential impacts to covered species. Impacts are considered less than significant with mitigation incorporated.

The No Project Alternative will not result in any direct impacts to biological resources because there will be no construction involved. The existing biology on the Project site will remain as is, Drainage 1 will not be modified, and Project impacts will be avoided. Therefore, impacts to biological resources will be reduced under this the No Project Alternative when compared to the Project; however, the Project site will remain underutilized.



## **Cultural Resources**

As discussed in Section 4.4, Cultural Resources, there are 77 cultural resources previously recorded within a 1-mile radius of the Project site; however, none of the resources are located within the Project area of potential effect (APE) (Appendix I). Initially, the project APE was defined as the 50.85-acre development area of the Project. Subsequent Project planning discussions determined that for the purposes of the cultural resources study, the APE will include the entirety of the Canyon Springs Business Park Specific Plan area, as the Specific Plan requires an amendment for the Project. The Project site is located within a low archaeological sensitivity area, and no archaeological resources were found within either the initial Project area or the expanded APE during the time of an intensive pedestrian field survey. With implementation of mitigation measures MM-CUL-1 through MM-CUL-4, outlined in Section 4.4.6, impacts associated with the potential discovery of unknown resources will be mitigated to a level of less than significant.

The Project site is located within an area of High Paleontological Sensitivity to encounter paleontological resources at depths of 4 feet or greater below the ground's surface; however, with the implementation of mitigation measures MM-CUL-1 through MM-CUL-4, outlined in Section 4.4.6, potential impacts to paleontological resources will be reduced to a less than significant level.

No construction will occur under the No Project Alternative, and therefore, no subsurface material that could potentially support or impact cultural or paleontological resources will be disturbed. As such, the No Project Alternative will have reduced impacts to cultural resources when compared to the Project; however, the Project site will remain underutilized.

## **Geology and Soils**

The potential for fault rupture on the Project site is low because the Project site is not within an Alquist-Priolo Earthquake Fault Zone or a Fault Hazard Zone (DOC 2015b), and there is no evidence of active faulting on, or adjacent to, the Project site.

The Project site is within a low liquefaction zone, and the potential for liquefaction is low due to the generally dense nature of the native soils underlying the site. The Project area is also located on land identified as having a 0% to 10% slope, which is the lowest of four potential categories susceptible to landslides. The Project site has been previously graded and leveled, and there are no known areas prone to landslides on site. The potential for landslides or lateral spreading is very low due to the relatively flat-lying topography of the Project site.

The Project site contains silty and clayey sands and may have expansive properties; however, Figure PS-3 of the City's General Plan 2025 indicates that the Project site is not located in an

area with soils that have a high shrink-swell potential, thereby substantially reducing the potential for adverse impacts related to being located on expansive soils (City of Riverside 2012b). Additionally, a majority of the area surrounding the Project site has been developed with multistory buildings. New structures being proposed by the Project will be designed to California Building Code (CBC) standards to anticipate impacts associated with liquefaction, expansive soils, and other seismic events. Furthermore, the California Office of Statewide Health and Planning Department's (OSHDP) Facilities Development Division will review and approve the plans and specifications of the proposed hospital building, MOB, skilled nursing facility, and related hospital facilities as required by and to ensure compliance with the provisions of the CBC (Title 24, California Code of Regulations).

Project construction activities such as excavation and grading may have the potential to cause soil erosion or the loss of topsoil. Short-term erosion effects during the construction phase of the Project will be prevented through required implementation of a stormwater pollution prevention plan (SWPPP) through compliance with the National Pollutant Discharge Elimination System (NPDES) program and the incorporation of best management practices (BMPs) intended to reduce soil erosion. The SWPPP is required by the City during plan review and approval of project improvement plans; therefore, with implementation of an approved SWPPP, impacts resulting from erosion during construction operations will be less than significant.

The No Project Alternative will not involve any development and/or grading on the Project site. As such, there will be no on-site structures subject to seismic or other geotechnical events. Thus, impacts to geology and soils associated with the No Project Alternative will be less than that of the Project; however, the Project site will remain underutilized.

### **Greenhouse Gas Emissions**

As discussed in Section 4.5, Greenhouse Gas Emissions, construction-related greenhouse gas (GHG) emissions impacts associated with the Project will be short-term in nature, lasting only the duration of the construction period, and will not represent a long-term source of GHG emissions. With the implementation of mitigation measures MM-AQ-1 through MM-AQ-6, the Project's GHG operational emissions will be reduced by approximately 28.38% when compared to the baseline scenario. The 28.38% reduction is consistent with the target reduction percentage of 15% below 2010 levels based on the City of Riverside's Climate Action Plan (CAP) analysis supporting Assembly Bill (AB) 32 (City of Riverside 2016). Therefore, impacts related to GHG emissions are considered less than significant with mitigation incorporated. The Project will also be consistent with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs.

Due to the avoidance of short-term and long-term GHG Emissions, the No Project Alternative's impacts with regard to GHG Emissions will be less than that of the Project. There will be no direct construction-related GHG emissions impacts associated with the No Project Alternative because the Project site will remain in its current state and no construction will occur. The Project site will continue to operate as a vacant, undeveloped site, and GHG emissions will continue to be the same. Therefore, because no additional emissions will occur under the No Project Alternative, GHG impacts will be lessened when compared to the Project; however, the Project site will remain underutilized.

### **Hazards and Hazardous Materials**

As discussed in Section 4.6, Hazards and Hazardous Materials, the Project site is located approximately 1.6 miles north of March Air Reserve Base (ARB), within the March ARB land use compatibility plan area. The March ARB identifies Accident Potential Zones (APZ); however, the Project site is located outside of all designated APZs (March ARB 2005; Mead & Hunt 2014). Therefore, no restrictions related to APZs apply to the Project.

The Project site is located within Zone D – Flight Corridor Buffer, as depicted in the March ARB/Inland Port Airport Land Use Compatibility Plan (ALUCP) (Mead & Hunt 2014). The Project uses are compatible with the uses described in Zone D. The Project applicant will be required to submit plans to the Federal Aviation Administration (FAA) if the notification criteria in Part 77 of the Federal Aviation Regulations are met. The FAA will ensure compliance with the FAA standards. Furthermore, the Project will go through review by the City of Riverside, March ARB, Riverside County ALUC, and Caltrans Division of Aeronautics (for the helistop) for approval. With the implementation of mitigation measures MM-HAZ-1 through MM-HAZ-3, outlined in Section 4.6.6, all potential impacts related to people working or residing within close proximity of a public airport will be reduced to a level that is less than significant. As such, safety hazard impacts related to the Project site being located in close proximity to a public airport are considered less than significant with mitigation incorporated.

The No Project Alternative will not result in a potential increase in safety hazards related to transportation or accidental release of hazardous materials, since construction or operation of development at the Project site will not occur. In addition, there will be no potential safety hazards related to being located in close proximity to a public airport, as the Project site will remain vacant. Similarly, the No Project Alternative will not introduce employees, patients, and visitors to potential safety hazards related to a public airport since nothing will be built on the Project site. Therefore, the No Project Alternative will have reduced impacts related to hazards and hazardous materials when compared to the Project; however, the Project site will remain underutilized.



## **Hydrology and Water Quality**

As discussed in Section 4.7, Hydrology and Water Quality, the Project complies with all applicable federal, state, and local rules and regulations regarding water quality and hydrology. The Project will implement a Water Quality Management Plan (WQMP) that includes structural and nonstructural BMPs. In addition, BMPs implemented as part of the SWPPP will further reduce potential impacts associated with violations of water quality standards or Waste Discharge Requirements to a less than significant level.

The Project will not substantially deplete groundwater supplies or interfere with groundwater recharge, and will have less than significant impacts associated with substantial erosion or siltation on or off the Project site. In addition, with design features, water quality BMPs, and required compliance with City requirements, impacts to existing or planned stormwater drainage systems and impacts associated with additional sources of polluted runoff, drainage patterns, and surface runoff are considered less than significant.

Overall, impacts related to hydrology and water quality were found to be less than significant through compliance with existing regulations and as a result of the Project design features.

Under the No Project Alternative, existing conditions will not change, and the Project site will remain vacant. The No Project Alternative will not result in any direct impacts related to hydrology and water quality since no construction will occur, and there will be no increase in runoff from the Project site. In addition, no construction or development activities will take place that could generate an increase in potential pollutants. Therefore, the No Project Alternative will have reduced hydrology and water quality impacts when compared to the Project; however, the Project site will remain underutilized.

## **Land Use and Planning**

As discussed in Section 4.8, Land Use and Planning, the Project will include an amendment to the City's General Plan 2025 to designate the Specific Plan area as the Canyon Springs Healthcare Campus Specific Plan and replace the current land use designations. The Project also will include a rezoning of the Canyon Springs Business Park area to be zoned as the Canyon Springs Healthcare Campus Specific Plan and revise the current City Zoning Map. The proposed Specific Plan land use designation and zoning will allow for implementation of the Specific Plan and associated development standards, which are necessary to meet the increasing demand for healthcare campus services and amenities. The Specific Plan will streamline development by outlining existing uses and future uses and laying out a cohesive set of guidelines that will provide a clear understanding of how growth and development will occur. With adoption of the proposed General Plan 2025 and Zoning Code amendments, implementation of the Project will not conflict with an adopted plan, policy, or regulation

established to avoid environmental effects. In addition, with the implementation of mitigation measures outlined in Section 4.8.6 (MM-AQ-1 through MM-AQ-6; MM-BIO-2 and MM-BIO-3; MM-CUL-2 and MM-CUL-4; MM-NOI-1; MM-TRAFFI-1 through MM-TRAF-14; and MM-UTL-2 and MM-UTL-3), the Project will not conflict with the MSCHP and will not result in any other significant land use impacts.

Under the No Project Alternative, the Specific Plan will not be implemented and the commercial zoning and Canyon Springs Business Park Specific Plan designations for the Project site area will remain. The No Project Alternative will not be consistent with certain General Plan 2025 Goals that pertain to providing for continued growth within the General Plan Area. There is an existing shortage of healthcare service capacity currently available to residents in the General Plan Area, and access to healthcare is needed for the growing population. The No Project Alternative will not alleviate this shortage and will not allow for the development of other healthcare facilities to serve Riverside and the surrounding communities. Therefore, impacts with regard to land use and planning will be increased under the No Project Alternative when compared to the Project, and the Project site will remain underutilized.

### **Mineral Resources**

The Project site lies within Mineral Resource Zone 3 (MRZ-3), as depicted on Figure OS-1 of the City's General Plan 2025 (City of Riverside 2012a), indicating that the area contains known or inferred mineral occurrences of undetermined mineral resources significance. Given that the Project site has been previously disturbed by rough grading and is surrounded by existing development (e.g., commercial shopping center, MOB, office buildings, residential development, and a school) that are incompatible with mining operations, it is unlikely that an economically viable mining operation could take place at the Project site. Therefore, the Project will not result in the loss of a known mineral resource.

Under No Project Alternative, no construction will occur, and impacts to mineral resources will not occur. Therefore, similar to the Project, there will be no impacts to mineral resources under the No Project Alternative; however, the Project site will remain underutilized.

### **Noise**

As discussed in Section 4.9, Noise, construction noise is exempt under the Riverside Municipal Code, Section 7.35.20 (Exemptions; City of Riverside 2007a). The Project will contribute operational stationary-source noise level increases at nearby receiver locations. This will result in potentially significant increases in ambient noise levels in the Project vicinity. As such, with the incorporation of mitigation measure MM-NOI-1, as outlined in Section 4.9.6, the Project's operational stationary-source noise will not result in a substantial temporary/periodic or permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project.

Once the Project is operational, the Project's contribution to existing noise levels will be less than significant for all of the study area roadway segments. As such, the Project's off-site traffic noise level will have a less than significant impact on the study area roadway segments for existing conditions and for General Plan 2026 Buildout conditions.

Since there would be no construction on the Project site under the No Project Alternative, there would be no construction noise impacts. The No Project Alternative will avoid impacts related to operational stationary noise sources when compared to the Project because no new noise sources will be developed. There will also be no new traffic noise generated with the No Project Alternative. Therefore, the No Project Alternative will have reduced noise impacts when compared to the Project; however, the Project site will remain underutilized.

### **Population and Housing**

The Project involves development of a hospital, MOBs, central energy plant, parking structures, hospital-related facilities, senior housing facility, independent living facility, assisted living facility, skilled nursing facility, and associated infrastructure improvements. Although the proposed senior housing facility, assisted living facility, and independent living facility will provide housing for residents, they do not generate a substantial population growth as these residents will generally move from the Riverside and Moreno Valley communities to the housing facility at the Project site to take advantage of the amenities and resources provided for that specific population. The Project will enhance the jobs/housing balance of the City by providing up to approximately 2,450 new permanent jobs at full buildout. Therefore, the Project will not generate substantial population growth. Existing infrastructure systems are adequate to serve the Project, and therefore, no improvements to infrastructure are needed to serve the Project. Consequently, the Project will provide hospital Emergency Medical Service (EMS) for community disaster preparedness, medical check-ups and services at the MOBs, and resources and services for those with medical needs at the independent living facility, assisted living facility, and skilled nursing facility, within the Riverside and Moreno Valley communities and Inland Empire region. The Project site does not currently support any housing; therefore, substantial numbers of existing housing or people will not be displaced, and the construction of replacement housing elsewhere is not necessary as a result of developing the Project. No significant impacts related to population growth will result from the Project.

The No Project Alternative will retain the Project site's existing conditions, and no development will occur. The No Project Alternative will not contribute to new employment positions or housing opportunities. Therefore, under the No Project Alternative, impacts to population and housing will be less when compared to the Project; however, the Project site will remain underutilized.



## Public Services

As discussed in the Initial Study (Appendix A to the Draft EIR) and Section 4.10, Public Services of the Draft EIR, the Project will create an increased demand for emergency medical, fire protection, fire prevention, and rescue fire services that could be manifested by an increased number of emergency and public service calls. Implementation of the Project will introduce permanent and temporary residents, staff, and patients to the area and entails the construction and operation of new structures on a currently vacant site. Development of the Project site was previously considered and analyzed as part of the City's General Plan 2025 Project (2007) and the Canyon Springs Business Park Specific Plan Project, and buildout of the City was considered in the General Plan 2025 and the General Plan 2025 Final Program EIR. The Final Program EIR disclosed a need for four additional fire stations 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 (City of Riverside 2007b). Two of the four fire stations identified as necessary to "maintain current levels of services and improve response times" in the General Plan 2025 Final Program EIR have since been constructed by the City through the use of the City's General Fund. The fire services analysis found that the Project will be designed in compliance with the current building code and Riverside Fire Department requirements. The Project will meet safety equipment standards and provide adequate emergency access, fire hydrants, water flows, and fire sprinklers. These systems will aid in the initial response to fire events occurring in proposed structures. Therefore, through adherence to General Plan policies, compliance with current building code and Riverside Fire Department requirements, in accordance with the conclusions of the General Plan 2025 Final Program EIR, new or physically altered government facilities will not be required to accommodate the Project. As such, the Project's impacts to fire protection services are considered less than significant.

The Project area is located in the East Neighborhood Policing Center serviced by Patrol for uniform presence (Lincoln Police Station) and the East Neighborhood Policing team (Fairmount Station) for any potential follow-ups of crimes or incidents. The current patrol staffing around the Project site is typically two to four officers during school hours. Project components, such as the senior housing and independent living, assisted living, and skilled nursing facility would generate housing for the "age-restricted group" and those needing medical assistant living; however, these groups of people would likely come from the existing Riverside population, and thus, would not substantially increase population in Riverside requiring the need for additional police services. In the event of medical emergencies, police officers along with emergency medical technicians could transport those individual(s) to the hospital on site. Additionally, the Project would result in approximately 2,450 new permanent jobs on the Project site; however, the Project is not expected to substantially increase emergency calls to the City's Police Department as typical land uses requiring more police services generally include commercial and

industrial uses, and residential development. Therefore, the Project site can be adequately served by existing police services in the City. Furthermore, the Project will not result in new facilities that would be needed to serve the Project.

The Project site is located within the Moreno Valley Unified School District. There is one school within 0.25 mile of the Project site. Edgemont Elementary School is located immediately adjacent to the southern boundary of Site C. The proposed senior housing will not result in a substantial increase in demand for schools as the proposed use would be geared towards the aging population; thus, it will not require educational facilities or services. The other Project components do not involve residential type uses, and therefore, will not result in an increased demand for schools.

The Project will not result in a substantial increase in the demand for parks. Pursuant to the Riverside Municipal Code, applicable fees will be paid to mitigate any potential impacts to park development and open space needs. No other public facilities or services other than police and fire protection are anticipated to serve the Project. Implementation of the Project would provide EMS, medical care, and senior care within the Riverside community and Inland Empire region. As such, the overall impacts of the Project on public services are less than significant.

The No Project Alternative will not result in any potential impacts to public services since no construction will occur and no permanent or temporary residents, staff, patients, and structures will be present on the Project site. The No Project Alternative will not require the need for new or additional public services and/or facilities. Therefore, the No Project Alternative will have reduced public services impacts when compared to the Project; however, the Project site will remain underutilized.

## **Recreation**

The Project includes the development of a hospital, MOBs, central energy plant, parking structures, hospital-related facilities, senior housing facility, independent living facility, assisted living facility, skilled nursing facility, and associated infrastructure improvements. The proposed senior housing and assisted living facility are not anticipated to substantially increase the use of existing parks or recreational facilities. The other Project components will not include residential-type uses or businesses that will increase the use of existing parks or recreational facilities. Thus, no deterioration of existing facilities will occur as a result of developing the Project. Nonetheless, the Riverside Municipal Code requires applicable fees to be paid to mitigate the potential impact to park development and open space needs generated by the Project. Furthermore, the Project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, less than significant impacts to recreational facilities will occur as a result of developing the Project.

The No Project Alternative will retain the Project site's existing conditions, and no residential uses or businesses will be provided that will increase the use of existing parks or recreational facilities. Also, no new recreational facilities will need to be expanded or constructed under the No Project Alternative. Since the use of recreational amenities will not occur under the No Project Alternative, impacts with regard to recreation will be less when compared to the Project; however, the Project site will remain underutilized.

### **Transportation/Traffic**

As discussed in Section 4.11, Transportation/Traffic, under Existing with Project Conditions, the Project causes a significant impact at the intersection of Valley Springs Parkway/Eucalyptus Avenue. With the implementation of mitigation measure MM-TRAF-1, as identified in Section 4.11.7, the Project's impacts will be reduced to less than significant levels.

Under Cumulative with Project conditions, the Project will result in significant impacts at the following intersections: I-215 southbound ramps/Eucalyptus Avenue; Valley Springs Parkway/Eucalyptus Avenue; Day Street/Cottonwood Avenue; Day Street/Bay Avenue; Day Street/Alessandro Boulevard; and Memorial Way/Towngate Drive. With the implementation of mitigation measures MM-TRAF-1 through MM-TRAF-8, as identified in Section 4.11.7, the Project's impacts at these intersections will be reduced to less than significant levels.

The Project also contributes to unacceptable LOS on the I-215 southbound freeway mainline, south of Eucalyptus Avenue under Cumulative with Project conditions. The operation of the highway is projected to remain at unacceptable levels due to a lack of feasible mitigation. Thus, the cumulative traffic increases are a significant cumulative impact, and the Project's incremental contribution to the increases is cumulatively considerable. As such, a Statement of Overriding Considerations will be required should the City choose to approve the Project.

In General Plan Buildout with Project Conditions, the Project will result in significant impacts at the following intersections: I-215 southbound ramps/Eucalyptus Avenue, Valley Springs Parkway/Eucalyptus Avenue, Day Street/Eucalyptus Avenue, Day Street/Cottonwood Avenue, Day Street/Bay Avenue, Day Street/Alessandro Boulevard, and Memorial Way/Towngate Drive. With the implementation of mitigation measures MM-TRAF-1 through MM-TRAF-12, as identified in Section 4.11.7, the Project's impacts at these intersections will be reduced to less than significant levels.

The Project also contributes to unacceptable LOS on the I-215 southbound freeway mainline, south of Eucalyptus Avenue and between the off-ramp and on-ramp on Eucalyptus Avenue in General Plan with Project conditions. The operation of the highway is projected to remain at unacceptable levels due to a lack of feasible mitigation. Thus, the cumulative traffic increases are a significant cumulative impact, and the Project's incremental contribution to the increases is



cumulatively considerable. As such, a Statement of Overriding Considerations will be required should the City choose to approve the Project.

The Project is located within a sector of March ARB Class C airspace, which is different from the zones contained in the Land Use Compatibility Plan Policy documentation. However, the Project uses are permitted within the March ARB/Inland Port ALUCP (Mead & Hunt 2014); the required regulatory actions will be taken; and mitigation measures MM-TRAF-13 and MM-TRAF-14, as identified in Section 4.11.7, will be implemented. Therefore, impacts are less than significant.

Because the No Project Alternative will not increase site-generated traffic above current levels, impacts to transportation/traffic will be less than that of the Project; however, the Project site will remain underutilized.

### **Utilities and Service Systems**

As discussed in Section 4.12, Utilities and Service Systems, the estimated demand for the Project exceeds the projected demand accounted for in the 2010 Urban Water Management Plan (UWMP), and will therefore, exceed the projected demand. However, with the implementation of Project elements that can reduce impacts, as well as the mitigation measures outlined in Section 4.12.6 (MM-UTIL-1 through MM-UTIL-3), impacts to water consumption will be minimized to a level that is less than significant.

The construction of all phases of the Project will generate construction waste that will result in an increased demand for solid waste collection and disposal during construction. In addition, during operation, the solid waste quantities generated by the Project will increase, and adequate space will be needed to allow for the collection and storage of recyclable materials. With required recycling, the amount of solid waste generated and disposed of in nearby landfills during construction and operation of the Project will be within the permitted landfill capacities. The implementation of mitigation measures MM-UTIL-1 through MM-UTIL-3, outlined in Section 4.12.6, will ensure that adequate space for on-site recycling is allotted. Therefore, the Project's potential impacts associated with solid waste capacity are considered less than significant with mitigation incorporated.

Because the No Project Alternative will not involve any development that will increase traffic above current levels, impacts to utilities and service systems will be less than that of the Project; however, the Project site will remain underutilized.

## Energy Conservation

As discussed in Section 4.13, Energy Conservation, the Project will increase the demand for electricity and natural gas at the Project site, increase the consumption of gasoline in the region during construction and operation, and place additional demands on local and regional energy supplies. However, with the implementation of mitigation measures (MM-AQ-2, MM-AQ-3, and MM-AQ-4) outlined in Section 4.13.6, the Project will not contribute to the inefficient or wasteful consumption of electricity, natural gas, or petroleum, and impacts are considered less than significant. Also, the mitigation measures will ensure that the Project reduces energy consumption beyond what is required by the state and will also ensure that the Project is consistent with existing energy standards and regulations. Therefore, impacts related to a conflict with existing energy standards and regulations are considered less than significant with mitigation incorporated. In addition, the Project includes transportation demand management (TDM) strategies in the Specific Plan that will help achieve the required vehicle reduction targets from the City's TDM Regulations. Furthermore, the implementation of mitigation measures (MM-AQ-2, MM-AQ-3, and MM-AQ-4) outlined in Section 4.13.6 will reduce vehicle miles traveled and petroleum consumption, as pedestrian and bicycle connections will be provided to surrounding areas consistent with the City's General Plan. Therefore, impacts related to energy supplies and capacity are considered less than significant.

The No Project Alternative will not increase the use of energy, natural gas, or petroleum. The No Project Alternative will also not require additional energy supplies because no construction will occur under this alternative. As such, impacts to energy consumption will be reduced when compared to the Project; however, the Project site will remain underutilized.

## Relationship to Project Objectives and Feasibility

Under the No Project Alternative, the Project site will remain vacant and undeveloped. This alternative will not result in new construction. Table 6-2 provides a list of the Project objectives and whether or not the alternative meets each objective.

**Table 6-2**  
**Summary of No Project Alternative Success at Meeting Project Objectives**

Project Objective	Alternative Meets Objective?
1. The proposed Canyon Springs Healthcare Campus Specific Plan will allow future development more streamlined by outlining future allowable uses, and laying out a cohesive set of design guidelines that will provide City staff, the future Canyon Springs Healthcare Campus operator, and the public with a clear understanding of how growth and development will occur at the site.	<b>No.</b> Under the No Project Alternative, the current land use designation for the Project site will remain Commercial. The properties will still be subject to the provisions of the Canyon Springs Business Park Specific Plan within Planning Areas 7, 8, 9, and 10, and the different areas will continue to be zoned for commercial and office uses as they are in the Canyon Springs Business Park Specific Plan Overlay. There will be no design and development standards to help streamline the entitlement process as a healthcare campus will not be developed, and the Project site will remain vacant.



**Table 6-2**  
**Summary of No Project Alternative Success at Meeting Project Objectives**

<b>Project Objective</b>	<b>Alternative Meets Objective?</b>
2. The overall goal of the proposed Canyon Springs Healthcare Campus Specific Plan is to guide future development on the Canyon Springs Healthcare Campus and define the extent, scale, and location of future development on the Canyon Springs Healthcare Campus.	<b>No.</b> Under the No Project Alternative, the current land use designation for the Project site will remain Commercial, and the different areas will continue to be zoned for commercial and office uses as they are in the Canyon Springs Business Park Specific Plan Overlay. The Canyon Springs Healthcare Campus will not be developed on the Project site, and the Specific Plan will not be implemented to guide future development. The Project site will remain vacant.
3. The Canyon Springs Healthcare Campus Specific Plan will allow for the construction of a hospital and MOB with associated hospital-related facilities, as well as a senior housing, independent living, assisted living, and skilled nursing facility to address an existing shortage of healthcare service capacity now available to residents in the surrounding area as well as to improve access to healthcare for a growing population.	<b>No.</b> No construction will take place as a result of the No Project Alternative, and therefore, this alternative will not develop hospital, MOB, and associated hospital-related facilities or senior housing, independent living, assisted living, or skilled nursing facilities. None of the healthcare services and living facilities will be developed under the No Project Alternative, and the Project site will remain vacant.
4. In the event of a disaster, the Canyon Springs Healthcare Campus will provide another hospital facility that will serve Riverside and the surrounding communities.	<b>No.</b> Under the No Project Alternative, a healthcare campus will not be designed or constructed to meet the varied and evolving healthcare demands for the City of Riverside and residents of the region. There will not be another hospital facility serving the City of Riverside, and the surrounding communities and the Project site will remain vacant.

While the No Project Alternative will result in a reduction of environmental impacts, this alternative will not meet any of the Project objectives. Therefore, this alternative has been eliminated from further consideration and is determined to be not feasible.

### **6.6.2 Alternative 1 – Buildout Consistent with Canyon Springs Business Park Specific Plan**

Alternative 1 proposes to build out the Project area consistent with the permitted uses pertaining to the existing Canyon Springs Business Park Specific Plan. The Project site is located within the boundaries of the Canyon Springs Business Park Specific Plan. More specifically, the northwest 10.45-acre portion of the senior housing site (Site A) is located within Specific Plan Planning Area 8 (Office); the independent living, assisted living, and skilled nursing sites (Site B) of the Project are located within Specific Plan Planning Area 9 (Professional Office); and the hospital, MOB, and parking structure site (Site C) of the Project are located within Specific Plan Planning Areas 7 (Support Commercial) and 10 (Medical Campus).

The purpose of the Canyon Springs Business Park Specific Plan is to “create a commerce center of retail commercial, office, and recreational uses together with appropriate public, quasi-public,

and private services” (City of Riverside 2003). In addition to a general purpose, the Canyon Springs Business Park Specific Plan also includes a focused purpose and development standard for each of the ten planning areas included in the Specific Plan area boundary. The purpose of the permitted uses pertaining to the Canyon Springs Business Park Specific Plan’s Planning Areas 7, 8, 9, and 10 are described below.

- **Planning Area 7:** Regional Oriented Retail support commercial uses will be contained in a 16.4-acre site. Uses within Planning Area 7 will be developed as one-story freestanding uses such as restaurants, financial institutions, a theater complex, and furniture showrooms, department or home improvement stores, as well as multiple-tenant retail uses as a support element to the Regional Shopping Center. These uses will include a wide range of primarily one-story buildings containing gift shops, boutiques, appliance, department and specialty retail, and service establishments. Occasional two-story structures may be included, as well as service facilities such as an automobile service station.
- **Planning Area 8:** Corporate Office/Health Club uses will be in an area totaling 30.0 acres. Planning Area 8 will consist of freestanding, garden and corporate offices. A health club/spa is planned in the southern area of Planning Area 8 and will include such uses as racquet ball courts, a gymnasium, tennis and basketball courts, a swimming pool, a jogging track, and related retail uses such as eating establishments, sports clothing, sporting goods, and vitamin sales. Several support uses such as restaurants, barber and beauty shops, interior decorator showrooms, blueprinting, and pharmacies may be included in the office areas. The tallest structures in Canyon Springs will be concentrated in this Planning Area, away from residential uses and the Edgemont Community to the South.
- **Planning Area 9:** This area contains 17.2 acres. A Professional Office area will be developed and will consist of freestanding and garden office complexes. This planning area will provide a campus-like environment of offices primarily oriented to service and professional pursuits with ancillary and support uses such as restaurants, barber and beauty shops, interior decorators showrooms, mimeographing and blueprint services, and pharmacies.
- **Planning Area 10:** Planning Area 10 contains 23.7 acres. The Medical Campus area will consist of freestanding and garden office complexes, primarily two to four stories in height. This planning area is intended to provide a campus-like environment of offices primarily oriented to service, medical, and professional pursuits with ancillary and support uses such as restaurants, barber and beauty shops, interior decorators showrooms, mimeographing and blueprint services, and pharmacies. Additionally, a 3-acre stormwater detention basin is located in this planning area on the north side of Eucalyptus Avenue. Alternative 1 proposes to build out the Project area with land uses consistent with the uses specified in each of the Planning Areas. Under this alternative, it is assumed that the height and size of the proposed new buildings will be consistent with the



development standards allowed for Planning Areas 7 through 10 in the Canyon Springs Business Park Specific Plan.

### **Aesthetics**

As discussed in Section 4.1, Aesthetics, the Project will have less than significant impacts associated with scenic vistas from Sycamore Canyon Wilderness Park, viewpoints and trails within Box Springs Mountain Reserve, and SR-60, and as such, the Project will not substantially obstruct or interrupt existing views to identified major scenic resources.

The nearest designated state scenic highway by Caltrans is I-215 located approximately 11 miles south of the Project site. The Project site is not visible from the designated portion of I-215 (Caltrans 2008). The Project site is vacant and does not support historic buildings or rock outcroppings. Therefore, the Project will not substantially damage scenic resources within a state scenic highway.

Impacts to visual character will also be less than significant with implementation of the Project. Viewers along perimeter streets and from surrounding properties will experience views of a developed hospital campus instead of the existing vacant site. The Specific Plan will identify design guidelines and development standards for the proposed buildings. With implementation of the design guidelines, the buildings' mass and scale will be controlled and all architectural materials will be of high quality. The Specific Plan's landscaping guidelines will also ensure that development of the Project is compatible with the surrounding developed areas.

In addition, the Project will not have any significant impacts from lighting or glare. The Project site is located in a developed area with existing sources of nighttime lighting. Currently there are sources of nighttime light and glare from the existing office, commercial uses, big box retail, and residential uses, as well as from street lights. Although the Project will increase lighting on the Project site compared to current conditions, the Specific Plan outlines minimum and maximum light intensities for the Project area and establishes design guidelines for the installation of lights. Pursuant to the development standards and design guidelines, pole lighting will be directed, oriented, and shielded to prevent light from shining onto the adjacent properties. Additionally, a visual buffer will be provided by landscaping along the perimeter of the Project site. Therefore, the lighting from the Project will not result in substantial light or glare that will adversely affect nighttime views in the surrounding area.

Under Alternative 1, the Project site will be developed with buildings that are consistent with the design guidelines and development standards of the Canyon Springs Business Park Specific Plan. This alternative will not include implementation of the design guidelines and development standards that are included as part of the Project; therefore, development of the Project area will be less controlled and impacts to scenic resources and visual quality will be

more impactful than under the Project. As such, overall, impacts to aesthetics will be greater under Alternative 1 than under the Project.

### **Agriculture and Forestry Resources**

The Project site is designated “Urban and Built-up Land” by the California DOC Farmland Mapping and Monitoring Program and as depicted in Figure OS-2 of the City’s General Plan 2025. Since the Project site is not located on any Farmland designations, no conversion of Prime Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to non-agricultural use will occur as a result of developing the Project. In addition, the City’s Land Use Zoning Map and General Plan Land Use Map indicate that no portion of the Project site is located within an area that is zoned for agricultural use (City of Riverside 2013). The Project site is located within commercial and/or office zones. According to the DOC’s Williamson Act Map (DOC 2016) and as depicted in Figure OS-3, Williamson Act Preserves in the City’s General Plan 2025 Open Space and Conservation Element, there are no Williamson Act contracts on the Project site (City of Riverside 2012a). Since the Project is not an agricultural land use and is not under a Williamson Act contract, no impacts to an agricultural use or Williamson Act contract will occur with the Project.

No forest land, timberland, or Timberland Production areas (as defined in the Public Resources Codes 12220(g) and 4526 or Government Code 51104(g)) are located within or adjacent to the Project site (City of Riverside 2012a). Therefore, the Project will not conflict with existing zoning for forest land, timberland, or Timberland Production areas, or result in the loss or conversion of forest lands to non-forest uses, as none exist. The Project site is currently vacant and undeveloped and contains no forest land. Therefore, implementation of the Project will not result in the loss of forest land or conversion of forest land to non-forest use.

Under Alternative 1, the Project site will be developed with the uses allowed under the Canyon Springs Business Park Specific Plan, which includes commercial and office uses. As described above, the Project site does not have any designated agricultural use, timberland production areas and no Williamson Act preserves; therefore, Alternative 1 will have no impacts with regard to agriculture and forestry resources. As such, the impacts of developing Alternative 1 will be the same as developing the Project.

### **Air Quality**

As discussed in Section 4.2, Air Quality, the daily construction emissions will not exceed the SCAQMD’s significance thresholds for VOC, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub> during construction of the Project in any of the construction years. The Project, however, will exceed the daily construction emissions threshold for NO<sub>x</sub>. With implementation of MM-AQ-1, which requires improved off-road equipment engines, NO<sub>x</sub> emissions will be reduced below the SCAQMD



significance threshold, thus resulting in a less than significant air quality impact from construction emissions.

The Project's operational emissions will not exceed the SCAQMD's significance threshold for SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>. The Project, however, will exceed operational emissions thresholds for VOC, NO<sub>x</sub>, and CO, even with implementation of MM-AQ-2 through MM-AQ-6, and therefore, the Project's operational emissions will remain significant and unavoidable.

The LST analysis shows that the Project construction and operational emissions will not exceed the applicable LSTs for NO<sub>2</sub>, CO, PM<sub>10</sub>, or PM<sub>2.5</sub>. As such, this impact is less than significant.

The Project will not result in on-road traffic volumes at affected intersections that result in a CO hotspot. This impact is less than significant.

The cancer risk and non-cancer risk at the nearby residents, workers, and school children will not exceed the SCAQMD threshold of 10 in 1 million or chronic hazard index of 1.0, respectively, and impacts are less than significant.

In summary, the Project will result in significant and unavoidable impacts related to an obstruction of the implementation of the applicable air quality plan and long-term operational impacts. Accordingly, the Project will also result in significant and unavoidable cumulatively considerable impacts and a Statement of Overriding Considerations will be required should the City choose to approve the Project.

Alternative 1 will still result in air emissions that will be generated during construction and operation. Construction of this alternative will still require grading, site preparation, and construction of facilities, all of which generate air emissions. Alternative 1 will allow for the development of multistory commercial and office buildings in Planning Areas 7, 8, 9, and 10. This development will be more intense than the development allowed under the Project. Therefore, more vehicle trips will be generated by Alternative 1. As such, air quality impacts under Alternative 1 will be greater, and likely significant and unavoidable, due to the number of vehicle trips and lack of feasible mitigation to reduce emissions from those trips. Impacts to air quality under Alternative 1 are considered slightly more compared to those under the Project and will still be significant and unavoidable. Alternative 1 will also require a Statement of Overriding Considerations.

## **Biological Resources**

As discussed in Section 4.3, Biological Resources, the Project site supports one drainage feature, Drainage 1, which is an unnamed, ephemeral drainage feature that flows north to south across a portion of the Project site. Drainage 1 exhibits a surface hydrologic connection to downstream

waters of the United States via the City's underground storm drain system and qualifies as waters of the United States, which falls under the jurisdiction of the ACOE. Approximately 0.02 acre of ACOE jurisdiction is located within the boundaries of Site B. With the incorporation of mitigation measure MM-BIO-1, outlined in Section 4.3.6, impacts occurring within ACOE and RWQCB jurisdictional areas are considered less than significant with mitigation incorporated. Drainage 1 is considered a CDFW streambed with approximately 0.12 acre of jurisdictional streambed located within the boundaries of Site B. However, with implementation of the mitigation measures outlined in Section 4.3.6, the Project will comply with all the regulatory permits and associated conditions related to jurisdictional drainage features, and impacts are considered less than significant. No jurisdictional wetland features were found to occur within Site B, so impacts related to wetlands are considered less than significant.

The Project site is located within the MSHCP Area, but is not located in the Criteria Area and does not have conservation requirements (County of Riverside 2003). The Project site is, however, subject to consistency review with MSHCP Sections. The MSHCP consistency review found that the Project site is located within a burrowing owl survey area as defined in Section 6.3.2 of the MSHCP. As such, to meet requirements in the MSHCP, a habitat assessment for burrowing owls was conducted on September 16, 2015, to identify suitable habitat for burrowing owl. No burrowing owls or potential signs of burrowing owl (e.g., owl pellets, prints, molting feathers, abundant insect remains) were detected during the burrowing owl habitat assessment. However, after conducting the habitat assessment, it was determined that the Project site and undeveloped parcels within a 500-foot buffer provide suitable foraging habitat and suitable nesting habitat where burrowing owl burrows were noted, particularly on the perimeter of the Project site, fence lines, dirt mounds, and berms lining roadways. A concrete drainage on the southern portion of the northeast section of Site B was also found to be suitable habitat for burrowing owl. With the incorporation of mitigation measures MM-BIO-2 and MM-BIO-3, outlined in Section 4.3.6, the Project will be compliant with MSHCP Section 6.3.2, and impacts are less than significant with mitigation incorporated.

In addition to being located within a burrowing owl survey area, the Project site is located in the plan area of the SKR HCP (Riverside County Habitat Conservation Agency 1990). However, the Project site is outside of the SKR Management Areas of the HCP. As such, impacts related to SKR are considered to be less than significant.

In summary, the Project will be fully compliant with the MSHCP and fully covered for potential impacts to covered species. Impacts are considered less than significant with mitigation incorporated. Under Alternative 1, construction of commercial and office facilities will occur, and depending on the location of these facilities on the Project site, similar mitigation measures will be required.



Alternative 1 allows for the development of multistory commercial and office buildings in Areas 7, 8, 9, and 10, which is more intense than the development allowed under the Project. As such, overall, impacts to biological resources will be slightly more under Alternative 1 than those created by the Project.

### **Cultural Resources**

As discussed in Section 4.4, Cultural Resources, there are 77 cultural resources previously recorded within a 1-mile radius of the Project site; however, none of the resources are located within the Project APE (Appendix I). Initially, the project APE was defined as the 50.85-acre development area of the Project. Subsequent Project planning discussions determined that for the purposes of the cultural resources study, the APE will include the entirety of the Canyon Springs Business Park Specific Plan area, as the Specific Plan requires an amendment for the Project. The Project site is located within a low archaeological sensitivity area and no archaeological resources were found within either the initial Project area or the expanded APE during the time of an intensive pedestrian field survey. With implementation of mitigation measures MM-CUL-1 through MM-CUL-4, outlined in Section 4.4.6, impacts associated with the potential discovery of unknown resources will be mitigated to a level of less than significant.

The Project site is located within an area of High Paleontological Sensitivity to encounter paleontological resources at depths of 4 feet or greater below the ground's surface; however, with the implementation of mitigation measures MM-CUL-1 through MM-CUL-4, outlined in Section 4.4.6, potential impacts to paleontological resources will be reduced to a less than significant level.

Alternative 1 will allow for the development of multistory commercial and office buildings, along with surface parking lots and landscaping, in Areas 7, 8, 9, and 10. Under this alternative, the same amounts of grading and ground disturbance will occur, and site plans and building scale will be similar than those developed under the Project. Therefore, impacts to cultural resources will be the same under Alternative 1 when compared to the Project.

### **Geology and Soils**

The potential for fault rupture on the Project site is low because the Project site is not within an Alquist-Priolo Earthquake Fault Zone or a Fault Hazard Zone (DOC 2015b), and there is no evidence of active faulting on, or adjacent to, the Project site.

The Project site is within a low liquefaction zone, and the potential for liquefaction is low due to the generally dense nature of the native soils underlying the site. The Project area is also located on land identified as having a 0% to 10% slope, which is the lowest of four potential categories susceptible to landslides. The Project site has been previously graded and leveled, and there are

no known areas prone to landslides on site. The potential for landslides or lateral spreading is very low due to the relatively flat-lying topography of the Project site.

The Project site contains silty and clayey sands and may have expansive properties; however, Figure PS-3 of the City's General Plan 2025 indicates that the Project site is not located in an area with soils that have a high shrink-swell potential, thereby substantially reducing the potential for adverse impacts related to being located on expansive soils (City of Riverside 2012b). Additionally, a majority of the area surrounding the Project site has been developed with multistory buildings. New structures being proposed by the Project will be designed to CBC standards to anticipate impacts associated with liquefaction, expansive soils, and other seismic events. Furthermore, the OSHPD Facilities Development Division will review and approve the plans and specifications of the proposed hospital building, MOB, skilled nursing facility, and related hospital facilities as required by and to ensure compliance with the provisions of the CBC (Title 24, California Code of Regulations).

Project construction activities such as excavation and grading may have the potential to cause soil erosion or the loss of topsoil. Short-term erosion effects during the construction phase of the Project will be prevented through required implementation of a SWPPP through compliance with the NPDES program and the incorporation of BMPs intended to reduce soil erosion. The SWPPP is required by the City during plan review and approval of project improvement plans; therefore, with implementation of an approved SWPPP, impacts resulting from erosion during construction operations will be less than significant.

Alternative 1 allows for the development of multistory commercial and office buildings in Areas 7, 8, 9, and 10. This development will be more intense than the development allowed under the Project and could subject more people to seismic or other geotechnical events. However, similar to the Project, structures constructed under this alternative will be designed to CBC standards that will anticipate impacts associated with liquefaction, expansive soils, and other seismic events. Thus, impacts associated with Alternative 1 will be the same as that of the Project.

### **Greenhouse Gas Emissions**

As discussed in Section 4.5, Greenhouse Gas Emissions, construction-related GHG emissions impacts associated with the Project will be short-term in nature, lasting only the duration of the of the construction period, and will not represent a long-term source of GHG emissions. With the implementation of mitigation measures MM-AQ-1 through MM-AQ-6, the Project's GHG operational emissions will be reduced by approximately 28.38% when compared to the baseline scenario. The 28.38% reduction is consistent with the target reduction percentage of 15% below 2010 levels based on the City of Riverside's CAP analysis supporting AB 32 (City of Riverside 2016). Therefore, impacts related to GHG emissions are considered less than significant with

mitigation incorporated. The Project will also be consistent with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs.

Similar to the Project, construction of facilities under Alternative 1 will result in construction-related GHG emissions, and the emissions will be short-term in nature, and thereby, will not represent a long-term source of GHG emissions. In addition, Alternative 1 will be required to implement similar mitigation measures (MM-AQ-1 through MM-AQ-6) that will reduce GHG operational emissions to a level that is consistent with the target reduction percentage in the City of Riverside's CAP. The commercial and office uses allowed under Alternative 1 will be more intense than the development allowed under the Project; therefore, due to the increase in size of the development, GHG emissions impacts under Alternative 1 will be more when compared to the Project.

### **Hazards and Hazardous Materials**

As discussed in Section 4.6, Hazards and Hazardous Materials, the Project site is located approximately 1.6 miles north of March ARB, within the March ARB land use compatibility plan area. The March ARB identifies APZs; however, the Project site is located outside of all designated APZs (March ARB 2005; Mead & Hunt 2014). Therefore, no restrictions related to APZs apply to the Project.

The Project site is located within Zone D – Flight Corridor Buffer, as depicted in the March ARB/Inland Port ALUCP (Mead & Hunt 2014). The Project uses are compatible with the uses described in Zone D. The Project Applicant will be required to submit plans to the FAA if the notification criteria in Part 77 of the Federal Aviation Regulations are met. The FAA will ensure compliance with the FAA standards. Furthermore, the Project will go through review by the City of Riverside, March ARB, Riverside County ALUC, and Caltrans Division of Aeronautics (for the helistop) for approval. With the implementation of mitigation measures MM-HAZ-1 through MM-HAZ-3, outlined in Section 4.6.6, all potential impacts related to people working or residing within close proximity of a public airport will be reduced to a level that is less than significant. As such, safety hazard impacts related to the Project site being located in close proximity to a public airport are considered less than significant with mitigation incorporated.

Under Alternative 1, the same potential hazards will exist and similar mitigation measures will be necessary to ensure that an FAA Form 7460-1 is submitted to the FAA to ensure compliance with FAA standards and that the March ARB, Riverside County ALUC, and Caltrans Division of Aeronautics processes for review and approval are followed. The development allowed under Alternative 1 will include development of more multistory commercial and office buildings in Planning Areas 7, 8, 9, and 10 in comparison to the Project. As such, this development will be slightly more intense than the development allowed under the Project. Accordingly, there will be an increased number of visitors, customers, and employees present on the Project site as



compared to the Project. Therefore, impacts related to hazards and hazardous materials under Alternative 1 will be slightly increased when compared to the Project.

### **Hydrology and Water Quality**

As discussed in Section 4.7, Hydrology and Water Quality, the Project complies with all applicable federal, state, and local rules and regulations regarding water quality and hydrology. The Project will implement a WQMP that includes structural and nonstructural BMPs. In addition, BMPs implemented as part of the SWPPP will further reduce potential impacts associated with violations of water quality standards or Waste Discharge Requirements to a less than significant level.

The Project will not substantially deplete groundwater supplies or interfere with groundwater recharge, and will have less than significant impacts associated with substantial erosion or siltation on or off the Project site. In addition, with design features, water quality BMPs, and required compliance with City requirements, impacts to existing or planned stormwater drainage systems and impacts associated with additional sources of polluted runoff, drainage patterns, and surface runoff are considered less than significant. Overall, impacts related to hydrology and water quality were found to be less than significant through compliance with existing regulations and as a result of the Project design features.

Alternative 1 will also be required to comply with all applicable federal, state, and local regulations regarding water quality and hydrology. The increase in the development potential will not remove these requirements. Similar to the Project, a SWPPP will be required, and BMPs that are similar to those required for the Project will be implemented to reduce potential impacts. Therefore, Alternative 1 will have the same impacts on water quality and hydrology when compared to the Project.

### **Land Use and Planning**

As discussed in Section 4.8, Land Use and Planning, the Project will include an amendment to the City's General Plan 2025 to designate the Specific Plan area as the Canyon Springs Healthcare Campus Specific Plan and replace the current land use designations. The Project also will include a rezoning of the Canyon Springs Business Park area to be zoned as the Canyon Springs Healthcare Campus Specific Plan and revise the current City Zoning Map. The proposed Specific Plan land use designation and zoning will allow for implementation of the Specific Plan and associated development standards, which are necessary to meet the increasing demand for healthcare campus services and amenities. The Specific Plan will streamline development by outlining existing uses and future uses and laying out a cohesive set of guidelines that will provide a clear understanding of how growth and development will occur. With adoption of the proposed General Plan 2025 and Zoning Code amendments, implementation of the Project will

not conflict with an adopted plan, policy, or regulation established to avoid environmental effects. In addition, with the implementation of mitigation measures outlined in Section 4.8.6 (MM-AQ-1 through MM-AQ-6; MM-BIO-2 and MM-BIO-3; MM-CUL-2 and MM-CUL-4; MM-NOI-1; MM-TRAFI-1 through MM-TRAF-14; and MM-UTL-2 and MM-UTL-3), the Project will not conflict with the MSCHP and will not result in any other significant land use impacts.

Under Alternative 1, the City General Plan 2025 will not be amended, and the Canyon Springs Business Park Specific Plan will remain. In addition, Alternative 1 will not require the rezoning of the Project site or amendment of the City Zoning Map. The Canyon Springs Business Park Specific Plan will be implemented and all of its associated development standards will remain. Therefore, Alternative 1 will have greater land use impacts when compared to the Project.

### **Mineral Resources**

The Project site lies within MRZ-3, as depicted on Figure OS-1 of the City's General Plan 2025 (City of Riverside 2012a), indicating that the area contains known or inferred mineral occurrences of undetermined mineral resources significance. Given that the Project site has been previously disturbed by rough grading and is surrounded by existing development (e.g., commercial shopping center, MOB, office buildings, residential development, and a school) that are incompatible with mining operations, it is unlikely that an economically viable mining operation could take place at the Project site. Therefore, the Project will not result in the loss of a known mineral resource.

Alternative 1 will allow for the development of commercial and office uses on the Project site. As discussed above, the surrounding land uses are incompatible with mining operations, and mining operations are unlikely to take place at the Project site because they are not economically viable. Therefore, impacts to mineral resources will be the same under Alternative 1 as the Project.

### **Noise**

As discussed in Section 4.9, Noise, construction noise is exempt under the Riverside Municipal Code, Section 7.35.20 (Exemptions; City of Riverside 2007a). The Project will contribute operational stationary-source noise level increases at nearby receiver locations. This will result in potentially significant increases in ambient noise levels in the Project vicinity. As such, with the incorporation of mitigation measure MM-NOI-1, as outlined in Section 4.9.6, the Project's operational stationary-source noise will not result in a substantial temporary/periodic or permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project.

Once the Project is operational, the Project's contribution to existing noise levels will be less than significant for all of the study area roadway segments. As such, the Project's off-site traffic noise level will have a less than significant impact on the study area roadway segments for existing conditions and for General Plan 2026 Buildout conditions.

Alternative 1 will allow multistory commercial and office buildings to be constructed on the Project site, which will draw new customers, patrons, visitors, and employees to the area. With the development of these facilities, new noise sources will be created, including additional traffic, mechanical equipment, and noise associated with parking facilities. These noise sources would likely be similar to the Project's noise sources, and will require similar mitigation (MM-NOI-1). However, since the Project includes additional noise sources that Alternative 1 would not, such as helicopters and emergency service sirens, the Project is anticipated to have slightly more operational noise impacts than Alternative 1. Therefore, development under Alternative 1 will have reduced noise impacts when compared to the Project.

### **Population and Housing**

The Project involves development of a hospital, MOBs, central energy plant, parking structures, hospital-related facilities, senior housing facility, independent living facility, assisted living facility, skilled nursing facility, and associated infrastructure improvements. Although the proposed senior housing facility, assisted living facility, and independent living facility will provide housing for residents, they do not generate a substantial population growth as these residents will generally move from the Riverside and Moreno Valley communities to the housing facility at the Project site to take advantage of the amenities and resources provided for that specific population. The Project will enhance the jobs/housing balance of the City by providing up to approximately 2,450 new permanent jobs at full buildout. Therefore, the Project will not generate substantial population growth. Existing infrastructure systems are adequate to serve the Project, and therefore, no improvements to infrastructure are needed to serve the Project. Consequently, the Project will provide hospital EMS for community disaster preparedness, medical check-ups and services at the MOBs, and resources and services for those with medical needs at the independent living facility, assisted living facility, and skilled nursing facility, within the Riverside and Moreno Valley communities and Inland Empire region. The Project site does not currently support any housing; therefore, substantial numbers of existing housing or people will not be displaced and the construction of replacement housing elsewhere is not necessary as a result of developing the Project. No significant impacts related to population growth will result from the Project.

Alternative 1 will allow for the development of multistory office and commercial buildings on the Project site. The implementation of Alternative 1 will introduce increased levels of customers, patrons, employees, and structures to the currently vacant Project site, and will generate a large number of new permanent jobs at full buildout. This will generate population



growth by drawing new employees to an area that needs housing. However, Alternative 1 does not contain new residential uses like the Project (for senior housing, assisted living, etc.). The Project will introduce permanent and temporary residents to the area along with a number of new permanent jobs (approximately 2,450). Therefore, under Alternative 1, impacts to population/housing will be slightly less than impacts created by the Project.

### **Public Services**

As discussed in the Initial Study (Appendix A to the Draft EIR) and Section 4.10, Public Services of the Draft EIR, the Project will create an increased demand for emergency medical, fire protection, fire prevention, and rescue fire services that could be manifested by an increased number of emergency and public service calls. Implementation of the Project will introduce permanent and temporary residents, staff, and patients to the area and entails the construction and operation of new structures on a currently vacant site. Development of the Project site was previously considered and analyzed as part of the City's General Plan 2025 Project (2007) and the Canyon Springs Business Park Specific Plan Project, and buildout of the City was considered in the General Plan 2025 and the General Plan 2025 Final Program EIR. The Final Program EIR disclosed a need for four additional fire stations 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 (City of Riverside 2007b). Two of the four fire stations identified as necessary to "maintain current levels of services and improve response times" in the General Plan 2025 Final Program EIR have since been constructed by the City through the use of the City's General Fund. The fire services analysis found that the Project will be designed in compliance with the current building code and Riverside Fire Department requirements. The Project will meet safety equipment standards and provide adequate emergency access, fire hydrants, water flows, and fire sprinklers. These systems will aid in the initial response to fire events occurring in proposed structures. Therefore, through adherence to General Plan policies, compliance with current building code and Riverside Fire Department requirements, in accordance with the conclusions of the General Plan 2025 Final Program EIR, new or physically altered government facilities will not be required to accommodate the Project. As such, the Project's impacts to fire protection services are considered less than significant.

The Project area is located in the East Neighborhood Policing Center serviced by Patrol for uniform presence (Lincoln Police Station) and the East Neighborhood Policing team (Fairmount Station) for any potential follow-ups of crimes or incidents. The current patrol staffing around the Project site is typically two to four officers during school hours. Project components, such as the senior housing and independent living, assisted living, and skilled nursing facility would generate housing for the "age-restricted group" and those needing medical assistant living; however, these groups of people would likely come from the existing Riverside population, and

thus, would not substantially increase population in Riverside requiring the need for additional police services. In the event of medical emergencies, police officers along with emergency medical technicians could transport those individual(s) to the hospital on site. Additionally, the Project would result in approximately 2,450 new permanent jobs on the Project site; however, the Project is not expected to substantially increase emergency calls to the City's Police Department as typical land uses requiring more police services generally include commercial and industrial uses, and residential development. Therefore, the Project site can be adequately served by existing police services in the City. Furthermore, the Project will not result in new facilities that would be needed to serve the Project.

The Project site is located within the Moreno Valley Unified School District. There is one school within 0.25 mile of the Project site. Edgemont Elementary School is located immediately adjacent to the southern boundary of Site C. The proposed senior housing will not result in a substantial increase in demand for schools as the proposed use would be geared towards the aging population; thus, it will not require educational facilities or services. The other Project components do not involve residential type uses, and therefore, will not result in an increased demand for schools.

The Project will not result in a substantial increase in the demand for parks. Pursuant to the Riverside Municipal Code, applicable fees will be paid to mitigate any potential impacts to park development and open space needs. No other public facilities or services other than police and fire protection are anticipated to serve the Project. Implementation of the Project would provide EMS, medical care, and senior care within the Riverside community and Inland Empire region. As such, the overall impacts of the Project on public services were found to be less than significant.

The implementation of Alternative 1 will introduce increased levels of customers, employees, patrons, and structures to the currently vacant Project site, but will not introduce permanent and temporary residents to the site. The development permitted under Alternative 1 is more intense than the development allowed under the Project; however, the emergency access and safety equipment requirements required to handle the commercial and office development allowed under Alternative 1 will be less than the requirements for the residential development allowed under the Project. Overall, due to the lack of permanent residents under Alternative 1, this alternative will have reduced impacts to public services when compared to the Project.

## **Recreation**

The Project includes the development of a hospital, MOBs, central energy plant, parking structures, hospital-related facilities, senior housing facility, independent living facility, assisted living facility, skilled nursing facility, and associated infrastructure improvements. The proposed senior housing and assisted living facility are not anticipated to substantially increase the use of

existing parks or recreational facilities. The other Project components will not include residential-type uses or businesses that will increase the use of existing parks or recreational facilities. Thus, no deterioration of existing facilities will occur as a result of developing the Project. Nonetheless, the Riverside Municipal Code requires applicable fees to be paid to mitigate the potential impact to park development and open space needs generated by the Project. Furthermore, the Project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, less than significant impacts to recreational facilities will occur as a result of developing the Project.

The implementation of Alternative 1 will entail the introduction of increased levels of customers, employees, patrons, and structures to the currently vacant Project site, but will not entail the introduction of permanent and temporary residents. Overall, due to the lack of permanent residents under Alternative 1, this alternative will have reduced impacts to recreation when compared to the Project.

### **Transportation/Traffic**

As discussed in Section 4.11, Transportation/Traffic, under Existing with Project Conditions, the Project causes a significant impact at the intersection of Valley Springs Parkway/Eucalyptus Avenue. With the implementation of mitigation measure MM-TRAF-1, as identified in Section 4.11.7, the Project's impacts will be reduced to less than significant levels.

Under Cumulative with Project conditions, the Project will result in significant impacts at the following intersections: I-215 southbound ramps/Eucalyptus Avenue, Valley Springs Parkway/Eucalyptus Avenue, Day Street/Cottonwood Avenue, Day Street/Bay Avenue, Day Street/Alessandro Boulevard, and Memorial Way/Towngate Drive. With the implementation of mitigation measures MM-TRAF-1 through MM-TRAF-8, as identified in Section 4.11.7, the Project's impacts at these intersections will be reduced to less than significant levels.

The Project also contributes to unacceptable LOS on the I-215 southbound freeway mainline, south of Eucalyptus Avenue under Cumulative with Project conditions. The operation of the highway is projected to remain at unacceptable levels due to a lack of feasible mitigation. Thus, the cumulative traffic increases are a significant cumulative impact, and the Project's incremental contribution to the increases is cumulatively considerable. As such, a Statement of Overriding Considerations will be required should the City choose to approve the Project.

In General Plan Buildout with Project Conditions, the Project will result in significant impacts at the following intersections: I-215 southbound ramps/Eucalyptus Avenue, Valley Springs Parkway/Eucalyptus Avenue, Day Street/Eucalyptus Avenue, Day Street/Cottonwood Avenue, Day Street/Bay Avenue, Day Street/Alessandro Boulevard, and Memorial Way/Towngate Drive. With the implementation of mitigation measures MM-TRAF-1 through MM-TRAF-12, as



identified in Section 4.11.7, the Project's impacts at these intersections will be reduced to less than significant levels.

The Project also contributes to unacceptable LOS on the I-215 southbound freeway mainline, south of Eucalyptus Avenue and between the off-ramp and on-ramp on Eucalyptus Avenue in General Plan with Project conditions. The operation of the highway is projected to remain at unacceptable levels due to a lack of feasible mitigation. Thus, the cumulative traffic increases are a significant cumulative impact, and the Project's incremental contribution to the increases is cumulatively considerable. As such, a Statement of Overriding Considerations will be required should the City choose to approve the Project.

The Project is located within a sector of March ARB Class C airspace, which is different from the zones contained in the Land Use Compatibility Plan Policy documentation. However, the Project uses are permitted within the March ARB/Inland Port ALUCP (Mead & Hunt 2014); the required regulatory actions will be taken; and mitigation measures MM-TRAF-13 and MM-TRAF-14, as identified in Section 4.11.7, will be implemented. Therefore, impacts are less than significant.

Under Alternative 1, the development of commercial and office land uses permitted in Areas 7, 8, 9, and 10 will be more intense than the development of healthcare and residential uses allowed under the Project. Therefore, the amount of traffic coming and going from the Specific Plan area will be increased in proportion with the development allowed under Alternative 1. There will also be an increase in the number of employees, patrons, customers, and visitors the Specific Plan area could hold, which will lead to an increase in traffic. Alternative 1 will also contribute to cumulative traffic impacts that result in deficient freeway segments in the Congestion Management Plan, and similar mitigation measures (MM-TRAF-1 through MM-TRAF-14) will be required. Therefore, impacts to transportation/traffic under Alternative 1 are considered slightly increased when compared to transportation/traffic impacts created by the Project and will be significant and unavoidable. Alternative 1 will require a Statement of Overriding Considerations.

### **Utilities and Service Systems**

As discussed in Section 4.12, Utilities and Service Systems, the estimated demand for the Project exceeds the projected demand accounted for in the 2010 UWMP, and will therefore, exceed the projected demand. However, with the implementation of Project elements that can reduce impacts, as well as the mitigation measures outlined in Section 4.12.6 (MM-UTIL-1 through MM-UTIL-3), impacts to water consumption will be minimized to a level that is less than significant.

The construction of all phases of the Project will generate construction waste that will result in an increased demand for solid waste collection and disposal during construction. In addition, during operation, the solid waste quantities generated by the Project will increase, and adequate space will be needed to allow for the collection and storage of recyclable materials. With required recycling, the amount of solid waste generated and disposed of in nearby landfills during construction and operation of the Project will be within the permitted landfill capacities. The implementation of mitigation measures MM-UTIL-1 through MM-UTIL-3, outlined in Section 4.12.6, will ensure that adequate space for on-site recycling is allotted. Therefore, the Project's potential impacts associated with solid waste capacity are considered less than significant with mitigation incorporated.

Under Alternative 1, the development permitted in Areas 7, 8, 9, and 10 will include commercial and office land uses, which are more intense than the healthcare and residential development allowed under the Project. During construction, the amount of solid waste generated by Alternative 1 will be increased, since there will be more square footage of building constructed. Additionally, since Alternative 1 will have more square footage and more intense allowable uses, the amount of wastewater and solid waste generated, as well as water used during operation, will also be more. Therefore, Alternative 1 will have increased impacts on utilities and service systems when compared to the Project.

### **Energy Conservation**

As discussed in Section 4.13, Energy Conservation, the Project will increase the demand for electricity and natural gas at the Project site, increase the consumption of gasoline in the region during construction and operation, and place additional demands on local and regional energy supplies. However, with the implementation of mitigation measures (MM-AQ-2, MM-AQ-3, and MM-AQ-4) outlined in Section 4.13.6, the Project will not contribute to the inefficient or wasteful consumption of electricity, natural gas, or petroleum, and impacts are considered less than significant. Also, the mitigation measures will ensure that the Project reduces energy consumption beyond what is required by the state and will also ensure that the Project is consistent with existing energy standards and regulations. Therefore, impacts related to a conflict with existing energy standards and regulations are considered less than significant with mitigation incorporated. In addition, the Project includes TDM strategies in the Specific Plan that will help achieve the required vehicle reduction targets from the City's TDM Regulations. Furthermore, the implementation of mitigation measures (MM-AQ-2, MM-AQ-3, and MM-AQ-4) outlined in Section 4.13.6 will reduce vehicle miles traveled and petroleum consumption, as pedestrian and bicycle connections will be provided to surrounding areas consistent with the City's General Plan. Therefore, impacts related to energy supplies and capacity are considered less than significant.

Alternative 1 will also result in an increase in the amount of electricity, natural gas, and petroleum used during construction and operation when compared to the Project. Since

Alternative 1 will increase the development potential allowed and generate even more traffic without the TDM strategies included in the Project, the amount of energy required will be more than the amount of energy required under the Project. Therefore, Alternative 1 will have increased impacts on energy consumption when compared to the Project.

### Relationship to Project Objectives and Feasibility

Under Alternative 1, the Project site will be developed with the uses allowed under the current Canyon Springs Business Park Specific Plan, which includes Commercial, Office, and MOB uses. This alternative will result in new construction and the development intensity allowed under this alternative will be more than that allowed under the Project. Table 6-3 provides a list of the Project objectives and whether or not Alternative 1 meets each objective.

**Table 6-3**  
**Summary of Alternative 1's Success at Meeting Project Objectives**

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



**Table 6-3**  
**Summary of Alternative 1's Success at Meeting Project Objectives**

Project Objective	Alternative Meets Objective?
	development of a hospital could be designed or constructed to help serve evolving healthcare demands for the City of Riverside and residents of the region.

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

### **6.6.3 Alternative 2 – Alternative Site Location in City of Moreno Valley**

The Project will construct the healthcare campus on the approximately 50.85-acre Project site located within the Sycamore Canyon/Canyon Springs Neighborhood of Riverside, California. In accordance with State CEQA Guidelines, Section 15126.6(f)(2), the City attempted to identify feasible alternative off-site locations within the Project area that could be available for the proposed healthcare campus development. Per State CEQA Guidelines, Section 15126.6(f)(2)(A), the key question and first step in analysis of the off-site location is whether any of the significant effects of the Project will be avoided or substantially lessened by moving the Project to another location. After a review of 20 available open spaces of approximately 50 acres (similar to the Project site in size) around the City of Riverside, the City of Moreno Valley, and the area controlled by the March Joint Powers Authority, a site where a hospital could be located was identified in the City of Moreno Valley, as depicted in Figure 6-2.

Alternative 2 involves the construction of the proposed healthcare campus at the 54.22-acre site located north of SR-60 in the City of Moreno Valley (Assessor's Parcel Numbers 291-100-055 and 291-100-054), approximately 0.6 mile northeast of the Project site. This site is currently vacant and rough graded. The Alternative 2 site is located approximately 0.6 mile closer to Box Springs Mountain Reserve than the Project site. The Alternative 2 site is surrounded by single-family residential development to the east, Box Springs Elementary School and more single-family residential development to the north, a commercial shopping center to the west, and SR-60 to the south. The site is currently owned by the first National Bank of

Iowa City and the MW Investment Company and is under the land use jurisdiction of the City of Moreno Valley. The Alternative 2 site is currently designated Commercial under the City of Moreno Valley General Plan (City of Moreno Valley 2006a), and the site is zoned Community Commercial under the City of Moreno Valley Municipal Code (City of Moreno Valley 2017). Under Alternative 2, the Project Applicant will lease or purchase the land from the owners for construction of the Project, such as the hospital, MOBs, senior housing, independent living, assisted living, and skilled nursing facilities.

### **Aesthetics**

As discussed in Section 4.1, Aesthetics, the Project will have less than significant impacts associated with scenic vistas from Sycamore Canyon Wilderness Park, viewpoints and trails within Box Springs Mountain Reserve, and SR-60, and as such, the Project will not substantially obstruct or interrupt existing views to identified major scenic resources.

The nearest designated state scenic highway by Caltrans is I-215 located approximately 11 miles south of the Project site (Caltrans 2008). The Project site is not visible from the designated portion of I-215. The Project site is vacant and does not support historic buildings or rock outcroppings. Therefore, the Project will not substantially damage scenic resources within a state scenic highway.

Impacts to visual character will also be less than significant with implementation of the Project. Viewers along perimeter streets and from surrounding properties will experience views of a developed hospital campus instead of the existing vacant site. The Specific Plan will identify design guidelines and development standards for the proposed buildings. With implementation of the design guidelines, the buildings' mass and scale will be controlled, and all architectural materials will be of high quality. The Specific Plan's landscaping guidelines will also ensure that development of the Project is compatible with the surrounding developed areas.

In addition, the Project will not have any significant impacts from lighting or glare. The Project site is located in a developed area with existing sources of nighttime lighting. Currently there are sources of nighttime light and glare from the existing office, commercial uses, big box retail, and residential uses, as well as from street lights. Although the Project will increase lighting on the Project site compared to current conditions, the Specific Plan outlines minimum and maximum light intensities for the Project area and establishes design guidelines for the installation of lights. Pursuant to the development standards and design guidelines, pole lighting will be directed, oriented, and shielded to prevent light from shining onto the adjacent properties. Additionally, a visual buffer will be provided by landscaping along the perimeter of the Project site. Therefore, the lighting from the Project will not result in substantial light or glare that will adversely affect nighttime views in the surrounding area.

Alternative 2 will be located approximately 0.6 mile northeast of the Project site along SR-60. The Alternative 2 site is located approximately 11.5 miles from the portion of I-215 that is identified in the California Scenic Highway System, and views to the Alternative 2 site from this segment of I-215 will be prevented by distance, as well as intervening development and terrain.

SR-60 is a state route designated by the City of Moreno Valley General Plan as a scenic route. According to Figure 5.11-1, Major Scenic Resources, of the City of Moreno Valley's General Plan Final Program EIR's Aesthetics Section, SR-60 is a scenic corridor that provides fleeting views of major scenic resources including the Badlands, the Foothills, Mount Russell & Foothills area, and Box Springs Mountains (City of Moreno Valley 2006b). Alternative 2 development will be situated north of SR-60 and near existing residential and commercial development within the area. As such, Alternative 2 development will potentially obstruct or interrupt views from SR-60 to the Box Springs Mountains (located north of SR-60). Therefore, development on the Alternative 2 site, located north of SR-60, will potentially obstruct or interrupt existing views of the terrain available to east- and west-bound motorists.

Development of the Alternative 2 site will be slightly more impactful to existing available views from the M Peak and segments of the M trail on the Box Springs Mountain Reserve. As viewed from Box Springs Mountain Reserve, development of the Alternative 2 site with a three- to five-story healthcare campus will be inconsistent with the existing urban character of the immediate surrounding area. Furthermore, proposed development on the Alternative 2 site will obstruct or interrupt available views from elevated vantage points in the reserve.

Therefore, impacts to aesthetics from development under Alternative 2 are considered to be more impactful than development under the Project because Alternative 2 development will result in greater adverse effects on existing views and visual character than the Project.

### **Agriculture and Forestry Resources**

The Project site is designated "Urban and Built-up Land" by the California DOC Farmland Mapping and Monitoring Program and as depicted in Figure OS-2 of the City's General Plan 2025. Since the Project site is not located on any Farmland designations, no conversion of Prime Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to non-agricultural use will occur as a result of developing the Project. In addition, the City's Land Use Zoning Map and General Plan Land Use Map indicate that no portion of the Project site is located within an area that is zoned for agricultural use (City of Riverside 2013). The Project site is located within commercial and/or office zones. According to the DOC's Williamson Act Map (DOC 2016) and as depicted in Figure OS-3, Williamson Act Preserves in the City's General Plan 2025 Open Space and Conservation Element, there are no Williamson Act contracts on the Project site (City of Riverside 2012a). Since the Project is not an agricultural land use and is not



under a Williamson Act contract, no impacts to an agricultural use or Williamson Act contract will occur with the Project.

No forest land, timberland, or Timberland Production areas (as defined in the Public Resources Codes 12220(g) and 4526 or Government Code 51104(g)) are located within or adjacent to the Project site. Therefore, the Project will not conflict with existing zoning for forest land, timberland, or Timberland Production areas, or result in the loss or conversion of forest lands to non-forest uses, as none exist. The Project site is currently vacant and undeveloped and contains no forest land. Therefore, implementation of the Project will not result in the loss of forest land or conversion of forest land to non-forest use.

The Alternative 2 site is also designated “Urban and Built-up Land” by the California DOC Farmland Mapping and Monitoring Program. Since the Alternative 2 site is not located on a site with any Farmland designations, no conversion of Prime Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to non-agricultural use will occur under Alternative 2. In addition, the Moreno Valley Land Use Zoning Map and General Plan Land Use Map indicate that no portion of the Project site is located within an area that is zoned for agricultural use (City of Moreno Valley 2006a), and the site is zoned for Community Commercial under the City of Moreno Valley Municipal Code (City of Moreno Valley 2017). There are also no Williamson Act or Timberland preserves on the Alternative 2 site. Since there are no impacts to Agriculture or Forestland under this alternative, the impacts of Alternative 2 as compared to the Project will be the same.

### **Air Quality**

As discussed in Section 4.2, Air Quality, the daily construction emissions will not exceed the SCAQMD’s significance thresholds for VOC, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub> during construction of the Project in any of the construction years. The Project, however, will exceed the daily construction emissions threshold for NO<sub>x</sub>. With implementation of MM-AQ-1, which requires off-road equipment engines that are Tier 3-certified or better by the California Air Resources Board, NO<sub>x</sub> emissions will be reduced below the SCAQMD significance threshold, thus resulting in a less than significant air quality impact from construction emissions.

The Project’s operational emissions will not exceed the SCAQMD’s significance threshold for SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>. The Project, however, will exceed operational emissions thresholds for VOC, NO<sub>x</sub>, and CO, even with implementation of MM-AQ-2 through MM-AQ-6, and therefore, the Project’s operational emissions will remain significant and unavoidable.

The LST analysis shows that the Project construction and operational emissions will not exceed the applicable LSTs for NO<sub>2</sub>, CO, PM<sub>10</sub>, or PM<sub>2.5</sub>. As such, this impact is less than significant.

The Project will not result in on-road traffic volumes at affected intersections that result in a CO hotspot. This impact is less than significant.

The cancer risk and non-cancer risk at the nearby residents, workers, and school children will not exceed the SCAQMD threshold of 10 in 1 million or chronic hazard index of 1.0, respectively, and impacts are less than significant.

In summary, the Project will result in significant and unavoidable impacts related to an obstruction of the implementation of the applicable air quality plan and long-term operational impacts. Accordingly, the Project will also result in significant and unavoidable cumulatively considerable impacts and a Statement of Overriding Considerations will be required should the City choose to approve the Project.

Alternative 2 will also result in air emissions that will be generated during construction and operation. Construction of Alternative 2 will still require grading, site preparation, and construction of facilities, all of which generate air emissions, but due to the slope of the site, the equipment will generate slightly more emissions during construction. Alternative 2's development will be the same development allowed under the Project and the same mitigation measures will be implemented. Therefore, the amount of vehicle trips generated under Alternative 2 will be the same, and the air quality impacts under Alternative 2 will continue to be considered significant and unavoidable due to the number of vehicle trips and lack of feasible mitigation to reduce emissions from those trips. Project impacts and cumulative impacts to air quality under Alternative 2 are considered slightly more (due to developing on a sloping site) when compared to those air quality impacts created by the Project and will still be significant and unavoidable. Alternative 2 will require a Statement of Overriding Considerations.

### **Biological Resources**

As discussed in Section 4.3, Biological Resources, the Project site supports one drainage feature, Drainage 1, which is an unnamed, ephemeral drainage feature that flows north to south across a portion of the Project site. Drainage 1 exhibits a surface hydrologic connection to downstream waters of the United States via the City's underground storm drain system and qualifies as waters of the United States, which falls under the jurisdiction of the ACOE. Approximately 0.02 acre of ACOE jurisdiction is located within the boundaries of Site B. With the incorporation of mitigation measure MM-BIO-1, outlined in Section 4.3.6, impacts occurring within ACOE and RWQCB jurisdictional areas are considered less than significant with mitigation incorporated. Drainage 1 is considered a CDFW streambed with approximately 0.12 acre of jurisdictional streambed located within the boundaries of Site B. However, with implementation of the mitigation measures outlined in Section 4.3.6, the Project will comply with all the regulatory

permits and associated conditions related to jurisdictional drainage features, and impacts are considered less than significant. No jurisdictional wetland features were found to occur within Site B, so impacts related to wetlands are considered less than significant.

The Project site is located within the MSHCP Area, but is not located in the Criteria Area and does not have conservation requirements (County of Riverside 2003). The Project site is, however, subject to consistency review with MSHCP Sections. The MSHCP consistency review found that the Project site is located within a burrowing owl survey area as defined in Section 6.3.2 of the MSHCP. As such, to meet requirements in the MSHCP, a habitat assessment for burrowing owls was conducted on September 16, 2015, to identify suitable habitat for burrowing owl. No burrowing owls or potential signs of burrowing owl (e.g., owl pellets, prints, molting feathers, abundant insect remains) were detected during the burrowing owl habitat assessment. However, after conducting the habitat assessment, it was determined that the Project site and undeveloped parcels within a 500-foot buffer provide suitable foraging habitat and suitable nesting habitat where burrowing owl burrows were noted, particularly on the perimeter of the Project site, fence lines, dirt mounds, and berms lining roadways. A concrete drainage on the southern portion of the northeast section of Site B was also found to be suitable habitat for burrowing owl. With the incorporation of mitigation measures MM-BIO-2 and MM-BIO-3, outlined in Section 4.3.6, the Project will be compliant with MSHCP Section 6.3.2, and impacts are less than significant with mitigation incorporated.

In addition to being located within a burrowing owl survey area, the Project site is located in the plan area of the SKR HCP (Riverside County Habitat Conservation Agency 1990). However, the Project site is outside of the SKR Management Areas of the HCP. As such, impacts related to SKR are considered to be less than significant. In summary, the Project will be fully compliant with the MSHCP and fully covered for potential impacts to covered species. Impacts are considered less than significant with mitigation incorporated.

Like the Project site, the Alternative 2 site is currently vacant; however, under Alternative 2, construction of proposed facilities will occur on a site that has six unnamed drainage features flowing in a north to south direction. During an aerial analysis of maps, it was observed that the site likely contains two jurisdictional drainage features that meet the criteria to be considered jurisdictional. The potential jurisdictional features contain evidence of a noticeable change in soil and vegetation composition and what appears to be hydrologic connectivity to surrounding areas. Alternative 2's components will need to be designed to avoid all potential jurisdictional areas on the site. Mitigation measures addressing potential direct and indirect impacts from grading activities during the bird breeding and nesting season may also be needed, as well as the installation of fencing and drainage controls to prevent water flow and sediment from entering jurisdictional areas on portions of the site. Therefore, Alternative 2 may be more impactful to wetlands, as defined by Section 404 of the Clean Water Act, directly, indirectly, and



cumulatively. The drainage features will need a jurisdictional delineation to determine if they are considered waters of the United States and subject to the jurisdiction of the wetland agencies. If they are determined to be waters of the United States, they will require similar mitigation measures identified for the Project. In addition, two of these drainage features appear to be longer than 300 feet, and if the proposed construction impacts more than 300 linear feet (0.5 acre) of a feature found to be under the jurisdiction of the ACOE, Project Alternative 2 will not be covered under the Nationwide Permit program and will need to prepare an individual ACOE permit.

Like the Project site, the Alternative 2 site is also located within the MSHCP Area and is subject to the same consistency review with MSHCP Sections as the Project. Based on the conservation description provided on the MSHCP map, it is anticipated that MSHCP review will find that the Alternative 2 site will also have suitable habitat for burrowing owl and nesting birds and could create potential impacts to other covered species. Alternative 2 will also be subject to similar mitigation measures as those outlined in Section 4.3.6 for the Project. With mitigation, Alternative 2 will also be compliant with the MSHCP, and impacts will likely be considered less than significant.

Overall, because of the additional drainage features on the Alternative 2 site, impacts to wetlands and other biological resources are considered to be greater under Alternative 2 than impacts under the Project.

### **Cultural Resources**

As discussed in Section 4.4, Cultural Resources, there are 77 cultural resources previously recorded within a 1-mile radius of the Project site; however, none of the resources are located within the Project APE (Appendix I). Initially, the project APE was defined as the 50.85-acre development area of the Project. Subsequent Project planning discussions determined that for the purposes of the cultural resources study, the APE will include the entirety of the Canyon Springs Business Park Specific Plan area, as the Specific Plan requires an amendment for the Project. The Project site is located within a low archaeological sensitivity area and no archaeological resources were found within either the initial Project area or the expanded APE during the time of an intensive pedestrian field survey. With the implementation of mitigation measures MM-CUL-1 through MM-CUL-4, outlined in Section 4.4.6, impacts associated with the potential discovery of unknown resources will be mitigated to a level of less than significant.

The Project site is located within an area of High Paleontological Sensitivity to encounter paleontological resources at depths of 4 feet or greater below the ground's surface; however, with the implementation of mitigation measures MM-CUL-1 through MM-CUL-4, outlined in Section 4.4.6, potential impacts to paleontological resources will be reduced to a less than significant level.

Like the Project site, the Alternative 2 site is currently vacant. The site is also without any historic buildings or rock outcroppings; therefore, like the Project, Alternative 2 will have no impact to historical resources. Given its close proximity to the Project site, many of the previously recorded cultural resources surrounding the Project site are likely to be within 1 mile of the Alternative 2 site, but an area search will be necessary to determine if any of these resources is located within the Alternative 2 APE. Like the Project, the Alternative 2 site is also located within a low archaeological sensitivity area, but a pedestrian field survey will be needed to determine if there are any archaeological resources on the Alternative 2 site or within an expanded APE. Alternative 2's development will be the same as the development allowed under the Project. Under Alternative 2, the same amount of grading and ground disturbance will occur, and site plans and building scale will be similar to those of the Project. Therefore, under Alternative 2, the Project will be subject to the same mitigation measures as the Project to mitigate the potential impacts associated with the potential discovery of unknown resources. Additionally, as the Alternative 2 site is also located in an area of High Paleontological Sensitivity to encounter paleontological resources at depths of 4 feet or greater below the ground's surface, Alternative 2 will be subject to the same mitigation measures as the Project to mitigate impacts to paleontological resources. Therefore, Alternative 2 will be required to have the same mitigation measures as the Project, and it is anticipated that impacts to cultural resources under Alternative 2 will be the same as impacts created by the Project.

### **Geology and Soils**

The potential for fault rupture on the Project site is low because the Project site is not within an Alquist-Priolo Earthquake Fault Zone or a Fault Hazard Zone (DOC 2015b), and there is no evidence of active faulting on, or adjacent to, the Project site.

The Project site is within a low liquefaction zone, and the potential for liquefaction is low due to the generally dense nature of the native soils underlying the site. The Project area is also located on land identified as having a 0% to 10% slope, which is the lowest of four potential categories susceptible to landslides. The Project site has been previously graded and leveled, and there are no known areas prone to landslides on site. The potential for landslides or lateral spreading is very low due to the relatively flat-lying topography of the Project site.

The Project site contains silty and clayey sands and may have expansive properties; however, Figure PS-3 of the City's General Plan 2025 indicates that the Project site is not located in an area with soils that have a high shrink-swell potential, thereby substantially reducing the potential for adverse impacts related to being located on expansive soils (City of Riverside 2012b). Additionally, a majority of the area surrounding the Project site has been developed with multistory buildings. New structures being proposed by the Project will be designed to CBC standards to anticipate impacts associated with liquefaction, expansive soils and other seismic events. Furthermore, the OSHPD Facilities Development Division will review and approve the

plans and specifications of the proposed hospital building, MOBs, skilled nursing facility, and related hospital facilities as required by and to ensure compliance with the provisions of the CBC (Title 24, California Code of Regulations\_.

Project construction activities such as excavation and grading may have the potential to cause soil erosion or the loss of topsoil. Short-term erosion effects during the construction phase of the Project will be prevented through required implementation of a SWPPP through compliance with the NPDES program and the incorporation of BMPs intended to reduce soil erosion. The SWPPP is required by the City during plan review and approval of project improvement plans; therefore, with implementation of an approved SWPPP, impacts resulting from erosion during construction operations will be less than significant.

Similar to the Project, structures constructed under Alternative 2 will be designed to CBC standards that will anticipate impacts associated with liquefaction, expansive soils, and other seismic events. However, Alternative 2 allows development of a healthcare campus on a vacant site that is substantially more sloped than the Project site, and therefore, will be more susceptible to landslides and other seismic geotechnical events. Due to the sloped terrain of the Alternative 2 site, geotechnical impacts associated with Alternative 2 will be greater than that of the Project.

### **Greenhouse Gas Emissions**

As discussed in Section 4.5, Greenhouse Gas Emissions, construction-related GHG emissions impacts associated with the Project will be short-term in nature, lasting only the duration of the of the construction period, and will not represent a long-term source of GHG emissions. With the implementation of mitigation measures MM-AQ-1 through MM-AQ-6, the Project's GHG operational emissions will be reduced by approximately 28.38% when compared to the baseline scenario. The 28.38% reduction is consistent with the target reduction percentage of 15% below 2010 levels based on the City of Riverside's CAP analysis supporting AB 32 (City of Riverside 2016). Therefore, impacts related to GHG emissions are considered less than significant with mitigation incorporated. The Project will also be consistent with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs.

Alternative 2's development will be the same as the development allowed under the Project; however, the Alternative 2 site is on a sloped area that has a sharper increase in elevation from the Project site. Due to the sharp slope, the construction of the proposed facilities under Alternative 2 will require more grading and site preparation than needed to develop the Project. Construction-related GHG emissions will still be short-term in nature and will not represent a long-term source of GHG emissions; however, construction-related GHG emissions will be slightly higher with the additional grading required on the sloped site under Alternative 2. Alternative 2 will be required to



have similar mitigation measures to reduce GHG operational emissions. Therefore, with the implementation of similar mitigation measures as outlined in Section 4.5.6 (MM-AQ-1 through MM-AQ-6), Alternative 2 will have similar operational GHG emissions that are less than significant. Overall, due to the additional grading and site preparation, it is anticipated that GHG emissions impacts under Alternative 2 will be slightly more than those impacts created by the Project.

### **Hazards and Hazardous Materials**

As discussed in Section 4.6, Hazards and Hazardous Materials, the Project site is located approximately 1.6 miles north of March ARB, within the March ARB land use compatibility plan area. The March ARB identifies APZs; however, the Project site is located outside of all designated APZs (March ARB 2005; Mead & Hunt 2014). Therefore, no restrictions related to APZs apply to the Project.

The Project site is located within Zone D – Flight Corridor Buffer, as depicted in the March ARB/Inland Port ALUCP (Mead & Hunt 2014). The Project uses are compatible with the uses described in Zone D. The Project Applicant will be required to submit plans to the FAA if the notification criteria in Part 77 of the Federal Aviation Regulations are met. The FAA will ensure compliance with the FAA standards. Furthermore, the Project will go through review by the City of Riverside, March ARB, Riverside County ALUC, and Caltrans Division of Aeronautics (for the helistop) for approval. With the implementation of mitigation measures MM-HAZ-1 through MM-HAZ-3, outlined in Section 4.6.6, all potential impacts related to people working or residing within close proximity of a public airport will be reduced to a level that is less than significant. As such, safety hazard impacts related to the Project site being located in close proximity to a public airport are considered less than significant with mitigation incorporated.

Under Alternative 2, the site is located within Zone E of the March ARB/Inland Port ALUCP (Mead & Hunt 2014). Zone E is intended to encompass areas of low noise and low accident potential risk within the flight corridor buffer (Mead & Hunt 2014). Zone E is the outer or occasionally used portion of flight corridors and direct overflights of these areas will occur occasionally. Accident potential risk levels in this zone are low. March ARB also identifies APZs. The Project site is not located within a designated APZ I or APZ II, and instead lies outside of all APZs in the March ARB/Inland Port ALUCP (March ARB 2005; Mead & Hunt 2014). Therefore, the potential hazards that will exist on the Alternative 2 site are reduced from the potential hazards of the Project. Similar mitigation measures will be necessary to require that an FAA Form 7460-1 is submitted to the FAA to ensure compliance with FAA standards, and that the March ARB, Riverside County ALUC, and Caltrans Division of Aeronautics processes for review and approval are followed. Alternative 2's development permitted will be the same as the development allowed under the Project. Therefore, there will be the same amount of patients, visitors, and employees present on the Alternative 2 site when compared to the Project. Overall,

impacts related to public airport proximity safety hazards under Alternative 2 will be slightly reduced when compared to impacts created by the Project.

### **Hydrology and Water Quality**

As discussed in Section 4.7, Hydrology and Water Quality, the Project complies with all applicable federal, state, and local rules and regulations regarding water quality and hydrology. The Project will implement a WQMP that includes structural and nonstructural BMPs. In addition, BMPs implemented as part of the SWPPP will further reduce potential impacts associated with violations of water quality standards or Waste Discharge Requirements to a less than significant level.

The Project will not substantially deplete groundwater supplies or interfere with groundwater recharge, and will have less than significant impacts associated with substantial erosion or siltation on or off the Project site. In addition, with design features, water quality BMPs, and required compliance with City requirements, impacts to existing or planned stormwater drainage systems and impacts associated with additional sources of polluted runoff, drainage patterns, and surface runoff are considered less than significant. Overall, impacts related to hydrology and water quality were found to be less than significant through compliance with existing regulations and as a result of the Project design features.

Like the Project site, there are no waterbodies or streams on the Alternative 2 site, and stormwater on site and in surrounding areas are collected by drainage swales, inlets, and subsurface storm drains and delivered to off-site basins. Like the Project site, the Alternative 2 site has no impervious surfaces (i.e., pavement or structures). The Alternative 2 site, however, does have a more substantial slope than the Project site and has as many as six drainage features on site; therefore, the site may be subject to more runoff than infiltration. The Alternative 2 site is not within a Federal Emergency Management Agency 100-year flood hazard area or a dam inundation area; however, given the substantial slope of the Alternative 2 site, the runoff created may exceed the capacity of the existing stormwater drainage systems and may require new systems. Under Alternative 2, the Project will also be required to comply with all applicable federal, state, and local regulations regarding water quality and hydrology and this alternative's development will be the same as the Project's development and will not remove these requirements. Similar BMPs, design features, and the required SWPPP will also be implemented to further reduce potential impacts. Therefore, Alternative 2 is expected to have a greater impact on water quality and hydrology than the impacts created by the Project.

### **Land Use and Planning**

As discussed in Section 4.8, Land Use and Planning, the Project will include an amendment to the City's General Plan 2025 to designate the Specific Plan area as the Canyon Springs

Healthcare Campus Specific Plan and replace the current land use designations. The Project also will include a rezoning of the Canyon Springs Business Park area to be zoned as the Canyon Springs Healthcare Campus Specific Plan and revise the current City Zoning Map. The proposed Specific Plan land use designation and zoning will allow for implementation of the Specific Plan and associated development standards, which are necessary to meet the increasing demand for healthcare campus services and amenities. The Specific Plan will streamline development by outlining existing uses and future uses and laying out a cohesive set of guidelines that will provide a clear understanding of how growth and development will occur. With adoption of the proposed General Plan 2025 and Zoning Code amendments, implementation of the Project will not conflict with an adopted plan, policy, or regulation established to avoid environmental effects. In addition, with the implementation of mitigation measures outlined in Section 4.8.6 (MM-AQ-1 through MM-AQ-6; MM-BIO-2 and MM-BIO-3; MM-CUL-2 and MM-CUL-4; MM-NOI-1; MM-TRAFI-1 through MM-TRAF-14; and MM-UTL-2 and MM-UTL-3), the Project will not conflict with the MSCHP and will not result in any other significant land use impacts.

Under Alternative 2, the City of Moreno's General Plan will need to be amended to designate a commercial area as the Canyon Springs Healthcare Campus Specific Plan. This Alternative will also need a rezone the property and amend the City of Moreno Valley's Zoning Map to designate the area as Canyon Springs Healthcare Campus Specific Plan. This will allow the Specific Plan to be implemented and all of its associated development standards to be in place for the site. With the adoption of the proposed General Plan and Zoning Code amendments, the land use impacts of Alternative 2 will be the same as that of the Project.

### **Mineral Resources**

The Project site lies within MRZ-3, as depicted on Figure OS-1 of the City's General Plan 2025 (City of Riverside 2012a), indicating that the area contains known or inferred mineral occurrences of undetermined mineral resources significance. Given that the Project site has been previously disturbed by rough grading and is surrounded by existing development (e.g., commercial shopping center, MOBs, office buildings, residential development, and a school) that are incompatible with mining operations, it is unlikely that an economically viable mining operation could take place at the Project site. Therefore, the Project will not result in the loss of a known mineral resource.

The Alternative 2 site also lies within MRZ-3. Like the Project site, portions of the Alternative 2 site have also been previously disturbed and rough graded and are surrounding by existing development (e.g., commercial shopping center, residential development, and a school). Similar to the Project site, the land uses surrounding the Alternative 2 site are also incompatible with mining operations and it is unlikely that an economically viable mining operation could take

place at the Alternative 2 site. Therefore, impacts regarding mineral resources are the same at the Alternative 2 site as they are at the Project site.

## Noise

As discussed in Section 4.9, Noise, construction noise is exempt under the Riverside Municipal Code, Section 7.35.20 (Exemptions; City of Riverside 2007a). The Project will contribute operational stationary-source noise level increases at nearby receiver locations. This will result in potentially significant increases in ambient noise levels in the Project vicinity. As such, with the incorporation of mitigation measure MM-NOI-1, as outlined in Section 4.9.6, the Project's operational stationary-source noise will not result in a substantial temporary/periodic or permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project.

Once the Project is operational, the Project's contribution to existing noise levels will be less than significant for all of the study area roadway segments. As such, the Project's off-site traffic noise level will have a less than significant impact on the study area roadway segments for existing conditions and for General Plan 2026 Buildout conditions.

Like the Project, construction at the Alternative 2 site will also be restricted to daytime hours consistent with City of Moreno Valley requirements, so vibration impacts will also be eliminated from sensitive nighttime hours. The Project site has a residential area south of the site, but aside from these residences, the nearest other noise-sensitive receivers are separated from a direct line-of-site by the residences. These receivers will not be impacted by operational noise on the Project site. There are, however, an increased number of off-site sensitive receptors located in close proximity to the Alternative 2 site than those located near the Project site. The nearest off-site sensitive receptors to Alternative 2 operations will be the single-family residential areas west and north of the site, as well as Box Springs Elementary School located directly north of the site. Depending on exactly where the proposed buildings are positioned on the Alternative 2 site, noise from operations will be readily audible to these sensitive receptors, and in addition to the standard policies and Project design features outlined for the Project, additional noise reduction measures may be required as conditions of approval for Alternative 2 building permits. Analysis of noise effects on noise sensitive land uses will need to be conducted by an acoustical specialist to provide additional mitigation measures that will reduce long-term operational noise levels associated with Alternative 2's operations.

Alternative 2's frequency of emergency vehicle visits, helicopter visits, traffic associated with the proposed parking structures and surface parking lots, use of on-site stationary equipment, and additional traffic generated along adjacent roads will be the same as the Project's, and the mitigation measure (MM-NOI-1) outlined for the Project will be required for Alternative 2 as



well. However, given the close proximity of additional sensitive receptors to the Alternative 2 site (i.e., single-family residences to the north and east, and Box Springs Elementary School to the north), additional analysis of the noise effects from operations will need to be conducted to determine their impact on the nearby sensitive receptors and determine if additional mitigation measures are needed to reduce operational noise levels. Therefore, Alternative 2 is expected to have greater noise impacts when compared to the Project.

### **Population and Housing**

The Project involves the development of a hospital, MOBs, central energy plant, parking structures, hospital-related facilities, senior housing facility, independent living facility, assisted living facility, skilled nursing facility, and associated infrastructure improvements. Although the proposed senior housing facility, assisted living facility, and independent living facility will provide housing for residents, it does not generate a substantial population growth as these residents will generally move from the Riverside and Moreno Valley communities to the housing facility at the Project site to take advantage of the amenities and resources provided for that specific population. The Project will enhance the jobs/housing balance of the City by providing up to approximately 2,450 new permanent jobs at full buildout. Therefore, the Project will not generate substantial population growth. Existing infrastructure systems are adequate to serve the Project, and therefore, no improvements to infrastructure are needed to serve the Project. Consequently, the Project will provide hospital EMS for community disaster preparedness, medical check-ups and services at the MOBs, and resources and services for those with medical needs at the independent living facility, assisted living facility, and skilled nursing facility, within the Riverside and Moreno Valley communities and Inland Empire region. The Project site does not currently support any housing; therefore, substantial numbers of existing housing or people will not be displaced and the construction of replacement housing elsewhere is not necessary as a result of developing the Project. No significant impacts related to population growth will result from the Project.

Alternative 2 will allow the same development as the Project, and this alternative will contribute the same employment positions or housing opportunities as the Project. Alternative 2 will need to be evaluated in terms of the jobs/housing balance for the City of Moreno Valley, but since the development will not generate substantial population growth, it is anticipated that population growth will be less than significant. Similar to the Project site, the Alternative 2 site does not currently support any housing; therefore, no housing or people will be displaced and the construction of replacement housing will not be necessary as a result of developing Alternative 2. Therefore, under Alternative 2, impacts to population/housing will be the same as the Project.

### **Public Services**

As discussed in the Initial Study (Appendix A to the Draft EIR) and Section 4.10, Public Services of the Draft EIR, the Project will create an increased demand for emergency medical, fire protection, fire prevention, and rescue fire services that could be manifested by an increased number of emergency and public service calls. Implementation of the Project will introduce permanent and temporary residents, staff, and patients to the area and entails the construction and operation of new structures on a currently vacant site. Development of the Project site was previously considered and analyzed as part of the City's General Plan 2025 Project (2007) and the Canyon Springs Business Park Specific Plan Project, and buildout of the City was considered in the General Plan 2025 and the General Plan 2025 Final Program EIR. The Final Program EIR disclosed a need for four additional fire stations 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 (City of Riverside 2007b). Two of the four fire stations identified as necessary to "maintain current levels of services and improve response times" in the General Plan 2025 Final Program EIR have since been constructed by the City through the use of the City's General Fund. The fire services analysis found that the Project will be designed in compliance with the current building code and Riverside Fire Department requirements. The Project will meet safety equipment standards, provide adequate emergency access, fire hydrants, water flows, and fire sprinklers. These systems will aid in the initial response to fire events occurring in proposed structures. Therefore, through adherence to General Plan policies, compliance with current building code and Riverside Fire Department requirements, in accordance with the conclusions of the General Plan 2025 Final Program EIR, new or physically altered government facilities will not be required to accommodate the Project. As such, the Project's impacts to fire protection services are considered less than significant.

The Project area is located in the East Neighborhood Policing Center serviced by Patrol for uniform presence (Lincoln Police Station) and the East Neighborhood Policing team (Fairmount Station) for any potential follow-ups of crimes or incidents. The current patrol staffing around the Project site is typically two to four officers during school hours. Project components, such as the senior housing and independent living, assisted living, and skilled nursing facility would generate housing for the "age-restricted group" and those needing medical assistant living; however, these groups of people would likely come from the existing Riverside population, and thus, would not substantially increase population in Riverside requiring the need for additional police services. In the event of medical emergencies, police officers along with emergency medical technicians could transport those individual(s) to the hospital on site. Additionally, the Project would result in approximately 2,450 new permanent jobs on the Project site; however, the Project is not expected to substantially increase emergency calls to the City's Police Department as typical land uses requiring more police services generally include commercial and industrial uses, and residential development. Therefore, the Project site can be adequately served by existing police services in the City. Furthermore, the Project will not result in new facilities that would be needed to serve the Project.

The Project site is located within the Moreno Valley Unified School District. There is one school within 0.25 mile of the Project site. Edgemont Elementary School is located immediately adjacent to the southern boundary of Site C. The proposed senior housing will not result in a substantial increase in demand for schools as the proposed use would be geared towards the aging population; thus, it will not require educational facilities or services. The other Project components do not involve residential type uses, and therefore, will not result in an increased demand for schools.

The Project will not result in a substantial increase in the demand for parks. Pursuant to the Riverside Municipal Code, applicable fees will be paid to mitigate any potential impacts to park development and open space needs. No other public facilities or services other than police and fire protection are anticipated to serve the Project. Implementation of the Project would provide EMS, medical care, and senior care within the Riverside community and Inland Empire region. As such, the overall impacts of the Project on public services were found to be less than significant.

The implementation of Alternative 2 will include the introduction of permanent and temporary residents and increased levels of staff, patients, customers, patrons, and structures to a currently vacant site. The development allowed under Alternative 2 is the same as the development allowed under the Project; therefore, Alternative 2 will create an increased demand for public services that could be manifested by an increased number of emergency and public service calls. Development of the Project on the Alternative 2 site will continue to be designed in compliance with the current building code requirements; however, unlike the Project, development of the Alternative 2 site was not necessarily considered in the City of Moreno Valley's General Plan and will need to be designed in compliance with Moreno Valley Fire Department, Police Department, school district, recreation department, and other public service department requirements. An analysis of fire and police protection services will need to be conducted to determine whether additional stations, personnel, or equipment will be needed to maintain current levels of service and response times as development pursuant to the General Plan proceeds. The site will also need to be evaluated to determine if adequate emergency access can be provided. Therefore, because the General Plan did not necessarily contemplate development of the site, it is anticipated that new or physically altered government facilities will be required to accommodate the Project. As such, Alternative 2 is anticipated to have greater impacts to public services when compared to the Project.

## **Recreation**

The Project includes the development of a hospital, MOBs, central energy plant, parking structures, hospital-related facilities, senior housing facility, independent living facility, assisted living facility, skilled nursing facility, and associated infrastructure improvements. The proposed senior housing and assisted living facility are not anticipated to substantially increase the use of existing parks or recreational facilities. The other Project components will not include

residential-type uses or businesses that will increase the use of existing parks or recreational facilities. Thus, no deterioration of existing facilities will occur as a result of developing the Project. Nonetheless, the Riverside Municipal Code requires applicable fees to be paid to mitigate the potential impact to park development and open space needs generated by the Project. Furthermore, the Project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, less than significant impacts to recreational facilities will occur as a result of developing the Project.

Alternative 2 will allow for the same development as the Project, and this alternative will contribute the same number of employment positions or housing opportunities as the Project. An analysis of recreational facilities will need to be conducted to determine whether additional recreational facilities or expansion of existing facilities will be required to be consistent with City of Moreno Valley's General Plan goals. It is anticipated that new or physically altered recreational facilities will be required to accommodate Alternative 2. As such, Alternative 2 is anticipated to have greater impacts to recreation when compared to the Project.

### **Transportation/Traffic**

As discussed in Section 4.11, Transportation/Traffic, under Existing with Project Conditions, the Project causes a significant impact at the intersection of Valley Springs Parkway/Eucalyptus Avenue. With the implementation of mitigation measure MM-TRAF-1, as identified in Section 4.11.7, the Project's impacts will be reduced to less than significant levels.

Under Cumulative with Project conditions, the Project will result in significant impacts at the following intersections: I-215 southbound ramps/Eucalyptus Avenue, Valley Springs Parkway/Eucalyptus Avenue, Day Street/Cottonwood Avenue, Day Street/Bay Avenue, Day Street/Alessandro Boulevard, and Memorial Way/Towngate Drive. With the implementation of mitigation measures MM-TRAF-1 through MM-TRAF-8, as identified in Section 4.11.7, the Project's impacts at these intersections will be reduced to less than significant levels.

The Project also contributes to unacceptable LOS on the I-215 southbound freeway mainline, south of Eucalyptus Avenue under Cumulative with Project conditions. The operation of the highway is projected to remain at unacceptable levels due to a lack of feasible mitigation. Thus, the cumulative traffic increases are a significant cumulative impact, and the Project's incremental contribution to the increases is cumulatively considerable. As such, a Statement of Overriding Considerations will be required should the City choose to approve the Project.

In General Plan Buildout with Project Conditions, the Project will result in significant impacts at the following intersections: I-215 southbound ramps/Eucalyptus Avenue, Valley Springs Parkway/Eucalyptus Avenue, Day Street/Eucalyptus Avenue, Day Street/Cottonwood Avenue, Day Street/Bay Avenue, Day Street/Alessandro Boulevard, and Memorial Way/Towngate Drive.



With the implementation of mitigation measures MM-TRAF-1 through MM-TRAF-12, as identified in Section 4.11.7, the Project's impacts at these intersections will be reduced to less than significant levels.

The Project also contributes to unacceptable LOS on the I-215 southbound freeway mainline, south of Eucalyptus Avenue and between the off-ramp and on-ramp on Eucalyptus Avenue in General Plan with Project conditions. The operation of the highway is projected to remain at unacceptable levels due to a lack of feasible mitigation. Thus, the cumulative traffic increases are a significant cumulative impact, and the Project's incremental contribution to the increases is cumulatively considerable. As such, a Statement of Overriding Considerations will be required should the City choose to approve the Project.

The Project is located within a sector of March ARB Class C airspace, which is different from the zones contained in the Land Use Compatibility Plan Policy documentation. However, the Project uses are permitted within the March ARB/Inland Port ALUCP (Mead & Hunt 2014); the required regulatory actions will be taken; and mitigation measures MM-TRAF-13 and MM-TRAF-14, as identified in Section 4.11.7, will be implemented. Therefore, impacts are less than significant.

Under Alternative 2, the development will be the same as the development allowed under the Project. Therefore, the amount of traffic coming and going to the Alternative 2 site will be the same as the amount of traffic generated under the Project. Like the Project site, the Alternative 2 site is currently vacant, and the number of new residents, patients, employees, and visitors to the Specific Plan area will lead to an increase in traffic in the surrounding area. Alternative 2 will likely have significant impacts to a number of intersections and roadway segments during Existing Plus Project traffic conditions and Cumulative (Opening Year – 2016) with Project traffic conditions, and will likely require the implementation of mitigation measures in the form of roadway or intersection improvements similar to the Project.

Alternative 2 will also contribute to the existing and forecasted deficient freeway segments in the Congestion Management Plan; therefore, the Alternative 2 Project will contribute to these cumulative traffic impacts and will be considered cumulatively considerable and unavoidable like the Project. Therefore, impacts to transportation/traffic under Alternative 2 are considered to be the same as the significant and unavoidable transportation/traffic impacts created by the Project. Alternative 2 will require a Statement of Overriding Considerations.

### **Utilities and Service Systems**

As discussed in Section 4.12, Utilities and Service Systems, the estimated demand for the Project exceeds the projected demand accounted for in the 2010 UWMP, and will therefore, exceed the projected demand. However, with the implementation of Project elements that can

reduce impacts, as well as the mitigation measures outlined in Section 4.12.6 (MM-UTIL-1 through MM-UTIL-3), impacts to water consumption will be minimized to a level that is less than significant.

The construction of all phases of the Project will generate construction waste that will result in an increased demand for solid waste collection and disposal during construction. In addition, during operation, the solid waste quantities generated by the Project will increase, and adequate space will be needed to allow for the collection and storage of recyclable materials. With required recycling, the amount of solid waste generated and disposed of in nearby landfills during construction and operation of the Project will be within the permitted landfill capacities. The implementation of mitigation measures MM-UTIL-1 through MM-UTIL-3, outlined in Section 4.12.6, will ensure that adequate space for on-site recycling is allotted. Therefore, the Project's potential impacts associated with solid waste capacity are considered less than significant with mitigation incorporated.

Under Alternative 2, development will be the same as the development permitted under the Project. The estimated demand for Alternative 2 will be the same as the demand generated under the Project, and will require the same mitigation measures as the Project to minimize impacts to water demand to a level that is less than significant. During construction, the amount of solid waste generated by this alternative will be the same, since there will be the same square footage of building constructed. Additionally, since Alternative 2 will have the same square footage and the same intensity of uses, the amount of solid waste generated during Alternative 2's operation will be the same as that generated under the Project, and the same mitigation measures will be required. A review of the solid waste and recycling facilities in the City of Moreno Valley shows that there is existing capacity for the solid waste generated by developing Alternative 2. Therefore, Alternative 2 will have the same impacts on utilities and service systems as the Project.

### **Energy Conservation**

As discussed in Section 4.13, Energy Conservation, the Project will increase the demand for electricity and natural gas at the Project site, increase the consumption of gasoline in the region during construction and operation, and place additional demands on local and regional energy supplies. However, with the implementation of mitigation measures (MM-AQ-2, MM-AQ-3, and MM-AQ-4) outlined in Section 4.13.6, the Project will not contribute to the inefficient or wasteful consumption of electricity, natural gas, or petroleum, and impacts are considered less than significant. Also, the mitigation measures will ensure that the Project reduces energy consumption beyond what is required by the state and will also ensure that the Project is consistent with existing energy standards and regulations. Therefore, impacts related to a conflict with existing energy standards and regulations are considered less than significant with mitigation incorporated. In addition, the Project includes TDM strategies in the Specific Plan

that will help achieve the required vehicle reduction targets from the City’s TDM Regulations. Furthermore, the implementation of mitigation measures (MM-AQ-2, MM-AQ-3, and MM-AQ-4) outlined in Section 4.13.6 will reduce vehicle miles traveled and petroleum consumption, as pedestrian and bicycle connections will be provided to surrounding areas consistent with the City’s General Plan. Therefore, impacts related to energy supplies and capacity are considered less than significant.

Alternative 2 will have the same development as the development allowed in the Project, and will have the same increase in the amount of electricity, natural gas, and petroleum used during construction and operation. The amount of energy required will be the same of required under the Project and will require the same mitigation measures (MM-AQ-2, MM-AQ-3, and MM-AQ-4) as required for the Project. An analysis of the City of Moreno Valley’s regulations regarding TDM would need to be conducted to determine if the TDM strategies in the Specific Plan would help achieve vehicle reduction targets for Moreno Valley or if other strategies would be required; however, it is anticipated that with the implementation of similar mitigation measures and Project design features, Alternative 2 will have the same impacts on energy consumption when compared to the Project.

### Relationship to Project Objectives and Feasibility

Under Alternative 2, the Project site will remain in its current vacant condition and the Alternative 2 site will be developed with the same development as allowed under the Project. Table 6-4 provides a list of the Project objectives and whether or not Alternative 2 meets each objective.

**Table 6-4**  
**Summary of Alternative 2’s Success at Meeting Project Objectives**

<b>Project Objective</b>	<b>Alternative Meets Objective?</b>
1. The proposed Canyon Springs Healthcare Campus Specific Plan will allow future development more streamlined by outlining future allowable uses, and laying out a cohesive set of design guidelines that will provide City staff, the future Canyon Springs Healthcare Campus operator, and the public with a clear understanding of how growth and development will occur at the site.	<b>Yes.</b> Alternative 2 will allow a future entitlement process that will be more streamlined by providing all stakeholders a specific plan that will outline future allowable uses and provide a cohesive set of design guidelines that will provide a clear understanding of how growth and development will occur at the Alternative 2 site.
2. The overall goal of the proposed Canyon Springs Healthcare Campus Specific Plan is to guide future development on the Canyon Springs Healthcare Campus and define the extent, scale, and location of future development on the Canyon Springs Healthcare Campus.	<b>Yes.</b> Alternative 2 will provide the Canyon Springs Healthcare Campus Specific Plan, which will guide future development of a comprehensively planned, integrated healthcare campus on the Alternative 2 site. The Canyon Springs Healthcare Campus Specific Plan will include design guidelines that define the extent, scale, location, and future development of the Canyon springs Healthcare Campus on the Alternative 2 site.
3. The Canyon Springs Healthcare Campus Specific Plan will allow for the construction of a hospital and MOB with	<b>Yes.</b> Under Alternative 2, development will be allowed for the construction of a hospital, MOBs, and associated

**Table 6-4**  
**Summary of Alternative 2's Success at Meeting Project Objectives**

Project Objective	Alternative Meets Objective?
associated hospital-related facilities, as well as a senior housing, independent living, assisted living, and skilled nursing facility to address an existing shortage of healthcare service capacity now available to residents in the surrounding area as well as to improve access to healthcare for a growing population.	hospital-related facilities, as well as senior housing, independent living, assisted living, and a skilled nursing facility. Alternative 2 will improve access to healthcare for a growing population in the City of Moreno Valley, City of Riverside, and the surrounding communities.
4. In the event of a disaster, the Canyon Springs Healthcare Campus will provide another hospital facility that will serve Riverside and the surrounding communities.	<b>Yes.</b> Under Alternative 2, another healthcare campus facility will be designed and constructed to meet the healthcare demands for the City of Riverside and the surrounding communities in the event of a disaster.

Alternative 2 will result in the new construction of a healthcare campus and the objectives of the Project will be met, but this alternative is more environmentally impactful than the Project in terms of aesthetics, air quality, biological resources, geology and soils, GHG emissions, hydrology and water quality, noise, public services, and recreation.

#### **6.6.4 Alternative 3 – Alternative Location in City of Riverside**

The Project will construct the healthcare campus on the approximately 50.85-acre Project site located within the Canyon Springs Business Park Specific Plan in Riverside, California. In accordance with State CEQA Guidelines, Section 15126.6(f)(2), the City attempted to identify feasible alternative off-site locations within the Project area that could be available for the proposed healthcare campus development. Per State CEQA Guidelines, Section 15126.6(f)(2)(A), the key question and first step in analysis of the off-site location is whether any of the significant effects of the Project will be avoided or substantially lessened by moving the Project to another location. After a review of 20 available open spaces of approximately 50 acres (similar to the Project site in size) around the City of Riverside, the City of Moreno Valley, and the area controlled by the March Joint Powers Authority, a site where a hospital could be located was identified in the City of Riverside, as depicted in Figure 6-3.

Alternative 3 involves the construction of the proposed healthcare campus at the 64.37-acre area site located west of SR-60 and south of Central Avenue (Assessor's Parcel Number 253-270-043). This site is part of the Sycamore Canyon Wilderness Park and is approximately 1.9 miles west of the Project site in the City of Riverside. The property is currently owned by the City of Riverside and is under the City's land use jurisdiction. The Alternative 3 site is currently designated as Public Park in the City of Riverside General Plan (City of Riverside 2013), and the site is zoned for R-1-8500 - Single-Family Residential and Specific Plan (Sycamore Canyon Business Park) Overlay Zones under the City of Riverside Municipal



Code (City of Riverside 2010). Under Alternative 3, the Project Applicant will lease or purchase the land from the City for construction of the Project.

### **Aesthetics**

As discussed in Section 4.1, Aesthetics, the Project will have less than significant impacts associated with scenic vistas from Sycamore Canyon Wilderness Park, viewpoints and trails within Box Springs Mountain Reserve, and SR-60, and as such, the Project will not substantially obstruct or interrupt existing views to identified major scenic resources.

The nearest designated state scenic highway by the California Department of Transportation (Caltrans) is Interstate 215 (I-215) located approximately 11 miles south of the Project site. The Project site is not visible from the designated portion of I-215 (Caltrans 2008). The Project site is vacant and does not support historic buildings or rock outcroppings. Therefore, the Project will not substantially damage scenic resources within a state scenic highway.

Impacts to visual character will also be less than significant with implementation of the Project. Viewers along perimeter streets and from surrounding properties will experience views of a developed hospital campus instead of the existing vacant site. The Canyon Springs Specific Plan will identify design guidelines and development standards for the proposed buildings. With implementation of the design guidelines, the buildings' mass and scale will be controlled and all architectural materials will be of high quality. The Specific Plan's landscaping guidelines will also ensure that development of the Project is compatible with the surrounding developed areas.

In addition, the Project will not have any significant impacts from lighting or glare. The Project site is located in a developed area with existing sources of nighttime lighting. Currently there are sources of nighttime light and glare from the existing office, commercial uses, big box retail, and residential uses, as well as from street lights. Although the Project will increase lighting on the Project site compared to current conditions, the Specific Plan outlines minimum and maximum light intensities for the Project area and establishes design guidelines for the installation of lights. Pursuant to the development standards and design guidelines, pole lighting will be directed, oriented, and shielded to prevent light from shining onto the adjacent properties. Additionally, a visual buffer will be provided by landscaping along the perimeter of the Project site. Therefore, the lighting from the Project will not result in substantial light or glare that will adversely affect nighttime views in the surrounding area.

Alternative 3 is located approximately 1.9 miles west of the Project site, west of SR-60, and south of Central Avenue, within the Sycamore Canyon Wilderness Park. Long-distance views of natural terrain and vegetation can be found throughout Sycamore Canyon Wilderness Park and the Box Springs Mountain Reserve. The Box Springs Mountain Reserve (including M Peak and M Trail) is located approximately two miles east of the Alternative 3 site. Due to their elevated

vantage points, M Peak and the M Trail provide opportunities for recreationists to have long panoramic views of mountainous terrain to the west. While the characteristics of local terrain suggests that views to the Alternative 3 site may be available from the Box Springs Mountain Reserve, with the exception of the highest locations of the M Peak and M Trail, views to the Alternative 3 site are not available from this area due to the presence of intervening development and landscaping that obscure views to the Alternative 3 site. Therefore, as viewed from Box Springs Mountain Reserve, development of the Alternative 3 site with a healthcare campus with primarily three- to five-story buildings will not substantially obstruct or interrupt available views from elevated vantage points in the reserve. Views will continue to be long and broad and will be unencumbered by development on the Alternative 3 site.

Development on the Alternative 3 site will be visually prominent and will display substantially different characteristics from existing conditions within Sycamore Canyon Wilderness Park. Given the scale of the proposed buildings, development may appear incompatible with the existing parklands and the single-story residential development located north and east of the park. Furthermore, certain views of Sycamore Canyon from adjacent residential uses will be blocked by the development allowed under Alternative 3 and available views from some adjacent residences to parklands will be obstructed, depending on how the buildings are positioned on the site. Therefore, Alternative 3 development will result in more impacts to views than the Project.

There are no officially designated or eligible state scenic highways from which views of the Alternative 3 site are currently available. The nearest facility of the California Scenic Highway System, I-215 from SR-74 near Romoland to SR-74 near Perris, is located approximately 11 miles south of the Alternative 3 site (Caltrans 2016). This segment of the Interstate is identified by Caltrans as an eligible state scenic highway. Views to the Alternative 3 site from this segment of I-215 are prevented by distance and intervening development and terrain, as the Alternative 3 site is located approximately 11.5 miles from that portion of I-215.

Since Alternative 3 will obstruct and interrupt existing views from Sycamore Canyon Wilderness Park trails, development of three- to five-story healthcare buildings will be inconsistent with the existing urban character of the immediate surrounding area, and existing views of the Sycamore Canyon Wilderness Park will be obstructed from adjacent residences, impacts to aesthetics under Alternative 3 are considered to have a greater impact when compared to the Project.

### **Agriculture and Forestry Resources**

The Project site is designated “Urban and Built-up Land” by the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program and as depicted in Figure OS-2 of the City’s General Plan 2025. Since the Project site is not located on any Farmland

designations, no conversion of Prime Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to non-agricultural use will occur as a result of developing the Project. In addition, the City's Land Use Zoning Map and General Plan Land Use Map indicate that no portion of the Project site is located within an area that is zoned for agricultural use (City of Riverside 2013). The Project site is located within commercial and/or office zones. According to the DOC's Williamson Act Map (DOC 2016) and as depicted in Figure OS-3, Williamson Act Preserves in the City's General Plan 2025 Open Space and Conservation Element, there are no Williamson Act contracts on the Project site (City of Riverside 2012a). Since the Project is not an agricultural land use and is not under a Williamson Act contract, no impacts to an agricultural use or Williamson Act contract will occur with the Project.

No forest land, timberland, or Timberland Production areas (as defined in the Public Resources Codes (PRC) 12220(g) and 4526 or Government Code (GC) 51104(g)) are located within or adjacent to the Project site. Therefore, the Project will not conflict with existing zoning for forest land, timberland, or Timberland Production areas, or result in the loss or conversion of forest lands to non-forest uses, as none exist. The Project site is currently vacant and undeveloped and contains no forest land. Therefore, implementation of the Project will not result in the loss of forest land or conversion of forest land to non-forest use.

The Alternative 3 site is also designated "Urban and Built-up Land" by the California DOC Farmland Mapping and Monitoring Program as depicted in Figure OS-2 of the City's General Plan 2025. Since the Alternative 3 site is not located on a site with any Farmland designations, no conversion of Prime Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to non-agricultural use will occur under this alternative. In addition, the City of Riverside 2025 General Plan Land Use Map designates the Alternative 3 site as Public Park, and the site is zoned for R-1-85000 SP - Single-Family Residential and Specific Plan (Sycamore Canyon Business Park) Overlay Zones under the City of Riverside Municipal Code (City of Riverside 2010). No portion of the Alternative 3 site is located within an area that is zoned for agricultural use. There are also no Williamson Act or Timberland preserves on the Alternative 3 site. As such, since there are no impacts to Agriculture or Forestland under this alternative, the impacts of Alternative 3 as compared to the Project will be the same.

## **Air Quality**

As discussed in Section 4.2, Air Quality, the daily construction emissions will not exceed the SCAQMD's significance thresholds for VOC, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub> during construction of the Project in any of the construction years. The Project, however, will exceed the daily construction emissions threshold for NO<sub>x</sub>. With implementation of MM-AQ-1, which requires off-road equipment engines that are Tier 3-certified or better by the California Air Resources

Board, NO<sub>x</sub> emissions will be reduced below the SCAQMD significance threshold, thus resulting in a less than significant air quality impact from construction emissions.

The Project's operational emissions will not exceed the SCAQMD's significance threshold for SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>. The Project, however, will exceed operational emissions thresholds for VOC, NO<sub>x</sub>, and CO, even with implementation of MM-AQ-2 through MM-AQ-6, and therefore, the Project's operational emissions will remain significant and unavoidable.

The LST analysis shows that the Project construction and operational emissions will not exceed the applicable LSTs for NO<sub>2</sub>, CO, PM<sub>10</sub>, or PM<sub>2.5</sub>. As such, this impact is less than significant.

The Project will not result in on-road traffic volumes at affected intersections that result in a CO hotspot. This impact is less than significant.

The cancer risk and non-cancer risk at the nearby residents, workers, and school children will not exceed the SCAQMD threshold of 10 in 1 million or chronic hazard index of 1.0, respectively, and impacts are less than significant.

In summary, the Project will result in significant and unavoidable impacts related to an obstruction of the implementation of the applicable air quality plan and long-term operational impacts. Accordingly, the Project will also result in significant and unavoidable cumulatively considerable impacts, and a Statement of Overriding Considerations will be required should the City choose to approve the Project.

Alternative 3 will result in more air emissions than will be generated during construction of the Project. Construction of this alternative will require grading, site preparation, and construction of facilities on a site that has significant slopes. The sloped area will require additional grading, and therefore, will generate additional air emissions during construction. Alternative 3's development will be the same as the development allowed under the Project, and the same mitigation measures (MM-AQ-1 through MM-AQ-6) will be implemented. Therefore, the amount of vehicle trips generated will be the same and air quality impacts under Alternative 3 will continue to be considered significant and unavoidable due to the number of vehicle trips and lack of feasible mitigation to reduce emissions from those trips. Since additional air quality impacts will be generated during the construction of Alternative 3 (due to development on steep terrain), impacts to air quality under Alternative 3 are considered more when compared to those impacts created by the Project. Cumulative impacts generated by Alternative 3 will still be significant and unavoidable and will require a Statement of Overriding Considerations.



## Biological Resources

As discussed in Section 4.3, Biological Resources, the Project site supports one drainage feature, Drainage 1, which is an unnamed, ephemeral drainage feature that flows north to south across a portion of the Project site. Drainage 1 exhibits a surface hydrologic connection to downstream waters of the United States via the City's underground storm drain system and qualifies as waters of the United States, which falls under the jurisdiction of the ACOE. Approximately 0.02 acre of ACOE jurisdiction is located within the boundaries of Site B. With the incorporation of mitigation measure MM-BIO-1, outlined in Section 4.3.6, impacts occurring within ACOE and RWQCB jurisdictional areas are considered less than significant with mitigation incorporated. Drainage 1 is considered a CDFW streambed with approximately 0.12 acre of jurisdictional streambed located within the boundaries of Site B. However, with implementation of the mitigation measures outlined in Section 4.3.6, the Project will comply with all the regulatory permits and associated conditions related to jurisdictional drainage features, and impacts are considered less than significant. No jurisdictional wetland features were found to occur within Site B, so impacts related to wetlands are considered less than significant.

The Project site is located within the MSHCP Area, but is not located in the Criteria Area and does not have conservation requirements (County of Riverside 2003). The Project site is, however, subject to consistency review with MSHCP Sections. The MSHCP consistency review found that the Project site is located within a burrowing owl survey area as defined in Section 6.3.2 of the MSHCP. As such, to meet requirements in the MSHCP, a habitat assessment for burrowing owls was conducted on September 16, 2015, to identify suitable habitat for burrowing owl. No burrowing owls or potential signs of burrowing owl (e.g., owl pellets, prints, molting feathers, abundant insect remains) were detected during the burrowing owl habitat assessment. However, after conducting the habitat assessment, it was determined that the Project site and undeveloped parcels within a 500-foot buffer provide suitable foraging habitat and suitable nesting habitat where burrowing owl burrows were noted, particularly on the perimeter of the Project site, fence lines, dirt mounds, and berms lining roadways. A concrete drainage on the southern portion of the northeast section of Site B was also found to be suitable habitat for burrowing owl. With the incorporation of mitigation measures MM-BIO-2 and MM-BIO-3, outlined in Section 4.3.6, the Project will be compliant with MSHCP Section 6.3.2, and impacts are less than significant with mitigation incorporated.

In addition to being located within a burrowing owl survey area, the Project site is located in the plan area of the SKR HCP (Riverside County Habitat Conservation Agency 1990). However, the Project site is outside of the SKR Management Areas of the HCP. As such, impacts related to SKR are considered to be less than significant.

In summary, the Project will be fully compliant with the MSHCP and fully covered for potential impacts to covered species. Impacts are considered less than significant with mitigation incorporated. Alternative 3 will be located approximately 1.9 miles west of the Project site, west of SR-60 and south of Central Avenue.

Like the Project site, the Alternative 3 site is currently vacant; however, under Alternative 3, construction of proposed facilities will occur within Sycamore Canyon Wilderness Park. This park includes several unnamed drainage features, including a meandering drainage feature that flows from east to west across the Alternative 3 site. During an aerial analysis of maps, it was observed that the Alternative 3 site likely contains one jurisdictional drainage feature that meets the criteria to be considered jurisdictional. The potential jurisdictional feature contains evidence of a noticeable change in soil and vegetation composition and what appears to be hydrologic connectivity to other areas. Alternative 3 components will need to be designed to avoid all potential jurisdictional areas on the site. Mitigation measures addressing potential direct and indirect impacts from grading activities during the bird breeding and nesting season may also be needed, as well as the installation of fencing and drainage controls to prevent water flow and sediment from entering jurisdictional areas on portions of the site. Therefore, Alternative 3 may be more impactful to wetlands as defined by Section 404 of the Clean Water Act directly, indirectly and cumulatively. These features will need a jurisdictional delineation to determine if they are considered waters of the United States and subject to the jurisdiction of the wetland agencies. If they are determined to be waters of the United States, they will require similar mitigation measures to that required for the Project. In addition, the drainage feature appears to be longer than 300 feet, and if the proposed construction impacts more than 300 linear feet (0.5 acre) of a feature found to be under the jurisdiction of the ACOE, Alternative 3 will not be covered under the Nationwide Permit program and will need to prepare an individual ACOE permit.

Like the Project site, the Alternative 3 site is located within the MSHCP area and is subject to the same consistency review with MSHCP Sections as the Project. Based on the conservation description provided on the MSHCP map, it is anticipated that the MSHCP review will find that the Alternative 3 site will also have suitable habitat for rare local species. The Sycamore Canyon Wilderness Park provides vast areas of open space containing vital biological resources and wildlife habitat areas, including rare local species and species such as the SKR. The Alternative 3 site is located in SKR HCP, and in compliance with that plan, will need to pay the SKR mitigation fee. There are expected to be other local species on the Alternative 3 site; thus, the proposed development on the Alternative 3 site could create potential impacts to covered species. Alternative 3 may also be subject to mitigation measures such as payment of an MSHCP development mitigation fee and HCP fees for any impacted species, in order to be compliant with the MSHCP.

Overall, because of the additional drainage features on the Alternative 3 site and the known potential for wildlife habitat areas being present on the site, impacts to biological resources are considered to be more impactful under Alternative 3 when compared to the Project.

### **Cultural Resources**

As discussed in Section 4.4, Cultural Resources, there are 77 cultural resources previously recorded within a 1-mile radius of the Project site; however, none of the resources are located within the Project APE (Appendix I). Initially, the project APE was defined as the 50.85-acre development area of the Project. Subsequent Project planning discussions determined that for the purposes of the cultural resources study, the APE will include the entirety of the Canyon Springs Business Park Specific Plan area, as the Specific Plan requires an amendment for the Project. The Project site is located within a low archaeological sensitivity area, and no archaeological resources were found within either the initial Project area or the expanded APE during the time of an intensive pedestrian field survey. With implementation of mitigation measures MM-CUL-1 through MM-CUL-4, outlined in Section 4.4.6, impacts associated with the potential discovery of unknown resources will be mitigated to a level of less than significant.

The Project site is located within an area of High Paleontological Sensitivity to encounter paleontological resources at depths of 4 feet or greater below the ground's surface; however, with the implementation of mitigation measures MM-CUL-1 through MM-CUL-4, outlined in Section 4.4.6, potential impacts to paleontological resources will be reduced to a less than significant level.

Like the Project site, the Alternative 3 site is currently vacant; however, the site does have several natural features including rock outcroppings. Thus, Alternative 3 could have an impact to historical resources. The site has not been graded and has the potential to have cultural resources within the site or within 1 mile of the site, but an area search will be necessary to determine if any of these resources is located within the Alternative 3 APE. The Alternative 3 site is also located within a medium archaeological sensitivity area and a high geographically sensitive area; therefore, there is a greater likelihood that archaeological resources will be found in the Alternative 3 site. There will need to be an area study to determine if there are any archaeological resources on the Alternative 3 site or within the expanded APE. Alternative 3's development will be the same as the development allowed under the Project. Under Alternative 3, the site plans and building scale will be similar to those of the Project; however, the amount of grading and ground disturbance that will be required will be greater due to the slope of the existing terrain. Therefore, under Alternative 3, the Project will be subject to more mitigation than the Project at the Project site to mitigate potential impacts associated with ground disturbance and the potential discovery of unknown resources.

The Alternative 3 site is located in an area of low paleontological sensitivity to encounter paleontological resources. Thus, no direct mitigation is required unless a fossil is encountered during site development. Should a fossil be encountered, Alternative 3 will be subject to the same mitigation measures (MM-CUL-1 through MM-CUL-4) when compared to the Project to mitigate potential impacts to paleontological resources.

Overall, Alternative 3 will be required to have more mitigation measures than the Project for archeological resources and the same mitigation for paleontological resources. It is anticipated that impacts to cultural resources under Alternative 3 will be greater than those created by the Project.

### **Geology and Soils**

The potential for fault rupture on the Project site is low because the Project site is not within an Alquist-Priolo Earthquake Fault Zone or a Fault Hazard Zone (DOC 2015b), and there is no evidence of active faulting on, or adjacent to, the Project site.

The Project site is within a low liquefaction zone, and the potential for liquefaction is low due to the generally dense nature of the native soils underlying the site. The Project area is also located on land identified as having a 0% to 10% slope, which is the lowest of four potential categories susceptible to landslides. The Project site has been previously graded and leveled, and there are no known areas prone to landslides on site. The potential for landslides or lateral spreading is very low due to the relatively flat-lying topography of the Project site.

The Project site contains silty and clayey sands and may have expansive properties; however, Figure PS-3 of the City's General Plan 2025 indicates that the Project site is not located in an area with soils that have a high shrink-swell potential, thereby substantially reducing the potential for adverse impacts related to being located on expansive soils (City of Riverside 2012b). Additionally, a majority of the area surrounding the Project site has been developed with multistory buildings. New structures being proposed by the Project will be designed to CBC standards to anticipate impacts associated with liquefaction, expansive soils and other seismic events. Furthermore, the OSHPD Facilities Development Division will review and approve the plans and specifications of the proposed hospital building, MOBs, skilled nursing facility, and related hospital facilities as required by and to ensure compliance with the provisions of the CBC (Title 24, California Code of Regulations).

Project construction activities such as excavation and grading may have the potential to cause soil erosion or the loss of topsoil. Short-term erosion effects during the construction phase of the Project will be prevented through required implementation of a SWPPP through compliance with the NPDES program and the incorporation of BMPs intended to reduce soil erosion. The SWPPP is required by the City during plan review and approval of project improvement plans; therefore,



with implementation of an approved SWPPP, impacts resulting from erosion during construction operations will be less than significant.

Similar to the Project, structures constructed under Alternative 3 will be designed to CBC standards that will anticipate impacts associated with liquefaction, expansive soils, and other seismic events. Furthermore, the OSHPD Facilities Development Division will also review and approve the plans and specifications of the buildings allowed under Alternative 3 to ensure compliance with the provisions of the CBC (Title 24, California Code of Regulations). However, Alternative 3 allows for the development of a healthcare campus on a vacant site that is substantially more sloped than the Project site and that will be more susceptible to landslides and other seismic geotechnical events. Due to the sloped terrain of the Alternative 3 site, geotechnical impacts associated with Alternative 3 will be greater than those of the Project.

### **Greenhouse Gas Emissions**

As discussed in Section 4.5, Greenhouse Gas Emissions, construction-related GHG emissions impacts associated with the Project will be short-term in nature, lasting only the duration of the of the construction period, and will not represent a long-term source of GHG emissions. With the implementation of mitigation measures MM-AQ-1 through MM-AQ-6, the Project's GHG operational emissions will be reduced by approximately 28.38% when compared to the baseline scenario. The 28.38% reduction is consistent with the target reduction percentage of 15% below 2010 levels based on the City of Riverside's CAP analysis supporting AB 32 (City of Riverside 2016). Therefore, impacts related to GHG emissions are considered less than significant with mitigation incorporated. The Project will also be consistent with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs.

The development allowed under Alternative 3 will be the same as the development allowed under the Project. Therefore, the construction of the proposed facilities under Alternative 3 will be similar to construction under the Project. However, although the Alternative 3 site is vacant, it has not been previously graded and will require a higher level of grading and site preparation when compared to the Project site. Construction-related GHG emissions will be higher for Alternative 3 than for the Project, but will still be short-term in nature and will not represent a long-term source of GHG emissions. Alternative 3 will be required to have similar mitigation measures (MM-AQ-1 through MM-AQ-6) to reduce GHG operational emissions to a level that is consistent with the target reduction percentage in the City of Riverside's CAP. Therefore, with the implementation of the mitigation measures outlined in Section 4.5.6 (MM-AQ-1 through MM-AQ-6), Alternative 3 will also have operational GHG emissions that are less than significant. Overall, it is anticipated that GHG emissions impacts under Alternative 3 will be slightly more than those created by the Project because of an increase in construction-related GHG emissions.

## **Hazards and Hazardous Materials**

As discussed in Section 4.6, Hazards and Hazardous Materials, the Project site is located approximately 1.6 miles north of March ARB, within the March ARB land use compatibility plan area. The March ARB identifies APZs; however, the Project site is located outside of all designated APZs (March ARB 2005; Mead & Hunt 2014). Therefore, no restrictions related to APZs apply to the Project.

The Project site is located within Zone D – Flight Corridor Buffer, as depicted in the March ARB/Inland Port ALUCP (Mead & Hunt 2014). The Project uses are compatible with the uses described in Zone D. The Project Applicant will be required to submit plans to the FAA if the notification criteria in Part 77 of the Federal Aviation Regulations are met. The FAA will ensure compliance with the FAA standards. Furthermore, the Project will go through review by the City of Riverside, March ARB, Riverside County ALUC, and Caltrans Division of Aeronautics (for the helistop) for approval. With the implementation of mitigation measures MM-HAZ-1 through MM-HAZ-3, outlined in Section 4.6.6, all potential impacts related to people working or residing within close proximity of a public airport will be reduced to a level that is less than significant. As such, safety hazard impacts related to the Project site being located in close proximity to a public airport are considered less than significant with mitigation incorporated.

Like the Project site, the Alternative 3 site is located within Zone D – Flight Corridor Buffer of the March ARB/Inland Port ALUCP (Mead & Hunt 2014). Zone D is intended to encompass areas of moderate to low noise and low accident potential risk within the flight corridor buffer. As summarized in the March ARB/Inland Port ALUCP, Zone D is intended to encompass other places where aircraft fly below about 3,000 feet above the airport elevation on either arrival or departure. Additionally, it includes locations near the primary flight paths where aircraft noise may regularly be loud enough to be disruptive. Direct overflights of these areas may occur occasionally. Accident potential risk levels in this zone are low. The Alternative 3 site is not located within a designated APZ. Therefore, under Alternative 3, the same potential hazards will exist and similar mitigation measures will be required to ensure that an FAA Form 7460-1 is submitted to the FAA to ensure compliance with FAA standards, and that the March ARB, Riverside County ALUC, and Caltrans Division of Aeronautics processes for review and approval are followed. Alternative 3's development will be the same as the development allowed under the Project. Therefore, there will be the same amount of patients, visitors, and employees present on the Alternative 3 site when compared to the Project site. Therefore, impacts related to public airport proximity safety hazards under Alternative 3 will be the same when compared to the Project.

## **Hydrology and Water Quality**

As discussed in Section 4.7, Hydrology and Water Quality, the Project complies with all applicable federal, state, and local rules and regulations regarding water quality and hydrology. The Project will implement a WQMP that includes structural and nonstructural BMPs. In addition, BMPs implemented as part of the SWPPP will further reduce potential impacts associated with violations of water quality standards or Waste Discharge Requirements to a less than significant level.

The Project will not substantially deplete groundwater supplies or interfere with groundwater recharge, and will have less than significant impacts associated with substantial erosion or siltation on or off the Project site. In addition, with design features, water quality BMPs, and required compliance with City requirements, impacts to existing or planned stormwater drainage systems and impacts associated with additional sources of polluted runoff, drainage patterns, and surface runoff are considered less than significant. Overall, impacts related to hydrology and water quality were found to be less than significant through compliance with existing regulations and as a result of the Project design features.

The Alternative 3 site is on a sloped area that has a sharper increase in elevation than the Project site. Like the Project site, there are no waterbodies or streams on the Alternative 3 site, and stormwater on site and in surrounding areas are collected by drainage swales, inlets, and subsurface storm drains and delivered to off-site basins. Like the Project site, the Alternative 3 site has no impervious surfaces (i.e., pavement or structures). The Alternative 3 site, however, does have a more substantial slope than the Project site. In addition, an aerial analysis of maps of the Alternative 3 site shows that the site has at least two unnamed drainage features on site, including a meandering drainage feature that flows from east to west. Given the slope of the site and the presence of drainage features, the site may be subject to more runoff than infiltration. The Alternative 3 site is not within a Federal Emergency Management Agency 100-year flood hazard area or a dam inundation area; however, given the substantial slope of the Alternative 3 site, the runoff created may exceed the capacity of the existing stormwater drainage systems and may require new systems. Under Alternative 3, the Project will also be required to comply with all applicable federal, state, and local regulations regarding water quality and hydrology, and Alternative 3's development will be the same as the Project's development and will not remove these requirements. Similar BMPs, design features, and the required SWPPP will also be implemented to further reduce potential impacts. Therefore, Alternative 3 is expected to have a greater impact on water quality and hydrology than the impacts created by the Project.

## **Land Use and Planning**

As discussed in Section 4.8, Land Use and Planning, the Project will include an amendment to the City's General Plan 2025 to designate the Specific Plan area as the Canyon Springs

Healthcare Campus Specific Plan and replace the current land use designations. The Project also will include a rezoning of the Canyon Springs Business Park area to be zoned as the Canyon Springs Healthcare Campus Specific Plan and revise the current City Zoning Map. The proposed Specific Plan land use designation and zoning will allow for implementation of the Specific Plan and associated development standards, which are necessary to meet the increasing demand for healthcare campus services and amenities. The Specific Plan will streamline development by outlining existing uses and future uses and laying out a cohesive set of guidelines that will provide a clear understanding of how growth and development will occur. With adoption of the proposed General Plan 2025 and Zoning Code amendments, implementation of the Project will not conflict with an adopted plan, policy, or regulation established to avoid environmental effects. In addition, with the implementation of mitigation measures outlined in Section 4.8.6 (MM-AQ-1 through MM-AQ-6; MM-BIO-2 and MM-BIO-3; MM-CUL-2 and MM-CUL-4; MM-NOI-1; MM-TRAF-1 through MM-TRAF-14; and MM-UTL-2 and MM-UTL-3), the Project will not conflict with the MSCHP and will not result in any other significant land use impacts.

Under Alternative 3, the City of Riverside's General Plan will need to be amended to remove the current land use designation of Public Park and redesignate the now vacant area as the Canyon Springs Healthcare Campus Specific Plan. This loss of public park will be a significant land use impact and will need to be mitigated. This alternative will also need a rezone on the City of Riverside's Zoning Map to allow the existing R-1-8500 SP - Single-Family Residential and Specific Plan (Sycamore Canyon Business Park) Overlay Zones area to be rezoned as the Canyon Springs Healthcare Campus Specific Plan. This will allow the Specific Plan to be implemented and all of its associated development standards to be in place for the site, but an evaluation of the land uses will need to be conducted to determine if there are any impacts that require mitigation. With the adoption of the proposed General Plan and Zoning Code amendments, the land use impacts of Alternative 3 will be greater when compared to the Project, because development of the Alternative 3 site will result in loss of public park land.

### **Mineral Resources**

The Project site lies within MRZ-3, as depicted on Figure OS-1 of the City's General Plan 2025 (City of Riverside 2012a), indicating that the area contains known or inferred mineral occurrences of undetermined mineral resources significance. Given that the Project site has been previously disturbed by rough grading and is surrounded by existing development (e.g., commercial shopping center, MOB, office buildings, residential development, and a school) that are incompatible with mining operations, it is unlikely that an economically viable mining operation could take place at the Project site. Therefore, the Project will not result in the loss of a known mineral resource.



The Alternative 3 site also lies within MRZ-3. The Alternative 3 site is a public park site that is surrounded by residential development. Like the Project site, the land uses within and adjacent to the Alternative 3 site are also incompatible with mining operations, and it is unlikely that an economically viable mining operation could take place at the Alternative 3 site. As such, impacts regarding mineral resources are the same at the Alternative 3 site as they are at the Project site.

## Noise

As discussed in Section 4.9, Noise, construction noise is exempt under the Riverside Municipal Code, Section 7.35.20 (Exemptions; City of Riverside 2007a). The Project will contribute operational stationary-source noise level increases at nearby receiver locations. This will result in potentially significant increases in ambient noise levels in the Project vicinity. As such, with the incorporation of mitigation measure MM-NOI-1, as outlined in Section 4.9.6, the Project's operational stationary-source noise will not result in a substantial temporary/periodic or permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project.

Once the Project is operational, the Project's contribution to existing noise levels will be less than significant for all of the study area roadway segments. As such, the Project's off-site traffic noise level will have a less than significant impact on the study area roadway segments for existing conditions and for General Plan 2026 Buildout conditions.

The Alternative 3 site is vacant like the Project site. There are additional off-site sensitive receptors located in close proximity to the Alternative 3 site than those located near the Project site. The Alternative 3 site has a residential area to the east, but aside from residences, the nearest other noise-sensitive receivers include nearby parks. The Sycamore Canyon Wilderness Park and the Sycamore Highlands Park are each located on or adjacent to the Alternative 3 site and will be potentially impacted by operational noise. Depending on exactly where the proposed buildings are positioned on the Alternative 3 site, operational noise may be readily audible to these sensitive receptors; therefore, additional noise reduction measures may be required in addition to the standard policies and design features outlined for the Project. The long-term operational noise associated with Alternative 3's operations will be the same as that generated by the Project. Alternative 3's frequency of emergency vehicle visits, traffic associated with the proposed parking structures and surface parking lots, use of on-site stationary equipment and helicopters, and additional traffic generated along adjacent roads will be the same as that created by the Project, and the mitigation measures outlined for the Project will also be necessary for Alternative 3. However, given the close proximity of additional sensitive receptors to the Alternative 3 site (i.e., single-family residences to the east and park areas to the north, west, and south), additional analysis of the noise effects from operations will need to be conducted to

determine their impact on the nearby sensitive receptors and to determine if additional mitigation measures are needed to reduce operational noise levels. Therefore, development under Alternative 3 is anticipated to have greater noise impacts when compared to the Project.

### **Population and Housing**

The Project involves the development of a hospital, MOBs, central energy plant, parking structures, hospital-related facilities, senior housing facility, independent living facility, assisted living facility, skilled nursing facility, and associated infrastructure improvements. Although the proposed senior housing facility, assisted living facility, and independent living facility will provide housing for residents, it does not generate a substantial population growth as these residents will generally move from the Riverside and Moreno Valley communities to the housing facility at the Project site to take advantage of the amenities and resources provided for that specific population. The Project will enhance the jobs/housing balance of the City by providing up to approximately 2,450 new permanent jobs at full buildout. Therefore, the Project will not generate substantial population growth. Existing infrastructure systems are adequate to serve the Project, and therefore, no improvements to infrastructure are needed to serve the Project. Consequently, the Project will provide hospital EMS for community disaster preparedness, medical check-ups and services at the MOBs, and resources and services for those with medical needs at the independent living facility, assisted living facility, and skilled nursing facility, within the Riverside and Moreno Valley communities and Inland Empire region. The Project site does not currently support any housing; therefore, substantial numbers of existing housing or people will not be displaced, and the construction of replacement housing elsewhere is not necessary as a result of developing the Project. No significant impacts related to population growth will result from the Project.

Alternative 3 will allow the same development as the Project, and this alternative will contribute the same employment positions and housing opportunities as the Project. The Alternative 3 site is currently a public park that has no housing that will be displaced or result in the need for replacement housing. The Alternative 3 site has not been mass graded, and the site's current use as a wilderness park means that the site has not been built with large amounts of infrastructure; therefore, the site is not expected to have adequate existing infrastructure systems to serve the Project's proposed uses and anticipated population increase. Improvements to infrastructure at the Alternative 3 site will be needed to serve the Project; therefore, impacts to population/housing under Alternative 3 will be greater than that of the Project.

## Public Services

As discussed in the Initial Study (Appendix A to the Draft EIR) and Section 4.10, Public Services of the Draft EIR, the Project will create an increased demand for emergency medical, fire protection, fire prevention, and rescue fire services that could be manifested by an increased number of emergency and public service calls. Implementation of the Project will introduce permanent and temporary residents, staff, and patients to the area, and entails the construction and operation of new structures on a currently vacant site. Development of the Project site was previously considered and analyzed as part of the City's General Plan 2025 Project (2007) and the Canyon Springs Business Park Specific Plan Project, and buildout of the City was considered in the General Plan 2025 and the General Plan 2025 Final Program EIR. The Final Program EIR disclosed a need for four additional fire stations 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 (City of Riverside 2007b). Two of the four fire stations identified as necessary to "maintain current levels of services and improve response times" in the General Plan 2025 Final Program EIR have since been constructed by the City through the use of the City's General Fund. The fire services analysis found that the Project will be designed in compliance with the current building code and Riverside Fire Department requirements. The Project will meet safety equipment standards, provide adequate emergency access, fire hydrants, water flows, and fire sprinklers. These systems will aid in the initial response to fire events occurring in proposed structures. Therefore, through adherence to General Plan policies, compliance with current building code and Riverside Fire Department requirements, in accordance with the conclusions of the General Plan 2025 Final Program EIR, new or physically altered government facilities will not be required to accommodate the Project. As such, the Project's impacts to fire protection services are considered less than significant.

The Project area is located in the East Neighborhood Policing Center serviced by Patrol for uniform presence (Lincoln Police Station) and the East Neighborhood Policing team (Fairmount Station) for any potential follow-ups of crimes or incidents. The current patrol staffing around the Project site is typically two to four officers during school hours. Project components, such as the senior housing and independent living, assisted living, and skilled nursing facility, would generate housing for the "age-restricted group" and those needing medical assistant living; however, these groups of people would likely come from the existing Riverside population, and thus, would not substantially increase population in Riverside requiring the need for additional police services. In the event of medical emergencies, police officers along with emergency medical technicians could transport those individual(s) to the hospital on site. Additionally, the Project would result in approximately 2,450 new permanent jobs on the Project site; however, the Project is not expected to substantially increase emergency calls to the City's Police Department as typical land uses requiring more police services generally include commercial and

industrial uses, and residential development. Therefore, the Project site can be adequately served by existing police services in the City. Furthermore, the Project will not result in new facilities that would be needed to serve the Project.

The Project site is located within the Moreno Valley Unified School District. There is one school within 0.25 mile of the Project site. Edgemont Elementary School is located immediately adjacent to the southern boundary of Site C. The proposed senior housing will not result in a substantial increase in demand for schools as the proposed use would be geared towards the aging population; thus, it will not require educational facilities or services. The other Project components do not involve residential type uses, and therefore, will not result in an increased demand for schools.

The Project will not result in a substantial increase in the demand for parks. Pursuant to the Riverside Municipal Code, applicable fees will be paid to mitigate any potential impacts to park development and open space needs. No other public facilities or services other than police and fire protection are anticipated to serve the Project. Implementation of the Project would provide EMS, medical care, and senior care within the Riverside community and Inland Empire region. As such, the overall impacts of the Project on public services were found to be less than significant.

The implementation of Alternative 3 will include the introduction of permanent and temporary residents and increased levels of staff, patients, customers, patrons, and structures to a currently vacant site. The development allowed under Alternative 3 is the same as the development allowed under the Project; therefore, Alternative 3 will create an increased demand for police protection, fire protection, emergency medical, fire prevention, and rescue fire services that could be manifested by an increased number of emergency and public service calls. Similar to the Project, development of the Alternative 3 site will be designed in compliance with the current building code, Riverside Fire Department requirements, and within safety equipment standards. Systems in the Project design will continue to aid in the initial response to fire events occurring in proposed structures. In addition, the buildout of the City was considered in the General Plan 2025, and two of the four stations identified in the General Plan 2025 Final Program EIR have been constructed by the City to maintain current levels and improved response times. Therefore, since Alternative 3 will continue to adhere to General Plan policies as contemplated in the General Plan 2025 Final Program EIR, compliance with current building code and Riverside Fire Department requirements, new or physically altered fire facilities will not be required to accommodate the Project at the Alternative 3 site.

Development of Alternative 3 will take place on land designated as Public Park. Adoption of the Specific Plan will reduce the park space in the City, and new park space will have to be found and developed to mitigate for this loss. Development of Alternative 3 will result in the need for



new or physically altered park facilities. As such, Alternative 3 will result in greater impacts to public services when compared to the Project.

### **Recreation**

The Project includes the development of a hospital, MOB, central energy plant, parking structures, hospital-related facilities, senior housing facility, independent living facility, assisted living facility, skilled nursing facility, and associated infrastructure improvements. The proposed senior housing and assisted living facility are not anticipated to substantially increase the use of existing parks or recreational facilities. The other Project components will not include residential-type uses or businesses that will increase the use of existing parks or recreational facilities. Thus, no deterioration of existing facilities will occur as a result of developing the Project. Nonetheless, the Riverside Municipal Code requires applicable fees to be paid to mitigate the potential impact to park development and open space needs generated by the Project. Furthermore, the Project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, less than significant impacts to recreational facilities will occur as a result of developing the Project.

Alternative 3 will allow for the same development as the Project, and this alternative will contribute the same employment positions and housing opportunities as the Project. However, development of Alternative 3 will take place on land designated as Public Park. Adoption of the Specific Plan will reduce the park space in the City, and new park space will have to be found and developed to mitigate for this loss. Development of Alternative 3 will result in the need for new or physically altered park facilities. As such, Alternative 3 will result in greater impacts to recreation when compared to the Project.

### **Transportation/Traffic**

As discussed in Section 4.11, Transportation/Traffic, under Existing with Project Conditions, the Project causes a significant impact at the intersection of Valley Springs Parkway/Eucalyptus Avenue. With the implementation of mitigation measure MM-TRAF-1, as identified in Section 4.11.7, the Project's impacts will be reduced to less than significant levels.

Under Cumulative with Project conditions, the Project will result in significant impacts at the following intersections: I-215 southbound ramps/Eucalyptus Avenue, Valley Springs Parkway/Eucalyptus Avenue, Day Street/Cottonwood Avenue; Day Street/Bay Avenue, Day Street/Alessandro Boulevard, and Memorial Way/Towngate Drive. With the implementation of mitigation measures MM-TRAF-1 through MM-TRAF-8, as identified in Section 4.11.7, the Project's impacts at these intersections will be reduced to less than significant levels.

The Project also contributes to unacceptable LOS on the I-215 southbound freeway mainline, south of Eucalyptus Avenue under Cumulative with Project conditions. The operation of the highway is projected to remain at unacceptable levels due to a lack of feasible mitigation. Thus, the cumulative traffic increases are a significant cumulative impact, and the Project's incremental contribution to the increases is cumulatively considerable. As such, a Statement of Overriding Considerations will be required should the City choose to approve the Project.

In General Plan Buildout with Project Conditions, the Project will result in significant impacts at the following intersections: I-215 southbound ramps/Eucalyptus Avenue, Valley Springs Parkway/Eucalyptus Avenue, Day Street/Eucalyptus Avenue, Day Street/Cottonwood Avenue, Day Street/Bay Avenue, Day Street/Alessandro Boulevard, and Memorial Way/Towngate Drive. With the implementation of mitigation measures MM-TRAF-1 through MM-TRAF-12, as identified in Section 4.11.7, the Project's impacts at these intersections will be reduced to less than significant levels.

The Project also contributes to unacceptable LOS on the I-215 southbound freeway mainline, south of Eucalyptus Avenue and between the off-ramp and on-ramp on Eucalyptus Avenue in General Plan with Project conditions. The operation of the highway is projected to remain at unacceptable levels due to a lack of feasible mitigation. Thus, the cumulative traffic increases are a significant cumulative impact, and the Project's incremental contribution to the increases is cumulatively considerable. As such, a Statement of Overriding Considerations will be required should the City choose to approve the Project.

The Project is located within a sector of March ARB Class C airspace, which is different from the zones contained in the Land Use Compatibility Plan Policy documentation. However, the Project uses are permitted within the March ARB/Inland Port ALUCP (Mead & Hunt 2014); the required regulatory actions will be taken; and mitigation measures MM-TRAF-13 and MM-TRAF-14, as identified in Section 4.11.7, will be implemented. Therefore, impacts are less than significant.

Under Alternative 3, the development will be the same as the development allowed under the Project. Therefore, the amount of traffic coming and going to the Alternative 3 site will be the same as the amount of traffic created by the Project. Like the Project site, the Alternative 3 site is currently vacant, and the number of residents, patients, employees, and visitors to the site will lead to an increase in traffic in the Alternative 3 site area. Alternative 3 will likely have significant impacts to a number of intersections and roadway segments during Existing Plus Project traffic conditions and Cumulative (Opening Year – 2016) with Project traffic conditions, and will likely require the implementation of mitigation measures in the form of roadway or intersection improvements, similar to the Project. In addition, the Alternative 3 site has not been mass graded, and the site's current use as a wilderness park means that the site

has not been built with large amounts of infrastructure. Therefore, the site is not expected to have adequate existing infrastructure systems in terms of roads to serve the Project's proposed uses and anticipated population increase. Improvements to infrastructure at the Alternative 3 site will be needed to serve the Project. Alternative 3 will also contribute to the existing and forecasted deficiency of freeway segments in the Congestion Management Plan. The density of the Project may overwhelm on/off ramps to SR-60 and cause other infrastructure issues. Therefore, Alternative 3 will contribute to these cumulative traffic impacts and will be considered cumulatively considerable and unavoidable like the Project. Therefore, impacts to transportation/traffic under Alternative 3 are considered to be greater when compared to the Project. Alternative 3 will require a Statement of Overriding Considerations.

### **Utilities and Service Systems**

As discussed in Section 4.12, Utilities and Service Systems, the estimated demand for the Project exceeds the projected demand accounted for in the 2010 UWMP, and will therefore, exceed the projected demand. However, with the implementation of Project elements that can reduce impacts, as well as the mitigation measures outlined in Section 4.12.6 (MM-UTIL-1 through MM-UTIL-3), impacts to water consumption will be minimized to a level that is less than significant.

The construction of all phases of the Project will generate construction waste that will result in an increased demand for solid waste collection and disposal during construction. In addition, during operation, the solid waste quantities generated by the Project will increase, and adequate space will be needed to allow for the collection and storage of recyclable materials. With required recycling, the amount of solid waste generated and disposed of in nearby landfills during construction and operation of the Project will be within the permitted landfill capacities. The implementation of mitigation measures MM-UTIL-1 through MM-UTIL-3, outlined in Section 4.12.6, will ensure that adequate space for on-site recycling is allotted. Therefore, the Project's potential impacts associated with solid waste capacity are considered less than significant with mitigation incorporated.

Under Alternative 3, the development will be the same as the development permitted under the Project. The estimated demand for Alternative 3 will be the same as the demand generated under the Project, and will require the same mitigation measures as the Project to minimize impacts to water demand to a level that is less than significant. The Alternative 3 site has not been mass graded, and the site's current use as a wilderness park means that the site has not been built with large amounts of infrastructure. Therefore, the site is not expected to have adequate existing water and/or wastewater infrastructure systems to serve the Project's proposed uses and anticipated population increase. Improvements to infrastructure at the Alternative 3 site will be

needed to serve the Project; therefore, impacts to utilities and service systems will be greater under Alternative 3 than that of the Project.

During construction, the amount of solid waste generated by Alternative 3 will be the same, since there will be the same square footage of building constructed. Additionally, since Alternative 3 will have the same square footage and the same intensity of uses, the amount of solid waste generated during Alternative 3's operation will be the same as that generated by the Project, and the same mitigation measures will be required.

In summary, Alternative 3 will require improvements to water and wastewater infrastructure at the Alternative 3 site, and therefore will have increased impacts on utilities and service systems when compared to the Project.

### **Energy Conservation**

As discussed in Section 4.13, Energy Conservation, the Project will increase the demand for electricity and natural gas at the Project site, increase the consumption of gasoline in the region during construction and operation, and place additional demands on local and regional energy supplies. However, with the implementation of mitigation measures (MM-AQ-2, MM-AQ-3, and MM-AQ-4) outlined in Section 4.13.6, the Project will not contribute to the inefficient or wasteful consumption of electricity, natural gas, or petroleum, and impacts are considered less than significant. Also, the mitigation measures will ensure that the Project reduces energy consumption beyond what is required by the state and will also ensure that the Project is consistent with existing energy standards and regulations. Therefore, impacts related to a conflict with existing energy standards and regulations are considered less than significant with mitigation incorporated. In addition, the Project includes TDM strategies in the Specific Plan that will help achieve the required vehicle reduction targets from the City's TDM Regulations. Furthermore, the implementation of mitigation measures (MM-AQ-2, MM-AQ-3, and MM-AQ-4) outlined in Section 4.13.6 will reduce vehicle miles traveled and petroleum consumption, as pedestrian and bicycle connections will be provided to surrounding areas consistent with the City's General Plan. Therefore, impacts related to energy supplies and capacity are considered less than significant.

Alternative 3 will have the same development as the development allowed in the Project and will have the same increase in the amount of electricity, natural gas, and petroleum used during construction and operation. The amount of energy required under Alternative 3 will be the same as that required under the Project, and the same mitigation measures will be required under both scenarios. Therefore, under Alternative 3, impacts to energy consumption and capacity will be similar to the Project.



### Relationship to Project Objectives and Feasibility

Under Alternative 3, the Project site will remain in its current vacant condition, and the Alternative 3 site will be developed with the same development as allowed under the Project. Table 6-5 provides a list of the Project objectives and whether or not Alternative 3 meets each objective.

**Table 6-5**  
**Summary of Alternative 3's Success at Meeting Project Objectives**

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

Alternative 3 will result in the new construction of a healthcare campus and the objectives of the Project will be met, but this alternative is more impactful than the Project in terms of aesthetics, air quality, biological resources, cultural resources, geology and soils, GHG emissions, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation/traffic, and utilities and service systems.

### 6.6.5 Alternative 4 – Reduced Project Alternative

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

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

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

### **Aesthetics**

As discussed in Section 4.1, Aesthetics, the Project will have less than significant impacts associated with scenic vistas from Sycamore Canyon Wilderness Park, viewpoints and trails within Box Springs Mountain Reserve, and SR-60, and as such, the Project will not substantially obstruct or interrupt existing views to identified major scenic resources.

The nearest designated state scenic highway by Caltrans is I-215 located approximately 11 miles south of the Project site. The Project site is not visible from the designated portion of I-215 (Caltrans 2008). The Project site is vacant and does not support historic buildings or rock outcroppings. Therefore, the Project will not substantially damage scenic resources within a state scenic highway.

Impacts to visual character will also be less than significant with implementation of the Project. Viewers along perimeter streets and from surrounding properties will experience views of a developed hospital campus instead of the existing vacant site. The Specific Plan will identify design guidelines and development standards for the proposed buildings. With implementation of the design guidelines, the buildings' mass and scale will be controlled, and all architectural materials will be of high quality. The Specific Plan's landscaping guidelines will also ensure that development of the Project is compatible with the surrounding developed areas.

In addition, the Project will not have any significant impacts from lighting or glare. The Project site is located in a developed area with existing sources of nighttime lighting. Currently there are sources of nighttime light and glare from the existing office, commercial uses, big box retail, and residential uses, as well as from street lights. Although the Project will increase lighting on the Project site compared to current conditions, the Specific Plan outlines minimum and maximum light intensities for the Project area and establishes design guidelines for the installation of lights. Pursuant to the development standards and design guidelines, pole lighting will be directed, oriented, and shielded to prevent light from shining onto the adjacent properties. Additionally, a visual buffer will be provided by landscaping along the perimeter of the Project site. Therefore, the lighting from the Project will not result in substantial light or glare that will adversely affect nighttime views in the surrounding area.

Under Alternative 4, the height and/or footprint of the proposed new hospital, MOB, senior housing facility, and independent living/memory care, assisted living, and skilled nursing facility buildings will be reduced in size by approximately 25%. The development of a reduced project will allow the construction of buildings that are smaller and include less square footage. Therefore, impacts to views and visual character under Alternative 4 will be less than the Project. Overall, aesthetic impacts will be reduced under this alternative when compared to the Project.

### **Agriculture and Forestry Resources**

The Project site is designated “Urban and Built-up Land” by the California DOC Farmland Mapping and Monitoring Program and as depicted in Figure OS-2 of the City’s General Plan 2025. Since the Project site is not located on any Farmland designations, no conversion of Prime Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to non-agricultural use will occur as a result of developing the Project. In addition, the City’s Land Use Zoning Map and General Plan Land Use Map indicate that no portion of the Project site is located within an area that is zoned for agricultural use (City of Riverside 2013). The Project site is located within commercial and/or office zones. According to the DOC’s Williamson Act Map (DOC 2016) and as depicted in Figure OS-3, Williamson Act Preserves in the City’s General Plan 2025 Open Space and Conservation Element, there are no Williamson Act contracts on the Project site (City of Riverside 2012a). Since the Project is not an agricultural land use and is not under a Williamson Act contract, no impacts to an agricultural use or Williamson Act contract will occur with the Project.

No forest land, timberland, or Timberland Production areas (as defined in the Public Resources Codes 12220(g) and 4526 or Government Code 51104(g)) are located within or adjacent to the Project site. Therefore, the Project will not conflict with existing zoning for forest land, timberland, or Timberland Production areas, or result in the loss or conversion of forest lands to

non-forest uses, as none exist. The Project site is currently vacant and undeveloped and contains no forest land. Therefore, implementation of the Project will not result in the loss of forest land or conversion of forest land to non-forest use.

The Alternative 4 site is the same as the Project site. The Project site has no significant impacts with regard to agriculture and forestry resources; therefore, the impacts of developing Alternative 4 as compared to the Project will be the same.

### **Air Quality**

As discussed in Section 4.2, Air Quality, the daily construction emissions will not exceed the SCAQMD's significance thresholds for VOC, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub> during construction of the Project in any of the construction years. The Project, however, will exceed the daily construction emissions threshold for NO<sub>x</sub>. With implementation of MM-AQ-1, which requires off-road equipment engines that are Tier 3-certified or better by the California Air Resources Board, NO<sub>x</sub> emissions will be reduced below the SCAQMD significance threshold, thus resulting in a less than significant air quality impact from construction emissions.

The Project's operational emissions will not exceed the SCAQMD's significance threshold for SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub>. The Project, however, will exceed operational emissions thresholds for VOC, NO<sub>x</sub>, and CO, even with implementation of MM-AQ-2 through MM-AQ-6, and therefore, the Project's operational emissions will remain significant and unavoidable.

The LST analysis shows that the Project construction and operational emissions will not exceed the applicable LSTs for NO<sub>2</sub>, CO, PM<sub>10</sub>, or PM<sub>2.5</sub>. As such, this impact is less than significant.

The Project will not result in on-road traffic volumes at affected intersections that result in a CO hotspot. This impact is less than significant.

The cancer risk and non-cancer risk at the nearby residents, workers, and school children will not exceed the SCAQMD threshold of 10 in 1 million or chronic hazard index of 1.0, respectively, and impacts are less than significant.

In summary, the Project will result in significant and unavoidable impacts related to an obstruction of the implementation of the applicable air quality plan and long-term operational impacts. Accordingly, the Project will also result in significant and unavoidable cumulatively considerable impacts, and a Statement of Overriding Considerations will be required should the City choose to approve the Project.

Alternative 4 will generate fewer air emissions during construction and operation than the Project. Construction of Alternative 4 will require grading, site preparation, and construction of



facilities, all of which generate air emissions; however, under Alternative 4, the height and/or footprint of the proposed new hospital, MOBs, senior housing facility, and independent living/memory care, assisted living, and skilled nursing facility buildings will be reduced in size by approximately 25%. The reduced development will generate fewer construction activities and will shorten the duration of construction.

During Alternative 4's operation, there will be fewer on-road vehicles and less traffic drawn to the area as compared to the Project because fewer patients, visitors, and employees will visit the healthcare campus. Less traffic will create fewer operational emissions. Nevertheless, air quality impacts under Alternative 4 may be considered significant and unavoidable due to the number of vehicle trips and lack of feasible mitigation to reduce emissions from those trips, even though a reduction will occur.

Air Quality impacts for Alternative 4 are considered reduced when compared to impacts created by the Project, but will likely still be significant and unavoidable and require a Statement of Overriding Considerations. In addition, the site will be underutilized under Alternative 4.

### **Biological Resources**

As discussed in Section 4.3, Biological Resources, the Project site supports one drainage feature, Drainage 1, which is an unnamed, ephemeral drainage feature that flows north to south across a portion of the Project site. Drainage 1 exhibits a surface hydrologic connection to downstream waters of the United States via the City's underground storm drain system and qualifies as waters of the United States, which falls under the jurisdiction of the ACOE. Approximately 0.02 acre of ACOE jurisdiction is located within the boundaries of Site B. With the incorporation of mitigation measure MM-BIO-1, outlined in Section 4.3.6, impacts occurring within ACOE and RWQCB jurisdictional areas are considered less than significant with mitigation incorporated. Drainage 1 is considered a CDFW streambed with approximately 0.12 acre of jurisdictional streambed located within the boundaries of Site B. However, with implementation of the mitigation measures outlined in Section 4.3.6, the Project will comply with all the regulatory permits and associated conditions related to jurisdictional drainage features, and impacts are considered less than significant. No jurisdictional wetland features were found to occur within Site B, so impacts related to wetlands are considered less than significant.

The Project site is located within the MSHCP Area, but is not located in the Criteria Area and does not have conservation requirements (County of Riverside 2003). The Project site is, however, subject to consistency review with MSHCP Sections. The MSHCP consistency review found that the Project site is located within a burrowing owl survey area as defined in Section 6.3.2 of the MSHCP. As such, to meet requirements in the MSHCP, a habitat assessment for burrowing owls was conducted on September 16, 2015, to identify suitable habitat for burrowing owl. No burrowing owls or potential signs of burrowing owl (e.g., owl pellets,

prints, molting feathers, abundant insect remains) were detected during the burrowing owl habitat assessment. However, after conducting the habitat assessment, it was determined that the Project site and undeveloped parcels within a 500-foot buffer provide suitable foraging habitat and suitable nesting habitat where burrowing owl burrows were noted, particularly on the perimeter of the Project site, fence lines, dirt mounds, and berms lining roadways. A concrete drainage on the southern portion of the northeast section of Site B was also found to be suitable habitat for burrowing owl. With the incorporation of mitigation measures MM-BIO-2 and MM-BIO-3, outlined in Section 4.3.6, the Project will be compliant with MSHCP Section 6.3.2, and impacts are less than significant with mitigation incorporated.

In addition to being located within a burrowing owl survey area, the Project site is located in the plan area of the SKR HCP. However, the Project site is outside of the SKR Management Areas of the HCP. As such, impacts related to SKR are considered to be less than significant. In summary, the Project will be fully compliant with the MSHCP and fully covered for potential impacts to covered species. Impacts are considered less than significant with mitigation incorporated.

Under Alternative 4, construction of facilities will still occur, and similar mitigation measures will be required. Construction of Alternative 4 will require grading, site preparation, and development of facilities; however, under Alternative 4, the footprint of the proposed new hospital, MOBs, senior housing facility, and independent living/memory care, assisted living, and skilled nursing facility buildings will be reduced in size by approximately 25%. It is unclear whether, given the location of the identified drainage feature, they could be avoided either partially or in their entirety through the design of Alternative 4, or if the drainage features will be impacted to the same extent as the Project. The reduced development footprint of Alternative 4 buildings will likely reduce impacts to biological resources; therefore, there will be fewer biological resource impacts under this alternative when compared to the Project.

## **Cultural Resources**

As discussed in Section 4.4, Cultural Resources, there are 77 cultural resources previously recorded within a 1-mile radius of the Project site; however, none of the resources are located within the Project APE (Appendix I). Initially, the project APE was defined as the 50.85-acre development area of the Project. Subsequent Project planning discussions determined that for the purposes of the cultural resources study, the APE will include the entirety of the Canyon Springs Business Park Specific Plan area, as the Specific Plan requires an amendment for the Project. The Project site is located within a low archaeological sensitivity area and no archaeological resources were found within either the initial Project area or the expanded APE during the time of an intensive pedestrian field survey. With implementation of mitigation measures MM-

CUL-1 through MM-CUL-4, outlined in Section 4.4.6, impacts associated with the potential discovery of unknown resources will be mitigated to a level of less than significant.

The Project site is located within an area of High Paleontological Sensitivity to encounter paleontological resources at depths of 4 feet or greater below the ground's surface; however, with the implementation of mitigation measures MM-CUL-1 through MM-CUL-4, outlined in Section 4.4.6, potential impacts to paleontological resources will be reduced to a less than significant level.

Under Alternative 4, construction of facilities will still occur, and similar mitigation measures will be required. Construction of Alternative 4 will require grading, site preparation, and development of facilities; however, under Alternative 4, the footprint of the proposed new hospital, MOBs, senior housing facility, and independent living/memory care, assisted living, and skilled nursing facility buildings will be reduced in size by approximately 25%. Depending on the configuration of Alternative 4's design, the structures developed might require smaller amounts of grading and ground disturbance, and there may be a smaller APE than the Project's APE. Therefore, impacts to cultural resources might be slightly reduced under Alternative 4 when compared to the Project.

### **Geology and Soils**

The potential for fault rupture on the Project site is low because the Project site is not within an Alquist-Priolo Earthquake Fault Zone or a Fault Hazard Zone (DOC 2015b), and there is no evidence of active faulting on, or adjacent to, the Project site.

The Project site is within a low liquefaction zone, and the potential for liquefaction is low due to the generally dense nature of the native soils underlying the site. The Project area is also located on land identified as having a 0% to 10% slope, which is the lowest of four potential categories susceptible to landslides. The Project site has been previously graded and leveled, and there are no known areas prone to landslides on site. The potential for landslides or lateral spreading is very low due to the relatively flat-lying topography of the Project site.

The Project site contains silty and clayey sands and may have expansive properties; however, Figure PS-3 of the City's General Plan 2025 indicates that the Project site is not located in an area with soils that have a high shrink-swell potential, thereby substantially reducing the potential for adverse impacts related to being located on expansive soils (City of Riverside 2012b). Additionally, a majority of the area surrounding the Project site has been developed with multistory buildings. New structures being proposed by the Project will be designed to CBC standards to anticipate impacts associated with liquefaction, expansive soils and other seismic events. Furthermore, the OSHPD Facilities Development Division will review and approve the plans and specifications of the proposed hospital building, MOBs, skilled nursing facility, and

related hospital facilities as required by and to ensure compliance with the provisions of the CBC (Title 24, California Code of Regulations).

Project construction activities such as excavation and grading may have the potential to cause soil erosion or the loss of topsoil. Short-term erosion effects during the construction phase of the Project will be prevented through required implementation of a SWPPP through compliance with the NPDES program and the incorporation of BMPs intended to reduce soil erosion. The SWPPP is required by the City during plan review and approval of project improvement plans; therefore, with implementation of an approved SWPPP, impacts resulting from erosion during construction operations will be less than significant.

Under Alternative 4, construction of facilities will still occur. Construction of Alternative 4 will require grading, site preparation, and development of facilities; however, under Alternative 4, the height and/or footprint of the proposed new hospital, MOB, senior housing facility, and independent living/memory care, assisted living, and skilled nursing facility buildings will be reduced in size by approximately 25%. Depending on the configuration and height of Alternative 4's development, there will likely be smaller amounts of grading and ground disturbance and less erosion than under the Project, and the height of structures will likely be less tall than the structures developed under the Project. In addition, there will be fewer permanent and temporary residents, as well as patients, staff, and visitors to the Project area. Fewer people at the site will mean that fewer people will be impacted by seismic or other geotechnical events. Therefore, geology and soils impacts associated with Alternative 4 will be less than that of the Project.

### **Greenhouse Gas Emissions**

As discussed in Section 4.5, Greenhouse Gas Emissions, construction-related GHG emissions impacts associated with the Project will be short-term in nature, lasting only the duration of the of the construction period, and will not represent a long-term source of GHG emissions. With the implementation of mitigation measures MM-AQ-1 through MM-AQ-6, the Project's GHG operational emissions will be reduced by approximately 28.38% when compared to the baseline scenario. The 28.38% reduction is consistent with the target reduction percentage of 15% below 2010 levels based on the City of Riverside's CAP analysis supporting AB 32 (City of Riverside 2016). Therefore, impacts related to GHG emissions are considered less than significant with mitigation incorporated. The Project will also be consistent with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs.

Similar to the Project, under Alternative 4, the construction of facilities will still occur, but construction-related GHG emissions will be shorter in duration, will continue to be short-term in nature, and will not represent a long-term source of GHG emissions. In addition, Alternative 4 will include similar mitigation measures that will reduce GHG operational emissions to a



level that is consistent with the target reduction percentage in the City of Riverside's CAP. However, due to the decrease in size of the Project under Alternative 4, impacts will be reduced when compared to the Project.

### **Hazards and Hazardous Materials**

As discussed in Section 4.6, Hazards and Hazardous Materials, the Project site is located approximately 1.6 miles north of March ARB, within the March ARB land use compatibility plan area. The March ARB identifies APZs; however, the Project site is located outside of all designated APZs (March ARB 2005; Mead & Hunt 2014). Therefore, no restrictions related to APZs apply to the Project.

The Project site is located within Zone D – Flight Corridor Buffer, as depicted in the March ARB/Inland Port ALUCP (Mead & Hunt 2014). The Project uses are compatible with the uses described in Zone D. The Project Applicant will be required to submit plans to the FAA if the notification criteria in Part 77 of the Federal Aviation Regulations are met. The FAA will ensure compliance with the FAA standards. Furthermore, the Project will go through review by the City of Riverside, March ARB, Riverside County ALUC, and Caltrans Division of Aeronautics (for the helistop) for approval. With the implementation of mitigation measures MM-HAZ-1 through MM-HAZ-3, outlined in Section 4.6.6, all potential impacts related to people working or residing within close proximity of a public airport will be reduced to a level that is less than significant. As such, safety hazard impacts related to the Project site being located in close proximity to a public airport are considered less than significant with mitigation incorporated.

Under Alternative 4, the same potential hazards will exist, and similar mitigation measures will be necessary to ensure that a FAA Form 7460-1 is submitted to the FAA to ensure compliance with FAA standards, and that the March ARB, Riverside County ALUC, and Caltrans Division of Aeronautics' processes for review and approval are followed. Alternative 4's development will be 25% less intense than the development allowed under the Project. Therefore, there will be a decreased number of patients, visitors, and employees present on the Project site compared to the Project. Therefore, impacts related to public airport proximity safety hazards under Alternative 4 will be slightly decreased when compared to the Project.

### **Hydrology and Water Quality**

As discussed in Section 4.7, Hydrology and Water Quality, the Project complies with all applicable federal, state, and local rules and regulations regarding water quality and hydrology. The Project will implement a WQMP that includes structural and nonstructural BMPs. In addition, BMPs implemented as part of the SWPPP will further reduce potential impacts

associated with violations of water quality standards or Waste Discharge Requirements to a less than significant level.

The Project will not substantially deplete groundwater supplies or interfere with groundwater recharge, and will have less than significant impacts associated with substantial erosion or siltation on or off the Project site. In addition, with design features, water quality BMPs, and required compliance with City requirements, impacts to existing or planned stormwater drainage systems and impacts associated with additional sources of polluted runoff, drainage patterns, and surface runoff are considered less than significant. Overall, impacts related to hydrology and water quality were found to be less than significant through compliance with existing regulations and as a result of the Project design features.

Alternative 4 will also be required to comply with all applicable federal, state, and local regulations regarding water quality and hydrology, and the reduction in the development potential will not remove these requirements. A SWPPP and similar BMPs will also be implemented to further reduce potential impacts. In addition, there will be less development on the Project site and fewer impervious surfaces. Therefore, Alternative 4 will be slightly less impactful to water quality and hydrology when compared to the Project.

### **Land Use and Planning**

As discussed in Section 4.8, Land Use and Planning, the Project will include an amendment to the City's General Plan 2025 to designate the Specific Plan area as the Canyon Springs Healthcare Campus Specific Plan and replace the current land use designations. The Project also will include a rezoning of the Canyon Springs Business Park area to be zoned as the Canyon Springs Healthcare Campus Specific Plan and revise the current City Zoning Map. The proposed Specific Plan land use designation and zoning will allow for implementation of the Specific Plan and associated development standards, which are necessary to meet the increasing demand for healthcare campus services and amenities. The Specific Plan will streamline development by outlining existing uses and future uses and laying out a cohesive set of guidelines that will provide a clear understanding of how growth and development will occur. With adoption of the proposed General Plan 2025 and Zoning Code amendments, implementation of the Project will not conflict with an adopted plan, policy, or regulation established to avoid environmental effects. In addition, with the implementation of mitigation measures outlined in Section 4.8.6 (MM-AQ-1 through MM-AQ-6; MM-BIO-2 and MM-BIO-3; MM-CUL-2 and MM-CUL-4; MM-NOI-1; MM-TRAF-1 through MM-TRAF-14; and MM-UTL-2 and MM-UTL-3), the Project will not conflict with the MSCHP and will not result in any other significant land use impacts.

Under Alternative 4, the City General Plan 2025 will still be amended to designate the Specific Plan area as the Canyon Springs Healthcare Campus Specific Plan and replace the current land

use designations. In addition, Alternative 4 will also require a rezone to designate the Canyon Springs Healthcare Campus Specific Plan and revise the current City Zoning Map. The Specific Plan will still include development standards for a healthcare campus and will still outline the slightly decreased future uses and lay out. Since Alternative 4 will also require adoption of a General Plan and Zoning Code amendment, Alternative 4 will have the same land use impacts when compared to the Project.

### **Mineral Resources**

The Project site lies within MRZ-3, as depicted on Figure OS-1 of the City's General Plan 2025 (City of Riverside 2012a), indicating that the area contains known or inferred mineral occurrences of undetermined mineral resources significance. Given that the Project site has been previously disturbed by rough grading and is surrounded by existing development (e.g., commercial shopping center, MOB, office buildings, residential development, and a school) that are incompatible with mining operations, it is unlikely that an economically viable mining operation could take place at the Project site. Therefore, the Project will not result in the loss of a known mineral resource.

Alternative 4 will allow for the development of the same types of uses as the Project, only on a smaller scale. Alternative 4 development will take place on the same site as the Project, which is surrounded by incompatible uses to mining operations and unlikely to be developed as a mining operation because it is not economically viable. Therefore, impacts to mineral resources will be the same under Alternative 4 as the Project.

### **Noise**

As discussed in Section 4.9, Noise, construction noise is exempt under the Riverside Municipal Code, Section 7.35.20 (Exemptions; City of Riverside 2007a). The Project will contribute operational stationary-source noise level increases at nearby receiver locations. This will result in potentially significant increases in ambient noise levels in the Project vicinity. As such, with the incorporation of mitigation measure MM-NOI-1, as outlined in Section 4.9.6, the Project's operational stationary-source noise will not result in a substantial temporary/periodic or permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project.

Once the Project is operational, the Project's contribution to existing noise levels will be less than significant for all of the study area roadway segments. As such, the Project's off-site traffic noise level will have a less than significant impact on the study area roadway segments for existing conditions and for General Plan 2026 Buildout conditions.

Under Alternative 4, construction of a new hospital, MOB, senior housing facility, and an independent living/memory care facility and skilled nursing facility will still occur; however,

these facilities will be reduced in size by approximately 25%. The reduced project's operation will have fewer stationary noise sources and fewer on-road vehicles will be drawn to the area as compared to the Project because fewer patients, visitors and employees will visit the healthcare campus. Operational noise will be reduced under Alternative 4; therefore, noise impacts are considered reduced when compared to impacts created by the Project.

### **Population and Housing**

The Project involves the development of a hospital, MOBs, central energy plant, parking structures, hospital-related facilities, senior housing facility, independent living facility, assisted living facility, skilled nursing facility, and associated infrastructure improvements. Although the proposed senior housing facility, assisted living facility, and independent living facility will provide housing for residents, they do not generate a substantial population growth as these residents will generally move from the Riverside and Moreno Valley communities to the housing facility at the Project site to take advantage of the amenities and resources provided for that specific population. The Project will enhance the jobs/housing balance of the City by providing up to approximately 2,450 new permanent jobs at full buildout. Therefore, the Project will not generate substantial population growth. Existing infrastructure systems are adequate to serve the Project, and therefore, no improvements to infrastructure are needed to serve the Project. Consequently, the Project will provide hospital EMS for community disaster preparedness, medical check-ups and services at the MOBs, and resources and services for those with medical needs at the independent living facility, assisted living facility, and skilled nursing facility, within the Riverside and Moreno Valley communities and Inland Empire region. The Project site does not currently support any housing; therefore, substantial numbers of existing housing or people will not be displaced, and the construction of replacement housing elsewhere is not necessary as a result of developing the Project. No significant impacts related to population growth will result from the Project.

The development allowed under Alternative 4 will allow for a smaller healthcare campus that will be 25% less intense than the development allowed under the Project. While the implementation of this alternative will include the introduction of permanent and temporary residents and increased levels of staff, patients, visitors, and structures to a currently vacant site, Alternative 4 will provide fewer permanent jobs at full buildout than the Project. This alternative will also require less new infrastructure to accommodate the proposed development. In summary, the population growth that will be generated by Alternative 4 will be lower than that of the Project; therefore, impacts to population/housing will be less under Alternative 4 than the impacts for the Project.



## Public Services

As discussed in the Initial Study (Appendix A to the Draft EIR) and Section 4.10, Public Services of the Draft EIR, the Project will create an increased demand for emergency medical, fire protection, fire prevention, and rescue fire services that could be manifested by an increased number of emergency and public service calls. Implementation of the Project will introduce permanent and temporary residents, staff, and patients to the area and entails the construction and operation of new structures on a currently vacant site. Development of the Project site was previously considered and analyzed as part of the City's General Plan 2025 Project (2007) and the Canyon Springs Business Park Specific Plan Project, and buildout of the City was considered in the General Plan 2025 and the General Plan 2025 Final Program EIR. The Final Program EIR disclosed a need for four additional fire stations 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 (City of Riverside 2007b). Two of the four fire stations identified as necessary to "maintain current levels of services and improve response times" in the General Plan 2025 Final Program EIR have since been constructed by the City through the use of the City's General Fund. The fire services analysis found that the Project will be designed in compliance with the current building code and Riverside Fire Department requirements. The Project will meet safety equipment standards, provide adequate emergency access, fire hydrants, water flows, and fire sprinklers. These systems will aid in the initial response to fire events occurring in proposed structures. Therefore, through adherence to General Plan policies, compliance with current building code and Riverside Fire Department requirements, in accordance with the conclusions of the General Plan 2025 Final Program EIR, new or physically altered government facilities will not be required to accommodate the Project. As such, the Project's impacts to fire protection services are considered less than significant.

The Project area is located in the East Neighborhood Policing Center serviced by Patrol for uniform presence (Lincoln Police Station) and the East Neighborhood Policing team (Fairmount Station) for any potential follow-ups of crimes or incidents. The current patrol staffing around the Project site is typically two to four officers during school hours. Project components, such as the senior housing and independent living, assisted living, and skilled nursing facility would generate housing for the "age-restricted group" and those needing medical assistant living; however, these groups of people would likely come from the existing Riverside population, and thus, would not substantially increase population in Riverside requiring the need for additional police services. In the event of medical emergencies, police officers along with emergency medical technicians could transport those individual(s) to the hospital on site. Additionally, the Project would result in approximately 2,450 new permanent jobs on the Project site; however, the Project is not expected to substantially increase emergency calls to the City's Police Department as typical land uses requiring more police services generally include commercial and

industrial uses, and residential development. Therefore, the Project site can be adequately served by existing police services in the City. Furthermore, the Project will not result in new facilities that would be needed to serve the Project.

The Project site is located within the Moreno Valley Unified School District. There is one school within 0.25 mile of the Project site. Edgemont Elementary School is located immediately adjacent to the southern boundary of Site C. The proposed senior housing will not result in a substantial increase in demand for schools as the proposed use would be geared towards the aging population; thus, it will not require educational facilities or services. The other Project components do not involve residential type uses, and therefore, will not result in an increased demand for schools.

The Project will not result in a substantial increase in the demand for parks. Pursuant to the Riverside Municipal Code, applicable fees will be paid to mitigate any potential impacts to park development and open space needs. No other public facilities or services other than police and fire protection are anticipated to serve the Project. Implementation of the Project would provide EMS, medical care, and senior care within the Riverside community and Inland Empire region. As such, the overall impacts of the Project on public services were found to be less than significant.

Implementation of Alternative 4 will include the introduction of permanent and temporary residents and increased levels of staff, patients, visitors, and structures to a currently vacant site. However, the development allowed under Alternative 4 will be 25% less intense than the development allowed under the Project; therefore, Alternative 4 will create less demand for police and fire protection, emergency medical, fire prevention, rescue fire services, schools, and parks as compared to the Project. In addition, the development allowed under this alternative will result in fewer people in the area and fewer numbers of emergency and public service calls. Overall, the decreased development potential under Alternative 4 will have reduced impacts when compared to the Project.

## **Recreation**

The Project includes the development of a hospital, MOBs, central energy plant, parking structures, hospital-related facilities, senior housing facility, independent living facility, assisted living facility, skilled nursing facility, and associated infrastructure improvements. The proposed senior housing and assisted living facility are not anticipated to substantially increase the use of existing parks or recreational facilities. The other Project components will not include residential-type uses or businesses that will increase the use of existing parks or recreational facilities. Thus, no deterioration of existing facilities will occur as a result of developing the Project. Nonetheless, the Riverside Municipal Code requires applicable fees to be paid to mitigate the potential impact to park development and open space needs generated by the

Project. Furthermore, the Project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, less than significant impacts to recreational facilities will occur as a result of developing the Project.

Alternative 4 will allow for the development of 25% smaller healthcare facilities on the Project site than the Project. The implementation of Alternative 4 will draw fewer staff, patients, and visitors to the area, and will not generate as many new permanent jobs at full buildout when compared to the Project. The population growth that will be generated by Alternative 4's new residents and employees will be substantially lower than that of the Project, and fewer people will be utilizing existing recreational facilities. Therefore, under Alternative 4, impacts to recreational facilities will be less than the impacts from the Project.

### **Transportation/Traffic**

As discussed in Section 4.11, Transportation/Traffic, under Existing with Project Conditions, the Project causes a significant impact at the intersection of Valley Springs Parkway/Eucalyptus Avenue. With the implementation of mitigation measure MM-TRAF-1, as identified in Section 4.11.7, the Project's impacts will be reduced to less than significant levels.

Under Cumulative with Project conditions, the Project will result in significant impacts at the following intersections: I-215 southbound ramps/Eucalyptus Avenue, Valley Springs Parkway/Eucalyptus Avenue, Day Street/Cottonwood Avenue, Day Street/Bay Avenue, Day Street/Alessandro Boulevard, and Memorial Way/Towngate Drive. With the implementation of mitigation measures MM-TRAF-1 through MM-TRAF-8, as identified in Section 4.11.7, the Project's impacts at these intersections will be reduced to less than significant levels.

The Project also contributes to unacceptable LOS on the I-215 southbound freeway mainline, south of Eucalyptus Avenue under Cumulative with Project conditions. The operation of the highway is projected to remain at unacceptable levels due to a lack of feasible mitigation. Thus, the cumulative traffic increases are a significant cumulative impact, and the Project's incremental contribution to the increases is cumulatively considerable. As such, a Statement of Overriding Considerations will be required should the City choose to approve the Project.

In General Plan Buildout with Project Conditions, the Project will result in significant impacts at the following intersections: I-215 southbound ramps/Eucalyptus Avenue, Valley Springs Parkway/Eucalyptus Avenue, Day Street/Eucalyptus Avenue, Day Street/Cottonwood Avenue, Day Street/Bay Avenue, Day Street/Alessandro Boulevard, and Memorial Way/Towngate Drive. With the implementation of mitigation measures MM-TRAF-1 through MM-TRAF-12, as identified in Section 4.11.7, the Project's impacts at these intersections will be reduced to less than significant levels.

The Project also contributes to unacceptable LOS on the I-215 southbound freeway mainline, south of Eucalyptus Avenue and between the off-ramp and on-ramp on Eucalyptus Avenue in General Plan with Project conditions. The operation of the highway is projected to remain at unacceptable levels due to a lack of feasible mitigation. Thus, the cumulative traffic increases are a significant cumulative impact, and the Project's incremental contribution to the increases is cumulatively considerable. As such, a Statement of Overriding Considerations will be required should the City choose to approve the Project.

The Project is located within a sector of March ARB Class C airspace, which is different from the zones contained in the Land Use Compatibility Plan Policy documentation. However, the Project uses are permitted within the March ARB/Inland Port ALUCP (Mead & Hunt 2014); the required regulatory actions will be taken; and mitigation measures MM-TRAF-13 and MM-TRAF-14, as identified in Section 4.11.7, will be implemented. Therefore, impacts are less than significant.

Implementation of Alternative 4 will also include the introduction of permanent and temporary residents and increased numbers of permanent jobs on a currently vacant site. This alternative will increase the traffic in the area and some mitigation in the form of road and intersection improvements may be necessary. However, the development permitted under Alternative 4 will be 25% less intense than the development allowed under the Project. Thus, the amount of traffic coming and going from the Project area will be reduced proportionately with the reduced development intensity.

There will be a decrease in the number of residents, patients, staff, and visitors in the Project area, which will lead to a decrease in traffic. Even though a reduction in traffic will occur, Alternative 4 is still likely to contribute to cumulative traffic impacts that will result in deficient freeway segments in the Congestion Management Plan. Impacts to transportation/traffic under Alternative 4 are considered reduced when compared to the Project, but will likely still result in significant and unavoidable impacts to freeway segments. Alternative 4 will require a Statement of Overriding Considerations.

### **Utilities and Service Systems**

As discussed in Section 4.12, Utilities and Service Systems, the estimated demand for the Project exceeds the projected demand accounted for in the 2010 UWMP, and will therefore, exceed the projected demand. However, with the implementation of Project elements that can reduce impacts, as well as the mitigation measures outlined in Section 4.12.6 (MM-UTIL-1 through MM-UTIL-3), impacts to water consumption will be minimized to a level that is less than significant.

The construction of all phases of the Project will generate construction waste that will result in an increased demand for solid waste collection and disposal during construction. In addition,



during operation, the solid waste quantities generated by the Project will increase, and adequate space will be needed to allow for the collection and storage of recyclable materials. With required recycling, the amount of solid waste generated and disposed of in nearby landfills during construction and operation of the Project will be within the permitted landfill capacities. The implementation of mitigation measures MM-UTIL-1 through MM-UTIL-3, outlined in Section 4.12.6, will ensure that adequate space for on-site recycling is allotted. Therefore, the Project's potential impacts associated with solid waste capacity are considered less than significant with mitigation incorporated.

Under Alternative 4, the development permitted will be less intense than the development allowed under the Project. During construction, the amount of solid waste generated by Alternative 4 will be reduced, since there will be less square footage of building constructed. Additionally, since Alternative 4 will have less square footage and less intense allowable uses, the amount of wastewater and solid waste generated, and water used, during operation will also be less. Therefore, Alternative 4 will have reduced impacts on utilities and service systems when compared to the Project.

### **Energy Conservation**

As discussed in Section 4.13, Energy Conservation, the Project will increase the demand for electricity and natural gas at the Project site, increase the consumption of gasoline in the region during construction and operation, and place additional demands on local and regional energy supplies. However, with the implementation of mitigation measures (MM-AQ-2, MM-AQ-3, and MM-AQ-4) outlined in Section 4.13.6, the Project will not contribute to the inefficient or wasteful consumption of electricity, natural gas, or petroleum, and impacts are considered less than significant. Also, the mitigation measures will ensure that the Project reduces energy consumption beyond what is required by the state and will also ensure that the Project is consistent with existing energy standards and regulations. Therefore, impacts related to a conflict with existing energy standards and regulations are considered less than significant with mitigation incorporated. In addition, the Project includes TDM strategies in the Specific Plan that will help achieve the required vehicle reduction targets from the City's TDM Regulations. Furthermore, the implementation of mitigation measures (MM-AQ-2, MM-AQ-3, and MM-AQ-4) outlined in Section 4.13.6 will reduce vehicle miles traveled and petroleum consumption, as pedestrian and bicycle connections will be provided to surrounding areas consistent with the City's General Plan. Therefore, impacts related to energy supplies and capacity are considered less than significant.

Alternative 4 will also include an increase in the amount of electricity, natural gas, and petroleum used during construction and operation when compared to existing conditions; however, since Alternative 4 will reduce the development potential allowed, the amount of energy required will be less than the Project. Additionally, the amount of traffic coming and

going from the Project area will be reduced under Alternative 4 proportionately with the reduced development intensity. There will be a decrease in the traffic from residents, patients, staff, and visitors, which will lead to a decrease in the amount of petroleum consumption that will occur. Therefore, Alternative 4 will have slightly reduced impacts on energy consumption when compared to the Project.

### Relationship to Project Objectives and Feasibility

Under Alternative 4, the development potential for the healthcare campus will be reduced by approximately 25% by reducing the following:

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

Under this alternative, the height and size of the proposed new buildings will be reduced in size by approximately 25%. This alternative will result in new construction, but at a development potential that is less than that of the Project. Table 6-6 provides a list of the Project objectives and whether Alternative 4 meets each objective.

**Table 6-6**  
**Summary of Alternative 4's Success at Meeting Project Objectives**

Project Objective	Alternative Meets Objective?
1. The proposed Canyon Springs Healthcare Campus Specific Plan will allow future development more streamlined by outlining future allowable uses, and laying out a cohesive set of design guidelines that will provide City staff, the future Canyon Springs Healthcare Campus operator, and the public with a clear understanding of how growth and development will occur at the site.	<b>Yes.</b> Under Alternative 4, the Canyon Springs Healthcare Campus Specific Plan will be implemented and will allow future development to be more streamlined by outlining future allowable uses and by providing design and development guidelines that will help provide a clear understanding of how growth and development will occur at the Project site.
2. The overall goal of the proposed Canyon Springs Healthcare Campus Specific Plan is to guide future development on the Canyon Springs Healthcare Campus and define the extent, scale, and location of future development on the Canyon Springs Healthcare Campus.	<b>Yes.</b> Under Alternative 4, the Canyon Springs Healthcare Campus Specific Plan will be implemented and will guide future development on the campus by defining the extent, scale, and location of its development.
3. The Canyon Springs Healthcare Campus Specific Plan	<b>No.</b> Alternative 4 includes the development of a smaller hospital

**Table 6-6**  
**Summary of Alternative 4's Success at Meeting Project Objectives**

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

Alternative 4 is feasible. While Alternative 4 includes a reduction in the development potential that will result in a reduction of environmental impacts, the alternative will not meet all of the Project objectives.

## 6.7 EVALUATION OF ALTERNATIVES

In accordance with the CEQA Guidelines Section 15126.6(d), the discussion of the environmental effects of the alternatives may be less detailed than the discussion of the impacts of the Project. Table 6-7 provides a comparison Project and Project Alternative impacts; an analysis of the environmentally superior alternative is provided in Section 6.8.

**Table 6-7**  
**Comparison of Project and Alternative Impacts**

Environmental Issue Area	Project	No Project	Alternative 1 – Buildout of Canyon Springs Business Park Specific Plan	Alternative 2 – Alternative Location in City of Moreno Valley	Alternative 3 – Alternative Location in the City of Riverside	Alternative 4, Reduced Project Alternative
Aesthetics	LTS	Reduced	Increased	Increased	Increased	Reduced
Agriculture and Forestry Resources	LTS	Similar	Similar	Similar	Similar	Similar
Air Quality	SU	Reduced	Increased	Increased	Increased	Reduced
Biological Resources	LTS	Reduced	Increased	Increased	Increased	Reduced
Cultural Resources	LTS	Reduced	Similar	Similar	Increased	Reduced
Geology and Soils	LTS	Reduced	Similar	Increased	Increased	Reduced
Greenhouse Gas Emissions	LTS	Reduced	Increased	Increased	Increased	Reduced
Hazards and Hazardous Materials	LTS	Reduced	Increased	Reduced	Similar	Reduced
Hydrology and Water Quality	LTS	Reduced	Similar	Increased	Increased	Reduced
Land Use and Planning	LTS	Increased	Increased	Similar	Increased	Similar
Mineral Resources	LTS	Similar	Similar	Similar	Similar	Similar
Noise	LTS	Reduced	Reduced	Increased	Increased	Reduced
Population and Housing	LTS	Reduced	Reduced	Similar	Increased	Reduced
Public Services	LTS	Reduced	Reduced	Increased	Increased	Reduced
Recreation	LTS	Reduced	Reduced	Increased	Increased	Reduced
Transportation/Traffic	SU	Reduced	Increased	Similar	Increased	Reduced
Utilities and Service Systems	LTS	Reduced	Increased	Similar	Increased	Reduced
Energy Conservation	LTS	Reduced	Increased	Similar	Similar	Reduced
Meets Project objectives?	Yes	No	No	Yes	Yes	No



The No Project Alternative was found to have improved impacts related to aesthetics, air quality, biological resources, cultural resources, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, mineral resources, noise, population and housing, public services, recreation, transportation/traffic, utilities and service systems, and energy conservation. However, the No Project Alternative does not meet any of the Project objectives.

Alternative 1 was found to have improved impacts related to land use and planning, noise, public services, and recreation and to have worse environmental impacts related to aesthetics, air quality, biological resources, GHG emissions, hazards and hazardous materials, land use, transportation and traffic, utilities and service systems, and energy conservation. Alternative 1 also does not meet any of the Project objectives.

While Alternative 2 does meet all of the Project objectives, this alternative was found to have reduced impacts related to hazards and hazardous materials and worse environmental impacts related to aesthetics, air quality, biological resources, geology and soils, GHG emissions, hydrology and water quality, noise, public services and recreation. However, Alternative 2 will not reduce the Project's significant and unavoidable air quality and transportation/traffic impacts to less than significant levels.

While Alternative 3 does meet all of the Project objectives, this alternative was found to have worse environmental impacts related to aesthetics, air quality, biological resources, cultural resources, geology and soils, GHG emissions, hydrology and water quality, land use planning, noise, population and housing, public services, recreation, transportation and traffic, and utilities and service systems. Alternative 3 was not able to improve the Project's significant and unavoidable air quality impacts, and this alternative was also found to increase the significant and unavoidable impacts related to transportation/traffic.

Alternative 4 was found to have improved impacts related to aesthetics, air quality, biological resources, cultural resources, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, noise, population and housing, public services, recreation, transportation/traffic, utilities and service systems, and energy conservation. However, Alternative 4 does not meet all of the Project objectives.

## **6.8 ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

As indicated in Table 6-7, Alternative 4 will result in the least environmental impacts and based on this is considered the environmentally superior alternative. While Alternative 4 includes a reduction in the development potential that will result in a reduction of environmental impacts,

Alternative 4 will not meet all of the Project objectives. Therefore, although Alternative 4 is feasible, it does not meet all of the Project objectives.

## 6.9 REFERENCES

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