

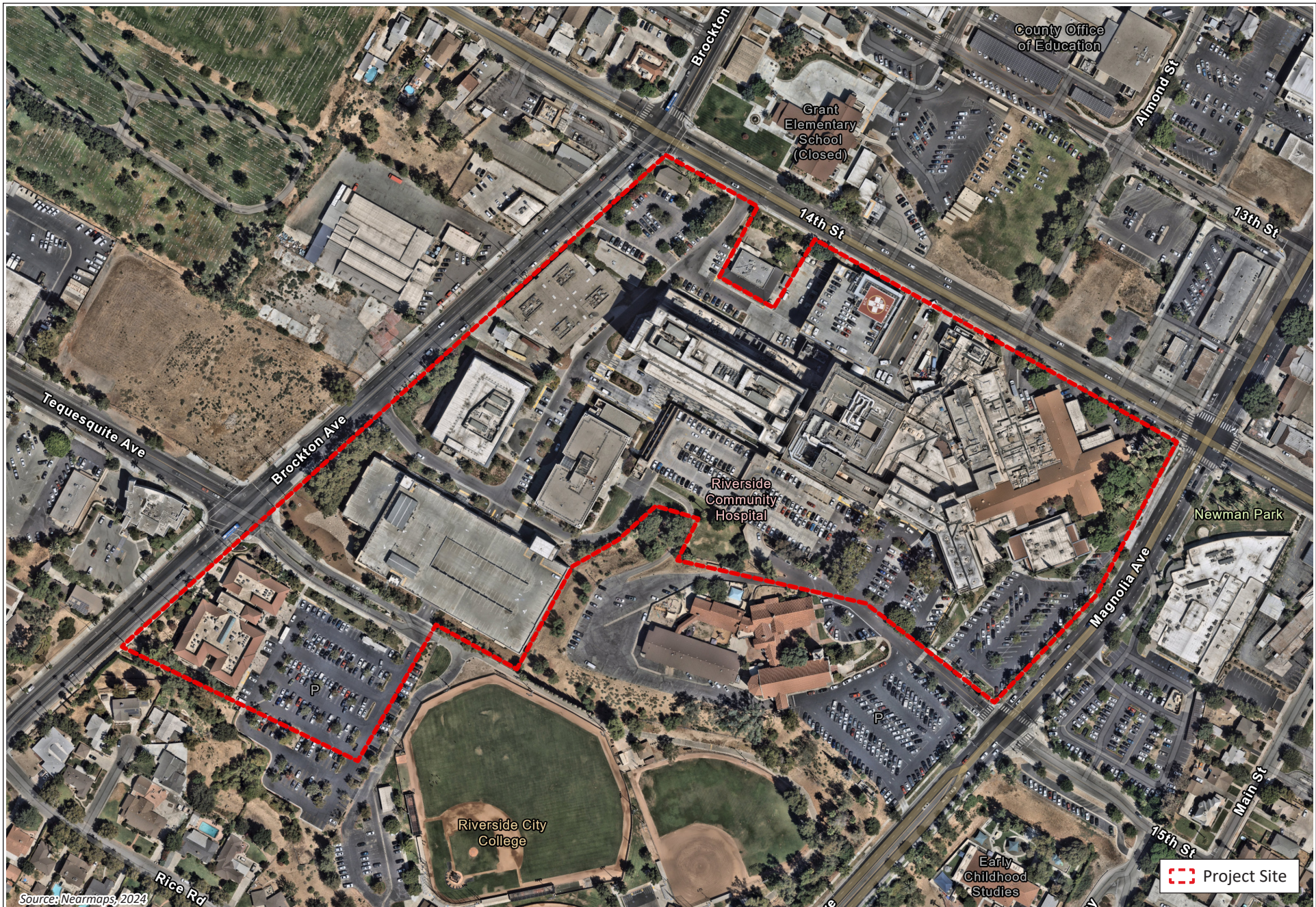
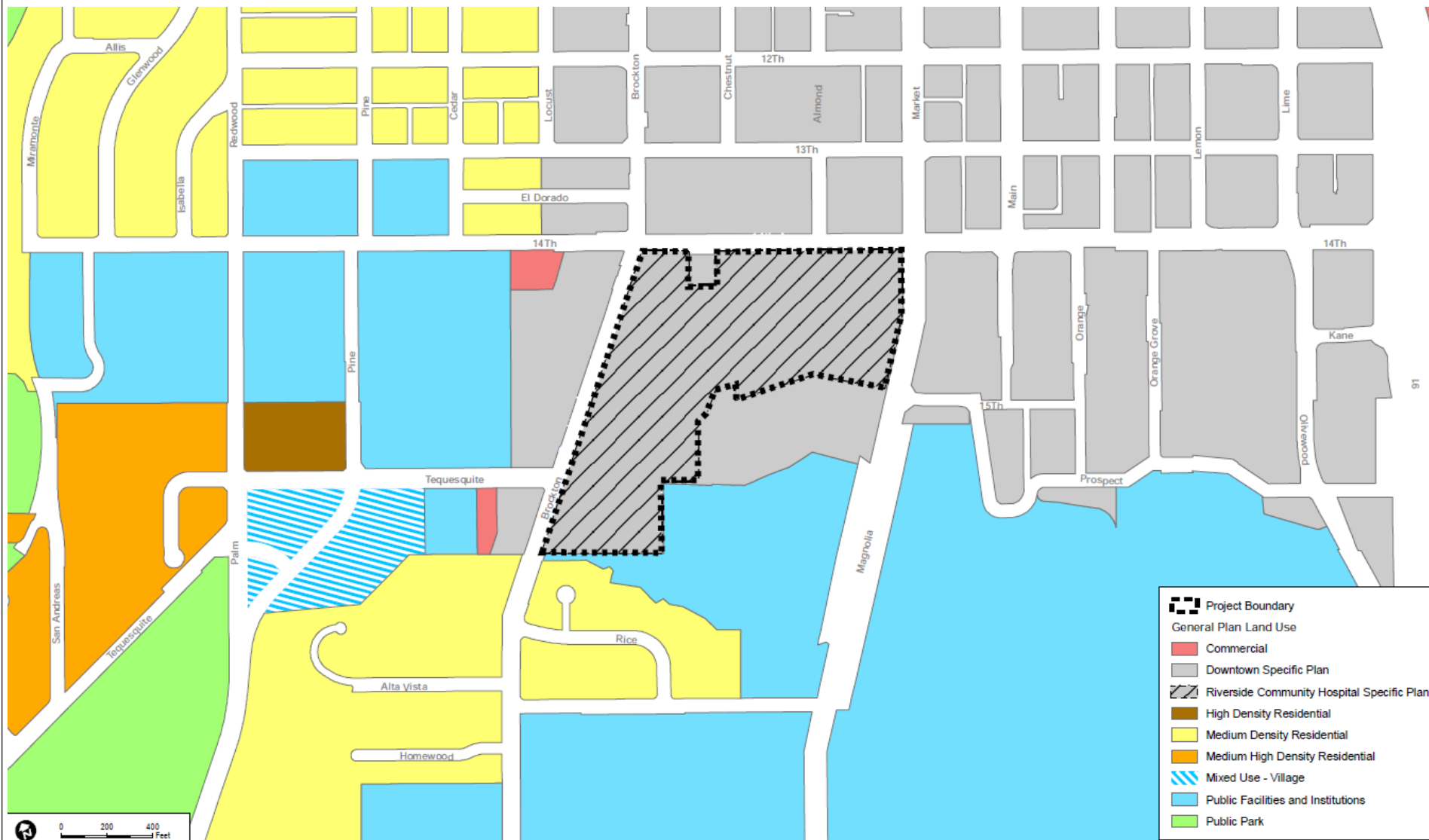


Exhibit 9: Proposed RCHSP Boundary
 Brockton Parking Garage Project



Kimley»Horn



Source:

Exhibit 10: Proposed General Plan Land Use Map Brockton Parking Garage Project

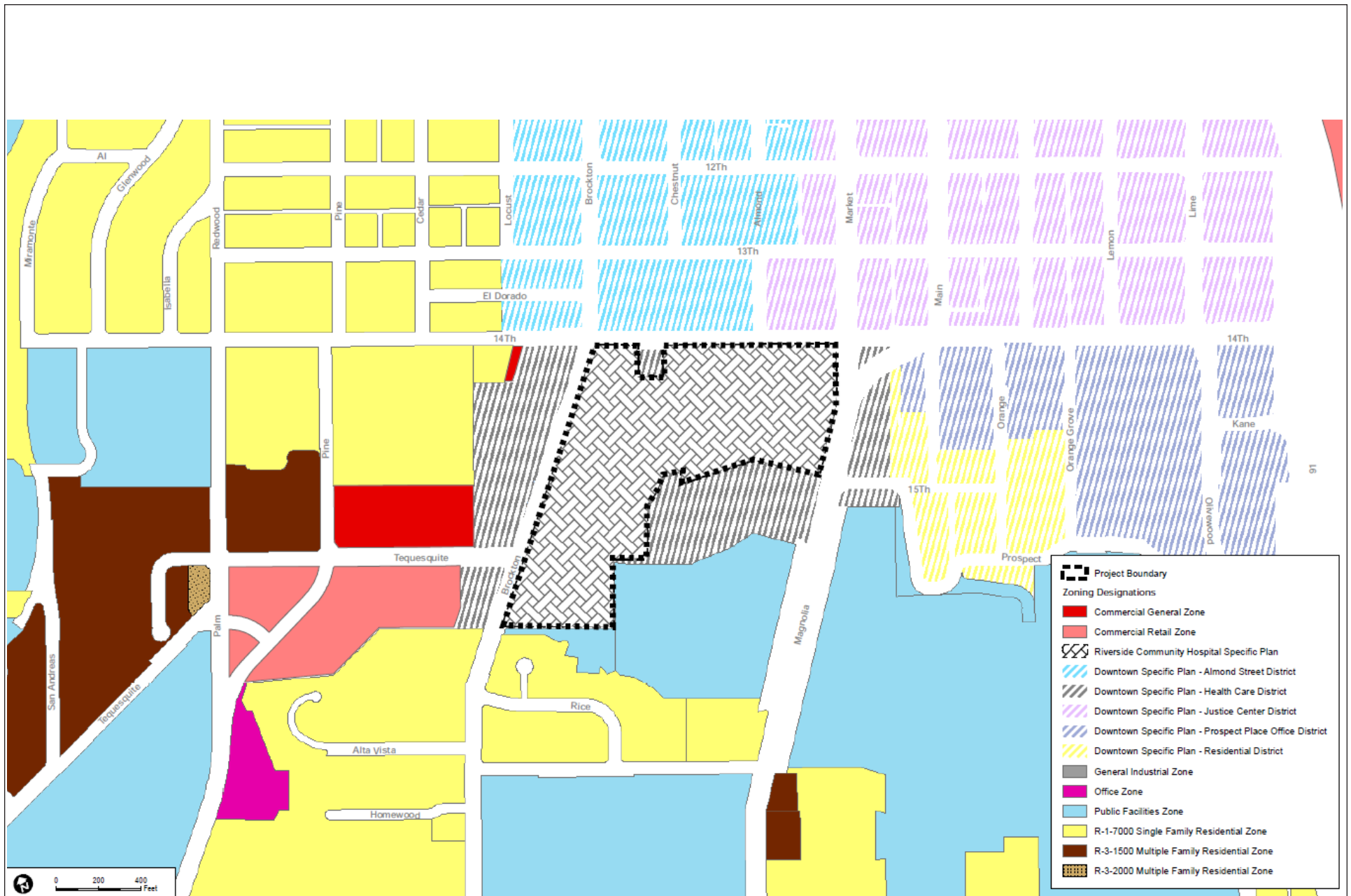


Exhibit 11: Proposed Zoning Map
Brockton Parking Garage Project

3 RCHSP FEIR ENVIRONMENTAL IMPACT ANALYSIS SUMMARY

The Approved Project's environmental impacts identified in the FEIR are summarized below:

ENVIRONMENTAL IMPACTS	Significant and Unavoidable Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. Would the RCHSP project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway?	☐	☐	☒	☐
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☒	☐	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☒	☐	☐
2. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the RCHSP project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒

ENVIRONMENTAL IMPACTS	Significant and Unavoidable Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒
3. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the RCHSP project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☒	☐	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐
4. BIOLOGICAL RESOURCES. Would the RCHSP project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the	☐	☐	☐	☒

ENVIRONMENTAL IMPACTS	Significant and Unavoidable Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☒	☐
5. CULTURAL RESOURCES. Would the RCHSP project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐
6. GEOLOGY AND SOILS. Would the RCHSP project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				

ENVIRONMENTAL IMPACTS	Significant and Unavoidable Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
2) Strong seismic ground shaking?	☐	☐	☒	☐
3) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
4) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the California Building Code (2001), creating substantial risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
7. GREENHOUSE GAS EMISSIONS. Would the RCHSP project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☒	☐	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐
8. HAZARDS AND HAZARDOUS MATERIALS. Would the RCHSP project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐

ENVIRONMENTAL IMPACTS	Significant and Unavoidable Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☒	☐	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☒	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☒	☐
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☒	☐
9. HYDROLOGY AND WATER QUALITY. Would the RCHSP project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop	☐	☐	☒	☐

ENVIRONMENTAL IMPACTS	Significant and Unavoidable Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
to a level which would not support existing land uses or planned uses for which permits have been granted)?				
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?	☐	☐	☒	☐
e) Create or contribute runoff which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐
g) Place housing within a 100-year flood hazard as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures, which would impede or redirect flood flows?	☐	☐	☒	☐
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☒	☐
j) Inundation by seiche, tsunami, or mudflow??	☐	☐	☒	☐
10. LAND USE AND PLANNING. Would the RCHSP project:				
a) Physically divide an established community?	☐	☐	☒	☐
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local costal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating and environmental effect?	☐	☐	☒	☐

ENVIRONMENTAL IMPACTS	Significant and Unavoidable Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☒	☐
11. MINERAL RESOURCES. Would the RCHSP project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☒	☐
12. NOISE. Would the RCHSP project:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐
e) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
13. POPULATION AND HOUSING. Would the RCHSP project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and	☐	☐	☐	☒

ENVIRONMENTAL IMPACTS	Significant and Unavoidable Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
businesses) or indirectly (for example, through extension of roads or other infrastructure)?				
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
14. PUBLIC SERVICES. Would the RCHSP project:				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
1) Fire protection?	☐	☐	☒	☐
2) Police protection?	☐	☐	☒	☐
3) Schools?	☐	☐	☒	☐
4) Parks?	☐	☐	☒	☐
5) Other public facilities?	☐	☐	☒	☐
15. RECREATION. Would the RCHSP project:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒
16. TRANSPORTATION/TRAFFIC. Would the RCHSP project:				

ENVIRONMENTAL IMPACTS	Significant and Unavoidable Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☒	☐	☐	☐
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☒	☐	☐	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☒	☐
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e) Result in inadequate emergency access?	☐	☐	☒	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☒	☐	☐
17. UTILITIES AND SERVICE SYSTEMS. Would the RCHSP project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐

ENVIRONMENTAL IMPACTS	Significant and Unavoidable Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

4 PROPOSED PROJECT ENVIRONMENTAL IMPACT ANALYSIS

The scope of the City's review of the Proposed Project is set forth in the State CEQA Guidelines. As stated in **Section 1.2: Statutory Authority and Requirements**, this review is limited to evaluating the Proposed Project's environmental effects when compared to the Approved Project, as evaluated in the FEIR. This Addendum also considers new information, if any, of substantial importance that was not known and could not have been known with the exercise of reasonable due diligence at the time the FEIR was certified.

As stated in **Section 1.4: Summary of Analysis and Findings**, pursuant to State CEQA Guidelines Section 15162, since the City has determined that Proposed Project implementation does not propose substantial changes to the Approved Project, no substantial changes in circumstances would occur which would require major revisions to the FEIR, and no new information of substantial importance has been revealed since the certification of FEIR that would result in either new significant effects or an increase in the severity of previously analyzed significant effects.

A Mitigation Monitoring and Reporting Program (MMRP) was developed to monitor the FEIR's recommended mitigation measures. The MMRP was adopted as a part of the FEIR to avoid or mitigate the RCHSP's significant environmental impacts. The previously adopted mitigation measures applicable to the Proposed Project will be imposed as conditions of approval for the Proposed Project, as applicable. The mitigation measures applicable to the Approved Project are contained in **Appendix A: Inventory of Applicable Mitigation Measures**.

4.1 Aesthetics

4.1a Would the Project have a substantial adverse effect on a scenic vista?

Summary of Previous Environmental Analysis

Less Than Significant With Mitigation Incorporated. The Certified FEIR identified that the Approved Project's construction-related impacts related to scenic vistas would be less than significant because although the presence of construction equipment could temporarily impair views of Mount Rubidoux and the San Bernardino Mountains from the RCH campus, activities would not be permanent and prominent peaks in the surrounding area would remain visible and would not be screened or blocked. The Certified FEIR identified that the RCHSP's operation-related impacts related to scenic vistas would be less than significant following compliance with the development standards outlined in Chapter 7.0 of the RCHSP.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact. Proposed Project construction would introduce the use of heavy machinery such as large trucks, cranes, bulldozers, and other equipment needed for construction activities. The presence of this equipment, especially tall cranes that would exceed the height of the parking garage being constructed, could temporarily impair views of Mount Rubidoux from the RCH campus. Large construction equipment would be visible from surrounding areas looking toward the RCH campus. Construction activities would also require the presence of construction workers and vehicles on the RCH

campus; however, activities would not be permanent. While construction activities would occupy a portion of the RCH campus, prominent peaks in the surrounding area would remain visible and would not be screened or blocked. Construction activities would not have substantial adverse impacts on scenic vistas, and impacts would be less than significant.

The Proposed Project site is currently developed with four buildings. The Proposed Project site is relatively flat and is located in a developed urban area surrounded by structures with varying heights. Views of Mount Rubidoux and the San Bernardino Mountains from the Proposed Project site area are already obscured by existing development, mature trees, above-ground utilities, and traffic signals. Therefore, although the Project would introduce a new five-level parking garage on the Proposed Project site, adjacent uses currently do not experience views of scenic vistas. Therefore, the Proposed Project's implementation would not substantially block views of scenic vistas compared to existing conditions and would not have a substantial adverse effect on a scenic vista.

Therefore, the Proposed Project would have a less than significant impact on scenic vistas, and no mitigation is required. No new or more severe impact concerning scenic vistas would occur due to the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.1b Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway?

Summary of Previous Environmental Analysis

Less Than Significant Impact. The Certified FEIR concluded that there are no State Scenic Highways located adjacent to the RCHSP area. Therefore, the RCHSP would not substantially damage scenic resources within a State scenic highway, and impacts would be less than significant, and no mitigation measures are necessary.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

No Impact. There are no State Scenic Highways in the Proposed Project site's vicinity.⁵ Therefore, the Proposed Project would have no impact on scenic resources within a State Scenic Highway, and no mitigation is required. No new or more severe impact concerning scenic resources within a State Scenic Highway would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

⁵ State of California, Department of Transportation. (2018). *California State Scenic Highway System Map*, Officially Designated State and County Scenic Highways, <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>, accessed December 4, 2024.

- 4.1c *If in a non-urbanized area, would the Project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

Summary of Previous Environmental Analysis

Less Than Significant With Mitigation Incorporated. The Certified FEIR concluded that with mitigation incorporated, the Approved Project would not substantially degrade the existing visual character or quality of the site and its surroundings. The Certified FEIR concluded that compliance with RCHSP Chapters 7.0 and 8.0, which outline the development standards and design guidelines, such as building height, setbacks, and floor area ratios, would ensure that all new developments would be visually compatible with adjacent uses. However, the Certified FEIR identified that there are a few buildings within and surrounding the RCH campus that are considered historic and can be seen from the campus's perimeter streets, including Magnolia Avenue. **FEIR MM AES-2** would be implemented to ensure that seismic upgrades of the RCHSP would not significantly alter character-defining features. With **FEIR MM AES-2** incorporated, impacts as a result of Phase I are considered to be less than significant. In addition, because Phase IIA planned to include development on the corner of 14th Street and Magnolia Avenue, which could be adjacent to the J. Harrison Wright Palm Grove, **FEIR MM AES-3** would be implemented to ensure that potential aesthetic impacts to the palm grove would be reduced or avoided. Compliance with the development standards and design guidelines set forth in Chapters 7.0 and 8.0 of the RCHSP, as well as implementation of **FEIR MM AES-3**, would ensure that impacts as a result of Phase IIA would be less than significant with mitigation incorporated. Additionally, **FEIR MM AES-1** would be implemented to address the indirect design compatibility impacts of Phase IIB and IIC on the Calvary Presbyterian Church. Therefore, impacts as a result of Phases IIB and IIC are considered less than significant with mitigation incorporated.

FEIR Mitigation Measures

- FEIR MM AES -1** In order to avoid potential indirect impacts to Calvary Presbyterian Church during Phases IIB and IIC, the following design guidelines in regard to the design of the Phase IIB and Phase IIC hospital bed tower shall be observed:
1. Ensure that the building is contemporary in design, but sensitive to the adjacent church in the placement of height, massing, landscaping, and in the use of materials.
 2. Design the building to step up in height, beginning with lower elements at the south and east elevations and progressing to higher elements toward the north and west.
 3. Refrain from the extensive use of highly reflective building materials in lower parts of the building.
 4. Use shading devices similar in concept to those used on Building B so as to soften the view to windows and provide a sense of depth to the building.
 5. Design the landscaping around the south and east sides of the building to create a landscape filter at both the lower and higher elevations. The type of tree

used in the parking lot for Building B is a good example of the type of landscaping that would effectively soften the view to the Phase IIB and Phase IIC hospital bed tower.

FEIR MM AES -2

In order to avoid potential direct impacts to Building B during seismic retrofitting in Phase I, the following measures shall be implemented:

1. Maintain the architectural integrity of Building B by preserving its character-defining features. If replacement of character-defining features becomes necessary, the replacements shall maintain the appearance of the original materials.
2. Locate seismic reinforcement within the interior of the building. To the extent that seismic reinforcement needs to be accomplished on the exterior of the building, it will be designed to blend as much as possible with the existing building. For example, any seismic wrap necessary on the building should protrude from the building face as little as possible and should be similar in color and texture to the existing building.
3. Maintain the lacy look provided by the lemon-scented eucalyptus trees south of Building B through preservation or relocation of existing trees or through the replacement of existing trees with specimen trees of the same variety.
4. Preserve all rock walls and seating areas associated with Building B's landscape. If new improvements necessitate the removal of some rock walls, replacement walls with the same appearance as the original walls shall be constructed.

FEIR MM AES -3

During Phase IIA, in order to avoid potential direct and indirect impacts to the J. Harrison Wright Palm Grove associated with the Building A site and the Newman Park Palm Grove, as well as protecting other mature trees near the palm trees and the mounded turf area, the following measures shall be implemented:

1. Establish a landscape setback that preserves the trees in the J. Harrison Wright Palm Grove with the frontage of the landscape setback to extend from the east frontage of the health education center Building H to the parking lot at the southwest corner of Magnolia Avenue and 14th Street. If necessary for the efficiency of the design of the building that replaces Building A, a small number of palms may be relocated within the defined setback area.
2. Ensure that the building that replaces Building A is of contemporary design, but sensitive in design, color, and materials. If the building has a direct frontage on the palm grove landscape setback, design the building to step down to one story at the edge of the palm grove, with a design that provides a compatible backdrop for the historical landscape.
3. Design the site plan for the building that replaces Building A so it has a building edge or building-like edge adjacent to the palm grove. A building-like edge could consist of an arcade-type structure similar in concept to that used along the Market Street frontage of the shopping center on the west side of Market Street,

between 3rd and 4th Streets. If such an arcade-like feature is used, it will be of an architectural style in keeping with the building behind it.

4. Design and install a plaque and interpretive feature with prominent public access in the palm grove that tells the history of J. Harrison Wright and his association with the landscaping of the hospital and Newman Park.

Analysis of Proposed Project

Less Than Significant Impact. The Proposed Project site, which is in an urbanized area, is developed with an auto body shop, Women’s Services Building (Building M), Brockton Storage Building (Building L), and medical office building that would be replaced with a five-level parking garage. Due to the developed and urban nature of the surrounding area and the limited amount of undisturbed topography in the Proposed Project site’s vicinity, the proposed parking garage would not strongly contrast with the surrounding development or the natural topography of the area. Through the Design Review process, the City would verify the Proposed Project’s consistency with the RCHSP’s zoning and other regulations (inclusive of the proposed Specific Plan Amendment) that govern visual and scenic quality, found in RCHSP Chapter 7.0: Development Standards and Chapter 8.0: Design Guidelines. Therefore, following compliance with the RCHSP (inclusive of the proposed Specific Plan Amendment) and City standards, the Proposed Project would result in a less than significant impact concerning regulations governing scenic quality, and no mitigation is required. No new or more severe impact concerning scenic quality would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.1d Would the Project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Summary of Previous Environmental Analysis

Less Than Significant With Mitigation Incorporated. The FEIR concluded that although the lighting proposed by the Approved Project would change the lighting on the site compared to current conditions, the Approved Project would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area. Given these factors, the contribution of light emitted from Phases I, IIA, IIB, and IIC of the Approved Project would be less than significant, and no mitigation measures are necessary.

Concerning glare, the FEIR identified that the Approved Project would increase the number of structures on the RCH campus, and it is possible that the number of glare-inducing reflective surfaces (i.e., windows) could increase above existing conditions. The FEIR includes **FEIR MM AES-4**, which requires window glazing on buildings constructed during Phases I, IIA, IIB, and IIC to be predominantly (at least 60%) lightly tinted in a natural glass color that has a low reflectance percentage, which will reduce the reflection of natural or artificial light off structural facades to reduce impacts to a less than significant level. **FEIR MM AES-4** would ensure that the reflection of natural or artificial light off the structural façade would not represent a safety impact on motorists on surrounding roadways. Other exterior portions of future development will incorporate a variety of non-reflective materials that would minimize the transmission of glare from building materials such as concrete and stucco. In addition, the FEIR includes **FEIR MM AES-**

5, which requires exterior landscaping, as needed, to minimize glare generated from windows and glass panels, especially when development occurs adjacent to sensitive land uses. **FEIR MM AES-5** would minimize the potential glare generated by the Approved Project from windows and glass panels. Therefore, the FEIR concluded that with **FEIR MM AES-4** and **FEIR MM AES-5** incorporated, the Approved Project would not create new substantial sources of glare that would adversely affect day or nighttime views in the area.

FEIR Mitigation Measures

- FEIR MM AES-4** Window glazing on buildings constructed during Phases I, IIA, IIB, and IIC shall be predominantly (at least 60%) lightly tinted in a natural glass color that has a low reflectance percentage, which will reduce the reflection of natural or artificial light off structural facades.
- FEIR MM AES-5** Development during Phases I, IIA, IIB, and IIC shall incorporate exterior landscaping, as needed, and will be determined during preparation of design plans, that minimizes glare generated from windows and glass panels, especially when development occurs adjacent to sensitive land uses.

Analysis of Proposed Project

Less Than Significant With Mitigation Incorporated. The Proposed Project site is already an illuminated area. Currently, there are nighttime light sources from the existing buildings and the nearby RCH campus. New light sources may be present during the Proposed Project's construction and operation. The existing hospital campus currently includes lighting around buildings, along walkways, and in parking areas for safety and security reasons. All lighting is in compliance with applicable laws and regulations. The Proposed Project would include exterior lighting for safety and security purposes that would be shielded and would also be in compliance with existing regulations. Per the RCHSP, Chapter 8.0, all lights would be directed, oriented, and shielded to prevent light from shining onto adjacent properties, onto public rights-of-way, and into driveway areas in a manner that would obstruct drivers' vision, in accordance with Chapter 19.556 of the City's Municipal Code. A lighting plan for the Proposed Project would be prepared consistent with RCHSP Chapter 8.0. Although the Proposed Project's lighting would change the lighting on the site compared to current conditions, the Proposed Project would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area. In addition, as required by **FEIR MM AES-5**, the Proposed Project would incorporate exterior landscaping, as needed, to minimize glare from the parking garage. Therefore, with the implementation of **FEIR MM AES-5**, the Proposed Project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area, and a less than significant impact would occur. No new or more severe impact concerning light and glare would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

Because the Proposed Project does not propose any glare-inducing reflective surfaces (i.e., windows), **FEIR MM AES-4**, which requires window glazing on buildings, does not apply..

- FEIR MM AES-5** Development during Phases I, IIA, IIB, and IIC shall incorporate exterior landscaping, as needed, and will be determined during preparation of design

plans, that minimizes glare generated from windows and glass panels, especially when development occurs adjacent to sensitive land uses.

Conclusion

Based on the comparative analysis outlined in this Addendum, no new impacts relative to aesthetic impacts or a substantial increase in the severity of a previously identified impact evaluated in the FEIR would occur. With regard to PUBLIC RESOURCES CODE Section 21166 and State CEQA Guidelines Section 15162(a), the Project would not result in any new impacts or increase the severity of the previously identified impacts with respect to aesthetics. There are no substantial changes to the circumstances under which the Proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the FEIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the FEIR was certified is available that would impact the prior finding of less than significant with mitigation. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.2 Agricultural and Forestry Resources

- 4.2a *Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?*
- 4.2b *Would the Project conflict with existing zoning for agricultural use or a Williamson Act contract?*
- 4.2c *Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?*
- 4.2d *Would the Project result in the loss of forest land or conversion of forest land to non-forest use?*
- 4.2e *Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?*

Summary of Previous Environmental Analysis

No Impact. The FEIR concluded that there would be no impacts to agricultural or forestry resources. The Approved Project is in an urbanized environment bordered by existing development. The Approved Project and surrounding properties are not zoned for agriculture, and the Approved Project site is not under a Williamson Act Contract.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

No Impact. No Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance exists on or near the Proposed Project site.⁶ Further, the Proposed Project site is not the subject of a Williamson Act Contract.⁷ No agricultural, forest land, or timberland zoning exists within or adjacent to the Proposed Project site. Therefore, the Proposed Project would have no impact concerning mapped farmlands, Williamson Act contracts, agricultural, forest, or timber land zoning, or the conversion or loss of Farmland, forest land, or timberland. No new or more severe impact concerning agricultural or forestry resources would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

Conclusion

Based on the comparative analysis outlined in this Addendum, no new impacts relative to agricultural or forestry resources would occur. With regard to Public Resources Code Section 21166 and State CEQA Guidelines Section 15162(a), the Proposed Project would not result in any new impacts with respect to agricultural and forestry resources. There are no substantial changes to the circumstances under which the proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the FEIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the FEIR was certified is available that would impact the prior finding of no impact. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.3 Air Quality

An Air Quality Assessment and Health Risk Assessment (HRA) was conducted to evaluate the Proposed Project's potential construction and operational emissions and determine the level of impact on the environment; see **Appendix B: Air Quality Assessment** and **Appendix C: Health Risk Assessment**. The Proposed Project-specific analyses and findings are presented below.

4.3a Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR analyzed the Approved Project's potential to conflict with or obstruct the implementation of the South Coast Air Quality Management District's (SCAQMD) 2012 Air Quality Management Plan (AQMP) and determined that the Approved Project would not conflict with or obstruct the implementation of the applicable air quality plan. Therefore, the FEIR concluded a less than significant impact in this regard.

FEIR Mitigation Measures

⁶ California Department of Conservation. (2022). California Important Farmland Finder. Retrieved from: <https://maps.conservation.ca.gov/DLRP/CIFF/>, accessed December 11, 2024.

⁷ California Department of Conservation. (2022). California Williamson Act Enrollment Finder. Retrieved from: <https://maps.conservation.ca.gov/dlrp/WilliamsonAct/>, accessed December 11, 2024.

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact. The Proposed Project is located within the South Coast Air Basin (SCAB), under the SCAQMD's jurisdiction. The SCAQMD is required, pursuant to the Federal Clean Air Act (FCAA), to reduce emissions of criteria pollutants for which the SCAB is in nonattainment. The SCAQMD drafted the 2016 AQMP and 2022 AQMP to reduce such emissions. The 2016 AQMP establishes a program of rules and regulations to reduce air pollutant emissions and achieve state (California) and national air quality standards. The 2022 AQMP builds upon measures already in place from previous AQMPs.⁸ The primary purpose of the 2022 AQMP is to identify, develop, and implement strategies and control measures to meet the 2015 8-hour ozone National Ambient Air Quality Standard (NAAQS). Air quality management planning is a regional and multi-agency effort, including the SCAQMD, the CARB, the Southern California Association of Governments (SCAG), and the U.S. EPA. The AQMPs' pollutant control strategies are based on the latest scientific and technical information and planning assumptions, including SCAG's growth projections and the RTP/SCS, updated emission inventory methodologies for various source categories, and SCAG's latest growth forecasts. SCAG's latest growth forecasts were defined in consultation with local governments and with reference to local general plans. The Proposed Project is subject to the SCAQMD's 2016 and 2022 AQMPs.

The following indicators define criteria for determining consistency with the AQMPs:

- **Consistency Criterion No. 1:** The Project will not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMPs.
- **Consistency Criterion No. 2:** The Project will not exceed the assumptions in the AQMPs or increments based on the years of the Project build-out phase.

According to the SCAQMD's *CEQA Air Quality Handbook*, the purpose of the consistency finding is to determine if a project is inconsistent with the assumptions and objectives of the regional air quality plans and, thus, if it would interfere with the region's ability to comply with CAAQS and National Ambient Air Quality Standards (NAAQS).⁹

The violations to which Consistency Criterion No. 1 refers are exceedances of the CAAQS or NAAQS. As shown below, the Project would not exceed the construction standards. Therefore, the Proposed Project would not increase the frequency or severity of existing air quality violations, cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMPs. Regarding operations, as concluded in the FEIR, the parking structure would not generate additional operational emissions because the proposed parking structure would support the on-site trip-generating uses. The trips associated with the RCHSP have been contemplated in the FEIR. Thus, the Proposed Project would be consistent with the AQMP under the first criterion.

Concerning Consistency Criterion No. 2, the 2022 AQMP contains air pollutant reduction strategies based on SCAG's growth forecasts included in the 2020-2045 RTP/SCS. SCAG's growth forecasts are made in consultation with local governments and with reference to their local general plans. The Proposed Project is consistent with the City of Riverside General Plan land use designations and with the RCHSP; therefore,

⁸ South Coast Air Quality Management District, *2022 Air Quality Management Plan*, page ES-2, December 2022. <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>, accessed November 2024

⁹ South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993.

the growth associated with the Project at the Project Site has been accounted for in SCAG's latest growth forecasts. The 2020–2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which SCAG's Regional Council adopts, are based on the local plans and policies applicable to the specific area; SCAG uses these in all phases of implementation and review.¹⁰ Thus, the Proposed Project would also be consistent with the AQMP under the second criterion.

As shown in **Table 3: Project Construction Criteria Pollutant Emissions**, the air pollutant emissions resulting from the Proposed Project implementation would not exceed the SCAQMD localized significance thresholds for construction. Localized significance thresholds were developed to ensure no exceedances of the California or federal ambient air quality standards would occur if project emissions were below thresholds.¹¹ As the Proposed Project would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations for air quality pollutants (including VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5}), the Proposed Project also would not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. In addition, the Proposed Project would be consistent with the population and employment growth projections in the AQMP.

Based on the above, approval of the Proposed Project would not result in any significant effects relating to a conflict with or obstruction of the implementation of the SCAQMD's AQMP. Further, the Proposed Project would be consistent with the land uses and density contemplated in the FEIR. The FEIR concluded that the buildout of the RCHSP would not conflict with or obstruct the implementation of the applicable air quality plan, and impacts were determined to be less than significant. No new impacts would occur relative to a conflict with an applicable air quality plan or a substantial increase in the severity of a previously identified impact evaluated in the FEIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the FEIR was certified is available that would impact the prior finding of no significant impact under this issue area.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.3b Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?

Summary of Previous Environmental Analysis

Significant and Unavoidable Impact. The FEIR concluded that even with the implementation of **FEIR MM AQ-1** and **FEIR MM AQ-2**, construction impacts from Phase I, Phase IIA, and Phase IIC are significant and unavoidable. However, construction emissions from Phase IIB would be less than significant since emissions are below the SCAQMD thresholds.

The FEIR concluded that the NO_x emissions during Phase I and IIA construction would be above the significance threshold, while Phase IIB construction emissions would be below the thresholds for all criteria pollutants. The construction of the project would generate VOC and NO_x emissions; however, estimated NO_x emissions would exceed SCAQMD's emission-based significance threshold during Phase I

¹⁰ Southern California Association of Governments, Connect SoCal (2020–2045 RTP/SCS), adopted September 2020, https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176, accessed November 2024

¹¹ South Coast Air Quality Management District, Localized Significance Thresholds, <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>, accessed November 2024

and Phase IIA. Therefore, the construction of the Approved Project would contribute considerably to the SCAB's O₃ nonattainment designation, and its impact would be significant. The FEIR concluded that operational emissions generated by Phase I, Phase IIA, and Phase IIB of the RCHSP would not result in a significant impact regarding VOC, NO_x, CO, SO, PM₁₀, and PM_{2.5} due to motor vehicles and area and stationary source emissions. However, given that the future conditions related to Phase IIC could not be analyzed when writing the FEIR, specific air quality analysis at the time specific projects are proposed, **FEIR MM AQ-2** was incorporated to address this impact. Accordingly, for Phase IIC only, the FEIR concluded the RCHSP could result in a cumulatively considerable increase in emissions of nonattainment pollutants. Thus, this impact would be significant and unavoidable for the future condition of Phase IIC.

FEIR Mitigation Measures

FEIR MM AQ-1 The following measures shall be adhered to during project grading and construction to reduce oxides of nitrogen (NO) from construction equipment for all phases of the project:

- a. Heavy-duty diesel-powered construction equipment rated at greater than 50 horsepower shall be equipped with Tier 2 or better diesel engines.
- b. The engine size of construction equipment shall be the minimum size.
- c. The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest number is operating at any one time.
- d. Construction equipment shall be maintained in tune per the manufacturer's specifications.
- e. Catalytic converters shall be installed on gasoline-powered equipment over 50 horsepower.
- f. Electric equipment shall be utilized in lieu of diesel-powered equipment, where feasible.

FEIR MM AQ-2 During the environmental review process for future discretionary permits for Phase IIC of the Riverside Community Hospital Expansion Project, an air quality technical report that includes project construction phasing, timing and operational details shall be analyzed using the current air quality model available from the South Coast Air Quality Management District (SCAQMD). Project emissions shall be modeled and then evaluated based on current SCAQMD thresholds. The technical analysis for Phase IIC shall be prepared to analyze construction and operational emissions.

If air quality impacts are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated to reduce impacts. Examples of standard construction mitigation measures include the following:

Consistent with SCAQMD Rule 403, it is required that fugitive dust generated by grading and construction activities be kept to a minimum with a goal of retaining dust on the site, by following the dust control measures listed below:

- a. During clearing, grading, earthmoving, excavation, or transportation of cut or fill materials, water trucks or sprinkler systems shall be used to prevent dust from leaving the site and to create a crust after each day's activities cease.
- b. During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this would include wetting down such areas later in the morning, after work is completed for the day, and whenever winds exceed 15 miles per hour.
- c. Soil stockpiled for more than 2 days shall be covered, kept moist, or treated with soil binders to prevent dust generation.
- d. Speeds on unpaved roads shall be reduced to less than 15 miles per hour.
- e. All grading and excavation operations shall be halted when wind speeds exceed 25 miles per hour.
- f. Dirt and debris spilled onto paved surfaces at the project site and on the adjacent roadways shall be swept, vacuumed, and/ or washed at the end of each workday.
- g. If import/export of soil materials would be required, all trucks hauling dirt, sand, soil, or other loose material to and from the construction site shall be covered and/ or a minimum 2 feet of freeboard shall be maintained.
- h. At a minimum, at each vehicle egress from the project site to a paved public road, a pad consisting of washed gravel (minimum size: 1 inch) shall be installed and maintained in clean condition to a depth of at least 6 inches and extending at least 30 feet wide and at least 50 feet long (or as otherwise directed by the SCAQMD).
- i. Any additional requirements of SCAQMD Rule 403 shall be reviewed and complied with.

The following measures shall be adhered to during project grading and construction to reduce emissions of volatile organic compounds (VOC) and oxides of nitrogen (NO_x) from construction equipment:

- a. Heavy-duty diesel-powered construction equipment rated at greater than 50 horsepower shall be equipped with Tier 4 or better diesel engines.
- b. The engine size of construction equipment shall be the minimum size.
- c. The amount of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest amount of equipment is operating at any one time.
- d. Construction equipment shall be maintained in tune per the manufacturer's specifications.
- e. Catalytic converters shall be installed on gasoline-powered equipment over 50 horsepower.
- f. Electric equipment shall be utilized in lieu of diesel-powered equipment, where feasible.
- g. RCH shall use zero-VOC-content architectural coatings during project construction/application of paints and other architectural coatings to reduce

ozone precursors. If zero-VOC paint cannot be utilized, the developer shall avoid application of architectural coatings during the peak smog season: July, August, and September. RCH shall procure architectural coatings from a supplier in compliance with the requirements of SCAQMD's Rule 1113 Architectural Coatings).

If air quality impacts for operational emissions for Phase IIC are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated to reduce impacts. Examples of standard operational mitigation measures include the following: reduce trips in passenger vehicles by patients, visitors, or physicians/ staff, enhance transportation management demand programs; and reduce energy usage.

Analysis of Proposed Project

Less Than Significant Impact With Mitigation Incorporated.

Construction Emissions

Construction associated with the Proposed Project would generate short-term emissions of criteria air pollutants. The criteria pollutants of primary concern within the SCAB include ozone-precursor pollutants (i.e., ROG and NO_x), PM₁₀, and PM_{2.5}. Construction-generated emissions of these criteria pollutants would be short-term and of temporary duration, lasting only as long as construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeded the SCAQMD's thresholds of significance.

Proposed Project construction would result in the temporary generation of criteria pollutant emissions from all phases of construction, including demolition, site grading, building construction, and architectural coating, as well as from motor vehicle exhaust associated with construction equipment, materials deliveries, and worker trips, and the movement of construction equipment, especially on unpaved surfaces. Emissions of airborne particulate matter are largely generated by motor vehicle exhaust and ground disturbance; the volume of airborne particulate matter largely depends on the amount of ground disturbance associated with site preparation activities, weather conditions, and the appropriate application of water.

Construction activities for the Proposed Project were assumed to begin in the second quarter of 2025. Construction-generated emissions associated with the Project were calculated using the CARB-approved California Emissions Estimator Model (CalEEMod), Version 2022, designed to model emissions for land-use development projects based on typical construction requirements. It was assumed that all construction equipment operated during each phase would be operated simultaneously to provide a conservative analysis. See **Appendix B** for more information regarding the construction assumptions used in this analysis.

The predicted maximum daily construction-generated criteria pollutant emissions for the proposed Project are reported in **Table 3: Project Construction Criteria Pollutant Emissions**. As noted in **Table 3**, the Project's emissions were calculated assuming mandatory compliance with SCAQMD Rule 403 (**FEIR**

MM AQ-3), fugitive dust control measures, and **FEIR MM AQ-1** and **FEIR MM AQ-2**, which require Tier 2¹² and Tier 4 or better, respectively, diesel engines for heavy-duty diesel-powered equipment.

Table 3: Project Construction Criteria Pollutant Emissions

Construction Year	Emissions (pounds per day) ^{1, 2}					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Year 1 (2025)	1.18	10.32	31.87	0.05	3.79	1.60
Year 2 (2026)	0.69	5.06	15.58	0.03	1.48	0.39
SCAQMD Threshold	75	100	550	150	150	55
SCAQMD Threshold Exceeded?	No	No	No	No	No	No
1. Mandatory compliance with SCAQMD Rule 403 Fugitive Dust assumed. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; water all haul roads twice daily. Reduction percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. 2. Compliance with Final EIR MM AQ-2 requiring Tier 4 or better diesel engines for heavy-duty diesel-powered equipment. Refer to Appendix B for Model Data Outputs.						

The results summarized in **Table 3** show that the Proposed Project's regional criteria pollutant emissions during construction would remain below applicable thresholds.

Proposed Project construction would also comply with SCAQMD Rules 402 (Nuisance)¹³ and 1113 (Architectural Coatings)¹⁴ and CARB's anti-idling regulations, which prohibit idling for more than five minutes; however, compliance with these rules was not assumed when estimating the Proposed Project's construction emissions for **Table 3**, above. Therefore, the Proposed Project's maximum-day construction emissions of criteria pollutants would be even lower than reported in **Table 3** when the Project's compliance with SCAQMD Rules 402 and 1113 and CARB's anti-idling regulations are considered.

As shown above, the Proposed Project's estimated criteria pollutant emissions during construction would be below their respective thresholds such that approval of the Project would not result in any significant project-level effects relating to regional construction air pollutant emissions. No new impacts or a substantial increase in the severity of a previously identified impact evaluated in the FEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the FEIR was certified is available that would impact the prior finding of no significant impact under this issue area.

Operational Emissions

The Proposed Project's operational emissions would be associated with area sources (e.g., landscape maintenance equipment, architectural coatings, etc.) and energy sources. As concluded in the 2014 Final EIR, the parking structure would not generate additional operational emissions because the proposed parking structures would support the on-site trip-generating uses. The trips associated with the RCHSP have been contemplated in the FEIR. Therefore, the primary sources of operational criteria pollutants are

¹² Since certification of the FEIR, Tier 4 Final is in full implementation.

¹³ SCAQMD Rule 402 prohibits the discharge of quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of people or the public or which endanger the comfort, repose, health, or safety of any such persons or the public or have a natural tendency to cause injury or damage to business or property.

¹⁴ SCAQMD Rule 1113 sets limits on the VOC content of architectural coatings.

area and energy. Long-term operational emissions attributable to the Project are summarized in **Table 4: Operational Criteria Pollutant Emissions**. The operational emissions sources are described below.

- Area Source Emissions. Area source emissions would be generated due to on-site equipment, architectural coating, and landscape maintenance equipment.
- Energy Source Emissions. Energy source emissions would be generated due to electricity usage associated with the Project. Primary energy uses include ventilation, lighting, and elevators.
- Mobile Source Emissions. As concluded in the FEIR, the parking structure would not generate additional operational emissions because the proposed parking structure would support the on-site trip-generating uses. Therefore, mobile emissions associated with the proposed parking garage are zero.
- Stationary Source Emissions. The proposed parking garage would include an emergency generator and a fire pump. Stationary equipment would not be part of the Project's normal daily operations. Nonetheless, emissions associated with one emergency backup generator and one fire pump were included to be conservative. Emissions were calculated separately from CalEEMod. However, CalEEMod default emissions rates were used.

Table 4: Operational Criteria Pollutant Emissions

Source	Emissions (pounds per day) ^{1, 2}					
	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Area	1.50	0.08	9.04	<0.10	0.02	0.01
Energy	--	--	--	--	--	--
Mobile	--	--	--	--	--	--
Stationary	1.00	2.79	2.55	<0.01	0.15	0.15
Proposed Project Total	2.50	2.87	11.59	<0.10	0.17	0.16
SCAQMD Threshold	55	55	550	150	150	55
SCAQMD Threshold Exceeded?	No	No	No	No	No	No
Worst-case seasonal maximum daily emissions are reported.						
Refer to Appendix B for model outputs.						

As shown in **Table 4**, and discussed above, operational (i.e., area, energy, stationary) emissions would not exceed SCAQMD thresholds for any criteria pollutant. Therefore, the Proposed Project would not violate air quality standards or contribute substantially to an existing or projected air quality violation. As a result, approval of the Proposed Project would not result in significant project-level effects relating to operational air quality impacts.

Cumulative Impacts

The nature of air emissions is largely a cumulative impact. As a result, no single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, individual project emissions contribute to existing cumulatively significant adverse air quality impacts. The SCAQMD developed the construction and operational thresholds of significance based on the level above which individual project emissions would result in a cumulatively considerable contribution to SCAB's existing air quality conditions. In addition, Appendix D of the SCAQMD White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (2003) notes that projects that result in emissions that do not exceed the project-specific SCAQMD regional thresholds of significance are considered to result in a

less than significant impact on a cumulative basis unless there is other pertinent information to the contrary.¹⁵ Therefore, a project whose emissions would exceed SCAQMD thresholds would also make a cumulatively considerable contribution to a significant cumulative impact and conversely, a project whose emissions would be below SCAQMD thresholds would not make a cumulatively considerable contribution to a significant cumulative impact.

Cumulative Construction Impacts

The SCAB is designated nonattainment for O₃, PM₁₀, and PM_{2.5} under the State standards and nonattainment for O₃ and PM_{2.5} under the federal standards. As discussed above, the Proposed Project's construction-related emissions alone would not exceed the SCAQMD significance thresholds for criteria pollutants. As discussed above, if a project is estimated to result in emissions that do not exceed SCAQMD thresholds, the project's contribution to the cumulative impact on air quality in the SCAB would not be considered to be cumulatively considerable.¹⁶ As shown in **Table 3** above, the Proposed Project's construction-related emissions would not exceed the SCAQMD significance thresholds for any of the criteria pollutants. Therefore, the Proposed Project would not generate a cumulatively considerable contribution to air pollutant emissions during construction.

The SCAQMD has developed strategies to reduce criteria pollutant emissions as outlined in the AQMP pursuant to the federal Clean Air Act mandates. The analysis assumed fugitive dust controls, including frequent water applications, would be used during construction. SCAQMD rules, mandates, and compliance with adopted AQMP emissions control measures would also be imposed on construction projects throughout SCAB, including related projects. As concluded above, the Project's construction-related impacts would be less than significant, and compliance with SCAQMD rules and regulations would further minimize the Proposed Project's construction-related emissions. Therefore, the Proposed Project's construction-related emissions, in combination with those from other related projects in the area, would not substantially deteriorate the local air quality. The Proposed Project's construction-related emissions would not result in a cumulatively considerable contribution to significant cumulative air quality impacts.

Cumulative Operational Impacts

As discussed above, projects that would result in operational emissions that do not individually exceed SCAQMD regional thresholds of significance are not considered to make a cumulatively considerable contribution to a significant cumulative impact on air quality in the SCAB. **Table 4** shows that the Proposed Project's operational emissions would not exceed the SCAQMD thresholds. As a result, operational emissions associated with the Proposed Project would not make a cumulatively considerable contribution to significant cumulative air quality impacts. Therefore, cumulative operational impacts would be less than significant.

¹⁵ South Coast Air Quality Management District, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, August 2003. <https://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper-appendix.pdf>, accessed November 2024

¹⁶ Ibid.

FEIR Mitigation Measures Applicable to the Proposed Project**FEIR MM AQ-1**

The following measures shall be adhered to during project grading and construction to reduce oxides of nitrogen (NO) from construction equipment for all phases of the project:

- g. Heavy-duty diesel-powered construction equipment rated at greater than 50 horsepower shall be equipped with Tier 2 or better diesel engines.
- h. The engine size of construction equipment shall be the minimum size.
- i. The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest number is operating at any one time.
- j. Construction equipment shall be maintained in tune per the manufacturer's specifications.
- k. Catalytic converters shall be installed on gasoline-powered equipment over 50 horsepower.
- l. Electric equipment shall be utilized in lieu of diesel-powered equipment, where feasible.

FEIR MM AQ-2

During the environmental review process for future discretionary permits for Phase IIC of the Riverside Community Hospital Expansion Project, an air quality technical report that includes project construction phasing, timing and operational details shall be analyzed using the current air quality model available from the South Coast Air Quality Management District (SCAQMD). Project emissions shall be modeled and then evaluated based on current SCAQMD thresholds. The technical analysis for Phase IIC shall be prepared to analyze construction and operational emissions.

If air quality impacts are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated to reduce impacts. Examples of standard construction mitigation measures include the following:

Consistent with SCAQMD Rule 403, it is required that fugitive dust generated by grading and construction activities be kept to a minimum with a goal of retaining dust on the site, by following the dust control measures listed below:

- j. During clearing, grading, earthmoving, excavation, or transportation of cut or fill materials, water trucks or sprinkler systems shall be used to prevent dust from leaving the site and to create a crust after each day's activities cease.
- k. During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this would include wetting down such areas later in the morning, after work is completed for the day, and whenever winds exceed 15 miles per hour.
- l. Soil stockpiled for more than 2 days shall be covered, kept moist, or treated with soil binders to prevent dust generation.
- m. Speeds on unpaved roads shall be reduced to less than 15 miles per hour.

- n. All grading and excavation operations shall be halted when wind speeds exceed 25 miles per hour.
- o. Dirt and debris spilled onto paved surfaces at the project site and on the adjacent roadways shall be swept, vacuumed, and/ or washed at the end of each workday.
- p. If import/export of soil materials would be required, all trucks hauling dirt, sand, soil, or other loose material to and from the construction site shall be covered and/ or a minimum 2 feet of freeboard shall be maintained.
- q. At a minimum, at each vehicle egress from the project site to a paved public road, a pad consisting of washed gravel (minimum size: 1 inch) shall be installed and maintained in clean condition to a depth of at least 6 inches and extending at least 30 feet wide and at least 50 feet long (or as otherwise directed by the SCAQMD).
- r. Any additional requirements of SCAQMD Rule 403 shall be reviewed and complied with.

The following measures shall be adhered to during project grading and construction to reduce emissions of volatile organic compounds (VOC) and oxides of nitrogen (NO) from construction equipment:

- h. Heavy-duty diesel-powered construction equipment rated at greater than 50 horsepower shall be equipped with Tier 4 or better diesel engines.
- i. The engine size of construction equipment shall be the minimum size.
- j. The amount of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest amount of equipment is operating at any one time.
- k. Construction equipment shall be maintained in tune per the manufacturer's specifications.
- l. Catalytic converters shall be installed on gasoline-powered equipment over 50 horsepower.
- m. Electric equipment shall be utilized in lieu of diesel-powered equipment, where feasible.
- n. RCH shall use zero-VOC-content architectural coatings during project construction/application of paints and other architectural coatings to reduce ozone precursors. If zero-VOC paint cannot be utilized, the developer shall avoid application of architectural coatings during the peak smog season: July, August, and September. RCH shall procure architectural coatings from a supplier in compliance with the requirements of SCAQMD's Rule 1113 Architectural Coatings).

If air quality impacts for operational emissions for Phase IIC are determined to be significant, feasible and appropriate project-specific mitigation measures shall be incorporated to reduce impacts. Examples of standard operational mitigation measures include the following: reduce trips in passenger vehicles by patients,

visitors, or physicians/ staff, enhance transportation management demand programs; and reduce energy usage.

4.3c Would the Project expose sensitive receptors to substantial pollutant concentrations?

Summary of Previous Environmental Analysis

Significant and Unavoidable Impact. The FEIR concluded that although buildout of the RCHSP would implement **FEIR MM AQ-3** and **FEIR MMs TRA-1** through **FEIR MM TRA-8**, impacts related to construction emissions of NO₂, PM₁₀, and PM_{2.5} would be significant and unavoidable.

FEIR Mitigation Measures

See **FEIR MM TRA-1** through **FEIR MM TRA-8** in **Section 4.16, Transportation**.

FEIR MM AQ-3 During construction of all phases of the project, the following mitigation measures shall be incorporated to reduce impacts resulting from the exceedance of the South Coast Air Management District (SCAQMD) localized significance thresholds.

Consistent with SCAQMD Rule 403, it is required that fugitive dust generated by grading and construction activities be kept to a minimum with a goal of retaining dust on the site, by following the dust control measures listed below:

- a. During clearing, grading, earthmoving, excavation, or transportation of cut or fill materials, water trucks or sprinkler systems shall be used to prevent dust from leaving the site and to create a crust after each day's activities cease.
- b. During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this would include wetting down such areas later in the morning, after work is completed for the day, and whenever winds exceed 15 miles per hour.
- c. Soil stockpiled for more than 2 days shall be covered, kept moist, or treated with soil binders to prevent dust generation.
- d. Speeds on unpaved roads shall be reduced to less than 15 miles per hour.
- e. All grading and excavation operations shall be halted when wind speeds exceed 25 miles per hour.
- f. Dirt and debris spilled onto paved surfaces at the project site and on the adjacent roadways shall be swept, vacuumed, and /or washed at the end of each workday.
- g. If import /export of soil materials would be required, all trucks hauling dirt, sand, soil, or other loose material to and from the construction site shall be covered, and /or a minimum 2 feet of freeboard shall be maintained.
- h. At a minimum, at each vehicle egress from the project site to a paved public road, a pad consisting of washed gravel (minimum size: 1 inch) shall be installed

and maintained in clean condition to a depth of at least 6 inches and extending at least 30 feet wide and at least 50 feet long (or as otherwise directed by SCAQMD).

i. Any additional requirements of SCAQMD Rule 403 shall be reviewed and complied with.

j. The construction contractor or Riverside Community Hospital representative shall notify sensitive receptors when building demolition and grading activities would occur so that sensitive residents could be kept indoors or other accommodations made for their comfort. The construction contractor shall post readily visible signage in publicly accessible areas along the property lines of the Riverside Community Hospital with a contact name and telephone number in the event that project construction would generate nuisance levels of air pollutants in the surrounding community. Action shall be taken within 4 hours after notification to determine the cause of the objectionable emissions and take corrective action.

The following measures shall be adhered to during project grading and construction to reduce emissions of oxides of nitrogen (NOx) from construction equipment:

a. Heavy-duty diesel-powered construction equipment rated at greater than 50 horsepower shall be equipped with Tier 3 or better diesel engines.

b. The engine size of construction equipment shall be the minimum size.

c. The amount of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest amount of equipment is operating at any one time.

d. Construction equipment shall be maintained in tune per the manufacturer's specifications.

e. Catalytic converters shall be installed on gasoline-powered equipment over 50 horsepower.

f. Electric equipment shall be utilized in lieu of diesel-powered equipment, where feasible.

Analysis of Proposed Project

Less Than Significant With Mitigation Incorporated.

Localized Construction Significance Analysis

The nearest sensitive receptor to the Proposed Project site is Grant Elementary School, located approximately 75 feet north of the Proposed Project site.¹⁷ To assess the potential for the Proposed Project's construction to create impacts to sensitive receptors, the SCAQMD recommends utilizing its

¹⁷ Grant Elementary School was closed in 2008; however, it was included in the analysis in the event that educational uses resume in the future.

Localized Significance Thresholds (LSTs) for construction. The LSTs were developed in response to the SCAQMD Governing Boards' Environmental Justice Enhancement Initiative (I-4) and are based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the state or federal ambient air quality standard (the more stringent of the two).¹⁸ For guidance, the SCAQMD provided the Final Localized Significance Threshold Methodology (dated June 2003 [revised 2008]).¹⁹ The LST methodology assists lead agencies in their project-specific analysis of the potential localized impacts associated with proposed projects.

The appropriate source receptor area (SRA) for the LSTs for the Proposed Project is SRA 23 since this area includes the Proposed Project site. LSTs only consider NOX, CO, PM10, and PM2.5 emissions.²⁰ The SCAQMD produced look-up tables for projects that disturb areas less than or equal to 5 acres in size.²¹ Based on the daily equipment modeled in CalEEMod, the Proposed Project's construction is anticipated to disturb approximately 1.5 acres in a single day. Thus, the LSTs applicable to the Proposed Project uses the SCAQMD-produced look-up tables for a 1.5-acre site.

The SCAQMD's methodology states that "off-site mobile emissions from the Proposed Project should not be included in the emissions compared to LSTs."²² Therefore, for the construction LST analysis purposes, only the emissions included in the CalEEMod "on-site" emissions outputs were considered. LST thresholds for distances to sensitive receptors of 25, 50, 100, 200, and 500 meters are provided. SCAQMD's LST guidance recommends using the 25-meter threshold for receptors located 25 meters (or approximately 82 feet) or less from the Proposed Project site.²³ Therefore, the LSTs for 1.5 acres at 25 meters were used for the construction analysis, consistent with the SCAQMD LST methodology.

Table 5: Localized Significance of Construction Emissions presents the modeling results for the Project's localized emissions during construction. As stated, compliance with SCAQMD Rules 402 and 1113 and CARB anti-idling regulations was not assumed when estimating the Proposed Project's localized construction emissions for **Table 5**. Therefore, the Proposed Project's maximum-day localized construction emissions would be even lower than reported in **Table 5**. **Table 5** shows that the emissions of these pollutants on the peak day of construction would not exceed the LSTs and, therefore, would not be expected to create substantial concentrations of pollutants at the sensitive receptors closest to the Proposed Project Site or cause or contribute to an exceedance of federal or state ambient air quality

¹⁸ South Coast Air Quality Management District, *Localized Significance Thresholds*, <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>, accessed November 2024

¹⁹ South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, Revised 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>, accessed November 2024

²⁰ South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, Revised 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>, accessed November 2024

²¹ South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology, Appendix C – Mass Rate LST Look-up Tables*, Revised 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>, accessed November 2024

²² South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, Revised 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>, accessed November 2024

²³ Ibid

standards. Therefore, approval of the Proposed Project would not result in any significant effects relating to localized construction air pollutant concentrations.

Table 5: Localized Significance of Construction Emissions

Source/Activity	Emissions (pounds per day) ^{1,2,3}			
	NO _x	CO	PM ₁₀	PM _{2.5}
Demolition	2.27	14.56	2.97	0.49
Site Preparation	1.01	11.88	2.48	1.21
Grading	1.20	14.24	2.81	1.38
Infrastructure Improvements	3.54	10.47	0.03	0.03
Building Construction	3.54	10.47	0.03	0.03
Paving	0.99	6.65	0.02	0.02
Architectural Coating	0.65	0.96	<0.01	<0.01
Infrastructure Improvements + Building Construction	7.08	20.94	0.06	0.06
Paving + Architectural Coating	1.64	7.61	0.02	0.02
<i>Maximum Daily Emissions</i>	7.08	20.94	2.97	1.38
SCAQMD LST (for 1.5 acres at 25 meters)	144	743	6	4
Maximum Daily Emissions Exceed SCAQMD Threshold?	No	No	No	No
1. Worst-case seasonal maximum daily emissions are reported. 2. Mandatory compliance with SCAQMD Rule 403 Fugitive Dust applied for construction emissions. The Rule 403 reduction/credits include the following: properly maintain mobile and other construction equipment; replace ground cover in disturbed areas quickly; water exposed surfaces three times daily; water all haul roads twice daily. Reduction percentages from the SCAQMD CEQA Handbook (Tables XI-A through XI-E) were applied. 3. Compliance with Final EIR MM AQ-2 requiring Tier 4 or better diesel engines for heavy-duty diesel-powered equipment.				
Source: CalEEMod version 2022. Refer to Appendix B for model outputs.				

Localized Operational Significance Analysis

According to the SCAQMD localized significance threshold methodology, operational LSTs apply only to on-site sources.²⁴ LSTs for receptors located at 25 meters for SRA 23 were utilized in this analysis. The 1.0-acre LST threshold was conservatively used for the Proposed Project Site.²⁵ The on-site operational emissions were calculated using CalEEMod and are compared to the LST thresholds in **Table 6: Localized Significance of Operational Emissions**.

²⁴ Ibid.

²⁵ Construction LST analysis is based on the amount of daily ground disturbance, which was calculated to be 1.5 acre. For operations, the size of the Project Site has been used.

Table 6: Localized Significance of Operational Emissions

Activity	Emissions (pounds per day) ^{1, 2}			
	NO _x	CO	PM ₁₀	PM _{2.5}
On-Site Emissions (Area, Energy, Stationary Sources)	2.87	11.59	0.17	0.16
SCAQMD Localized Screening Threshold (1.0 acre at 25 meters)	118	602	1	1
Exceed SCAQMD Threshold?	No	No	No	No
1. As recommended by the SCAQMD. Worst-case seasonal maximum daily emissions are reported.				
2. On-site emissions consist of area sources and energy sources.				
Refer to <u>Appendix B</u> for model outputs.				

The operational emissions shown on **Table 6** include all on-site Proposed Project-related sources (i.e., area and energy). On-site operational sources include stationary sources and/or on-site mobile equipment; off-site mobile emissions should not be included.²⁶ The results of the LST analysis show that the Proposed Project would not cause or contribute to an exceedance of federal or state ambient air quality standards. Therefore, approval of the Proposed Project would not result in any significant effects relating to operational air pollutant concentrations.

Carbon Monoxide Hotspots

Projects that would not produce traffic volumes resulting in more than 100,000 daily vehicles along project area roadway segments would not require the preparation of a detailed CO hot spot analysis. The Project would support on-site uses and would not generate vehicle trips. Trips generated by the RCHSP were contemplated in the FEIR, and no future study is required. Therefore, the Proposed Project would not result in any significant effects relating to CO concentrations.

Health Risk Assessment

CARB identified DPM as a TAC in 1998. Mobile sources (including trucks, buses, automobiles, trains, ships, and farm equipment) are the largest diesel emissions source. Diesel exhaust is emitted from a broad range of on- and off-road diesel engines. As the Proposed Project site is near existing sensitive receptors, an analysis of DPM was performed using the U.S. EPA-approved AERMOD model.

Carcinogenic Risk

Table 7: Carcinogenic Risk Assessment shows the unmitigated health risk for Proposed Project construction and operations. Based on OEHHA Guidance, the exposure duration for a resident is 30 years, beginning with the third trimester, and the worker and student/park exposure duration is 25 years and 9 years, respectively. Operations would commence following construction. As such, construction would not overlap with operations. The analysis calculates risk based on exposure to construction concentrations during the initial 16 months and operational concentrations for the remainder of the exposure duration. The Proposed Project (construction and operations combined scenario) would result in a maximum cancer risk of 4.3 in one million at the nearest residential receptors, 0.43 in one million at the nearest student receptors, 0.25 in one million at the nearest park receptors, and 1.20 in one million at the nearest worker

²⁶ South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology*, Revised 2008, <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>, accessed November 2024

receptors. Therefore, the SCAQMD threshold of 10 in one million would not be exceeded at the nearest receptors and impacts would be less than significant.

Table 7: Carcinogenic Risk Assessment

Exposure Scenario	Receptor Location (UTM Coordinates)	Cancer Risk (per Million) ¹	Significance Threshold (per Million)	Risk Exceeds Threshold?
Construction				
Residential Receptor	4200 14 th Street (464515.09, 3759834.01)	0.19	10	No
Student Receptor	Grant Elementary School (464694.84, 3759819.76)	0.04	10	No
Park Receptor	Evans Park (464517.36, 3759446.67)	0.003	10	No
Worker Receptor	Riverbrock Medical Plaza (464494.57, 3759655.56)	0.01	10	No
Operations				
Residential Receptor	4200 14 th Street (464515.09, 3759834.01)	5.39	10	No
Student Receptor	Grant Elementary School (464694.84, 3759819.76)	0.44	10	No
Park Receptor	Evans Park (464517.36, 3759446.67)	0.28	10	No
Worker Receptor	Riverbrock Medical Plaza (464494.57, 3759655.56)	1.25	10	No
Construction and Operations Combined				
Residential Receptor	4200 14 th Street (464515.09, 3759834.01)	4.30	10	No
Student Receptor	Grant Elementary School (464694.84, 3759819.76)	0.43	10	No
Park Receptor	Evans Park (464517.36, 3759446.67)	0.25	10	No
Worker Receptor	Riverbrock Medical Plaza (464494.57, 3759655.56)	1.20	10	No
UTM = Universal Transverse Mercator				

Exposure Scenario	Receptor Location (UTM Coordinates)	Cancer Risk (per Million) ¹	Significance Threshold (per Million)	Risk Exceeds Threshold?
1. The reported annual pollutant concentration is at the closest maximally exposed individual resident (MEIR) to the Project site.				
Source: Refer to Appendix B for modeling data.				

Non-Carcinogenic Risk

SCAQMD also requires an evaluation of non-cancer risk from TAC exposure, which is stated in terms of a hazard index. As discussed above, construction-related activities would result in project-generated DPM emissions, which are the primary TAC of concern. **Table 8: Chronic Hazard Assessment** shows the chronic non-cancer risk hazard index from Proposed Project construction emissions. A chronic hazard index of 1.0 is considered individually significant. The highest maximum chronic hazard index associated with unmitigated DPM emissions from the Proposed Project would be 0.0073 for residential receptors, 0.0033 for student receptors, 0.0026 for park receptors, and 0.0202 for worker receptors, which would be below the SCAQMD's maximum non-cancer risk hazard index threshold of 1.0. It is noted that there is no acute REL for DPM, and acute health risk cannot be calculated. Therefore, the Proposed Project construction activities would have a less than significant impact on non-carcinogenic hazards.

Table 8: Chronic Hazard Assessment

Exposure Scenario	Receptor Location (UTM Coordinates)	Concentration ($\mu\text{g}/\text{m}^3$) ¹	Chronic Hazard
Construction			
Residential Receptor	4200 14 th Street (464515.09, 3759834.01)	0.0014	0.0003
Student Receptor	Grant Elementary School (464694.84, 3759819.76)	0.0025	0.0005
Park Receptor	Evans Park (464517.36, 3759446.67)	0.0002	0.0005
Worker Receptor	Riverbrock Medical Plaza (464494.57, 3759655.56)	0.0025	0.0005
Operations			
Residential Receptor	4200 14 th Street (464515.09, 3759834.01)	0.0071	0.0014
Student Receptor	Grant Elementary School (464694.84, 3759819.76)	0.0033	0.0007

Exposure Scenario	Receptor Location (UTM Coordinates)	Concentration ($\mu\text{g}/\text{m}^3$) ¹	Chronic Hazard
Park Receptor	Evans Park (464517.36, 3759446.67)	0.0021	0.0004
Worker Receptor	Riverbrock Medical Plaza (464494.57, 3759655.56)	0.0202	0.0040
SCAQMD Threshold		N/A	1.0
Threshold Exceeded?		N/A	No
N/A = Not Applicable; UTM = Universal Transverse Mercator			
1. The reported pollutant concentration (annual period) is at the closest receptor (maximally exposed individual receptor).			
Source: Refer to Appendix B .			

As concluded above, impacts related to cancer risk would be less than significant with the incorporation of **FEIR MM AQ-3**. Additionally, non-carcinogenic hazards are calculated to be within acceptable limits. It should be noted that the impacts assess the Proposed Project's incremental contribution to health risk impacts, consistent with the SCAQMD guidance and methodology. The SCAQMD has not established separate cumulative thresholds and does not require combining impacts from cumulative projects. The SCAQMD considers projects that do not exceed the project-specific thresholds to generally not be cumulatively significant.²⁷ Therefore, impacts related to health risks from the Proposed Project would be less than significant with **FEIR MM AQ-3** incorporated.

FEIR Mitigation Measures Applicable to the Proposed Project

FEIR MM AQ-3

During construction of all phases of the project, the following mitigation measures shall be incorporated to reduce impacts resulting from the exceedance of the South Coast Air Management District (SCAQMD) localized significance thresholds.

Consistent with SCAQMD Rule 403, it is required that fugitive dust generated by grading and construction activities be kept to a minimum with a goal of retaining dust on the site, by following the dust control measures listed below:

- a. During clearing, grading, earthmoving, excavation, or transportation of cut or fill materials, water trucks or sprinkler systems shall be used to prevent dust from leaving the site and to create a crust after each day's activities cease.
- b. During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this would include wetting down such areas later in the morning,

²⁷ South Coast Air Quality Management District, *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution*, August 2003.

after work is completed for the day, and whenever winds exceed 15 miles per hour.

c. Soil stockpiled for more than 2 days shall be covered, kept moist, or treated with soil binders to prevent dust generation.

d. Speeds on unpaved roads shall be reduced to less than 15 miles per hour.

e. All grading and excavation operations shall be halted when wind speeds exceed 25 miles per hour.

f. Dirt and debris spilled onto paved surfaces at the project site and on the adjacent roadways shall be swept, vacuumed, and /or washed at the end of each workday.

g. If import /export of soil materials would be required, all trucks hauling dirt, sand, soil, or other loose material to and from the construction site shall be covered, and /or a minimum 2 feet of freeboard shall be maintained.

h. At a minimum, at each vehicle egress from the project site to a paved public road, a pad consisting of washed gravel (minimum size: 1 inch) shall be installed and maintained in clean condition to a depth of at least 6 inches and extending at least 30 feet wide and at least 50 feet long (or as otherwise directed by SCAQMD).

i. Any additional requirements of SCAQMD Rule 403 shall be reviewed and complied with.

j. The construction contractor or Riverside Community Hospital representative shall notify sensitive receptors when building demolition and grading activities would occur so that sensitive residents could be kept indoors or other accommodations made for their comfort. The construction contractor shall post readily visible signage in publicly accessible areas along the property lines of the Riverside Community Hospital with a contact name and telephone number in the event that project construction would generate nuisance levels of air pollutants in the surrounding community. Action shall be taken within 4 hours after notification to determine the cause of the objectionable emissions and take corrective action.

The following measures shall be adhered to during project grading and construction to reduce emissions of oxides of nitrogen (NOx) from construction equipment:

a. Heavy-duty diesel-powered construction equipment rated at greater than 50 horsepower shall be equipped with Tier 3 or better diesel engines.

b. The engine size of construction equipment shall be the minimum size.

c. The amount of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest amount of equipment is operating at any one time.

- d. Construction equipment shall be maintained in tune per the manufacturer's specifications.
- e. Catalytic converters shall be installed on gasoline-powered equipment over 50 horsepower.
- f. Electric equipment shall be utilized in lieu of diesel-powered equipment, where feasible.

4.3d *Would the Project create objectionable odors affecting a substantial number of people?*

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR concluded that construction-related odors would be temporary and generally occur at magnitudes that would not affect substantial numbers of people. Concerning long-term operations, the FEIR determined that the Approved Project's proposed development would not result in a land use commonly associated with odors. Therefore, the FEIR found that impacts related to odors would be less than significant.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact.

Construction

Odors that could be generated by construction activities are required to follow SCAQMD Rule 402 to prevent odor nuisances on sensitive land uses. SCAQMD Rule 402, Nuisance, states:

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

During construction, emissions from construction equipment, such as diesel exhaust, and from volatile organic compounds contained in architectural coatings and paving activities may generate odors. However, these odors would disperse rapidly and are not expected to affect a substantial number of people..

Operational

The SCAQMD *CEQA Air Quality Handbook* identifies certain land uses as sources of odors. These land uses include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The Proposed project involves the construction of a parking garage, which would not involve the types of uses that would emit objectionable odors that would affect substantial numbers of people. The Proposed Project would not include any of the land uses that have been identified by the SCAQMD as significant odor sources.

Therefore, the Proposed Project would not result in any significant effects relating to other air emissions affecting substantial numbers of people.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

Conclusion

Based on the comparative analysis outlined in this Addendum, air quality impacts associated with the Proposed Project would be less than those assumed for the Approved Project in the FEIR. No new impacts relative to adverse air quality impacts or a substantial increase in the severity of a previously identified significant impact evaluated in the FEIR would occur. With regard to Public Resources Code Section 21166 and State CEQA Guidelines Section 15162(a), the Project would not result in any new impacts or increase the severity of the previously identified impacts concerning air quality. There are no substantial changes to the circumstances under which the Proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the FEIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the FEIR was certified is available that would impact the prior finding of significant unavoidable impact. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.4 Biological Resources

4.4a Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Summary of Previous Environmental Analysis

Less Than Significant With Mitigation Incorporated. The FEIR identified that Phases I, IIA, IIB, and IIC all have the same potential to impact nesting birds. The FEIR concluded that with the implementation of **FEIR MM BIO-1**, requiring nesting bird surveys during all project phases prior to ground-disturbing activities impacts to any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service would be less than significant.

FEIR Mitigation Measures

FEIR MM BIO-1 In order to avoid potential impacts to nesting birds in conformance with the Migratory Bird Treaty Act and California Fish and Game Code during all phases (Phase I, Phase IIA, Phase IIB, and Phase IIC) of the project, a qualified biologist will conduct a nesting bird survey within 1 week prior to ground-disturbance activities. Avoidance will involve the period from approximately February 1 to August 31, which covers the breeding season for most birds that may occur in the project area. The survey shall consist of full coverage of the proposed disturbance footprint as well a 300-foot buffer. If no active nests are found, no additional measures are required. If active nests are found, the nest locations shall be mapped by the biologist using Global Positioning System (GPS) equipment. The

nesting bird species and, to the degree feasible, the nesting stage (e.g., incubation of eggs, feeding of young, near fledging) will be documented. The biologist shall establish a no-disturbance buffer around each active nest. The buffer will be determined by the biologist based on the species present and surrounding habitat. No construction or ground-disturbance activities shall be conducted within the buffer until the biologist has determined the nest is no longer active and has informed the construction supervisor that activities may resume.

Analysis of Proposed Project

Less Than Significant With Mitigation Incorporated. The Proposed Project site is in an urbanized area and is currently occupied by an auto body shop, medical office building, the Brockton Storage Building, and the Women's Services Building. On-site vegetation is limited to ornamental landscaping along the Proposed Project site's frontage, and within the Proposed Project site, it is limited to ornamental grass, shrubs, and trees. The existing trees within the Proposed Project site would be removed as part of the Proposed Project. No natural habitats are present on the property. Urban development borders the Proposed Project site, as summarized in **Table 1**. No native habitat is present on properties bordering the Proposed Project site, and landscaping is limited to ornamental vegetation. Based on a review of the existing and surrounding site conditions, no candidate, sensitive, or special-status plant or wildlife species are present on or adjacent to the Proposed Project site. Notwithstanding, the existing ornamental trees on the Proposed Project site have the potential to provide nesting habitat for birds; therefore, **FEIR MM BIO-1** is required, which requires nesting bird surveys prior to ground-disturbing activities. With **FEIR MM BIO-1** incorporated, impacts to any avian species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service would be less than significant. No new or more severe impact concerning these species would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

FEIR MM BIO-1 In order to avoid potential impacts to nesting birds in conformance with the Migratory Bird Treaty Act and California Fish and Game Code during all phases (Phase I, Phase IIA, Phase IIB, and Phase IIC) of the project, a qualified biologist will conduct a nesting bird survey within 1 week prior to ground-disturbance activities. Avoidance will involve the period from approximately February 1 to August 31, which covers the breeding season for most birds that may occur in the project area. The survey shall consist of full coverage of the proposed disturbance footprint as well a 300-foot buffer. If no active nests are found, no additional measures are required. If active nests are found, the nest locations shall be mapped by the biologist using Global Positioning System (GPS) equipment. The nesting bird species and, to the degree feasible, the nesting stage (e.g., incubation of eggs, feeding of young, near fledging) will be documented. The biologist shall establish a no-disturbance buffer around each active nest. The buffer will be determined by the biologist based on the species present and surrounding habitat. No construction or ground-disturbance activities shall be conducted within the buffer until the biologist has determined the nest is no longer active and has informed the construction supervisor that activities may resume.

4.4b *Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

Summary of Previous Environmental Analysis

No Impact. The FEIR concluded that the Approved Project site is fully developed and contains no riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Therefore, the FEIR concluded no impact in this regard.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

No Impact. There are no riparian habitats or other sensitive natural communities identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service present on the Proposed Project site.²⁸ Therefore, the Proposed Project would not impact these resources, and no mitigation is required. No new or more severe impact concerning riparian habitat or other sensitive natural communities would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.4c *Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

Summary of Previous Environmental Analysis

No Impact. The FEIR concluded that since there is no State or federally protected wetlands on-site, development occurring within the Approved Project site would not have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. Therefore, the FEIR concluded no impact in this regard.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

No Impact: No state or federally protected wetlands are on the Proposed Project site.²⁹ Therefore, the Proposed Project would have no impact on wetlands and no mitigation is required. No new or more severe impact concerning wetlands would occur as a result of the Proposed Project.

²⁸ U.S. Fish and Wildlife Service. (2024). National Wetlands Inventory Mapper. Retrieved from: <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>, accessed December 11, 2024.

²⁹ Ibid.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.4d Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Summary of Previous Environmental Analysis

No Impact. The FEIR concluded that because the RCHSP is developed with an existing hospital campus and surrounded by existing developments on all sides, the site does not function as a regional wildlife corridor or habitat linkage. Therefore, the FEIR concluded no impact in this regard.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

No Impact: There are no native resident or migratory fish or wildlife species or established native resident or migratory wildlife corridors or native wildlife nursery sites present on the Proposed Project site. Therefore, the Proposed Project would have no impacts on those resources and no mitigation is required. No new or more severe impact concerning those species, corridors, or nursery sites would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.4e Would the Project conflict with any local policies or ordinances related to protecting biological resources, such as a tree preservation policy or ordinance?

Summary of Previous Environmental Analysis

No Impact. The FEIR identified that there are no general plan policies related to the protection of biological resources applicable to the Approved Project, nor is there a City tree preservation policy that would affect the Approved Project. Therefore, the Approved Project is not subject to local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Therefore, the FEIR concluded no impact in this regard.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

No Impact. No local policies or ordinances are protecting biological resources, such as a tree preservation policy or ordinance, which are relevant to the Proposed Project site. Therefore, the Proposed Project would not conflict with local policies or ordinances protecting biological resources; no mitigation is required. No new or more severe impact concerning those policies or ordinances would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.4f Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR identified that the Approved Project is subject to compliance with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) because the City of Riverside is a Permittee to the MSHCP. The Approved Project is not located in an area subject to Cell Criteria under the MSHCP and, therefore, has no conservation requirements for building out the MSHCP Reserve. The Approved Project site does not support any riparian or riverine resources that would be affected by the RCHSP and is therefore compliant with Section 6.1.2 of the MSHCP, a Criteria Area Species Survey Area or Additional Species Survey Area per Section 6.3.2 of the MSHCP; or any other applicable conservation plan. Since no Conservation Areas are near the RCHSP, compliance with Section 6.1.4, Urban-Wildlands Interface Guidance, is unnecessary. As such, impacts are considered less than significant, and no mitigation was required.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

No Impact: The Proposed Project is subject to compliance with the MSHCP because the City of Riverside is a Permittee of the MSHCP. The Proposed Project site is not located in an area subject to Cell Criteria under the MSHCP and, therefore, has no conservation requirements for building out the MSHCP Reserve. The Proposed Project site does not support any riparian or riverine resources that would be affected by the Proposed Project and is compliant with MSHCP Section 6.1.2 or 6.3.2. Further, because no Conservation Areas are near the Proposed Project site, compliance with Section 6.1.4, Urban-Wildlands Interface Guidance, is not needed. Therefore, the Proposed Project would not conflict with an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan; therefore, the Proposed Project would result in no impact, and no mitigation is required. No new or more severe impact concerning those policies or ordinances would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.5 Cultural and Tribal Cultural Resources

The Proposed Project's analyses are based on **Appendix D: Cultural Resources Assessment**.

4.5a Would the Project cause a substantial adverse change in the significance of a historical resource pursuant Section 15064.5?

Summary of Previous Environmental Analysis

Less Than Significant With Mitigation Incorporated. The RCHSP is currently developed with the Riverside Community Hospital. The FEIR determined that the Palm Grove at Newman Park, Building B, the Calvary Presbyterian Church, the Chinatown site, the Old Magnolia Avenue Trolley Line and Refuse Dump, and the existing Riverside Community Hospital contain features that would qualify as a historical resource defined in State CEQA Guidelines Section 15064.5. The FEIR requires **FEIR MM AES-3** and **FEIR MM CUL-1** to ensure that the Palm Grove at Newman Park, including other mature trees in the vicinity of the palm trees and the mounded turf in the landscaped area where the trees are planted, is taken into consideration when the Phase IIA approximately 100,000 square foot mixed-use building and associated parking are designed. With **FEIR MM AES-3** and **FEIR MM CUL-1** incorporated, potential impacts to Palm Grove at Newman Park would be less than significant.

The FEIR identified that Building B appears eligible for the City of Riverside Cultural Heritage Landmark designation and for listing on the California Register of Historical Resources because Building B is an example of a Mid-Century Modern architectural design by a renowned local architect, Herman O. Ruhnau. To comply with current seismic standards per SB 1953, Building B is proposed for a full seismic upgrade, including new windows, due to the retrofit during Phase I. The Certified FEIR concluded that alterations of Building B may impact character-defining features of the building and, therefore, require **FEIR MM AES-2** to be implemented. Therefore, the FEIR concluded that impacts to Building B would be less than significant with mitigation incorporated. Additionally, the implementation of **FEIR MM CUL-2** would address issues related to access and parking for the Riverside Community Players Theatre and would include measures to soften views. Therefore, the FEIR concluded that impacts to the Riverside Community Players Theatre would be less than significant with mitigation incorporated.

The FEIR identified that the proximity of the multi-story towers proposed during Phase IIB and IIC could indirectly impact the historical context of the Calvary Presbyterian Church. However, the implementation of **FEIR MM AES-1**, which requires design measures that would ensure that the structure's historical designation as a City of Riverside Structure of Merit/Cultural Heritage Landmark and National Register of Historic Places eligibility are not adversely affected by the Approved Project. Therefore, the FEIR concluded that impacts to the Calvary Presbyterian Church would be less than significant with mitigation incorporated.

The FEIR identified that while there is no direct evidence of Chinatown-related uses on the RCHSP site, the location of Chinatown across Brockton Avenue leaves open the possibility that evidence of Chinatown's history may lie below the ground on the hospital site. To address the potential for archaeological evidence below the ground, grading activities during Phase I, IIA, IIB, and IIC would be monitored by a qualified archaeologist (**FEIR MM CUL-3**). Additionally, RCH, in coordination with the City, will notify local tribes 30 days prior to ground disturbing activities allowing the local tribes to monitor grading and ground-disturbing activities along with RCH's qualified archaeological monitor (**FEIR MM CUL-5**). With **FEIR MM CUL-3** and **FEIR MM CUL-5** incorporated, impacts to the Chinatown site are considered less than significant.

The FEIR identified that given the relatively close proximity of Phase IIA to the Old Magnolia Avenue Trolley Line and Refuse Dump located south of 14th Street in the vicinity of Magnolia Avenue, undiscovered subsurface cultural resources may exist that could be affected by implementation of the RCHSP. The FEIR

identified that implementation of **FEIR MM CUL-3** would ensure that proper measures are taken in the event that cultural resources are discovered during construction. With **FEIR MM CUL-3** incorporated, impacts to the Old Magnolia Avenue and Trolley Line and Refuse Dump are considered less than significant.

The FEIR identified that RCH was previously used for farm lots, and due to this history, it was recommended that an interpretive feature be installed to educate the public on the history of the site and to explain the story of RCH (**FEIR MM CUL-4**). With **FEIR MM CUL-4** incorporated, impacts would be considered less than significant.

FEIR Mitigation Measures

See **FEIR MM AES-1** through **FEIR MM AES-3** in Section 4.1, Aesthetics, above.

FEIR MM CUL-1 Design and install a plaque and interpretive feature with prominent public access in the palm grove, telling the history of J. Harrison Wright and his association with the landscaping of Riverside Community Hospital (RCH) and Newman Park.

FEIR MM CUL-2 In order to avoid potential indirect impacts to the Riverside Community Players Theatre during Phase I, RCH will implement the following measures prior to issuance of building permits:

1. Before ground is broken for the new Phase I hospital bed tower, provide improved parking for Riverside Community Players Theatre patrons in accordance with the agreement between RCH and the Riverside Community Players. Many of the theatre patrons are elderly, so much parking needs to be located near the theatre and at the same general grade as the theatre.
2. If necessary, pave and stripe the area below the parking structure/helipad, Building G, to provide added parking near the theatre.
3. Work with theatre management to develop a means for ensuring access to convenient parking for theatre patrons when performances are scheduled at the Community Players Theatre.
4. Narrow the planter areas shown on the plot plan east and west of the parking bay along the north face of the Phase I hospital bed tower and use the space gained to create four or five finger planters to break up the expanse of parking. In these planters, tree varieties that will help soften the view to the lower part of the building will be required.

FEIR MM CUL-3 In order to lessen direct and indirect impacts related to archaeological evidence of Chinatown's history that is around the project site or at the Old Magnolia Avenue Trolley Line and Refuse Dump, and any unknown Native American artifacts, all ground-disturbing activities during all construction phases of the project shall be monitored by a qualified archaeologist meeting the requirements of the Secretary of the Interior. In the event that the archaeological monitor identifies a potentially significant site, the monitor shall secure the discovery site from further impacts by delineating the site with staking and flagging, and by

diverting grading equipment away from the archaeological site. Following notification to the City of Riverside (City), the archaeological monitor shall conduct investigations as necessary to determine whether the discovery is significant under the criteria listed in the California Environmental Quality Act and the environmental guidelines of the City. If the discovery is determined to be not significant, grading operations may resume and the archaeological monitor shall summarize the findings in a letter report submitted to the City following the completion of mass grading activities. The letter report shall describe the results of the on-site archaeological monitoring, each archaeological site observed, the scope of testing conducted, results of laboratory analysis (if applicable), and conclusions. The letter report shall be completed prior to the release of grading bonds. Any artifacts recovered during the evaluation of resources shall be curated at a facility approved by the City.

Pursuant to Public Resources Code Section 5097.99, in the event Native American artifacts are discovered, work within the area of the discovery shall stop and the City shall consult with representatives of the Native American community to ensure the respectful treatment of Native American artifacts.

For the cultural prehistoric/historic resources that are determined to be significant, alternate means of achieving mitigation shall be pursued. In general, these forms of mitigation include the following:

1. Site avoidance by preservation of the archaeological site in a natural state in open space, or in specific open space easements
2. Site avoidance by preservation through capping the site and placing landscaping on top of the fill
3. Data recovery through implementation of an excavation and analysis program
4. A combination of one or more of the above measures.

FEIR MM CUL-4

In order to lessen direct and indirect impacts related to the historical resources located on the site, RCH shall develop an interpretive feature telling the story of RCH and display it in a prominent public place so that the public can be educated on the history of the site. This history will include the use of the property for farming and then athletic fields, as well as its ultimate development as a major medical center. This interpretive feature shall be installed prior to issuance of occupancy permits for Phase IIB.

FEIR MM CUL-5

In addition to **FEIR MM CUL-3** requiring all ground-disturbing activities during all construction phases of the project to be monitored by a qualified archaeologist, RCH, in coordination with the City, will notify local tribes 30 days prior to ground-disturbing activities, allowing the local tribes to monitor grading and ground-disturbing activities along with RCH's qualified archaeological monitor.

Analysis of Proposed Project

No Impact. As concluded in the Proposed Project’s Cultural Resources Assessment (**Appendix D**), there are no historical resources present within the Proposed Project site. No historical resource would be demolished or materially altered. Therefore, the Proposed Project would not cause an adverse change in the significance of a historical resource. No impact would occur in this regard, and no mitigation is required. No new or more severe impact concerning historical resources would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.5b Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

Summary of Previous Environmental Analysis

Less Than Significant With Mitigation Incorporated. The FEIR did not include an analysis of tribal cultural resources. However, the FEIR included an archaeological assessment to locate, record, and evaluate potentially significant historic and archaeological resources in the Approved Project site. The assessment did not identify previously recorded archaeological sites within the Approved Project site. However, the FEIR determined that development under the RCHSP could disturb unknown archaeological resources. The FEIR concluded that with **FEIR MM CUL-3**, which requires archaeological monitoring during grading, **FEIR MM CUL-4**, which requires an interpretive feature telling the story of RCH, incorporated, potential impacts to archaeological resources would be less than significant. In response to comments from the Pechanga Tribe requesting more involvement from the Pechanga during earthmoving activities, **FEIR MM CUL-5**, which requires notification to local tribes 30 days prior to ground-disturbing activities along with RCH’s qualified archaeological monitor, was added as a mitigation measure to clarify the City’s intentions for archaeological monitoring on the site. **FEIR MM CUL-5** is not required to reduce a significant impact to less than significant levels.

FEIR Mitigation Measures

See **FEIR MM CUL-3** through **FEIR MM CUL-5** above.

Analysis of Proposed Project

Less Than Significant With Mitigation Incorporated: Although the Proposed Project site has already been disturbed, consistent with the findings of the FEIR, there is a potential for previously unknown archaeological resources to be uncovered during ground-disturbing activities due to the Proposed Project site’s proximity to Riverside’s historic Chinatown. Therefore, **FEIR MM CUL-3** and **FEIR MM CUL-5** apply to the Proposed Project. As part of the current CEQA process for the Proposed Project, the City initiated formal tribal consultation under SB 18. The following Tribes were notified:

- Agua Caliente Band of Cahuilla Indians
- Augustine Band of Cahuilla Indians
- Cabazon Band of Cahuilla Indians
- Cahuilla Band of Indians
- Gabrieleno Band of Mission Indians – Kizh Nation

- Gabrieleno/Tongva San Gabriel Band of Mission Indians
- Gabrielino Tongva Indians of California Tribal Council
- Gabrielino/Tongva Nation
- Gabrielino-Tongva Tribe
- Los Coyotes Band of Cahuilla and Cupeño Indians
- Morongo Band of Mission Indians
- Pala Band of Mission Indians
- Pechanga Band of Indians
- Quechan Tribe of the Fort Yuma Reservation
- Ramona Band of Cahuilla
- Rincon Band of Luiseño Indians
- San Manuel Band of Mission Indians
- Santa Rosa Band of Cahuilla Indians
- Soboba Band of Luiseño Indians
- Torres-Martinez Desert Cahuilla Indians
- Serrano Nation of Mission Indians

Of the tribes listed above, the following requested consultation to discuss the Proposed Project in further detail:

- Gabrielino Band of Mission Indians
- Pechanga Band of Indians
- Rincon Band of Luiseño Indians
- Morongo Band of Mission Indians
- Soboba Band of Luiseño Indians

On January 23, 2025, the Pechanga Band of Indians contacted the City to inform them that they agree with the original mitigation measures of the Certified FEIR and concluded consultation. On February 25, 2025, Gabrieleno Band of Mission Indians informed and requested that the City include conditions of approval specific to their Tribe and requested COAs be incorporated; however, the City informed the Tribe that any conditions of approval would remain general for all consulting tribes. On February 18, 2025, the Rincon Band of Luiseño Indians provided modifications to the mitigation measures listed in the Certified FEIR. In response, on February 19, 2025, City staff provided standard conditions of approvals to the Rincon Band of Luiseño Indians for review and on March 7, 2025 they agreed with the proposed standard conditions. On January 7, 2025, the Morongo Band of Mission Indians requested receipt of the Cultural Report (**Appendix D**), the Geotechnical Report (**Appendix E**), and the Proposed Project plans. City staff followed up with the Morongo Band of Mission Indians on January 23, 2025, and February 21, 2025. No further response was received from the Morongo Band of Mission Indians. On February 26, 2025, Soboba Band of Luiseño Indians met with City staff and indicated their agreement with the City's proposed conditions of approvals.

No new or more severe impacts concerning tribal cultural resources would occur due to the Proposed Project following FEIR MM CUL-3 and FEIR MM CUL-5 compliance. Notwithstanding, as a good faith effort to further reduce the already insignificant impacts associated with an adverse change in the significance of archaeological resources, the City has added the following standard conditions of approval (COA).

Standard Conditions of Approval

- COA-1** Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the Applicant and the City shall contact Consulting Tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, the Consulting Tribes to discuss any proposed changes and review any new impacts to tribal cultural resources and/or potential avoidance/preservation of the tribal cultural resources on the project site. The City and the developer/applicant shall make all attempts to avoid and/or preserve in place as many tribal cultural resources as possible that are located on the project site if the site design and/or proposed grades should be revised. In the event of inadvertent discoveries of tribal cultural resources, work shall temporarily halt until agreements are executed with consulting tribe, to provide tribal monitoring for ground disturbing activities.
- COA-2** **Archaeological Monitoring:** At least 30 days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities take place, the developer/applicant shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources.
- A. The project archaeologist, in consultation with consulting tribes, the Developer, and the City, shall develop an Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and Tribal Cultural Resources activities that will occur on the project site. Details in the plan shall include:
- i. Project grading and development scheduling;
 - ii. The development of schedule in coordination with the developer/applicant and the project archaeologist for designated Tribal Monitors from the consulting tribes during grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and Tribal Monitors' authority to stop and redirect grading activities in coordination with all project archaeologists;
 - iii. The protocols and stipulations that the Applicant, Consulting Tribes, and project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered archaeological resources and tribal cultural resource deposits that shall be subject to a resources evaluation, including identification, significance, avoidance and treatment;
 - iv. Avoidance, treatment and final disposition of any tribal cultural resources, sacred sites, and Native American human remains if discovered on the project site; and
 - v. The scheduling and timing of the Cultural Sensitivity Training noted in Condition of Approval Number 5.
- COA-3** **Native American Monitor:** Prior to issuance of grading permit, the developer/permit applicant shall engage each of the consulting tribe(s) regarding Native American Monitoring. The developer/permit applicant shall provide evidence to the City that they have reached an agreement with each of the consulting tribe(s) regarding the following:
- i. The treatment of known tribal cultural resources;

- ii. The treatment and final disposition of any tribal cultural resources, sacred sites, archaeological and cultural resources inadvertently discovered on the Project site;
- iii. Project grading, ground disturbance (including but not limited to excavation, trenching, cleaning, grubbing, tree removals, grading and trenching) and development scheduling; and
- iv. The designation, responsibilities, and participation of professional Tribal Monitor(s) designated by the consulting tribe(s) during tree removal, grading, excavation and all ground disturbing activities, including any archaeological work.
- v. The developer/permit applicant shall provide sufficient evidence that they have made a reasonable good faith efforts to reach an agreement with the consulting tribes regards to items a-d, as listed above.

COA-4

Treatment and Disposition of Tribal Cultural Resources: In the event that Tribal Cultural Resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries:

- A. **Redirection of Work:** All work shall be halted in the area of the discovery and may be redirected to an alternate area of the project site, based on the direction of the project archaeologist and Tribal Monitors. Work may recommence once culturally appropriate treatment has been agreed upon by the City, developer, and consulting tribes;
- B. **Consulting Tribes Notified:** within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. The developer shall provide the city evidence of notification to consulting tribes. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation.
- C. **Temporary Curation and Storage:** During the course of construction, all discovered resources shall be temporarily curated in a secure location on site; and
- D. **Treatment and Final Disposition:** The landowner(s) shall relinquish ownership of all archaeological and tribal cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required conditions of approval for impacts to cultural resources. The Applicant shall relinquish the artifacts and tribal cultural resources through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same:
 - i. Accommodate the process avoidance, preservation in place and/or on-site reburial of the discovered items with the consulting tribes or bands. This shall include measures and provisions to protect the future reburial area from any future disturbance and impacts in perpetuity. Reburial shall not occur until all cataloguing and basic recordation, that has been approved by consulting tribes, has been completed;
 - ii. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers

for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation;

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

COA-5 Cultural Sensitivity Training: The Secretary of Interior Standards County certified archaeologist, and Tribal monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.

COA-6 Discovery of Human Remains: In the event that human remains (or remains that may be human) are discovered at the Project site during grading or earthmoving, the construction contractors, Project Archaeologist, and/or Tribal Monitor(s) shall immediately stop all activities within 100 feet of the find. The Project proponent shall then inform the Riverside County Coroner and the City of Riverside Community & Economic Development Department immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b) unless more current State law requirements are in effect at the time of the discovery. Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the Native American Heritage Commission shall be contacted within the period specified by law (24 hours). The coroner shall contact the NAHC to determine the most likely descendant(s). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The Disposition of the remains shall be overseen by the most likely descendant(s) (MLD) to determine the most appropriate means of treating the human remains and any associated grave artifacts in a culturally appropriate manner, including avoidance and preservation in place.

The specific locations of Native American burials and reburials will be proprietary and not disclosed to the general public. The County Coroner will notify the Native American Heritage Commission in accordance with California Public Resources Code 5097.98.

According to California Health and Safety Code disturbance of Native American cemeteries is a felony (Section 7052). The disposition of the remains shall be determined in consultation between the landowner and the MLD. In the event that the Project proponent and the MLD are in disagreement regarding the disposition of the remains, State law will apply, including Public Resources Code Section 5097.98 with the NAHC.

FEIR Mitigation Measures Applicable to the Proposed Project

FEIR MM CUL-3

In order to lessen direct and indirect impacts related to archaeological evidence of Chinatown's history that is around the project site or at the Old Magnolia Avenue Trolley Line and Refuse Dump, and any unknown Native American artifacts, all ground-disturbing activities during all construction phases of the project shall be monitored by a qualified archaeologist meeting the requirements of the Secretary of the Interior. In the event that the archaeological monitor identifies a potentially significant site, the monitor shall secure the discovery site from further impacts by delineating the site with staking and flagging, and by diverting grading equipment away from the archaeological site. Following notification to the City of Riverside (City), the archaeological monitor shall conduct investigations as necessary to determine whether the discovery is significant under the criteria listed in the California Environmental Quality Act and the environmental guidelines of the City. If the discovery is determined to be not significant, grading operations may resume and the archaeological monitor shall summarize the findings in a letter report submitted to the City following the completion of mass grading activities. The letter report shall describe the results of the on-site archaeological monitoring, each archaeological site observed, the scope of testing conducted, results of laboratory analysis (if applicable), and conclusions. The letter report shall be completed prior to the release of grading bonds. Any artifacts recovered during the evaluation of resources shall be curated at a facility approved by the City.

Pursuant to Public Resources Code Section 5097.99, in the event Native American artifacts are discovered, work within the area of the discovery shall stop and the

City shall consult with representatives of the Native American community to ensure the respectful treatment of Native American artifacts.

For the cultural prehistoric/historic resources that are determined to be significant, alternate means of achieving mitigation shall be pursued. In general, these forms of mitigation include the following:

1. Site avoidance by preservation of the archaeological site in a natural state in open space, or in specific open space easements
2. Site avoidance by preservation through capping the site and placing landscaping on top of the fill
3. Data recovery through implementation of an excavation and analysis program
4. A combination of one or more of the above measures.

FEIR MM CUL-5

In addition to **FEIR MM CUL-3** requiring all ground-disturbing activities during all construction phases of the project to be monitored by a qualified archaeologist, RCH, in coordination with the City, will notify local tribes 30 days prior to ground-disturbing activities, allowing the local tribes to monitor grading and ground-disturbing activities along with RCH's qualified archaeological monitor.

4.5c *Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

While the FEIR addressed the Approved Project's potential impacts on paleontological resources under Cultural Resources, due to the State CEQA Guidelines Appendix G update, which organized these issues under Geology and Soils, the discussion on paleontological resources and unique geologic features is now addressed under Response 4.6f below.

4.5d *Would the Project disturb any human remains, including those interred outside of formal cemeteries?*

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR determined that the RCHSP area is already fully developed, and it is highly unlikely that human remains are present. Nevertheless, if human remains were found, the remains would require proper treatment in accordance with applicable laws, including Public Resources Code Section 5097, *et seq.*, and Health and Safety Code Sections 7050.5-7055. The requirements and procedures set forth in Public Resources Code Section 5097.98 would be implemented if human remains are discovered, including notification of the County Coroner, notification of the Native American Heritage Commission, and consultation with the individual identified by the Native American Heritage Commission to be the "most likely descendant." If human remains are found during excavation, excavation must stop in the vicinity of the find and any area that is reasonably suspected to overlay adjacent remains until the County coroner investigates the remains have been investigated, and appropriate recommendations have been made for the treatment and disposition of the remains. Therefore, with compliance with applicable law regarding human remains, the FEIR concluded a less than significant impact concerning human remains.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact. Given the Proposed Project site's highly disturbed condition, the potential for the Proposed Project to disturb any human remains is remote. If human remains were found, these would require proper treatment in accordance with applicable laws pertaining to proper treatment, discovery, and notification, as detailed in the Certified FEIR.

Therefore, the Proposed Project's potential impacts concerning disturbance of human remains would be less than significant, following compliance with the established regulatory framework. No new or more severe impact concerning human remains would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

Conclusion

Based on the comparative analysis set forth in this Addendum, no new impacts relative to cultural or tribal cultural resources or a substantial increase in the severity of a previously identified potential significant impact evaluated in the FEIR would occur. With regard to Public Resources Code Section 21166 and State CEQA Guidelines Section 15162(a), the Project would not result in any new impacts or increase the severity of the previously identified potential impacts. There are no substantial changes to the circumstances under which the Proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the FEIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the FEIR was certified is available that would impact the prior finding of less than significant with mitigation. Therefore, the preparation of a subsequent environmental analysis is not warranted.

4.6 Geology and Soils

The Proposed Project's analyses are based on **Appendix E: Preliminary Geotechnical Investigation**.

4.6a Would the Project directly or indirectly cause potential substantial adverse effects, including the risk loss, injury, or death involving:

- (i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR concluded that an Alquist Priolo Earthquake Fault Zone would not affect the Approved Project, as none is present within the RCHSP area. Therefore, the Approved Project would not expose people or structures to potential substantial adverse effects involving rupture of a known earthquake fault. The FEIR concluded a less than significant impact in this regard.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

No Impact. The Proposed Project site is not affected by an Alquist Priolo Earthquake Fault Zone since there is none within the Proposed Project area. Therefore, the Proposed Project would not cause potential substantial adverse effects involving rupture of a known earthquake fault. No impact would occur in this regard, and no mitigation is required. No new or more severe impact concerning rupture of a known earthquake fault would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.6a Would the Project directly or indirectly cause potential substantial adverse effects, including the risk loss, injury, or death involving:

(ii) Strong seismic ground shaking?

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR concluded the RCHSP area could be subjected to significant ground shaking caused by earthquakes. However, the FEIR concluded that proper engineering design and construction in conformance with California Building Code standards would ensure that seismic ground shaking would be less than significant. Therefore, the Certified FEIR concluded a less than significant impact in this regard.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant With Mitigation Incorporated. The Proposed Project site is within a seismically active region, and strong seismic ground shaking could occur. Strong levels of seismic ground shaking can cause damage to buildings. The Proposed Project would be required to be in conformance with the California Building Code, City regulations, and other applicable seismic construction standards. Conformance with these standard engineering practices and design criteria would reduce the effects of seismic ground shaking as anticipated by the standards, which establish building safety standards. Further, the Proposed Project would be built and maintained in accordance with a site-specific geotechnical report, as required by Riverside Municipal Code Chapter 17.16. Further, the Project would be reviewed by the California Department of Health Care Access and Information Seismic Compliance Unit for compliance with SB 1953 provisions and adherence to California Building Code seismic safety standards. Therefore, following compliance with the California Building Code and Riverside Municipal Code, Proposed Project impacts would be less than significant concerning direct and indirect substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking, and no mitigation is required.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.6a *Would the Project directly or indirectly cause potential substantial adverse effects, including the risk loss, injury, or death involving:*

(iii) *Seismic-related ground failure, including liquefaction?*

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR concluded that liquefaction potential at the RCHSP site is low and impacts related to ground failure from liquefaction were determined to be less than significant.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant With Mitigation Incorporated: The California Department of Conservation does not map the Proposed Project site in a geologic hazard zone requiring liquefaction investigation.³⁰ The Proposed Project's Geotechnical Investigation provides recommendations concerning seismic design parameters, foundations, slabs, general earthwork, and grading, among other factors. The Geotechnical Investigation concludes that the Proposed Project construction is feasible from a geotechnical standpoint, provided the Investigation's recommendations are followed and implemented during design and construction. The City of Riverside Building and Safety Division will review construction plans to verify compliance with standard engineering practices, the Riverside Municipal Code, the California Building Code, and the Geotechnical Investigation recommendations and requirements for Project design and construction, specifically regarding seismic design parameters. Following compliance with standard engineering practices, the established regulatory framework, and the Geotechnical Investigation recommendations, the Proposed Project's potential impacts concerning exposure of people or structures to potential adverse effects involving liquefaction would be less than significant. Therefore, no new or more severe impact concerning liquefaction would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.6a *Would the Project directly or indirectly cause potential substantial adverse effects, including the risk loss, injury, or death involving:*

(iv) *Landslides?*

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR noted that the Approved Project is located on land identified by the City's General Plan EIR as having a 0 to 10 percent slope, the lowest of the four potential categories. Additionally, according to the geotechnical report, the majority of the site is relatively level, and there are no known landslides at the site, nor is the site on the path of any known or potential landslides. Therefore, the FEIR concluded a less than significant impact.

³⁰ California Department of Conservation. "California Earthquake Hazards Zone Application." Date accessed: December 1, 2024. <https://www.conservation.ca.gov/cgs/geohazards/eq-zapp>.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact. The Proposed Project site and its surroundings are relatively level. Given the Proposed Project site's topography, there is a low potential for seismically-induced landslides. Therefore, the Proposed Project would not cause adverse effects involving landslides and no mitigation is required. No new or more severe impact concerning landslides would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.6b Would the Project result in substantial erosion or loss of topsoil?

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR concluded that the Approved Project's construction activities such as excavation and grading may have the potential to cause soil erosion or the loss of top soil. Short-term erosion effects during the construction phase would be prevented through required implementation of a stormwater pollution prevention plan (SWPPP) through compliance with the National Pollutant Discharge Elimination System (NPDES) program and the incorporation of best management practices (BMPs) intended to reduce soil erosion. The SWPPP includes standard construction methods such as temporary detention basins to control on-site and off-site erosion. A SWPPP is required by the City during plan review and approval of project improvement plans; therefore, with implementation of an approved SWPPP, impacts resulting from erosion during construction operations would be less than significant. Further, the FEIR concluded that a network of storm drains and gutters would be maintained and upgraded as necessary and provided throughout the developed site, along with landscaped areas and groundcovers; therefore, soil erosion is not anticipated to be an issue upon buildout of the RCHSP. Therefore, the FEIR concluded a less than significant impact in this regard.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact. The Proposed Project site is level and does not possess site conditions necessarily conducive to soil erosion. Although the Proposed Project would result in ground-disrupting activities that would result in short-term soil erosion, the Proposed Project would be subject to compliance with the NPDES permitting process. Following compliance with applicable regulations, impacts regarding erosion and loss of topsoil would be less than significant. No new or more severe impact concerning erosion or loss of topsoil would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

- 4.6c *Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR concluded that based on the geotechnical report for the RCHSP, the potential for liquefaction, lateral spreading, and subsidence affecting the site is considered low. Therefore, the RCHSP area is not considered to be susceptible or located on an unstable site. Therefore, the FEIR concluded a less than significant impact.

Analysis of Proposed Project

Less Than Significant Impact. Refer to Responses 4.6aiii and 4.6aiv regarding the potential for liquefaction and landslides, respectively. Lateral spreading is lateral ground movement, with some vertical component, as a result of liquefaction. The soil rides on top of the liquefied layer. Lateral spreading can occur on relatively flat sites with slopes less than two percent under certain circumstances, generally when the liquefied layer is in relatively close proximity to an open, free slope face such as the bank of a creek channel. Lateral spreading can cause surficial ground tension cracking (i.e., lurch cracking) and settlement. The Proposed Project site is not considered to be susceptible to lateral spreading due to the lack of slopes. The Proposed Project site is relatively flat and not near any existing slopes. Therefore, the potential for future seismic settlement due to lateral spreading was determined to be very low. Further, the Proposed Project's Geotechnical Investigation provides recommendations concerning seismic design parameters, foundations, slabs, and general earthwork and grading, among other factors. The Geotechnical Investigation concludes Proposed Project construction is feasible from a geotechnical standpoint provided the Investigation's recommendations are followed and implemented during design and construction. The City of Riverside Building and Safety Division will review construction plans to verify compliance with standard engineering practices, the Riverside Municipal Code, California Building Code, and the Geotechnical Investigation recommendations and requirements for Project design and construction, specifically regarding seismic design parameters. Following compliance with standard engineering practices, the established regulatory framework, and the Geotechnical Investigation recommendations, the Proposed Project's potential impacts concerning on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse would be less than significant. Therefore, no new or more severe impact concerning unstable soils would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

- 4.6d *Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial direct or indirect risks to life or property?*

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR identified that soils containing high clay content often exhibit a relatively high potential to expand when saturated and to contract when dried out. The Certified FEIR concluded that the RCHSP site does not contain clay soils; rather, the natural soils on site generally consist of silt, silty sand, sand, and gravel. The upper natural soils are loose and medium stiff at present moisture

content and may become weaker and more compressible when wet. The deeper sand and gravel deposits are dense to very dense. Therefore, the Certified FEIR concluded a less than significant impact.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact. The Proposed Project's Geotechnical Investigation concluded that the on-site soils are generally considered suitable for reuse as compacted fill with the exception of any expansive clays that may be encountered in isolated areas. Section 6.0 of the Geotechnical Investigation provides recommendations concerning seismic design parameters, foundations, slabs, and general earthwork and grading, among other factors. The Geotechnical Investigation concludes that the Proposed Project construction is feasible from a geotechnical standpoint, provided the Investigation's recommendations are followed and implemented during design and construction. The City of Riverside Building and Safety Division will review construction plans to verify compliance with standard engineering practices, the Riverside Municipal Code, the California Building Code, and the Geotechnical Investigation recommendations and requirements for Project design and construction, specifically regarding seismic design parameters. Following compliance with the standard engineering practices and the established regulatory framework the Proposed Project would not create substantial direct or indirect risks to life or property containing expansive soils. Therefore, impacts would be less than significant, and no mitigation is required. No new or more severe impact concerning expansive soils would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.6e Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewer are not available for the disposal of waste water?

Summary of Previous Environmental Analysis

No Impact. The FEIR identified that development within the RCHSP would connect to the existing sewer systems and would not involve other alternative wastewater disposal methods. Therefore, the FEIR concluded no impact in this regard.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

No Impact. The Proposed Project would not utilize septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur in this regard. No new or more severe impact concerning septic tanks or alternative wastewater disposal systems as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.6f *Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR concluded that the Approved Project does not anticipate destroying any paleontological resource or unique geologic feature, given the disturbed nature of the site. No known paleontological resources have been found on-site during any past development. Therefore, the FEIR concluded a less than significant impact on paleontological resources, site, or unique geologic features.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact. The Proposed Project site has already been subject to extensive disruption and contains artificial fill materials. Given the Proposed Project site's highly disturbed condition, the Proposed Project's potential to impact an as yet unidentified paleontological resource is considered remote. Therefore, the Proposed Project's implementation would result in a less than significant impact involving the potential destruction of a paleontological resource, site, or unique geologic feature. No new or more severe impact concerning paleontological resources or sites or unique geologic features would occur due to the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

Conclusion

Based on the comparative analysis set forth in this Addendum, no new impacts relative to geology and soils or paleontological resources or a substantial increase in the severity of a previously identified significant impact evaluated in the FEIR would occur. With regard to Public Resources Code Section 21166 and State CEQA Guidelines Section 15162(a), the Proposed Project would not result in any new impacts or increase the severity of the previously identified impacts. There are no substantial changes to the circumstances under which the Proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the FEIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the FEIR was certified is available that would impact the prior finding of less than significant. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.7 Greenhouse Gas Emissions

The Proposed Project's analyses are based on **Appendix F: Greenhouse Gas Emissions Assessment**.

4.7a *Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

Summary of Previous Environmental Analysis

Less Than Significant With Mitigation Incorporated. The FEIR concluded that with **FEIR MM AQ-2** incorporated, which requires an air quality technical report be prepared for future discretionary permits for Phase IIC, the Approved Project would not generate greenhouse gas (GHG) emissions, either directly or indirectly that may have a significant impact on the environment.

FEIR Mitigation Measures

See **FEIR MM AQ-2** in **Section 4.3, Air Quality**.

Analysis of Proposed Project

Less Than Significant Impact.

Short-Term Construction Greenhouse Gas Emissions

The Proposed Project would result in direct emissions of GHGs from construction. The approximate quantity of daily GHG emissions generated by construction equipment utilized to build the Proposed Project is depicted in **Table 9: Construction-Related Greenhouse Gas Emissions**.

Table 9: Construction-Related Greenhouse Gas Emissions

Category	MTCO ₂ e
Construction Year 1 (2025)	505
Construction Year 2 (2026)	142
Total Construction Emissions	647
30-Year Amortized Construction	22
Source: CalEEMod version 2022.1. Refer to Appendix F for model outputs.	

As shown in **Table 9**, the Proposed Project would generate approximately 647 MTCO₂e during construction. Construction GHG emissions are typically summed and amortized over a 30-year period and then added to the operational emissions.³¹ The amortized Proposed Project construction emissions would be 22 MTCO₂e per year. Once construction is complete, the generation of these GHG emissions would cease.

Long-Term Operational Greenhouse Gas Emissions

Operational or long-term emissions occur over the life of the Project. GHG emissions would result from direct emissions such as the Proposed Project's generated vehicular traffic, the on-site combustion of natural gas, and the operation of any landscaping equipment. Operational GHG emissions would also result from indirect sources, such as the off-site generation of electrical power, solid waste generation, and the energy required to convey water to and wastewater from the Proposed Project. Total GHG

³¹ The amortization period of 30-years is based on the standard assumption of the South Coast Air Quality Management District (South Coast Air Quality Management District, *Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group #13*, August 26, 2009).

emissions associated with the Proposed Project are summarized in **Table 10: Project Greenhouse Gas Emissions**.

Table 10: Project Greenhouse Gas Emissions

Emissions Source	MTCO ₂ e per Year
Construction Amortized Over 30 Years	22
Area Source	4
Energy	247
Mobile	0
Waste	0
Water and Wastewater	<1
Refrigerants	0
Stationary Equipment	12
Total Project Emissions	286
<i>Threshold</i>	<i>3,000</i>
Exceeds Threshold?	<i>No</i>
Source: CalEEMod version 2022.1. Refer to Appendix F for model outputs.	

Below is a description of the primary sources of operational emissions:

- Area Sources. On-site equipment, architectural coatings, and landscape maintenance equipment would generate area source emissions.
- Energy Consumption. Energy source emissions would be generated due to electricity usage associated with the Project. Primary energy uses include ventilation, lighting, and elevators.
- Mobile Sources. As concluded in the FEIR, the parking structure would not generate additional operational emissions because it would support the on-site trip-generating uses. Therefore, mobile emissions associated with the proposed parking garage are zero.
- Solid Waste. When materials decompose, solid waste releases GHG emissions in the form of methane. According to CalEEMod default rates, the proposed parking garage would not generate solid waste.
- Water and Wastewater. GHG emissions from water demand would occur from electricity consumption associated with water conveyance and treatment.
- Refrigerants. Air conditioning and refrigerator equipment typically generate GHG emissions. The proposed parking garage would not require the use of refrigerants.

- **Stationary Source Emissions.** The proposed parking garage would include an emergency generator and a fire pump. Stationary equipment would not be part of the Project's normal daily operations. Nonetheless, emissions associated with one emergency backup generator and one fire pump were included to be conservative. Emissions were calculated separately from CalEEMod. However, CalEEMod default emissions rates were used.

Table 10 shows that the Proposed Project's unmitigated emissions would be approximately 286 MTCO₂e annually from operations with amortized construction. Proposed Project-related GHG emissions would not exceed SCAQMD's Interim 3,000 MTCO₂e per year threshold. Therefore, the Proposed Project-related GHG emissions would be less than significant.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.7b Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR concluded that the Approved Project would not conflict with applicable plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Therefore, the FEIR concluded a less than significant impact concerning conflicting with applicable GHG reduction plan, policy, or regulation.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact. Adopted December 15, 2022, CARB's *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan) sets a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels by 2045 in accordance with AB 1279. The key elements of the 2022 CARB Scoping Plan focus on transportation. Specifically, the 2022 Scoping Plan aims to rapidly move towards zero-emission (ZE) transportation (i.e., electrifying cars, buses, trains, and trucks), which constitutes California's single largest source of GHGs.

The City's General Plan and RRG-CAP identify objectives and policies that would reduce GHG emissions in the City such as the reduction of solid waste disposed of in landfills and the efficient use of energy and energy resources by residential and commercial users.

The Proposed Project consists of the development of a parking structure within the RCHSP. The Proposed Project would be constructed in accordance with Title 24 of the California Building Standards Code – Energy Efficiency Standards. The proposed parking structure would serve vehicle trips generated by the RCHSP, which have been accounted for and analyzed in the FEIR and would not generate mobile-source GHG emissions. In addition, the proposed parking structure would not include the use of natural gas, supporting statewide carbon neutrality goals. Therefore, the Proposed Project would not conflict with the 2022 CARB Scoping Plan and impacts would be less than significant.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

Conclusion

Based on the comparative analysis set forth in this Addendum, no new impacts relative to GHG or a substantial increase in the severity of a previously identified significant impact evaluated in the FEIR would occur. With regard to Public Resources Code Section 21166 and State CEQA Guidelines Section 15162(a), the Proposed Project would not result in any new impacts or increase the severity of the previously identified impacts. There are no substantial changes to the circumstances under which the Proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the FEIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the FEIR was certified is available that would impact the prior finding of less than significant with mitigation incorporated. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.8 Hazards and Hazardous Materials

The Proposed Project's analyses are based in-part on **Appendix G: Environmental Site Assessments**.

- 4.8a *Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*
- 4.8b *Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR identified that RCH currently implements a Hazardous Materials Business Plan for its existing hospital campus to regulate the routine transport, use, or disposal of hazardous materials and to identify what hazardous materials are on site to allow emergency responders to know what hazardous materials would be encountered in the event of an emergency. The City's Fire Department would require RCH to update its Hazardous Materials Business Plan to reflect the changes proposed to the existing hospital campus. Additionally, RCH is required to comply with the provisions of the City's Fire Code and any additional element as required in the California Health and Safety Code, Article 1, Chapter 6.95 for the Business Emergency Plan. Federal and state governments require all businesses that handle more than the specified amount of hazardous materials to submit a business plan to a regulating agency. Due to the existing regulations that would govern any small quantities of hazardous materials that might be associated with the hospital use, and since RCH implements its own Hazardous Materials Business Plan that addresses the use, transport, and disposal of any hazardous materials used by the hospital, the FEIR concluded that impacts are less than significant.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact. Phase I and Phase II Environmental Assessments were prepared for the Proposed Project site and concluded that chemicals of concern within the Proposed Project site were

either not detected or detected below the State Water Resources Control Board screening levels. Construction of the Proposed Project would involve the transport, use, and disposal of hazardous materials on and off of the Proposed Project site, which includes fuels, paints, mechanical fluids, and solvents, but would not be present in such a quantity or used in such a manner that would pose a significant hazard to the public. The routine transport, use, and disposal of these materials must adhere to federal, State, and local regulations for transport, handling, storage, and disposal of hazardous substances. Compliance with the regulatory framework would ensure that the Proposed Project construction does not create a significant hazard to the public or the environment.

The Proposed Project is a parking garage, and it is not anticipated to result in the release of hazardous materials into the environment. The proposed facility would be expected to use limited hazardous materials and substances, including cleaners, paints, solvents, fertilizers, and pesticides for site landscaping. The Proposed Project would not create a significant impact through the transport, use, or disposal of hazardous materials since the facilities are required to comply with all applicable federal, State, and regional regulations intended to avoid impacts to the public and environment. These regulations ensure that hazardous materials/waste users, generators, and transporters are provided with operational safety measures to reduce threats to public health and safety.

Therefore, the Proposed Project's potential impacts concerning the creation of a significant hazard to the public or the environment would be reduced to less than significant levels. No new or more severe impact would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.8c Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Summary of Previous Environmental Analysis

Less Than Significant Impact With Mitigation Incorporated. The FEIR identified the following existing schools located within one-quarter mile of the RCHSP area: Grant Elementary School³², located approximately 0.02 mile north of the site; the Riverside City College daycare facility, located 0.06 mile east of the site; a private elementary school and daycare facility at All Saint's Episcopal Church is located at the corner of Terracina Drive and Magnolia Avenue, approximately 0.13 mile south of the site; Central Middle School located 0.20-mile southeast from the closest boundary of the site, along Magnolia Avenue and Terracina Drive; and the Riverside City College campus core located approximately 0.20-mile southeast of the project site. The Riverside City College baseball fields are located 0.09 miles southeast of the site. The Certified FEIR identified that implementation of the phases outlined in the RCHSP could increase the amount of acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Prior to construction of Phases I, IIA, IIB, and IIC, RCH will prepare/update a hazardous substance management, handling, storage, disposal, and emergency response plan to be followed during construction that will ensure adherence to the construction specifications and applicable regulations

³² Grant Elementary School was closed in 2008.

regarding hazardous materials and hazardous waste, including disposal, and will ensure that construction will not create a significant hazard to the public or the environment, including nearby schools.

As part of the RCHSP (see FEIR Table 2.0-5 in Chapter 2.0, Project Description) and as required by state hospital licensing requirements, for Phases I, IIA, IIB, and IIC, RCH will continue to update its Hazardous Materials Business Plan (in accordance with California Health and Safety Code, Chapter 6.95, Sections 25500–25532) to reflect transport, storage, use, and disposal of hazardous materials following construction of each phase of the project. These updates would include the use of additional chemicals currently used at the hospital as well as any new chemicals required to operate the project’s components. The updated documents will be submitted to the County of Riverside Department of Environmental Health (DEH) and/or the City of Riverside Fire Department as required by California Health and Safety Code, Chapter 6.95, Sections 25500–25532. RCH is required to manage all chemicals on site in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (22 California Code of Regulations 4.5). Additionally, in accordance with the Code of Federal Regulations, Title 40, Part 112, prior to certificate of occupancy issuance for Phases I, IIA, IIB, and IIC, RCH will update its Spill Prevention, Control, and Countermeasure Plan, which identifies the measures RCH will take to control and contain any spills on site and prevent them from leaving the site. Compliance with RCH’s internal Hazardous Materials and Waste Management Plan, which is required to be updated as part of state hospital licensing requirements, as well as the Hazardous Materials Business Emergency Plan (in accordance with California Health and Safety Code, Chapter 6.95, Section 25500–25532), and SPCC Plan (in accordance with the Code of Federal Regulations, Title 40, Part 112) would ensure that the project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or wastes within one-quarter mile of a school.

Additionally, the FEIR identified that asbestos-containing materials and lead-based paint may be present in buildings identified for demolition and required **FEIR MM HAZ-1** be incorporated, which will ensure that all asbestos and lead-based paint materials are identified and remediated per the requirements identified by the County of Riverside DEH. Further, since there were previous releases associated with underground storage tanks (USTs) on the hospital campus and other investigations have identified surrounding land uses that have impacted groundwater and soils on the site, **FEIR MM HAZ-2** was incorporated, requiring that testing of soils for volatile organic compounds (VOCs) be conducted prior to ground disturbance for all phases of the project. Therefore, the FEIR concluded that with **FEIR MM HAZ-1** and **FEIR MM HAZ-2** incorporated, impacts are considered less than significant.

FEIR Mitigation Measures

FEIR MM HAZ-1 Prior to demolition activities in Phase I, Phase IIA, and Phase IIB of the project, a lead-based paint and asbestos survey shall be conducted. Should lead-based paint or asbestos-containing materials be identified during survey, abatement of the same will be accomplished in accordance with local, state, and federal guidelines.

FEIR MM HAZ-2 Prior to grading and/or subsurface work for Phase I, Phase IIA, Phase IIB, and Phase IIC of the project, air monitoring for volatile organic compounds (VOCs) shall be conducted to determine whether subsurface contamination will affect construction activities. If VOC levels are above those allowed for worker safety

and environmental compliance, Riverside Community Hospital (RCH) shall retain qualified personnel to train RCH employees and/or contractors, remediate existing VOC levels, and prevent exposure to RCH customers and employees/contractors through monitoring and remediating impacted materials, proper use of personal protective equipment, and utilizing best management procedures.

Analysis of Proposed Project

Less Than Significant Impact With Mitigation Incorporated. The school nearest the Proposed Project site is the Riverside County Community School, located at 3939 13th Street, approximately 0.2 miles from the Proposed Project site. The Proposed Project is a parking garage and does not involve land uses that would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. As discussed above, Proposed Project construction activities would involve transporting, storing, using, and/or disposing of limited quantities of hazardous materials, such as fuels, solvents, degreasers, and paints. However, using hazardous materials during construction would be subject to compliance with relevant regulatory requirements and restrictions. The Proposed Project includes demolishing four buildings that may contain asbestos-containing materials and lead-based paint. Therefore, implementation of **FEIR MM HAZ-1** shall be incorporated, ensuring that all asbestos and lead-based paint materials are identified and remediated per the requirements identified by the County of Riverside DEH.

Further, the Certified FEIR identified previous releases associated with USTs on the adjacent hospital campus and noted other investigations that identified surrounding land uses that had impacted groundwater and soil within the RCHSP area. Therefore, the Proposed Project would be required to implement **FEIR MM HAZ-2**, which requires testing of soils for VOCs prior to ground disturbance. Compliance with the regulatory framework, **FEIR MM HAZ-1**, and **FEIR MM HAZ-2** would ensure that the Proposed Project's construction activities do not create a significant hazard to nearby schools.

Additionally, the Proposed Project does not propose any uses that could generate hazardous emissions or involve the handling of hazardous materials, substances, or waste in significant quantities that could impact surrounding schools. The types of hazardous materials that would be routinely handled during Proposed Project operations would be limited to household cleaners, paints, solvents, fertilizers, and pesticides for site landscaping. The routine transport, use, and disposal of hazardous materials during operations would be subject to federal, state, and local regulations for the transport, handling, storage, and disposal of hazardous substances. Compliance with the regulatory framework would ensure that Proposed Project operations would not create a significant hazard to nearby schools. No new or more severe impact would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

FEIR MM HAZ-1 Prior to demolition activities in Phase I, Phase IIA, and Phase IIB of the project, a lead-based paint and asbestos survey shall be conducted. Should lead-based paint or asbestos-containing materials be identified during survey, abatement of the same will be accomplished in accordance with local, state, and federal guidelines.

FEIR MM HAZ-2 Prior to grading and/or subsurface work for Phase I, Phase IIA, Phase IIB, and Phase IIC of the project, air monitoring for volatile organic compounds (VOCs)

shall be conducted to determine whether subsurface contamination will affect construction activities. If VOC levels are above those allowed for worker safety and environmental compliance, Riverside Community Hospital (RCH) shall retain qualified personnel to train RCH employees and/or contractors, remediate existing VOC levels, and prevent exposure to RCH customers and employees/contractors through monitoring and remediating impacted materials, proper use of personal protective equipment, and utilizing best management procedures.

- 4.8d *Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and as a result, would create a significant hazard to the public or the environment?*

Summary of Previous Environmental Analysis

Less Than Significant Impact With Mitigation Incorporated. The FEIR concluded that according to Government Code, Section 65962.5, no hazardous materials or waste sites are located within the RCHSP area. However, the FEIR identified that based on the Phase I ESA, five USTs were previously located within the RCHSP area, and FEIR MM HAZ-3 was implemented to remediate any residual contamination from the former leaking USTs. Additionally, the Certified FEIR identified a release of hydraulic oil to the subsurface soils due to a leaking cylinder associated with the northernmost parking structure in Building I/Building J. This structure is proposed to be demolished as part of Phase IIC; therefore, prior to demolition, **FEIR MM HAZ-4** shall be implemented to remediate any soil contamination from the Building I/Building J parking structure elevator.

The FEIR also determined that surrounding properties may have impacted the environmental conditions at the site, including a gas station at 4395 Market Street, unauthorized release of gasoline at 4491 Brockton Avenue, a machine shop at 4468 Brockton Avenue, and former dry-cleaning operations at 4407, 4435, 4440, 4444, and 4459 Brockton Avenue. Therefore, to protect construction workers, RCH employees, and RCH customers from any potential contamination on-site that may have come from surrounding properties, **FEIR MM HAZ-2** shall be implemented to remediate any residual contamination from the nearby off-site properties.

The FEIR concluded that with the incorporation of **FEIR MM HAZ-2**, **FEIR MM HAZ-3**, and **FEIR MM HAZ-4**, the Approved Project would not create a significant hazard to the public or the environment, and impacts would be considered less than significant with mitigation incorporated.

FEIR Mitigation Measures

FEIR MM HAZ-2 Prior to grading and/or subsurface work for Phase I, Phase IIA, Phase IIB, and Phase IIC of the project, air monitoring for volatile organic compounds (VOCs) shall be conducted to determine whether subsurface contamination will affect construction activities. If VOC levels are above those allowed for worker safety and environmental compliance, Riverside Community Hospital (RCH) shall retain qualified personnel to train RCH employees and/or contractors, remediate existing VOC levels, and prevent exposure to RCH customers and employees/contractors through monitoring and remediating impacted materials,

proper use of personal protective equipment, and utilizing best management procedures.

FEIR MM HAZ-3

Prior to construction activities in the area of the former underground storage tanks (see FEIR Figure 4.6-1), a subsurface soil and soil vapor investigation shall be conducted in the north, northeast, and western portions of the project site. If contamination is detected during the subsurface investigations and the concentrations exceed worker safety thresholds, a soil management plan shall be prepared to protect worker health and safety during construction. If established regulatory agency contamination thresholds are exceeded, the regulatory agencies (e.g., the Department of Toxic Substances Control (DTSC) and the Regional Water Quality Control Board (RWQCB)) shall be notified, and remediation may be necessary.

FEIR MM HAZ-4

Prior to the demolition of the parking structure during Phase IIB of the project, an investigation of the soil in the area of the hydraulic oil release by the parking structure elevator shall be conducted. If contamination is detected during the subsurface investigations and the concentrations exceed worker safety thresholds, a soil management plan shall be prepared to protect worker health and safety during construction. If established regulatory agency contamination thresholds are exceeded, the regulatory agencies (e.g., the DTSC and the RWQCB) shall be notified, and remediation may be necessary.

Analysis of Proposed Project

No Impact. Government Code Section 65962.5 refers to the Hazardous Waste and Substances Site List, commonly known as the Cortese List, maintained by the Department of Toxic Substance Control (DTSC). The Cortese List contains hazardous waste and substance sites, including public drinking water wells with detectable levels of contamination, sites with known USTs having a reportable release, solid waste disposal facilities from which there is a known migration, hazardous substance sites selected for remedial action, historic Cortese sites, and sites with known toxic material identified through the abandoned site assessment program. The Proposed Project site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.³³ Therefore, the Proposed Project would result in no impact in this regard. No new or more severe impact would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.8e For a Project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard for people residing or working the project area?

³³ California Environmental Protection Agency. (2024). Cortese List Data Resources. Retrieved from <https://calepa.ca.gov/SiteCleanup/CorteseList/>, accessed December 2, 2024.

Summary of Previous Environmental Analysis

Less Than Significant Impact. The Certified FEIR identified that the Approved Project is located approximately 1.4 miles from Flabob Airport but is not located within the Airport Influence Area. Therefore, the FEIR concluded a less than significant impact in this regard.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact. Although the Proposed Project would be located within 2.0 miles of Flabob Airport, the Proposed Project site is not within the Airport Influence Area. Therefore, the Proposed Project would not result in an airport-related safety hazard for people working on the Proposed Project site, and no mitigation is required. Impacts would be less than significant, and no mitigation is required. No new or more severe impact concerning airport-related safety hazards would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.8f *Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR identified that the Approved Project shall comply with the City's Emergency Operations Plan (EOP) for both construction and operations of all phases. Construction activities during Phases I, IIA, IIB, and IIC that may temporarily restrict vehicular traffic would be required to implement adequate and appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures in accordance with the City's EOP. Approved Project operation would not interfere with the City's EOP as all exiting driveways off Magnolia Avenue, 14th Street, and Brockton Avenue would remain operational throughout buildout. The project proponent would be required to design, construct, and maintain structures, roadways, and facilities to comply with applicable local, regional, state, and/or federal emergency access and evacuation plan requirements. Further, the FEIR identified that the proposed site plan, including access driveways, will be reviewed and approved by the fire department during plan check review. The FEIR concluded that adherence to these requirements would reduce potential impacts related to this issue to a less than significant level, and no mitigation is required.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact. The Proposed Project would comply with the City's EOP for construction and operation. Construction activities that may temporarily restrict vehicular traffic would be required to implement adequate and appropriate measures to facilitate the passage of persons and vehicles through and around any required road closures in accordance with the City's EOP. The Proposed Project would be

designed, constructed, and maintained in compliance with applicable local, regional, state, and/or federal emergency access and evacuation plans requirements. In addition, the Proposed Project's plans, including access driveways would be reviewed and approved by the fire department during the City's plan check review process. Therefore, following compliance with the existing regulatory framework, the Proposed Project would not impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and impacts would be less than significant.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.8g Would the Project expose people or structures to a significant risk of loss, injury or death involving wildland fires?

Summary of Previous Environmental Analysis

Less Than Significant Impact. The Certified FEIR identified that the RCHSP area is not within a fire hazard area and is surrounded by development, therefore, the risk of a large, high-intensity fire impacting the site is very low. Therefore, the Certified FEIR concluded a less than significant impact.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact. The Proposed Project site is in a fully urbanized area and is not adjacent to any wildland. Therefore, the Proposed Project would not expose people or structures to a significant risk involving wildland fires. A less than significant impact would occur and no mitigation is required. No new or more severe impact concerning wildland fires would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

Conclusion

Based on the comparative analysis set forth in this Addendum, no new impacts relative to hazardous and hazardous materials or a substantial increase in the severity of a previously identified significant impact evaluated in the FEIR would occur. With regard to Public Resources Code Section 21166 and State CEQA Guidelines Section 15162(a), the Proposed Project would not result in any new impacts or increase the severity of the previously identified impacts. There are no substantial changes to the circumstances under which the Proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the FEIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the FEIR was certified is available that would impact the prior finding of less than significant with mitigation incorporated. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.9 Hydrology and Water Quality

The Proposed Project's analyses are based in part on **Appendix H: Hydrology Reports**.

4.9a Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR concluded that construction activities would result in short-term impacts to water quality; therefore, the Approved Project would be subject to compliance with General Construction Permit requirements. The Construction General Permit requires the preparation and implementation of a SWPPP, which will describe the BMPs that will be implemented to prevent the degradation of surface and ground waters during construction activities. With the implementation of the BMPs described in the project-specific SWPPP required per the Construction General Permit, the RCHSP is not expected to be a source of substantial water quality contaminants during construction or operation and impacts would be less than significant.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact. The Proposed Project would include construction activities subject to compliance with General Construction Permit requirements. The Applicant would prepare a SWPPP to control common pollutants in stormwater runoff leaving the Proposed Project site during construction. The SWPPP would include BMPs to minimize erosion and restrict sedimentation of the storm drain downstream. Further, the Proposed Project would be required to comply with all NPDES and General Construction Permit requirements. Therefore, Proposed Project's impacts during construction would be less than significant regarding water quality standards or waste discharge requirements.

Proposed Project operations could result in organics, trash, debris, oil/grease, nutrients, metals, and sediment, which could have a significant adverse impact to stormwater quality. The Proposed Project would be required to mitigate stormwater pollution by implementing BMPs to control pollutants, pollutant loads, and runoff volume. Therefore, following compliance with all applicable permit requirements, the Proposed Project implementation would have a less than significant impact on water quality standards or waste discharge requirements. No new or more severe impact concerning water quality standards or waste discharge requirements would occur due to the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.9b Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR concluded that the Approved Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that it may impede sustainable groundwater management of the basin because it would not substantially alter the amount of percolation and recharge of local groundwater. Furthermore, the Approved Project would not

reduce the ability of surface waters to be absorbed or interfere substantially with groundwater recharge as the RCHSP area's perviousness is expected to increase upon buildout. The Approved Project would not include the use of on-site groundwater for its potable or irrigation water sources. Therefore, the FEIR concluded a less than significant impact related to groundwater supplies and groundwater recharge.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact: The Proposed Project site is within the Riverside South Groundwater Basin. According to the Preliminary WQMP prepared for the Proposed Project, 117,700 square feet of existing impervious surfaces exist. The Proposed Project would result in approximately 83,069 square feet of impervious surfaces in its post-development condition. The Riverside Public Utilities (RPU) primary source of water supply is local groundwater, with production totaling approximately 81,676 acre-feet (AF) in 2020.³⁴ Local groundwater basins are recharged from natural runoff, treated wastewater, and imported water. Runoff from local rainfall is the main source of recharge for the smaller basins. Domestic demand for potable and non-potable water in the City is expected to increase from 81,338 AF per year in 2020 to 90,712 AF per year in 2025, and RPU anticipates a water supply of 114,923 AF per year in the year 2025 with a projected water surplus of approximately 24,211 AF. Supply is expected to exceed demand by 24,211 AF in 2025 during single-dry-year and multiple-dry-year conditions. According to the General Plan 2025 and the General Plan 2025 EIR, safe yield will be maintained in RPU's groundwater basins, and development under the General Plan 2025 would have impacts that are considered less than significant. Although the Proposed Project would require a General Plan Amendment and Zone Change, it would not induce population growth above what is forecasted for the City since no dwelling units would be built as part of the Proposed Project. Additionally, the Proposed Project is a parking garage that would consume less water than the existing uses on the site. Furthermore, the Proposed Project would be required to comply with all NPDES requirements, which would further ensure the Proposed Project would not substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Therefore, the Proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that it would impede sustainable groundwater management of the basin. Impacts are less than significant, and no mitigation is required. No new or more severe impact concerning groundwater would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.9c Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) result in substantial erosion or siltation on- or off-site;

³⁴ Riverside Public Utilities. (2021). *2020 Urban Water Management Plan*. Available at: <https://riversideca.gov/utilities/about-rpu/urban-water-management-plan>, accessed December 4, 2024.

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR identified that there are no existing drainage courses within the RCHSP area that would be affected by the buildout of the Approved Project. Further, the FEIR identified that the development of the site during all phases largely involves the replacement of existing impervious surfaces and would not result in a substantial change in drainage patterns, peak flow rates, or runoff volumes from the site. Therefore, the FEIR concluded the Approved Project phases would not substantially alter the existing drainage pattern on the site or in the area and determined that impacts related to drainage patterns of the site or area, including those that would result in substantial erosion or siltation on- or off-site would be less than significant and no mitigation measures are required.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact: As discussed above, the Proposed Project site currently contains 117,700 square feet of existing impervious surfaces. The Proposed Project would result in approximately 83,069 square feet of impervious surfaces at buildout. The Proposed Project includes two drainage management areas (DMA) to collect and convey runoff from landscaped and surface areas. DMA A would sheet flow southwesterly into an existing catch basin that discharges directly into the existing onsite storm drain line and discharges directly into an existing infiltration system via an existing 24-inch storm drain lateral along Tequesquite Avenue. DMA B would sheet flow west onto Brockton Avenue, where discharge is collected in an existing catch basin along Brockton Avenue. Therefore, the Project would not substantially alter the site's existing drainage pattern through the addition of impervious surfaces. Further, the Project would not alter the course of a stream or river, as none traverses or are located in the Project vicinity. The decrease in impervious surfaces on the Proposed Project site would reduce flows under the 100-year storm events compared to existing conditions; see **Appendix H** for output calculations. Further, as concluded in Response 4.9a, the Proposed Project would be subject to compliance with NPDES requirements, which include implementation of BMPs and, thus, would not result in substantial erosion or siltation on- or off-site. A less than significant impact would occur in this regard. No new or more severe impact concerning substantial erosion or siltation on- or off-site would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.9c *Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*

ii) *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; or*

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR concluded that although the project would result in a slight increase in runoff volume into the storm drain system at Outfall No. 1, development of the project would

not cause a substantial increase in on- or off-site flooding during the projected 50- or 100-year developed storm event or result in a permanent adverse change to the movement of surface water. The capacity of the existing storm drain system would not be impacted. Consequently, the FEIR concluded that impacts related to drainage patterns of the site or potential flooding would be less than significant and that no mitigation measures are required.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

No Impact. As demonstrated in **Appendix H**, the Proposed Project would reduce impervious surfaces, thereby reducing flows under storm events compared to the existing conditions. Because the Proposed Project would decrease surface runoff, it would not result in flooding on- or off-site. No impact would occur in this regard. No new or more severe impact concerning a substantial increase of the rate or amount of surface runoff in a manner that would result in flooding on- or off-site would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.9c *Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*

iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provided substantial additional resources of polluted runoff?

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR concluded that with the implementation of the BMPs described in the project-specific SWPPP required per the Construction General Permit, temporary construction activities are not expected to be a source of substantial runoff water that would exceed the existing stormwater drainage system or contaminants that would be a substantial source of polluted runoff during construction of any RCHSP phases. Based on the RCHSP Hydrology and Hydraulics Study and FEIR Table 4.7-1, the buildout of all phases of the project would result in no change in the runoff volumes draining to three of the five outfalls on the site (Outfalls No. 3, No. 4, and No. 5). Implementation of Phase IIA would result in a 47.8 percent reduction in runoff volume to Outfall No. 2 due to the infiltration system that would treat the runoff and slow the rate of runoff, as well as due to an increase of 0.84 acre in impervious surface within DMA 2, which does not reflect a change in the existing drainage pattern on the site. The project would increase runoff volume to Outfall No. 1 of 3.2 percent during a 2-year storm, even with the implementation of Phases I, IIB, and IIC, due to an increase in impervious surface within DMA 1 of 0.05 acre. Since the Santa Ana RWQCB considers an increase in runoff volume during a 2-year storm event of 5 percent or less to be insignificant, the increase of 3.2 percent in runoff volume to Outfall No. 2 during a 2-year storm event is not considered to be substantial. Consequently, the project's development would not exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, impacts related to the existing and planned stormwater

drainage systems would be less than significant. Additionally, impacts related to pollution of runoff would be less than significant. No mitigation measures are necessary.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact. As demonstrated in **Appendix H**, the Proposed Project would reduce impervious surfaces, thereby reducing flows under storm events as compared to the existing condition. Because the Project would decrease surface runoff, it would not create or contribute to runoff water that would exceed the capacity of existing or planned stormwater drainage systems. No impact would occur in this regard.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.9c *Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*

iv) *impede or redirect flood flows?*

Summary of Previous Environmental Analysis

No Impact. The FEIR concluded that the entire Approved Project is not within a 100-year flood hazard area and, therefore, the Approved Project would not have any risk of flood hazards. Therefore, the FEIR concluded no impact as it relates to impeding or redirecting flood flows.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

No Impact. The Proposed Project site is not within the 100-year hazard flood zone area. Flood Insurance Rate Map (FIRM) 06065C0710G indicates the Proposed Project site is within Zone X, an area with minimal flood hazard. Therefore, the Proposed Project site is not subject to flooding and would not impede or redirect flood flows. No impact would occur and no mitigation is required.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.9d *Would the Project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR concluded that given the Approved Project's location and since there are no features nearby that would pose a threat from seiche, tsunami, or mudflow, this impact is considered less than significant. Therefore, the FEIR concluded a less than significant impact in this regard.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

No Impact. The Proposed Project site was identified as being in an area of minimal flood hazard. The Proposed Project site is located away from any waterbodies or coastal zones; thus, it would not be within a levee, dam, or tsunami inundation area or subject to a seiche. Therefore, the Proposed Project would have no impact concerning the risk release of pollutants due to inundation, and no mitigation is required. No new or more severe impact would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.9e Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Summary of Previous Environmental Analysis

Not applicable since this threshold was not analyzed in the FEIR.

Analysis of Proposed Project

Less Than Significant Impact. See Response 4.9a for the Proposed Project above concerning water quality control plan compliance. See Response 4.9b for the Proposed Project above concerning sustainable groundwater management plan compliance.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

Conclusion

Based on the comparative analysis provided in this Addendum, no new impacts relative to hydrology and water quality or an increase in the severity of a previously identified significant impact evaluated in the FEIR would occur. With regard to Public Resources Code Section 21166 and State CEQA Guidelines Section 15162(a), the Proposed Project would not result in any new impacts or increase the severity of the previously identified impacts. On-site drainage improvements would decrease the potential for water quality impacts and uncontrolled runoff. There are no substantial changes to the circumstances under which the Proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the FEIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the FEIR was certified is available that would impact the prior finding of less than significant impact. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.10 Land Use and Planning

4.10a Would the Project physically divide an established community?

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR concluded that the Approved Project would not divide an established community but would further provide healthcare and emergency medical services for community disaster preparedness within the Riverside community and Inland Empire region as well as enhance the hospital's overall capabilities to respond to mass casualty events and other life-threatening situations. Therefore, the FEIR concluded a less than significant impact in this regard.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

No Impact. The Proposed Project would develop a parking garage within the RCHSP, and the proposed land uses would be consistent with the RCHSP's land use plan. Therefore, the Proposed Project would have no impact on physically dividing an established community, and no mitigation is required. No new or more severe impact concerning physically dividing an established community would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.10b Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Summary of Previous Environmental Analysis

Less Than Significant Impact. According to the FEIR, the Approved Project is consistent with the City's General Plan, Downtown Specific Plan, and Municipal Code. Therefore, the FEIR concluded that the Approved Project would be consistent with the applicable plans, policies, and regulations related to land use upon adoption of the proposed amendments to the General Plan and Zoning Map, and impacts would be considered less than significant.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact. See Response 4.4f concerning the Proposed Project's potential to conflict with any applicable habitat conservation plan or natural community conservation plan.

As concluded above, the FEIR concluded that the Approved Project is consistent with the pertinent land use planning and policy documents, including the General Plan, the City's Municipal Code (including its zoning ordinance), and the RCHSP. An approximately 0.8-acre portion of the Proposed Project site has a General Plan land use designation of Downtown Specific Plan, and the remaining approximately 0.86 acres are within the RCHSP land use designation. The RCHSP lists parking structures as a permitted use. Similarly, approximately 0.8 acres of the Project site are zoned Downtown Specific Plan – Almond Street District, with the remaining 0.86 acres within the RCHSP Zone. The Proposed Project requires a General Plan Amendment and Zone Change to change those portions of the Proposed Project site with a land use

designation and zoning of Downtown Specific Plan to RCHSP. Once the General Plan Amendment and Zone Change are adopted, the Proposed Project would be consistent with the General Plan land use designation and zoning district. Therefore, the Proposed Project is consistent with the pertinent land use planning and policy documents, including the General Plan, the City's Zoning Ordinance, and the RCHSP.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

Conclusion

Based on the comparative analysis provided in this Addendum, no new impacts relative to land use or a substantial increase in the severity of a previously identified significant impact evaluated in the FEIR would occur. With regard to Public Resources Code Section 21166 and State CEQA Guidelines Section 15162(a), the Proposed Project would not result in any new impacts or increase the severity of the previously identified impacts. There are no substantial changes to the circumstances under which the Proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the FEIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the FEIR was certified is available that would impact the prior finding of less than significant. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.11 Mineral Resources

4.11a Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

4.11b Would the Project result in the loss of availability of a locally important mineral resources recovery site delineated on a local general plan, specific plan, or other land use plan?

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR identified that the Approved Project lies within Mineral Resource Zone 3 (MRZ-3), which indicates that the area contains known or inferred mineral occurrences of undetermined mineral resources significance. However, the FEIR concluded that based on the MRZ-3 designation and given that the site is currently developed, the Approved Project is not likely to result in the loss of a known mineral resource. Therefore, the FEIR concluded less than significant impacts in this regard.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

No Impact: There are no State-designated mines, mineral producers, or maintenance of any natural mineral resources within the Proposed Project site. Therefore, the Proposed Project would have no impact on mineral resources and no mitigation is required. No new or more severe impact concerning mineral resources would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

Conclusion

Based on the comparative analysis set forth in this Addendum, no new impacts relative to mineral resources or a substantial increase in the severity of a previously identified significant impact evaluated in the Certified FEIR would occur. With regard to Public Resources Code Section 21166 and State CEQA Guidelines Section 15162(a), the Project would not result in any new impacts, or increase the severity of the previously identified impacts. There are no substantial changes to the circumstances under which the proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the Certified FEIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the Certified FEIR was certified is available that would impact the prior finding of less than significant. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.12 Noise

The Proposed Project's analyses are based on **Appendix I: Noise Assessment**.

4.12a Would the Project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Summary of Previous Environmental Analysis

Significant and Unavoidable Impact. The FEIR concluded that even with **FEIR MM NOISE-1** incorporated, impacts from construction noise from all phases of the Approved Project (Phase I, Phase IIA, Phase IIB, and Phase IIC) are considered significant even with mitigation incorporated. Further, the FEIR determined that potential impacts from parking structures or surface parking are considered to be less than significant with **FEIR MM NOISE-2** incorporated, which requires a project-specific noise study to be conducted. To ensure that noise from HVAC equipment, central plant equipment, and the emergency standby generator would not cause an exceedance of the City's Noise Code standards (e.g., 45 dBA Leq nighttime / 55 dBA Leq daytime for residences, 60 dBA Leq daytime or nighttime for community support land uses), the FEIR identified that **FEIR MM NOISE-3** shall be incorporated for all phases (Phase I, Phase IIA, Phase IIB, and Phase IIC) of construction.

FEIR Mitigation Measures

FEIR MM NOISE-1

In order to reduce impacts related to heavy construction equipment moving and operating on-site during all phases (Phase I, Phase IIA, Phase IIB, and Phase IIC) of demolition, grading, and construction, prior to issuance of grading permits mitigation measures shall be incorporated by the City of Riverside) as conditions on permits. Examples of measures to be required by the City are as follows:

- All construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers.
- Construction noise reduction methods, such as shutting off idling equipment, maximizing the distance between construction equipment staging areas and

occupied sensitive receptor areas, and using electric air compressors and similar power tools rather than diesel equipment, shall be used.

- During construction, stationary construction equipment shall be placed such that noise is directed away from or shielded from sensitive noise receivers. During construction, stockpiling, and vehicle staging areas shall be located far from noise-sensitive receptors.
- The project shall be in compliance with the City's Municipal Code: Construction shall occur between the hours of 7:00 a.m. and 7:00 p.m. on weekdays, and between 8:00 a.m. and 5:00 p.m. on Saturdays. Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners and residents to contact the job superintendent.

FEIR MM NOISE-2

If surface parking or parking structures are proposed during Phase IIA, IIB, or IIC of the project, the project proponent shall retain an acoustical specialist to conduct an analysis of noise effects from the proposed parking facilities at nearby noise - sensitive land uses, and to provide mitigation measures that will reduce noise levels to below 60 A-weighted decibels (dBA) or less at the property line and will not otherwise result in the project exceeding relevant noise standards at nearby noise-sensitive land uses (e.g., recreation, residential). Examples of mitigation measures are as follows: requirement of pavement treatments to reduce or eliminate tire squeal, administrative measures such as restricted speed limits and active enforcement thereof, or restricted parking hours.

FEIR MM NOISE-3

Because heating, ventilation, and air conditioning (HVAC) equipment, boilers, and generators can generate noise that could affect surrounding sensitive receptors for all phases (Phase I, Phase IIA, Phase IIB, and Phase IIC) of the project if not placed inside buildings or enclosures or otherwise shielded from receptors, and because the details, specifications, and locations of these facilities is not known yet, the project proponent shall retain an acoustical specialist to review project construction -level plans at every phase (Phase I, Phase IIA, Phase IIB, and Phase IIC) of the project to ensure that the equipment specifications and plans for HVAC, central plant, and emergency generator equipment incorporate measures, such as the specification of quieter equipment or provision of acoustical enclosures, that will reduce noise levels to below 60 dBA or less at the property line and will not otherwise result in the project exceeding relevant noise standards at nearby noise-sensitive land uses (e.g., recreation, residential). Prior to the commencement of construction for all phases (Phase I, Phase IIA, Phase IIB, and Phase IIC) of the project, the acoustical specialist shall certify in writing to the City that the equipment specifications and plans incorporate measures that will achieve the relevant noise limits.

Analysis of Proposed Project

Significant and Unavoidable Impact.

Construction

On-Site Construction Noise

As provided in the Noise Assessment (**Appendix I**), the Proposed Project's construction noise levels would range between approximately 60.7 dBA and 85.1 dBA and would exceed the Riverside Municipal Code Section 7.25.010 exterior noise standards of 55 dBA for residential and 60 dBA for community support uses. Proposed Project construction noise levels would likely result in a noticeable increase above ambient noise levels and could interrupt regular conversations and operations at nearby sensitive receptors. Thus, construction noise would result in a potentially significant impact.

To reduce construction noise impacts, the Proposed Project would be required to comply with **FEIR MM NOI-1**. **FEIR MM NOI-1** requires construction noise reduction measures such as mufflers for construction equipment, locating/orienting the staging area and equipment away from sensitive receptors (as feasible), and compliance with the City's allowable construction hours, among others. However, Proposed Project construction details, such as specific construction equipment sizes/types, noise specifications, and proposed mufflers, are currently unknown. Thus, the actual noise reduction(s) from the implementation of **FEIR MM NOI-1** are difficult to quantify, and construction noise levels would not likely be reduced below the City's 60 dBA. Therefore, the Proposed Project's construction noise impacts would be considered significant and unavoidable despite the implementation of **FEIR MM NOI-1**.

As concluded in the FEIR, on-site construction noise levels during all RCHSP phases (Phase I, Phase IIA, Phase IIB, and Phase IIC) would result in significant and unavoidable impacts. As shown above, the Proposed Project's estimated construction noise levels would exceed City noise standards, resulting in significant and unavoidable impacts despite implementing mitigation measures. Therefore, the Project would result in significant project-level effects relating to construction noise. However, no new impacts or a substantial increase in the severity of a previously identified impact evaluated in the FEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the FEIR was certified is available that would impact the prior finding of significant and unavoidable impact under this issue area.

Off-Site Construction Noise

In addition to on-site construction noise, the Proposed Project would generate mobile-source noise from delivery/haul trucks and construction workers traveling to and from the Proposed Project site during construction activities. Haul trucks would travel to and from the Proposed Project site using 14th Street and Magnolia Avenue. Although construction workers would arrive from various directions, worker trips would likely all utilize 14th Street and/or Magnolia Avenue to arrive at the Proposed Project site. According to modeling assumptions included in the air quality assessment (**Appendix B**), the construction phase with the highest assumed number of haul trucks and worker trips would be building construction, when there would be up to 34 daily haul truck trips and 87 worker trips (121 total daily trips) accessing the Proposed Project site.

Generally, a 3 dBA increase in traffic noise is barely perceptible to people, while a 5 dBA increase is readily noticeable. Traffic volumes on the roadways in the Proposed Project's area would have to approximately

double for the resulting traffic noise levels to generate a barely perceptible 3-dBA increase.³⁵ Based on traffic count data obtained by Kimley-Horn,³⁶ Brockton Avenue and 14th Street in the Proposed Project vicinity currently experience average daily traffic (ADT) volumes of 17,322 and 20,474, respectively. As noted above, the Proposed Project would generate a maximum of 107 daily trips during the building construction phase, which would not double the existing traffic volumes on Magnolia Avenue or 14th Street. Therefore, the Proposed Project would not result in a noticeable increase in traffic noise during construction, and impacts would be less than significant.

As concluded in the 2014 Final EIR, construction traffic noise levels during all RCHSP phases (Phase I, Phase IIA, Phase IIB, and Phase IIC) would result in a less than significant impact. Proposed Project construction traffic would result in a nominal increase in traffic noise levels compared to existing conditions, and impacts would also be less than significant. No new impacts or a substantial increase in the severity of a previously identified impact evaluated in the FEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the FEIR was certified is available that would impact the prior finding of no significant impact under this issue area.

Operations

The proposed parking structure would serve the Riverside Community Hospital and would not generate additional vehicle trips. The major noise sources associated with the Proposed Project include parking areas (i.e., car door slamming, car radios, engine start-up, and car pass-by) and off-site traffic noise.

Parking Structure Noise

Surface and basement parking lots currently exist on the Proposed Project site. Parking noise also occurs at adjacent properties and the Riverside Community Hospital under existing conditions. The proposed Project involves a new five-level parking structure with a total of 593 parking spaces. Traffic associated with parking areas is typically not of sufficient volume to exceed community noise standards, which are based on time-averaged scales. The instantaneous maximum sound levels generated by a car door slamming, engine starting up, and car pass-bys range from 53 to 61 dBA at 50 feet and may be an annoyance to adjacent noise-sensitive receptors.³⁷ Conversations in parking areas may also be an annoyance to adjacent sensitive receptors. Sound levels of speech typically range from 33 dBA at 50 feet for normal speech to 50 dBA at 50 feet for very loud speech.³⁸ It should be noted that parking lot noises are instantaneous noise levels compared to noise standards in the hourly L_{eq} metric, which are averaged over the entire duration of a time period.

For the purpose of providing a conservative, quantitative estimate of the noise levels that would be generated from the vehicles entering and exiting the parking structure, the methodology recommended by the Federal Transit Administration (FTA) for the general assessment of stationary transit noise sources is used. Using the methodology, the Proposed Project's peak hourly noise level that would be generated by the on-site parking levels was estimated using the following FTA equation for a parking lot:

³⁵ According to the California Department of Transportation *Technical Noise Supplement to Traffic Noise Analysis Protocol* (September 2013), it takes a doubling of traffic to create a noticeable (i.e., 3 dBA) noise increase.

³⁶ 24-hour traffic volumes provided by Counts Unlimited, Inc., 2024.

³⁷ Kariel, H. G., *Noise in Rural Recreational Environments*, Canadian Acoustics 19(5), 3-10, 1991.

³⁸ Elliott H. Berger, Rick Neitzel, and Cynthia A. Kladden. Noise Navigator Sound Level Database with Over 1700 Measurement Values, July 6, 2010.

$$L_{eq(h)} = SEL_{ref} + 10\log(NA/1,000) - 35.6$$

Where:

$L_{eq(h)}$ = hourly L_{eq} noise level at 50 feet

SEL_{ref} = reference noise level for stationary noise source represented in sound exposure level (SEL) at 50 feet

NA = number of automobiles per hour

35.6 is a constant in the formula, calculated as 10 times the logarithm of the number of seconds in an hour

The Proposed Project would generate 226 trips during the a.m. and 333 during the p.m. peak hours. Using the FTA's reference noise level of 92 dBA SEL^{39} at 50 feet from the noise source, the Proposed Project's p.m. peak hour vehicle trips would generate noise levels of approximately 51.6 dBA L_{eq} at 50 feet from the parking structure. The nearest residential uses are located approximately 230 feet to the northwest, the Riverside Community Players Theatre is located approximately 80 feet east, and Grant Elementary School is located approximately 115 feet north of the proposed parking structure. Based on these distances, vehicle-related noise levels at the parking structure would range from approximately 38.3 dBA L_{eq} to 47.5 dBA L_{eq} and would exceed Riverside Municipal Code noise standards. Parking noise levels at the Proposed Project boundary (as close as 15 feet from the proposed parking garage) would be approximately 57.1 dBA⁴⁰ and would not exceed the 60 dBA limit established in **FEIR MM NOI-2**. During other hours of the day, when fewer overall vehicles arrive and depart from the Proposed Project site, the noise levels at the nearest offsite sensitive land uses would be even lower. Additionally, parking noise would be partially masked by background noise from traffic along 14th Street and Brockton Avenue. As noted above, the Proposed Project site is located within the 60-65 dBA CNEL noise contour for 14th Street. Therefore, existing noise levels near the proposed parking structure already exceed 60 dBA, and the noise levels associated with parking noise. As such, parking lot noise would not result in substantially greater noise levels than currently exist in the vicinity and would not exceed the City standards, and operational noise impacts would be less than significant in this regard.

As concluded in the FEIR, parking structure noise impacts from the RCHSP would result in a less than significant impact with the incorporation of **FEIR MM NOI-2**. The Proposed Project's parking structure noise levels would not exceed the City's noise standards, or the 60 dBA noise limit established in **FEIR MM NOI-2**, and impacts would also be less than significant. No new impacts or a substantial increase in the severity of a previously identified impact evaluated in the FEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the FEIR was certified is available that would impact the prior finding of no significant impact under this issue area.

Off-Site Traffic Noise

Implementing the Proposed Project would generate increased traffic volumes along nearby roadway segments. The Proposed Project would generate 3,654 net daily trips, resulting in noise increases on

³⁹ Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

⁴⁰ Assuming a minimum 5 dBA reduction from intervening walls and structures within the parking garage.

Project area roadways. Generally, a traffic noise increase of less than 3 dBA is barely perceptible to people, while a 5-dBA increase is readily noticeable.⁴¹ Therefore, increases in traffic noise levels of less than 5 dBA would be less than significant, consistent with the FEIR methodology.

Traffic noise levels on roadways primarily affected by project-generated trips were calculated using the FHWA's Highway Noise Prediction Model (FHWA-RD-77-108). As shown in **Appendix I**, traffic-generated noise levels on the primary access roadways (Brockton Avenue and 14th Street) would range between 63.9 dBA CNEL and 64.5 dBA CNEL at 100 feet from the roadway centerline and would not exceed the 65 dBA CNEL noise standard. The Proposed Project would result in a maximum increase of 0.8 dBA CNEL along 14th Street, which is unnoticeable and is less than the 5 dBA criteria established in the FEIR. Therefore, the traffic associated with the Proposed Project and background traffic noise levels would result in a less than significant impact.

As concluded in the FEIR, operational traffic noise impacts from the RCHSP would result in a less than significant impact. The Proposed Project's operational traffic would result in a nominal increase in traffic noise levels compared to existing conditions, and impacts would also be less than significant. No new impacts or a substantial increase in the severity of a previously identified impact evaluated in the FEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the FEIR was certified is available that would impact the prior finding of no significant impact under this issue area.

Generator Noise

The Proposed Project would include a generator room located within the parking garage. However, the generators would only be used in emergency situations and would be fully enclosed within a room in the parking garage structure. Thus, generator noise would be minimal when operating during emergency situations and would not exceed 60 dBA in accordance with **FEIR MM NOI-3**. A less than significant impact would occur in this regard.

As concluded in the FEIR, emergency generator noise impacts from the RCHSP would result in a less than significant impact with the incorporation of **FEIR MM NOI-3**. The Proposed Project's emergency generator noise levels would not exceed the City's noise standards, or the 60 dBA noise limit established in **FEIR MM NOI-3**, and impacts would also be less than significant. No new impacts or a substantial increase in the severity of a previously identified impact evaluated in the FEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the FEIR was certified is available that would impact the prior finding of no significant impact under this issue area.

FEIR Mitigation Measures Applicable to the Proposed Project

FEIR MM NOISE-1 In order to reduce impacts related to heavy construction equipment moving and operating on-site during all phases (Phase I, Phase IIA, Phase IIB, and Phase IIC) of demolition, grading, and construction, prior to issuance of grading permits mitigation measures shall be incorporated by the City of Riverside) as conditions on permits. Examples of measures to be required by the City are as follows:

⁴¹ Federal Highway Administration, *Highway Traffic Noise Analysis and Abatement Policy and Guidance, Noise Fundamentals*, https://www.fhwa.dot.gov/enviroMent/noise/regulations_and_guidance/polguide/polguide02.cfm, accessed November 2024.

- All construction equipment, fixed or mobile, shall be equipped with properly operating and maintained mufflers.
- Construction noise reduction methods, such as shutting off idling equipment, maximizing the distance between construction equipment staging areas and occupied sensitive receptor areas, and using electric air compressors and similar power tools rather than diesel equipment, shall be used.
- During construction, stationary construction equipment shall be placed such that noise is directed away from or shielded from sensitive noise receivers. During construction, stockpiling, and vehicle staging areas shall be located far from noise-sensitive receptors.
- The project shall be in compliance with the City's Municipal Code: Construction shall occur between the hours of 7:00 a.m. and 7:00 p.m. on weekdays, and between 8:00 a.m. and 5:00 p.m. on Saturdays. Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow surrounding property owners and residents to contact the job superintendent.

FEIR MM NOISE-2

If surface parking or parking structures are proposed during Phase IIA, IIB, or IIC of the project, the project proponent shall retain an acoustical specialist to conduct an analysis of noise effects from the proposed parking facilities at nearby noise - sensitive land uses, and to provide mitigation measures that will reduce noise levels to below 60 A-weighted decibels (dBA) or less at the property line and will not otherwise result in the project exceeding relevant noise standards at nearby noise-sensitive land uses (e.g., recreation, residential). Examples of mitigation measures are as follows: requirement of pavement treatments to reduce or eliminate tire squeal, administrative measures such as restricted speed limits and active enforcement thereof, or restricted parking hours.

FEIR MM NOISE-3

Because heating, ventilation, and air conditioning (HVAC) equipment, boilers, and generators can generate noise that could affect surrounding sensitive receptors for all phases (Phase I, Phase IIA, Phase IIB, and Phase IIC) of the project if not placed inside buildings or enclosures or otherwise shielded from receptors, and because the details, specifications, and locations of these facilities is not known yet, the project proponent shall retain an acoustical specialist to review project construction -level plans at every phase (Phase I, Phase IIA, Phase IIB, and Phase IIC) of the project to ensure that the equipment specifications and plans for HVAC, central plant, and emergency generator equipment incorporate measures, such as the specification of quieter equipment or provision of acoustical enclosures, that will reduce noise levels to below 60 dBA or less at the property line and will not otherwise result in the project exceeding relevant noise standards at nearby noise-sensitive land uses (e.g., recreation, residential). Prior to the commencement of construction for all phases (Phase I, Phase IIA, Phase IIB, and Phase IIC) of the project, the acoustical specialist shall certify in writing to the City that the equipment specifications and plans incorporate measures that will achieve the relevant noise limits.

4.12b Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR concluded that the Approved Project is not anticipated to result in continuous vibration levels that typically annoy people, and the vibration impact is less than significant.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Construction

On-Site Construction Vibration

Increases in ground-borne vibration levels attributable to the Proposed Project would be primarily associated with short-term construction-related activities. Proposed Project construction could result in varying degrees of temporary ground-borne vibration, depending on the specific construction equipment used and the operations involved.

The impacts of construction vibration include human annoyance and building damage. Human annoyance occurs when construction vibration rises significantly above the threshold of human perception for extended periods of time. Building damage can be cosmetic or structural. Ordinary buildings that are not particularly fragile would not experience cosmetic damage (e.g., plaster cracks) at distances beyond 30 feet. This distance can vary substantially depending on the soil composition and underground geological layer between the vibration source and receiver. In addition, not all buildings respond similarly to vibration generated by construction equipment. The City does not provide numerical vibration standards for construction activities. The nearest structure is the Riverside Community Players Theatre, located approximately 65 feet to the east of the Proposed Project site. This impact discussion uses the FTA and Caltrans structural damage criterion of 0.5 in/sec PPV for commercial buildings and the human annoyance criterion of 0.4 in/sec PPV.

The ground-borne vibration generated by construction equipment spreads through the ground and diminishes in magnitude with distance increases. Equipment expected to be used at the Proposed Project site that FTA guidance includes reference vibration levels for include loaded haul trucks, large bulldozers, small bulldozers, jackhammers, hoe ram, and vibratory rollers.⁴² Haul trucks would be staged at locations providing ease of access/egress from the Proposed Project site and onto the roadway network. Loaded trucks would travel at distances greater than 25 feet from adjacent structures. A vibratory roller could be used during the parking garage construction, approximately 65 feet from the Riverside Community Players Theatre to the east and at further distances for other surrounding structures.

As indicated in **Appendix I**, vibration velocities from typical heavy construction equipment operations that would be used during Proposed Project construction range from 0.004 to 0.294 in/sec PPV at 65 feet from the source of activity (the distance to the nearest off-site building/structure) and would not exceed the

⁴² Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018. For equipment where FTA guidance does not include reference vibration levels for are assumed to not require analysis.

0.5 in/sec PPV structural damage threshold or 0.4 in/sec PPV annoyance threshold. Therefore, approval of the Proposed Project would not result in any significant effects relating to on-site construction vibration.

Off-Site Construction Vibration

With regard to construction trucks, the Proposed Project's construction would involve truck travel along nearby roadways, generating vibration events with each passing truck. During excavation, the soil would be stockpiled by trucks within designated areas of the Proposed Project site prior to export. According to the FTA's Transit Noise and Vibration Impact Assessment (September 2018), a truck rarely creates vibration levels that exceed 70 VdB (equivalent to 0.012 inches per second PPV) when on a roadway.⁴³ The factors influencing levels of ground-borne vibration include vehicle speed, vehicle suspension, and wheel condition and type. The FTA does not list the frequency of vibration events as an influencing factor for vibration velocity.⁴⁴ As such, multiple trucks traveling along the roadway would increase the frequency of vibration events but would not affect the vibration velocity experienced by receptors. Therefore, approval of the Proposed Project would not result in any significant effects relating to off-site construction vibration.

Operations

With respect to vibration-generating activities, operation of the Proposed Project would involve personal automobiles used by employees and patients accessing the parking garage that generate minimal vibration levels. Therefore, operational vibration levels from automobiles accessing the parking garage would not be perceptible and impacts would be less than significant.

As concluded in the FEIR, construction and operational vibration impacts from the RCHSP would be less than significant. The Proposed Project's vibration levels would not exceed any applicable standards and would also result in a less than significant impact. No new impacts or a substantial increase in the severity of a previously identified impact evaluated in the FEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the FEIR was certified is available that would impact the prior finding of no significant impact under this issue area.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.12c For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the project area to excessive noise levels?

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR concluded that implementation of the RCHSP would not expose people residing or working in the project area to excessive noise levels; therefore, impacts are considered to be less than significant, and no mitigation measures are necessary.

FEIR Mitigation Measures

⁴³ Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

⁴⁴ Ibid.

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact: The Proposed Project site is approximately 1.43 miles east of Flabob Airport. According to the Riverside County Airport Land Use Compatibility Plan Policy Document,⁴⁵ the Proposed Project site is not located within any Flabob Airport noise contour or Land Use Compatibility zones. An existing helipad at the Riverside Community Hospital is located approximately 310 feet east of the Proposed Project site. However, helicopter landings/takeoffs occur infrequently and would not conflict with the Riverside Municipal Code noise standards, as concluded in the FEIR. The Proposed Project would not change the existing location of the helipad or increase helicopter operations. Therefore, approval of the Proposed Project would not result in any significant effects relating to excessive airport/airstrip noise.

As concluded in the FEIR, impacts related to airport/aircraft noise from the RCHSP would be less than significant. The Proposed Project would also result in less than significant impacts. No new impacts or a substantial increase in the severity of a previously identified impact evaluated in the FEIR would occur. Additionally, no new information of substantial importance that was not known and could not have been known at the time the FEIR was certified is available that would impact the prior finding of no significant impact under this issue area.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

Conclusion

Based on the comparative analysis set forth in this Addendum, no new impacts relative to noise or a substantial increase in the severity of a previously identified significant impact evaluated in the Certified FEIR would occur. With regard to Public Resources Code Section 21166 and State CEQA Guidelines Section 15162(a), the Project would not result in any new impacts or increase the severity of the previously identified impacts. There are no substantial changes to the circumstances under which the proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the Certified FEIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the Certified FEIR was certified is available that would impact the prior finding of significant and unavoidable. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.13 Population and Housing

4.13a Would the Project induce substantial unplanned population growth in an area, either directly or indirectly?

Summary of Previous Environmental Analysis

No Impact. The FEIR concluded that because the Approved Project does not propose any housing and no improvements to infrastructure are needed, no impact related to population growth would occur. Therefore, the FEIR concluded no impact in this regard.

⁴⁵ Riverside County Airport Land Use Commission, *Riverside County Airport Land Use Compatibility Plan Policy Document, Flabob Airport*, adopted December 2004.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

No Impact. The Proposed Project would not develop residential land uses and, therefore, would not induce population growth directly through housing. Additionally, the Proposed Project does not include the extension of roads or other infrastructure to unserved areas, which could induce indirect growth. Therefore, the Proposed Project would not induce substantial unplanned population growth in the City. No impact would occur. Therefore, no new or more severe impact concerning population and housing would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.13b Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Summary of Previous Environmental Analysis

No Impact. The FEIR concluded that because the Approved Project site does not currently support any housing, substantial numbers of existing housing would not be displaced. Further, the construction of replacement housing elsewhere would not be necessary due to the Approved Project. Therefore, the FEIR concluded that no impact would occur.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

No Impact. There are no existing residential uses on the Proposed Project site; therefore, the Proposed Project would not displace people or housing. No impact would occur. No new or more severe impact concerning displacement would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

Conclusion

Based on the comparative analysis set forth in this Addendum and consistent with the FEIR, the Proposed Project would have no impact on population and housing. With regard to Public Resources Code Section 21166 and State CEQA Guidelines Section 15162(a), the Project would not result in any new impacts or increase the severity of the previously identified impacts. There are no substantial changes to the circumstances under which the Proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the FEIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the FEIR was certified is available that would impact the prior finding of less than significant. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.14 Public Services

4.14a Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for:

(i) Fire protection?

(ii) Police protection?

(iii) Schools?

(iv) Parks?

(v) Other Public Facilities?

Summary of Previous Environmental Analysis

Less Than Significant Impact.

Fire Protection. Fire protection is provided by the Riverside Fire Department. The FEIR concluded that impacts to fire services from implementation of the Approved Project were less than significant following compliance with the requirements of the City's Fire Department and Uniform Fire Code.

Police Protection. The Riverside Police Department provides law enforcement services to the City of Riverside, inclusive of the Approved Project. The FEIR determined that although implementation of the Approved Project would result in additional employees in the project area, it is not expected to substantially increase emergency calls to the City's Police Department. Therefore, the FEIR concluded that the impacts are less than significant in this regard.

Schools. The Approved Project is within the Riverside Unified School District. The Certified FEIR concluded that because the Approved Project does not include new housing and therefore would not generate an increase in the resident population requiring education facilities and services, impacts would be less than significant.

Parks. The FEIR concluded that because no residential uses are proposed, there is no expected increased demand for parks and impacts would be less than significant.

Other Public Facilities. The FEIR concluded that no other public facilities or services other than police and fire protection are anticipated to serve development within the RCHSP. Therefore, the FEIR concluded a less than significant impact in this regard.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact.

Fire Protection. The Riverside Fire Department provides fire protection to the Proposed Project site. The closest fire station, Station 1, is located at 3401 University Avenue, approximately 0.7 mile northeast of the Proposed Project site. The Proposed Project site is currently developed with four buildings. The

Proposed Project proposes to remove the existing on-site buildings and develop a new parking garage to serve the adjacent hospital campus. The Proposed Project does not involve any residential development and thus would not substantially increase the demand for fire protection and emergency medical services at the Proposed Project site. Further, the Proposed Project site is currently served by fire protection services and is located in an urban setting where fire protection services and equipment/infrastructure are already in place and would not require new or physically altered fire protection facilities to maintain service objectives. Therefore, the Proposed Project would not result in adverse physical impacts associated with the construction of fire protection facilities. No new or more severe impact concerning fire protection services would occur as a result of the Proposed Project.

Police Protection. The Proposed Project site is in a currently developed area served by the Riverside Police Department. The closest police station is located at 4102 Orange Street, approximately 0.5 mile east of the Proposed Project site. Because of this, and because law enforcement personnel already patrol the area, the Proposed Project is not anticipated to increase response times to the project site or surrounding area. Therefore, the Proposed Project would not result in adverse physical impacts associated with the construction of police protection facilities. No new or more severe impact concerning police protection services would occur as a result of the Proposed Project.

Schools. The Proposed Project is a non-residential land use. Implementation of the Proposed Project would not directly result in an increased population in the City and would therefore not increase the need for the construction of additional school facilities. The Project would be required to comply with SB 50 requirements, which allow school districts to collect impact fees from developers of new projects. In compliance with SB 50, the Riverside Unified School District requires a development fee for New Commercial/Industrial Construction to be paid by the applicant.⁴⁶ As stated in Government Code Section 65995(h), “The payment or satisfaction of a fee, charge, or other requirement levied or imposed ...are hereby deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization ...on the provision of adequate school facilities.” Therefore, the Proposed Project would not result in adverse physical impacts associated with the construction of schools. No new or more severe impact concerning schools would occur as a result of the Proposed Project.

Parks. See Section 4.15, Recreation.

Other Public Facilities. The Proposed Project would not generate population growth that would substantially increase the demand for facilities in the Riverside County Library System. Therefore, the proposed hospital expansion would not result in the need for new or expanded library facilities. No mitigation is required. No new or more severe impact concerning other public facilities would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

⁴⁶ Riverside Unified School District. (2024). *Developer Fees*.

<https://www.riversideunified.org/cms/One.aspx?portalId=580805&pageId=3262525>. Accessed December 3, 2024.

Conclusion

Based on the comparative analysis set forth in this Addendum, no new impacts relative to public services or an increase in the severity of a previously identified significant impact evaluated in the FEIR would occur. With regard to Public Resources Code Section 21166 and State CEQA Guidelines Section 15162(a), the Project would not result in any new impacts or increase the severity of the previously identified impacts. There are no substantial changes to the circumstances under which the Proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the FEIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the FEIR was certified is available that would impact the prior finding of less than significant. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.15 Recreation

4.15a Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR concluded that the Approved Project would not result in the development of new homes or businesses that would increase the use of existing parks or recreational facilities and thus no deterioration of existing recreational facilities would occur. Therefore, the FEIR concluded a less than significant impact in this regard.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

No Impact. The Proposed Project does not include residential development, which would directly increase population and result in increased demand for parks and recreational facilities. Accordingly, implementation of the Proposed Project would not generate an increase in demand on existing public or private parks or other recreational facilities that could result in substantial physical deterioration of the City's parks and recreational facilities. Therefore, no impact would occur. No new or more severe impact concerning other recreational facilities would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.15b Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Summary of Previous Environmental Analysis

No Impact. See Response 4.15a Summary of Previous Environmental Analysis above. The Approved Project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, the FEIR concluded no impacts to recreational facilities that might have an adverse physical effect on the environment would occur.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

No Impact: See Response 4.15a, Analysis of Proposed Project above. The Proposed Project does not include the construction of recreational facilities, nor would it require the construction or expansion of recreational facilities. Therefore, no impact to existing recreational facilities would occur and no mitigation is required.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

Conclusion

Based on the comparative analysis set forth in this Addendum, no new impacts relative to recreation or an increase in the severity of a previously identified significant impact evaluated in the FEIR would occur. With regard to Public Resources Code Section 21166 and State CEQA Guidelines Section 15162(a), the Proposed Project would not result in any new impacts or increase the severity of the previously identified impacts. There are no substantial changes to the circumstances under which the Proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the FEIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the FEIR was certified is available that would impact the prior finding of less than significant. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.16 Transportation

The Proposed Project's analyses are based on **Appendix J: Traffic Study**.

4.16a Would the Project conflict with program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Summary of Previous Environmental Analysis

Significant and Unavoidable. The Certified FEIR evaluated existing traffic conditions and existing plus project conditions and concluded that implementation of the RCHSP would result in significant impacts from Phases I, IIA, IIB, IIC related to traffic affecting the level of service (LOS) at certain intersections and roadway segments within the study area. Given these significant impacts, MM TRA-1 through MM TRA-8 were incorporated. Based on the mitigation measures being incorporated, the following intersections were determined to have less than significant impacts with mitigation incorporated:

Phase I

- 3. Brockton Avenue and 14th Street (MM TRA-1)
- 5. 14th Street and Magnolia Avenue/Market Street (MM TRA-2)
- 9. Brockton Avenue and RCH Entrance (MM TRA-3)

Phases IIA, IIB, and IIC

- 3. Brockton Avenue and 14th Street (MM TRA-4)

5. 14th Street and Magnolia Avenue/ Market Street (MM TRA-5)6. 14th Street and Lime Street (MM TRA-6)

9. Brockton Avenue and RCH Entrance (MM TRA-3)

Impacts to the intersection of 14th Street and RCH Entrance during Phases I, IIA, IIB, and IIC would remain significant. Although the evening peak hour LOS D is an acceptable level of service D during Phase I and LOS C during Phases IIA, IIB, and IIC is acceptable by the City's impact significance standard, the increase in delay at this intersection is considered significant. This intersection does not warrant a signal based on the signal warrant analysis. The backup as a result of the delay of this intersection will be related to outbound traffic and will occur on RCH property, not within City streets. Therefore, although there is a delay, this delay does not warrant circulation revisions on the site to accommodate the traffic that may use this entrance. For these reasons, the project will have a significant delay based on the City's thresholds and no improvements or feasible mitigation measures will be proposed that will address this impact. The impact at 14th Street and RCH Entrance will require a Statement of Overriding Considerations.

The following roadway segments were found to have impacts that are significant, but with mitigation can be reduced to less than significant:

- Brockton Avenue: 14th Street to Tequesquite Avenue— LOS F (MM TRA-8)
- Brockton Avenue: Tequesquite Avenue to Ramona Drive—LOS F (MM TRA-7).

The roadway segment of 14th Street from Magnolia Avenue/Market Street to Mulberry Avenue will operate at an LOS F during Phases IIA, IIB, and IIC. Because 14th Street at this segment is already built out to its ultimate General Plan 2025 configurations, and due to historic structures in the way of any further widening beyond what is in the General Plan 2025, the City does not plan to widen 14th Street at this intersection. Therefore, since widening cannot occur, which would be the only feasible measure to address the LOS on this roadway segment, impacts will remain significant with no feasible mitigation measures. The impact to 14th Street from Magnolia Avenue /Market Street to Mulberry Avenue will require a Statement of Overriding Considerations.

The FEIR further concluded that with the addition of Phase IIA, IIB, and IIC traffic, the following roadway segments would operate at a deficient LOS at Year 2035 Cumulative Conditions Plus Phases IIA, IIB, and IIC, and would result in significant impacts.

- 14th Street: Magnolia Avenue/ Market Street to Mulberry Avenue— LOS F
- Brockton Avenue: 14th Street to Tequesquite Avenue— LOS F
- Brockton Avenue: Tequesquite Avenue to Ramona Drive—LOS F.

The following roadway segments were found to have impacts that are significant, but with mitigation can be reduced to less than significant.

- Brockton Avenue: 14th Street to Tequesquite Avenue— LOS F (FEIR MM TRA-8)
- Brockton Avenue: Tequesquite Avenue to Ramona Drive—LOS F (FEIR MM TRA-7)

However, FEIR Appendix I indicates that these roadways are constructed to their ultimate General Plan configurations and are not planned to be widened beyond their current classification.

The roadway segment of 14th Street from Magnolia Avenue/ Market Street to Mulberry Avenue will operate at an LOS F during Phases IIA, IIB, and IIC. Because 14th Street at this segment is already built out to its ultimate GP 2025 configurations, and due to historic structures in the way of any further widening beyond what is in the GP 2025, the City does not plan to widen 14th Street at this intersection. Therefore, since widening cannot occur, which would be the only feasible measure to address the LOS on this roadway segment, impacts will remain significant with no feasible mitigation measures.

In addition, in an effort to further the alternative methods of transportation supporting the project, and therefore, supporting policies and plans related to alternative modes of transportation, the Certified FEIR identified that the project would implement **FEIR MM TRA-9** and **FEIR MM TRA-10**.

Overall, the Certified FEIR concluded that the RCHSP would result in significant and unavoidable impacts related to conflicting with program, plan, ordinance, or policy addressing the circulation system.

FEIR Mitigation Measures

FEIR MM TRA-1	Brockton Avenue and 14th Street: Prior to the completion of Phase I, Riverside Community Hospital (RCH) shall convert the number one westbound through lane to a second left-turn lane. (Completed)
FEIR MM TRA-2	14th Street and Magnolia Avenue / Market Street: Prior to the completion of Phase I, RCH shall modify the signal operation at 14th Street and Magnolia Avenue/ Market Street to provide right-turn overlap for the northbound approach. (Completed)
FEIR MM TRA-3	Brockton Avenue and RCH Entrance: Prior to the completion of Phase I, the driveway at the RCH entrance off Brockton Avenue shall be modified to prohibit westbound (outbound) left-turn movements to reduce delay. As a condition of approval, southbound left turns into the driveway at the RCH entrance off Brockton Avenue shall be restricted. This measure will also address level of service during Phases IIA, IIB, and IIC. (Completed)
FEIR MM TRA-4	Brockton Avenue and 14th Street: Prior to issuance of certificate of occupancy for Phase IIA, the intersection of Brockton Avenue and 14th Street shall be modified by converting one westbound through lane to a second left-turn lane. (Completed)
FEIR MM TRA-5	14th Street and Magnolia Avenue / Market Street: Prior to issuance of certificate of occupancy for Phase IIA, a second westbound left-turn lane shall be provided at the intersection of 14th Street and Magnolia Avenue / Market Street, as well as signal operation modification to provide right-turn overlap for the northbound approach. Additional right-of-way shall be dedicated on 14th Street at Market Street to accommodate the proposed turn lanes. If acquisition of off-site right-of-way is necessary, the applicant shall make a good faith effort to acquire the right-of-way needed to accomplish the improvement. (To be completed as part of Phase IIA completion)
FEIR MM TRA-6	14th Street and Lime Street: Prior to issuance of a certificate of occupancy for Phase IIA, the northbound through/right-turn lane at the intersection of 14th

Street and Lime Street shall be converted into an exclusive right-turn lane to accommodate heavy right-turn movement toward the freeway. Signal operation shall be modified to provide right-turn overlap for the northbound approach. (To be implemented as part of Phase IIA completion)

- FEIR MM TRA-7** **Brockton Avenue roadway segment from Tequesquite to Ramona:** During Phase I, modification of the traffic signal at the intersection of Brockton Avenue and Tequesquite Avenue shall provide protected/permissive left-turn phasing in all directions. (Completed)
- FEIR MM TRA-8** **Brockton Avenue roadway segment from 14th Street to Tequesquite:** During Phase I, Brockton Avenue south of 14th Street shall be restriped to provide a northbound right-turn lane and the traffic signal at the intersection of Brockton Avenue and 14th Street shall be modified to provide right-turn overlap for the northbound approach. (Completed)
- FEIR MM TRA-9** During Phases I, IIA, IIB, and IIC, RCH shall work with the Riverside Transit Agency and City of Riverside staff to identify modifications to reduce the potential for conflicts between buses and vehicles entering the RCH campus. (Ongoing)
- FEIR MM TRA-10** During Phases I, IIA, IIB, and IIC, RCH shall continue to implement two ride-sharing rewards programs in coordination with IE511 (Inland Empire Commuter Incentives). (Ongoing)

Analysis of Proposed Project

Less Than Significant Impact With Mitigation Incorporated.

Methodology

The Traffic Study provided an evaluation of peak hour conditions at the following 12 intersections using the methods prescribed in the Highway Capacity Manual (HCM) 7th Edition, consistent with the City of Riverside Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment (July 2020).

1. Brockton Avenue at University Avenue
2. Market Street at University Avenue
3. Brockton Street at 14th Street
4. Market Avenue/Magnolia Avenue at 14th Street
5. Brockton Avenue at Tequesquite Avenue
6. Magnolia Avenue at 15th Street
7. Brockton Avenue at Terracina Avenue
8. Magnolia Avenue at Terracina Avenue
- D1. Brockton Avenue at Existing South RCH Driveway
- D2. Brockton Avenue at New North RCH Driveway

D3. Brockton Avenue at New Garage Egress

D4. 14th Street at RCH Driveway

For signalized intersections, the HCM methodology estimates the average delay (in average seconds per vehicle) for each of the movements through the intersection, considering a number of factors, including number of lanes, volume of traffic, cycle length, and signal timing and phasing. For unsignalized intersections, the HCM methodology analysis determines the average total delay for each vehicle making any movement from the stop-controlled minor street, as well as left turns from the major street. Delay values are calculated based on the relationship between traffic on the major street and the availability of acceptable gaps in the traffic stream through which conflicting traffic movements can be made. The HCM delay forecast translates to a LOS designation, ranging from LOS A to LOS F. A summary description of each LOS and the corresponding delay is provided in **Appendix J**.

The City of Riverside General Plan includes the following policies regarding minimum acceptable LOS:

- LOS C is to be maintained at all street intersections
- LOS D is to be maintained at intersections of Collector or higher classification.

Operational improvements are required when the addition of project-related trips causes either peak hour LOS to degrade the acceptable (A through D) to unacceptable levels (E or F) or the peak hour delay to increase as follows:

- LOS A/B – By 10 seconds
- LOS C – By 8 seconds
- LOS D – By 5 seconds
- LOS E – By 2 seconds
- LOS F – By 1 second

Study Scenarios

Each of the study intersections has been analyzed for the following scenarios for this Addendum:

- Existing Conditions
- Opening Year 2026 (Existing + Ambient Growth)
- Opening Year 2026 Plus Project
- Build-Out 2035 Plus Project

Existing Conditions

Intersection LOS analysis was conducted for the AM and PM peak hours for the Existing Conditions. The scenario results of the intersection analysis are shown in **Table 11: Summary of Intersection Operation - Existing Conditions**, which shows that the study intersections currently operate at an acceptable LOS.

Table 11: Summary of Intersection Operation - Existing Conditions

No.	Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
1	Brockton Avenue at University Avenue	S	21.2	C	21.2	C
2	Market Street at University Avenue	S	20.9	C	30.5	C
3	Brockton Avenue at 14 th Street	S	24.4	C	24.3	C
4	Market Street/Magnolia Avenue at 14 th Street	S	29.1	C	30.6	C
5	Brockton Avenue at Tequesquite Avenue	S	17.4	B	15.5	B
6	Magnolia Avenue at 15 th Street	S	9.3	A	9.7	A
7	Brockton Avenue at Terracina Avenue	S	6.4	A	3.4	A
8	Magnolia Avenue at Terracina Avenue	S	19.1	B	14.5	B
D1	Brockton Avenue at EX South RCH Driveway	U	9.0	A	9.1	A
D2	Brockton Avenue at New North RCH Driveway	FUTURE INTERSECTION				
D3	Brockton Avenue at New Garage Egress	FUTURE INTERSECTION				
D4	14 th Street at RCH Driveway	U	9.2	A	9.1	A

Source: **Appendix J.**

In addition, roadway LOS analysis presented in **Appendix J, Table 3: Summary of Roadway Segment Analysis Existing Conditions** indicate that the study roadway segments currently operate at an acceptable LOS.

Proposed Project Trip Generation

For consistency with the FEIR, trip generation estimates for the Proposed Project were developed using the Institute of Transportation Engineers (ITE) Trip Generation Manual (9th Edition) average rates for Hospital (ITE Land Use 610) and Medical-Dental Office Building (ITE Land Use 720). The trip rates for “Hospital – trips per 1000 square feet” (ITE Code 610) are higher in the 9th edition of the ITE Trip Generation Manual compared to the current 11th edition of the ITE Trip Generation Manual. As a result, the Proposed Project’s trip generation is higher using the trip generation rates from the 9th edition. As such, the trip generation assumptions for the Proposed Project are conservative.

Daily, morning peak hour, and evening peak hour trip generation estimates for the Proposed Project are shown in **Appendix J, Table 6: Summary of Project Trip Generation**. The Proposed Project is estimated to generate 3,654 net new vehicle trips on a daily basis, with 266 trips (193 inbound and 73 outbound) during the morning peak hour, and 333 trips (104 inbound and 229 outbound) during the evening peak hour.

Future Conditions Plus Project

Project-related traffic was added to the Opening Year 2026 traffic volumes. Opening Year 2026 Plus Project traffic volumes are shown in **Appendix J, Figure 8: Opening Year 2026 Plus Project Traffic Volumes**. Intersection LOS Analysis was conducted for the AM and PM peak hours for the Opening Year 2026 Plus Project condition. The scenario results of the intersection analysis are shown in **Table 12: Summary of Intersection Operation Opening Year 2026 Plus Project Conditions**, which shows that the study intersections would continue to operate at an acceptable LOS. Roadway LOS was conducted based on the roadway capacities presented in the Traffic Study.

Table 12: Summary of Intersection Operation Opening Year 2026 Plus Project Conditions

No.	Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
1	Brockton Avenue at University Avenue	S	21.7	C	21.7	C
2	Market Street at University Avenue	S	21.4	C	32.0	C
3	Brockton Avenue at 14 th Street	S	25.5	C	25.5	C
4	Market Street/Magnolia Avenue at 14 th Street	S	30.4	C	31.7	C
5	Brockton Avenue at Tequesquite Avenue	S	18.1	B	16.0	B
6	Magnolia Avenue at 15 th Street	S	9.6	A	10.0	A
7	Brockton Avenue at Terracina Avenue	S	6.7	A	3.5	A
8	Magnolia Avenue at Terracina Avenue	S	19.7	B	14.9	B
D1	Brockton Avenue at EX South RCH Driveway	U	9.1	A	9.1	A
D2	Brockton Avenue at New North RCH Driveway	FUTURE INTERSECTION				
D3	Brockton Avenue at New Garage Egress	FUTURE INTERSECTION				
D4	14 th Street at RCH Driveway	U	9.2	A	9.1	A

Source: **Appendix J.**

The results of the roadway analysis for Opening Year 2026 Plus Project conditions are shown in **Appendix J, Table 8: Summary of Roadway Segment Analysis Opening Year 2026 Plus Project**, which shows that the study roadway segments would continue to operate at an acceptable LOS.

Build-Out 2035 Plus Project

The Build-Out scenario was analyzed to evaluate the consistency with the previously approved traffic study. Build-Out 2035 volumes were utilized from the “Traffic Impact Analysis for the Riverside Community Hospital Specific Plan Expansion Project” (January 2014) that was prepared as part of the Certified FEIR. Since Phase I has been completed, Phase I traffic volumes were added to forecast Build-Out baseline volumes. Proposed Project-related traffic was added to the Build-Out baseline volumes to generate Build-Out 2035 Plus Project traffic volumes.

The Build-Out 2035 scenario is analyzed based on the existing implemented mitigation measures when traffic counts were collected in May 2024. Phase I of RCHSP was completed before 2024. Therefore, the Build-Out 2035 scenario analysis includes MM TRA-1, MM TRA-3, MM TRA-4, MM TRA-7, and MM TRA-8.

As part of Phase I, RCH modified the signal operation at 14th Street and Magnolia Avenue / Market Street to provide right-turn overlap for the northbound approach, complying with MM TRA-2. However, as part of a local pavement project, the City of Riverside removed this mitigation measure prior to count collection in 2024, reverting the intersection back to its original operation. Thus, the Build-Out 2035 scenario does not include this mitigation measure in its analysis, consistent with Existing scenario signalization.

MM TRA-5 and MM TRA-6 are not included in the Build-Out 2035 scenario analysis as the mitigation measures are anticipated to be implemented with Phase II and were not existing in 2024. MM TRA-5 is offered as an improvement and analyzed as such in the recommended improvements section. It is worth noting that MM TRA-6 is not within the study area and therefore is not applicable to the analysis.

Intersection LOS Analysis was conducted for the AM and PM peak hours for the Build-Out 2035 Plus Project condition. The scenario results of the intersection analysis are shown in **Table 13: Summary of Intersection Operation Build Out 2035 Plus Project Conditions**, which indicates that the following study intersection would operate at an unacceptable LOS:

- #4 – Market Street/Magnolia Avenue at 14th Street: PM – LOS E

Table 13: Summary of Intersection Operation Build Out 2035 Plus Project Conditions

No.	Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
			Delay	LOS	Delay	LOS
1	Brockton Avenue at University Avenue	S	20.4	C	48.3	D
2	Market Street at University Avenue	S	34.6	C	45.9	D
3	Brockton Avenue at 14 th Street	S	37.8	D	41.9	D
4	Market Street/Magnolia Avenue at 14 th Street	S	41.3	D	74.0	E
5	Brockton Avenue at Tequesquite Avenue	S	16.7	B	27.8	C
6	Magnolia Avenue at 15 th Street	S	13.6	B	46.7	D
7	Brockton Avenue at Terracina Avenue	S	9.2	A	5.9	A
8	Magnolia Avenue at Terracina Avenue	S	22.0	C	22.6	C
D1	Brockton Avenue at EX South RCH Driveway	U	9.5	A	10.2	B
D2	Brockton Avenue at New North RCH Driveway	U	15.1	C	34.1	D
D3	Brockton Avenue at New Garage Egress	U	11.3	B	33.2	D
D4	14 th Street at RCH Driveway	U	9.5	A	10.3	B
Source: Appendix J .						

The deficiency at Intersection #4 (Market Street/Magnolia Avenue at 14th Street) is consistent with the FEIR's conclusions. Consistent with the FEIR, **FEIR MM TRA-5** would be implemented, which requires a second westbound left-turn lane and modifications to signal operations to provide right-turn overlap for the northbound approach. With **FEIR MM TRA-5** incorporated, Intersection #4 would operate at an acceptable LOS D. Therefore, impacts are less than significant with mitigation incorporated.

Roadway LOS Analysis was conducted based on the roadway capacities presented in the Traffic Study. The results of the roadway analysis for Build-Out 2035 Plus Project conditions are shown in **Appendix J, Table 10: Summary of Roadway Segment Analysis Build-Out 2035 Plus Project**. Consistent with FEIR Appendix I, under Build-Out 2035 Plus Project conditions, the following study roadway segments would operate at an unacceptable LOS:

- Brockton Avenue: South of Existing South RCH Driveway
- Brockton Avenue: Existing South Driveway to New North RCH Driveway
- Brockton Avenue: New North RCH Driveway to New Garage Egress
- Brockton Avenue: New Garage Egress to 14th Street

These roadway segments are within the "Brockton Avenue: 14th Street to Tequesquite Avenue" roadway segment analyzed in the FEIR. As noted above, FEIR Appendix I concluded that under Build-Out Plus Project Conditions, the roadway segment "Brockton Avenue: 14th Street to Tequesquite Avenue" would carry daily traffic volumes in excess of their daily capacity. As further noted in FEIR Appendix I, these

roadways are constructed to their ultimate General Plan configurations and are not planned to be widened beyond their current classification. Therefore, as with the FEIR, with implementation of **FEIR MM TRA-8** incorporated, impacts would be less than significant.

FEIR Mitigation Measures Applicable to the Proposed Project

FEIR MM TRA-1 through **FEIR MM TRA-4** and **FEIR MM TRA-7** through **FEIR MM TRA-8** have been completed. **FEIR MM TRA-6** is not applicable to the Proposed Project.

FEIR MM TRA-5 **14th Street and Magnolia Avenue / Market Street**, prior to issuance of certificate of occupancy for Phase IIA, a second westbound left-turn lane shall be provided at the intersection of 14th Street and Magnolia Avenue / Market Street, as well as signal operation modification to provide right-turn overlap for the northbound approach. Additional right-of-way shall be dedicated on 14th Street at Market Street to accommodate the proposed turn lanes. If acquisition of off-site right-of-way is necessary, the applicant shall make a good faith effort to acquire the right-of-way needed to accomplish the improvement.

4.16b *Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?*

Summary of Previous Environmental Analysis

Not applicable since this threshold was not analyzed in the FEIR.

Analysis of Proposed Project

Less Than Significant Impact. State CEQA Guidelines Section 15064.3 codifies the change from LOS to vehicle miles traveled (VMT) as a metric for transportation impact analysis. Pursuant to SB 743, VMT analysis is the primary method for determining transportation impacts under CEQA. The Office of Land Use and Climate Innovation Planning (LUCI) acknowledges that CEQA documents released for public review before July 1, 2020, are not required to incorporate a VMT analysis and that CEQA analyses prepared after July 1, 2020, may rely on a previously certified EIR that analyzes traffic impacts using the LOS metric. Lead agencies may use their discretion to determine if a VMT analysis is not required for later-prepared documents.⁴⁷ See, e.g., *CREED v. San Diego* (2011) 196 Cal.App.4th 515; *Concerned Dublin Citizens v. City of Dublin* (2013) 214 Cal.App.4th 1301, 1320.) Therefore, a VMT analysis is not required for the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

⁴⁷ California Governor's Office of Planning and Research, SB 743 Frequently Asked Questions, <https://opr.ca.gov/ceqa/sb-743/faq.html#draft-docs>. Accessed November 3, 2021.

4.16c Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR identified that reconfiguration of the vehicular circulation on the site, including the surface parking and parking structures, would be reviewed by the City's engineers. Additionally, the FEIR determined that the Approved Project does not propose any design features that are not standard or that have hazardous design features. Therefore, the FEIR concluded that the Approved Project would not substantially increase hazards due to a geometric design feature or incompatible uses, and a less than significant impact would occur.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact. Proposed Project construction may require temporary lane closures for utility hookups and loading of large equipment. However, no full lane closures are anticipated, and any closures would be temporary and done in coordination with the City. Therefore, the Proposed Project's construction activities would not increase hazards due to a geometric design feature or incompatible use.

Primary vehicular access to the Proposed Project site would be provided via one existing left-out restricted driveway on Brockton Avenue (Driveway 1), one proposed full-movement driveway on Brockton Avenue (Driveway 2), one proposed parking garage egress-only driveway on Brockton Avenue (Driveway 3), and one existing driveway on 14th Street with proposed left-out restricted access (Driveway 4). Driveway engineering would comply with the City's engineering standards to maintain an adequate line of sight, thereby reducing vehicle and pedestrian conflicts and hazards. Additionally, internal drive aisles would accommodate standard fire land turning radiuses, and hammerhead turnaround maneuvers would be designed for emergency vehicles and fire services. Proposed Project driveway and internal circulation improvements would be constructed according to City standards. The Proposed Project proposes a parking garage within a portion of the City that is predominately urban development. The Proposed Project does not include the use of any incompatible vehicles or dangerous intersections, nor does it introduce incompatible uses. Therefore, impacts are less than significant, and no mitigation is required. No new or more severe impact would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.16d Would the Project result in inadequate emergency access?

Summary of Previous Environmental Analysis

Less Than Significant Impact. See Response 4.8f Summary of Previous Environmental Analysis above.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact. See Response 4.8f Analysis of Proposed Project above.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

Conclusion

Based on the comparative analysis set forth in this Addendum, no new impacts relative to transportation or an increase in the severity of a previously identified significant impact evaluated in the FEIR would occur. With regard to Public Resources Code Section 21166 and State CEQA Guidelines Section 15162(a), the Proposed Project would not result in any new impacts or increase the severity of the previously identified impacts. There are no substantial changes to the circumstances under which the Proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the FEIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the FEIR was certified is available that would impact the prior finding of less than significant and unavoidable. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.17 Utilities and Service Systems

4.17a Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Summary of Previous Environmental Analysis

Less Than Significant Impact.

Water and Wastewater Facilities

The FEIR concluded that the Approved Project is not expected to require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities that would cause significant environmental effects. The Approved Project would be required to connect to existing water and wastewater infrastructure to provide the necessary construction and water/sewer needs for the project. Therefore, the FEIR concluded that the Approved Project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities that could cause significant environmental effects. Impacts are considered less than significant.

Stormwater Facilities

The FEIR concluded that the construction and operation of the new infiltration system at Outfall 2 and the moderate increase in runoff to Outfall 1 from the site due to the Approved Project would not require the

construction of new stormwater drainage facilities or expansion of existing facilities, and impact would be considered less than significant.

Electric Power, Natural Gas, and Telecommunication Facilities

The FEIR did not analyze impacts associated with the construction or relocation of electric power, natural gas, or telecommunication infrastructure.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact.

Water Facilities

The Proposed Project, which is a parking garage, would connect to the existing water lines in 14th Street and Brockton Avenue. The Proposed Project would not require the construction or expansion of water delivery systems or the expansion of the boundaries of the City of Riverside Public Utilities Department. Any new connections, laterals, or trenching required as part of Proposed Project construction would be subject to State and local regulations, including Riverside Municipal Code Chapter 14.20, Water Connections, and Chapter 18.220, Improvements, which outline water lateral requirements and connection fees. The environmental effects associated with the Proposed Project's on-site water facility improvements (e.g., new connections, laterals, and trenching) are analyzed throughout this Addendum. The Proposed Project would not result in significant environmental effects related to the relocation or construction of new or expanded water facilities. Impacts are less than significant and no mitigation is required.

Wastewater

The Proposed Project would be served by the City's existing sanitary sewer system and connect to the existing sanitary sewer lines in Brockton Avenue. Any new connections, laterals, or trenching required as part of Project construction would be subject to State and local regulations, including Riverside Municipal Code Chapter 14.04, Sewer Service Charges, Chapter 14.08, Sewer Connections and Permits, and Chapter 18.220, Improvements, which outline sewer requirements and connection fees. The environmental effects associated with the Proposed Project's on-site water facility improvements (e.g., new connections, laterals, and trenching) are analyzed throughout this Addendum. The Proposed Project would not result in significant environmental effects related to the relocation or construction of new or expanded wastewater facilities. Impacts are less than significant and no mitigation is required.

Stormwater Drainage Facilities

As discussed in **Section 4.9, Hydrology and Water Quality**, the Proposed Project would decrease the amount of impervious surfaces at the Proposed Project site, which would reduce stormwater runoff. Therefore, stormwater runoff expected at Proposed Project buildout would not exceed existing storm drainage capacities. Impacts would be less than significant.

Electric Power, Natural Gas, and Telecommunication Facilities

The Proposed Project would connect to existing electrical, natural gas, and telecommunications infrastructure, and no off-site improvements are proposed or required. Therefore, impacts are less than significant and no mitigation is required.

Conclusion

No new or more severe impacts concerning relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.17b Would the Project have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Summary of Previous Environmental Analysis

Less Than Significant Impact. The water supply assessment included in the Certified FEIR concluded that there would be ample water supply to serve the RCHSP. Therefore, the Certified FEIR concluded that a less than significant impact in this regard.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact. The Proposed Project site is currently developed with four buildings. The Proposed Project proposes to remove the existing on-site buildings and develop a new parking garage to serve the adjacent hospital campus. By their nature and use, parking garages are expected to have negligible water use. Therefore, the Proposed Project's water demand would be lesser than the existing uses onsite. Therefore, the Proposed Project would be adequately served by the water provider and impacts would be less than significant. No new or more severe impact concerning sufficient water supply would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.17c Would the Project result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Summary of Previous Environmental Analysis

Less Than Significant Impact. The FEIR concluded that each of the Approved Project's phases would be less than 75 percent of the City's sewer system's full flow capacity, which complies with the City's design standards. Therefore, the City would have adequate capacity to serve development within the RCHSP's projected wastewater demands. Therefore, the Certified FEIR concluded a less than significant impact.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact. The Proposed Project does not include restroom facilities and thus would not increase wastewater generation or require additional wastewater capacity. Therefore, the Proposed Project would have a less than significant impact concerning wastewater capacity and would not result in any new significant impacts or a substantial increase in the severity of a previously identified significant impact.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.17d Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

4.17e Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Summary of Previous Environmental Analysis

Less Than Significant With Mitigation Incorporated. The FEIR determined that implementation of the Approved Project would result in the generation of significant amounts of solid waste. However, impacts to existing solid waste facilities from the Approved Project would be reduced to a less than significant level with **FEIR MM UTL-1**, which requires completion and submittal of a Construction Waste Recycling Plan, and **FEIR MM UTL-2**, which requires compliance with the Riverside County Design Guidelines for Refuse and Recyclables Collection and Loading Areas.

FEIR Mitigation Measures

FEIR MM UTL-1 Prior to issuance of building permits, the applicant shall complete a Construction Waste Recycling Plan and submit the plan to the Riverside County Waste Management Department (RCWMD) for approval. The plan will identify and estimate the materials to be recycled during construction and demolition activities and will specify where and how the recyclable materials will be stored on the site. Compliance with the plan will be a requirement in all construction contracts. The RCWMD-approved plan will be attached to all construction plans and distributed to all construction contractors. Once construction is complete, the applicant will be responsible for preparing a Waste Recycling Report that demonstrates that the project recycled a minimum of 50% of its construction and demolition waste. The waste recycling report must be submitted to and approved by the RCWMD prior to issuance of occupancy permits. Since this project will be developed in phases over time, review and approval of Construction Waste Recycling Plans and Waste Recycling Reports can be submitted by phase or building. However, for each Construction Waste Recycling Plan submitted and approved, a corresponding Waste Recycling Report should also then be submitted for approval.

FEIR MM UTL-2

Prior to issuance of building permits, the applicant shall submit building plans to the RCWMD and obtain approval from the RCWMD for compliance with the Riverside County Design Guidelines for Refuse and Recyclables Collection and Loading Areas, which include specifications for recyclable storage space, location and access, signage, protection and security, compatibility, and overall compliance with federal, state, and local laws.

Analysis of Proposed Project

Less Than Significant With Mitigation Incorporated. Proposed Project construction would generate construction waste that would increase demand for solid waste collection and disposal capacity. As such, the Proposed Project would be required to implement **FEIR MM UTL-1**, which requires the completion and submittal of a waste recycling plan for approval prior to building permit issuance. The waste recycling plan would identify and estimate the materials to be recycled during construction and demolition activities and would specify where and how the recyclable materials will be stored on site. A waste recycling report that demonstrates that the project recycled a minimum of 50 percent of its construction and demolition waste will then be approved by the Riverside County Waste Management Department prior to the issuance of occupancy permits. The Proposed Project would also comply with all state and local statutes or regulations related to solid waste generation, storage, and disposal, including the California Integrated Waste Management Act.

FEIR Appendix H identified that parking structures are anticipated to generate 0.006 pounds (lbs) of solid waste per square foot per day based on CalRecycle generation rates. Based on 207,780 square feet and 0.006 lbs/square foot/day, the Proposed Project would generate approximately 1,247 lbs/day (approximately 0.62 tons per day).

Proposed Project implementation would increase solid waste disposal demands over existing conditions. Solid waste from the Proposed Project would be disposed of at either the Badlands Landfill, El Sobrante Landfill, or the Lamb Canyon Landfill. The Badlands Landfill has a maximum permitted daily throughput of 5,000 tons per day. The facility's maximum capacity is 82,300,000 cubic yards, with a remaining capacity of 7,800,000 cubic yards.⁴⁸ Therefore, solid waste generated from the Proposed Project could be accommodated at the Badlands Sanitary Landfill alone or in a combination with the disposal facilities currently receiving solid waste from the City.

As previously noted, Badlands Sanitary Landfill has a maximum permitted throughput of 5,000 tons per day. The Proposed Project's estimated solid waste generation of approximately 0.63 tons per day comprises less than one-tenth percent of Badland's maximum permitted daily throughput. Badland's remaining and maximum capacities are 7,800,000 cubic yards and 82,300,000 cubic yards, respectively. The Proposed Project would be served by a landfill with sufficient remaining permitted capacity to accommodate the Proposed Project's solid waste disposal needs. Further, operational activities would be subject to compliance with all applicable federal, state, and local statutes and regulations for solid waste, including those identified under CALGreen.

⁴⁸ CalRecycle, SWIS Facility/Site Activity Details, Badlands Sanitary Landfill (33-AA-006), <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2245?siteID=2367>, accessed December 2024.

Therefore, the Proposed Project would not generate solid waste in excess of state or local standards, in excess of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Following compliance with **FEIR MM ULT-1** and **FEIR MM ULT-2**, the Proposed Project would result in less than significant impacts concerning solid waste. No new or more severe impact concerning solid waste would occur as a result of the Proposed Project.

FEIR Mitigation Measures Applicable to the Proposed Project

FEIR MM UTL-1 Prior to issuance of building permits, the applicant shall complete a Construction Waste Recycling Plan and submit the plan to the Riverside County Waste Management Department (RCWMD) for approval. The plan will identify and estimate the materials to be recycled during construction and demolition activities and will specify where and how the recyclable materials will be stored on the site. Compliance with the plan will be a requirement in all construction contracts. The RCWMD-approved plan will be attached to all construction plans and distributed to all construction contractors. Once construction is complete, the applicant will be responsible for preparing a Waste Recycling Report that demonstrates that the project recycled a minimum of 50% of its construction and demolition waste. The waste recycling report must be submitted to and approved by the RCWMD prior to issuance of occupancy permits. Since this project will be developed in phases over time, review and approval of Construction Waste Recycling Plans and Waste Recycling Reports can be submitted by phase or building. However, for each Construction Waste Recycling Plan submitted and approved, a corresponding Waste Recycling Report should also then be submitted for approval.

FEIR MM UTL-2 Prior to issuance of building permits, the applicant shall submit building plans to the RCWMD and obtain approval from the RCWMD for compliance with the Riverside County Design Guidelines for Refuse and Recyclables Collection and Loading Areas, which include specifications for recyclable storage space, location and access, signage, protection and security, compatibility, and overall compliance with federal, state, and local laws.

Conclusion

Based on the comparative analysis set forth in this Addendum, no new impacts relative to utilities and services or a substantial increase in the severity of a previously identified significant impact evaluated in the FEIR would occur. With regard to Public Resources Code Section 21166 and State CEQA Guidelines Section 15162(a), the Proposed Project would not result in any new impacts or increase the severity of the previously identified impacts. There are no substantial changes to the circumstances under which the Proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the FEIR. Additionally, no new information of substantial importance that was not known and could not have been known at the time the FEIR was certified is available that would

impact the prior finding of less than significant with mitigation incorporated. Therefore, preparation of a subsequent environmental analysis is not warranted.

4.18 Energy

The Proposed Project's analyses are based in-part on **Appendix K: Energy Calculations**.

4.18a Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Summary of Previous Environmental Analysis

The updated State CEQA Guidelines include a new separate threshold for Energy, the FEIR analyzed energy conservation in FEIR Section 4.12, Energy Conservation.

Less Than Significant Impact. The FEIR concluded that although the Approved Project would increase the demand for electricity and natural gas at the project site and gasoline consumption in the region during construction and operation, the building envelope, heating, ventilation, air conditioning, lighting, and other systems, such as electric motor equipment would be designed to maximize energy performance. Therefore, the FEIR concluded electricity, natural gas, and petroleum consumption would not be inefficient or wasteful. Impacts related to wasteful, inefficient, or unnecessary energy consumption would be less than significant, and no mitigation measures are required.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact.

Electricity

Riverside Public Utilities provides electricity to the City. The Proposed Project's electricity demand is expected to be served by existing electrical facilities. The Proposed Project's construction-related electrical demand is anticipated to be nominal because most construction equipment would be gas- or diesel-powered. Electricity consumption during Proposed Project construction is associated with the conveyance of water during ground disturbance activities. The Proposed Project is anticipated to consume approximately 1,562 kWh during construction, constituting approximately 0.0016 percent of Countywide consumption.

During Proposed Project operations, the estimated operational electrical demand is 623,135 kWh per year, which constitutes approximately 0.0035 percent of Countywide consumption and would represent a less than significant percent increase in existing consumption. It is also noted that the Project (i.e., design and materials) would be subject to compliance with the most current Building Energy Efficiency Standards. Prior to Building Permit issuance, the City of Riverside Building Division would review and verify that the Project Site plans to demonstrate compliance with the current Building Energy Efficiency Standards. The Project would also be required to comply with the CALGreen Code, which establishes planning and design standards for sustainable site development, energy efficiency (more than California Energy Code requirements), water conservation, material conservation, and internal air contaminants. Therefore,

Proposed Project construction and operations would not result in wasteful, inefficient, or unnecessary consumption of electrical resources.

Natural Gas

No construction-related natural gas demand is anticipated since most construction equipment would be gas- or diesel-powered. Therefore, the Proposed Project would not require the use of natural gas during construction. No operational natural gas demand is anticipated as no building or water heating would be required to operate the proposed parking structure. Therefore, Proposed Project construction and operations would not result in wasteful, inefficient, or unnecessary consumption of natural gas resources.

Automotive Fuel

During Proposed Project construction, transportation energy use would depend on the type and number of trips, fuel efficiency of vehicles, and travel mode. Transportation energy use during construction would be from transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles that would use diesel fuel/gasoline. The use of energy resources by these vehicles would fluctuate according to the construction phase and would be temporary. Most construction equipment would be diesel-powered. Assuming that all construction equipment and haul/vendor trucks would be diesel-powered and all worker vehicles would be gasoline-powered, the Proposed Project's construction fuel consumption is estimated to be 50,949 gallons of diesel and 14,458 gallons of gasoline. This constitutes approximately 0.0196 percent and 0.0021 percent of Countywide diesel and gasoline consumption, respectively. Impacts related to transportation energy use during construction would also be nominal, as on-road vehicles (construction workers, haul and vendor trucks, etc.) accessing the Project site would be required to comply with State vehicle efficiency and emissions regulations, and advancements in vehicle technology are expected to support energy-efficient construction practices. The Proposed Project would not result in wasteful, inefficient, or unnecessary fuel consumption or require expanded energy supplies or the construction of new infrastructure.

As concluded in the FEIR, the parking structure would not generate additional operational emissions because the proposed parking structure would support the on-site trip-generating uses. Therefore, automotive fuel consumption associated with project operations is zero.

The Proposed Project would be subject to compliance with applicable energy standards, and new capacity would not be required. Proposed construction and operations would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Therefore, the Proposed Project would result in a less than significant environmental impact concerning consumption of energy resources.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

4.19b Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Summary of Previous Environmental Analysis

The updated State CEQA Guidelines include a new separate threshold for Energy, the FEIR analyzed energy conservation in FEIR Section 4.12, Energy Conservation.

Less Than Significant Impact. The FEIR concluded that because the Approved Project would voluntarily implement design features and programs to reduce energy consumption, the Approved Project would be consistent with existing energy standards and regulations. Impacts would be less than significant, and no mitigation measures are required.

FEIR Mitigation Measures

No mitigation measures are required.

Analysis of Proposed Project

Less Than Significant Impact. Proposed Project design and operations would be subject to compliance with State Building Energy Efficiency Standards, appliance efficiency regulations, and CALGreen Code standards. As concluded in Response 4.19a, Proposed Project construction and operations would not result in wasteful, inefficient, or unnecessary consumption of energy resources. The Proposed Project is a part of the RCHSP, which includes design features such as vision glass insulating glazing units, efficient lighting systems with time switches, photoelectric switches, occupancy sensors, etc., and water-efficient irrigation systems. The development of the proposed parking garage would be consistent with the project design features of the RCHSP, and the impact would be less than significant.

FEIR Mitigation Measures Applicable to the Proposed Project

No FEIR mitigation measures are applicable to the Proposed Project.

Conclusion

Based on the comparative analysis set forth in this Addendum, no new impacts relative to energy or a substantial increase in the severity of a previously identified significant impact evaluated in the FEIR would occur. With regard to Public Resources Code Section 21166 and State CEQA Guidelines Section 15162(a), the Proposed Project would not result in any new impacts or increase the severity of the previously identified impacts. There are no substantial changes to the circumstances under which the Proposed Project would be undertaken that would result in new or more severe environmental impacts than previously addressed in the FEIR. Additionally, no new information of substantial importance is known that would impact the prior finding of less than significant. The Proposed Project would have a less than significant impact on energy. Therefore, preparation of a subsequent environmental analysis is not warranted.