2.0 EXECUTIVE SUMMARY

This section of the Draft Environmental Impact Report (EIR) summarizes the requirements of the California Environmental Quality Act (CEQA or State *CEQA Guidelines*), provides an overview of the proposed project, which is described in detail in Section 3.0, PROJECT DESCRIPTION, and the conclusions of the environmental analysis, provided in detail in Sections 5.1 through 5.17. This chapter also summarizes the alternatives to the proposed project that are described in Section 7.0, ALTERNATIVES TO THE PROPOSED PROJECT, and identifies the environmentally superior alternative. Table 2-2, PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES, at the end of this section, provides a summary of the environmental effects of the proposed project identified in each technical issue chapter.

2.1 INTRODUCTION

Dignity Health Mercy Medical Center Redding (herein referred to as the "project applicant") is proposing the development of the North State Pavilion Project in a campus like setting whereby the buildings are compatible with each other from a site planning and architectural design perspective. The project is proposed as a wellness center for ambulatory medical offices and clinics distributed amongst three buildings.

This Draft EIR has been prepared by the City of Redding (City) as the Lead Agency under CEQA. The EIR provides information about the environmental setting and impacts of the proposed project and alternatives. It informs the public about the project and its impacts and provides information to meet the needs of local, State, and federal permitting agencies that are required to consider the project. The EIR will be used by the City to determine whether to issue a general plan amendment, rezone, parcel map, and use permit for the proposed project. These entitlement requests are summarized below in Subsection 2.2, *Project Summary*, and further described in Section 3.0, PROJECT DESCRIPTION.

2.2 PROJECT SUMMARY

The proposed 10.55-acre project site is located in the City of Redding, southwest of the intersection of Cypress Avenue and Hartnell Avenue, at the northerly terminus of Henderson Road. The proposed project is located within a developed area designated in the City of Redding *2000-2020 General Plan* (herein referenced as the *General Plan*) as "General Office" (GO), "General Commercial" (GC), and "Greenway" (GWY), and is zoned "General Office" (GO), "General Commercial" (GC), and "Open Space" (OS).

The proposed project includes three buildings totaling approximately 129,600 square feet with associated parking, landscaping and infrastructure on the 10.55-acre project site. Construction of the proposed project is anticipated to begin by spring 2020 with build-out anticipated over a four-year period.

The project is currently proposed to be developed in two phases. Phase 1 of the project includes demolition and removal of an existing 7,500 square-foot building and approximately 64,000 square feet of pavement. Phase 1 also includes mass grading of the entire 10.55-acre project site, and construction of Building 'A', interior roads and 338 parking spaces. Phase 1 construction would commence in 2020 and be complete by 2022. It is anticipated that Phase 1 construction would occur for 2 years. Phase 2

construction is assumed to commence in 2022, after completion of Phase 1. Phase 2 would include construction of Buildings 'B' and 'C' and the remaining 211 parking spaces. It is anticipated that Phase 2 construction would occur for 2 years. Overall, 549 parking spaces are proposed, including ADA and van accessible, compact, and motorcycle spaces. Bicycle racks will also be provided. For Phase 1, 338 parking spaces are proposed.

2.3 PURPOSE AND USE OF THE DRAFT EIR

An EIR is a public informational document used for planning and decision-making purposes. The City of Redding Planning Commission and City Council will consider the information in the EIR, including the public comments and staff response to those comments, during the public hearing process. As a legislative action, the final decision is made by the City Council, who may approve, conditionally approve, or deny the proposed project. The purpose of an EIR is to identify:

- The significant potential impacts of the project on the environment and indicate the manner in which those significant impacts can be avoided or mitigated;
- Any unavoidable adverse impacts that cannot be mitigated; and
- Reasonable and feasible alternatives to the project that would eliminate any significant adverse environmental impacts or reduce the impacts to a less than significant level.

An EIR also discloses growth-inducing impacts; impacts found not to be significant; and significant cumulative impacts of past, present, and reasonably anticipated future projects. CEQA requires an EIR be prepared that reflects the independent judgment of the lead agency regarding the impacts, the level of significance of the impacts both before and after mitigation, and mitigation measures proposed to reduce the impacts. A draft EIR is circulated to responsible agencies, trustee agencies with resources affected by the project, and interested agencies and individuals. The purposes of public and agency review of a draft EIR include sharing expertise, disclosing agency analyses, checking for accuracy, detecting omissions, discovering public concerns, and soliciting counterproposals. Reviewers of a draft EIR are requested to focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate significant environmental effects.

This Draft EIR is being distributed directly to agencies, organizations, and interested groups and persons for comment during a 45-day formal review period in accordance with §15087 of the State *CEQA Guidelines*. The EIR process, including means by which members of the public can comment on the EIR, is discussed further in Section 1.0, INTRODUCTION AND PURPOSE.

2.4 ENVIRONMENTAL SETTING

LOCAL SETTING

The proposed project encompasses approximately 10.55 acres and is currently undeveloped vacant land located primarily in Township 31 North, Range 4 West, Section 6, of the U.S. Geological Survey's (USGS) Enterprise, 7.5-minute quadrangle (USGS, 1957). A small portion of the site is located in Township 31 North, Range 5 West, Section 1, of the Enterprise quadrangle. The proposed project is comprised of

twelve Assessor Parcel Numbers (APNs) identified as follows: 107-400-008; 107-430-033, 034, 057, 059; 107-500-017, 018, 019, 020, 024, 025, 026.

The project site is located on land that is visible as viewed primarily along Hartnell Avenue, Cypress Avenue, the Sacramento River and across the River along Park Marina Drive. The topography of the proposed project is flat with an elevation of approximately 480 feet above mean sea level (msl).

Historical land uses of the project area and vicinity include use by Native Americans, ranching, and a bridge crossing location in the 1800s. Other historic land uses include a diversion of river flow into a horizontal paddlewheel facility in the early 1900s; a forest productions, cement plant, and gravel operation in the 1940s through the 1960s; a gravel operation used in the construction of Interstate 5 (I-5) during the 1960s and 1970s; a gasoline service station from 1972 to 1998; commercial uses some of which were removed in 2007 while the remainder of the still exists today; and staging for the Cypress Bridge Replacement Project in 2007 to 2011. Remnants of some of these land uses are visible today.

The Federal Emergency Management Agency (FEMA) 100-year floodplain of the Sacramento River inundates approximately 3.58 acres of the project site. Of this area, approximately 2.35 acres is within the FEMA mapped floodway limits, and the remaining 1.23 acres is within the FEMA mapped flood fringe. A Letter of Map Revision (LOMR) has been submitted to FEMA proposing removal of the floodway from the project site and leaving approximately 1.8 acres of the site within FEMA's 100-year floodplain.

SURROUNDING LAND USES

The project area is bounded on the west by the Henderson Open Space, with the Sacramento River further to the west; eastern boundary is generally defined by an existing primarily vacant shopping center, formerly referenced as the Raley's Shopping center; on the north by the Cypress Avenue bridge; and south by the Cobblestone Shopping Center, south of Parkview Avenue.

2.5 PROJECT OVERVIEW

This section summarizes the characteristics of the proposed project and highlights the project objectives. The proposed project is described in further detail in Section 3.0, PROJECT DESCRIPTION.

PROPOSED PROJECT ENTITLEMENTS

The following actions are being requested as part of the proposed project (refer to Section 3.0, PROJECT DESCRIPTION, for graphical representations of the proposed project):

- *General Plan Amendment.* Request to amend the City's *General Plan* from the existing designations of "General Office" (GO), "General Commercial" (GC), and "Greenway" (GWY) to "Public Facilities" (PF-I) on the entire 10.55-acre site.

- *Rezone.* Request to amend the existing zoning from "General Office" (GO) and "General Commercial" (GC) to "Public Facilities" (PF).

- *Use Permit.* Request to allow for the development of the project and for a portion of the parking lot to encroach into the FEMA regulated 100-year floodplain of the Sacramento River.

- *Parcel Map.* Approval to merge existing onsite Assessor's Parcel Numbers (APNs) 107-400-008; 107-430-033, -034, -057, -059; and 107-500-017, -018, -019, -020, -024, -025, -026, into one parcel.

PROPOSED ACTIVITIES AND OPERATIONS

As previously noted, the project applicant proposes the construction of three buildings totaling approximately 129,600 square feet for a wellness and prevention center in a campus like setting on the 10.55-acre project site. The project applicant has several wellness and prevention centers throughout the three states they are located (California, Nevada and Arizona) where emphasis is placed on health risk assessments, screenings, exercise, and wellness classes. Potential uses and services to be located within the proposed buildings may include, but are not limited to the following:

- Administrative Offices
- Auditorium / Conference Rooms / Class Rooms
- Cafeteria
- Diagnostic Imaging
- Electrical / Mechanical Rooms
- Employee Lounge / Locker Rooms
- Family Medicine / Pediatrics
- Gift Shop
- Janitorial Rooms
- Laboratories
- Orthopedics
- Palliative Care
- Pharmacy
- Physical Therapy
- Physician Offices
- Radiology
- Reception/Waiting Areas
- Rehabilitation
- Urgent Care Center
- Visitor Lounges
- Women's Health & Wellness

PROJECT CHARACTERISTICS

Major components of the proposed project are summarized below (refer to Section 3.0, PROJECT DESCRIPTION, for additional detail):

Development Summary

Development approval will allow the project applicant to construct three buildings that will total 129,600 square feet on the approximate 10.55-acre project site. Three parcels will be created for each building and a fourth parcel will be held in common by each building parcel. Parcel 'A' is 0.53 acres and contains Building 'A', Parcel 'B' is 0.31 acres for Building 'B', Parcel 'C' has 0.30 acres for Building 'C', and all the common features are located within Parcel 1.

The project is currently proposed to develop in two phases. Phase 1 includes Building 'A' comprised of 80,000 square feet which is projected to be completed in 2022. Buildings 'B' and 'C' are considered Phase 2 construction that is expected to begin in 2024. It is estimated that up to 180 persons will be employed once the proposed project is completed.

The project proposes right-of-way (ROW) improvements to Henderson Road (North), Parkview Avenue (South), Henderson Road (South), and Parkview Avenue (Open Space Access). The improvements include, where applicable; street widening, paving and repaving, lane striping, curb, gutters, sidewalks, and drainage structures. All utilities, including water, sewer, stormwater, electrical, natural gas, cable and telephone service lines and conduits will be undergrounded. Fire hydrants and electrical transformers will be located per City of Redding standards and requirements.

Architecture

The location of the three buildings interspersed on the site and visually "tied together" in a campus like setting with landscaping, both adjacent to the buildings and within the parking areas, that provide visual corridors primarily of the existing riparian areas within the Henderson Open Space and beyond to the Sacramento River to the west and northwest.

The proposed buildings' architecture provides a mixture of materials including, but not limited to; metal, stone, cement plaster, and glazing. The buildings and associated facades will have varying heights, sun shades, awnings, canopies, raised parapets with cornices, and other decorative fixtures to provide articulation to the building elevations which, along with varying natural earth tone colors and patterns, provide variation in the appearance of the buildings. The raised parapets with cornices also serve to provide screening of mechanical equipment.

Access and Parking

The two public access points to the proposed project are provided by Henderson Road (North) and Henderson Road (South). The proposed project would normally require 576 parking spaces based on one space per 225 square feet of building. However, due to the Redding Area Bus Authority (RABA) "Bus Stop/Transportation Facility Credit," a parking space credit of 28 spaces is realized, thereby reducing the number of spaces required to 548. The credit allows up to a five percent reduction when a bus stop is located within 400 feet of the use. The nearest Route 5 bus stop is located on the west side of Hartnell Avenue, south of Henderson Road, approximately 200 feet from the proposed project.

An estimated 70 ADA accessible parking spaces will be provided of which 11 are van accessible. In addition, 33 of the parking spaces will have electric vehicle charging stations, and 44 spaces will be preferential parking for clean air vehicles. Onsite bicycle parking (28 secured bicycle racks) will be provided onsite. Overall, 549 parking spaces are proposed.

Landscaping

The project proposes approximately 92,100 square feet of landscaped areas including parking islands, perimeter landscaping, and internal campus landscaping. This includes the planting of 224 trees onsite.

Parking Lot and Security Lighting

Parking lot lighting will include exterior pole-mounted light standards (maximum 25 feet high) located throughout the site to provided safety and security lighting. The light standards and additional wall-mounted light fixtures on building structures will be used to ensure safety of the public and safe onsite pedestrian and vehicular circulation.

Tree Removal & Retention

Project implementation would result in the redevelopment of approximately 8.8 acres of existing urban habitat. In addition, approximately 0.4 acres of riparian habitat will be removed from the westernmost extension of the project site. Due to the disturbed nature onsite and the high level of human activity, the onsite riparian habitat does not represent a high-quality occurrence of the community type.

The proposed project site contains a total of 82 mature trees with diameters greater than 6 inches at breast height (dbh). Of the 82 trees, 58, or 71 percent, will be removed as a result of the proposed project. None of the trees are considered heritage or landmark trees. Due to grading associated primarily with parking lot improvements, the greatest number of trees to be removed is an estimated 29 Fremont cottonwood trees. Overall, the proposed project will minimally encroach into Valley Foothill Riparian areas where the majority of the offsite cottonwoods exist. Twenty-four, or 29% of trees with diameters greater than 6 inches dbh will be retained onsite.

Grading

To the maximum extent feasible, the earthwork will be balanced between cut and fill. Maximum excavations are estimated at 10 feet and maximum fills of 12 feet. It is estimated that the maximum amount of earthwork will be 30,000 cubic yards (CYs) of which 15,000 CYs will be cut and 15,000 CYs of fill. Existing retaining walls from previous site improvements will serve to identify transition areas between cuts and fills.

Floodplain

Approximately 3.58 acres of the proposed project site is located within the established 100-year floodplain of the Sacramento River. The portion of the site in the current established floodplain includes a portion of Building 'A', the portion of the parking lot between Building 'A' and Building 'B', and the parking lot west of Building 'B'.

A formal analysis completed in February 2016 determined that construction of the parking lot as presently anticipated will not increase the water surface elevation of the extent of inundation during the most probably 100-year flood. However, a substantial portion of the parking lot is identified within the FEMA designated floodway, an area reserved to convey the FEMA Base Flood (FEMA estimate of the most probable 100-year flood). Subsequent analysis determined that the FEMA floodway was incorrectly delineated and that "the parking lot will be entirely in the floodway fringe, that area between the floodway and the flood limit, rather than within the floodway." To make this correction a Letter of Map Revision (LOMR) must be prepared that meets the study and mapping requirements of FEMA.

A Conditional Letter of Map Revision based on Fill (CLOMR-F) will need to be approved prior to issuing a grading permit for fill in the floodway fringe. A LOMR dated February 14, 2017 was prepared and subsequently submitted to FEMA by the City after their review and approval. Once the LOMR is approved, the CLOMR-F will be prepared and submitted to FEMA.

Storm Water Management

The proposed project will be approximately 77 percent impervious, which is a significant increase from existing approximate 27 percent impervious condition. Development of the project will result in 10-

year, 25-year, and 100-year peak flows that are 38 cubic feet per second (cfs), 45 cfs, and 56 cfs, respectively. This amounts to an increase of 18 cfs, 20 cfs, and 20 cfs for the 10-year, 25-year, and 100-year peak flows, respectively.

Although the project increases peak flows, the increases discharge directly to City land and into the Sacramento River, so there are no downstream properties that will be adversely affected by the increased runoff. Therefore, the project is not subject to mitigation of increased peak flows.

Utility Infrastructure Improvements and Service Provision

The proposed project will construct water, sanitary sewer, natural gas, electric, telephone, cable, and street light on and offsite utility infrastructure improvements, in addition to the storm water management improvements previously discussed to support the development.

Adequate utilities and service systems are available to serve the proposed project (refer to Section 5.16, UTILITIES AND SERVICE SYSTEMS). Water and sewer services will be provided by the City of Redding and easily extended. The proposed project will be connecting to an existing sewer along Parkview Avenue. Storm water will be collected and detained onsite and transferred via an underground conveyance system to three connection points. One connection is to the City's storm-drain system located at the northwest corner of the project site and the other two will each tie into a proposed culvert at the west property line with the Henderson Open Space site and will daylight within the Henderson Open Space area. The project applicant will be responsible to locate an onsite detention facility outside the building pad and provide detention facilities to accommodate the building and parking areas.

The City of Redding Solid Waste Division will collect solid waste. The proposed project will provide the required trash enclosures as shown on the site plan. Pacific Gas and Electric Company (PG&E) will provide natural gas service, and the City of Redding will provide electrical services. AT&T can provide land line telephone services. Spectrum can provide cable services. The project applicant will be responsible to coordinate the relocation and/or extension of existing gas, electric, and telephone lines to the buildings.

PROJECT OBJECTIVES

State *CEQA Guidelines* (§15124[b]) require that the project description contain a statement of objectives that includes the underlying purpose of the project. The underlying purpose of the proposed project is to continue Dignity Health's long-standing commitment to providing high quality healthcare services to the City of Redding through a new "Wellness Center" where medical and mental health care professionals provide community residents and businesses centralized health services in one geographic location to improve overall physical and mental health.

The proposed project has the following objectives:

O1. Maximize positive tax revenues to the City's General Fund, as well as support the City's economic development goals.

O2. Provide for a comprehensively planned "Wellness Center" project in a campus-like setting whereby, the buildings are compatible with each other from a site planning, architectural, and landscape design perspective.

O3. Provide the proposed project in a relatively centralized location within the City to facilitate efficient traffic utilization of existing arterials linking Interstate 5 and State Highways 44, 299, and 273 for access from throughout the City and Shasta County.

O4. Promote the use of alternative modes of transportation by locating the site within close proximity to local bus routes and public bicycle and pedestrian facilities.

O5. Locate the proposed project in an area in relatively close proximity to the City's main hospitals, Mercy Medical Center and Shasta Regional Medical Center, to coordinate services, as necessary.

O6. Make efficient use of underutilized redevelopment land while creating a physical connection between the Wellness Center location and healthy outdoor living experience.

O7. Promote walking as a lifestyle by providing onsite and offsite pedestrian friendly infrastructure to the open space area to the west and shopping center, including restaurants and retail uses to the east.

O8. Create new employment opportunities that contribute to improving the local economy while providing much needed physical and mental health and related educational services.

O9. Provide a project that is sensitive to environmental issues, such as minimizing impacts to riparian areas to the west, conserving energy and encouraging alternative modes of transportation, while minimizing the extension of public services and utilities to the maximum extent feasible.

2.6 ENVIRONMENTAL IMPACTS

Section 15128 of the State *CEQA Guidelines* requires that an EIR contain a statement briefly indicating the reasons that various, possible, new significant effects of a project were determined not to be significant, and were therefore not discussed in detail in the EIR. The City has engaged the public to participate in the scoping of the environmental document.

The contents of this Draft EIR were established based on a Notice of Preparation/Initial Study (NOP/IS) prepared in accordance with the State *CEQA Guidelines*, as well as public and agency input that were received during the scoping process. The comments to the NOP/IS are found in Appendix 15.1, PUBLIC SCOPING REPORT, of this document. Based on the findings of the NOP and the results of scoping, a determination was made that the EIR did not need to further analyze agricultural and mineral resources

IMPACTS NOT FURTHER CONSIDERED IN THIS EIR

As discussed in Appendix 15.1, PUBLIC SCOPING REPORT, the proposed project was determined to have *no impact* with regard to the following impact thresholds which are therefore not analyzed in this Draft EIR.

Aesthetics

- Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway.

Agricultural Resources

- Convert Prime Farmland, Unique Farmland, or 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.
- Conflict with existing zoning for agricultural use, or a Williamson Act Contract.

- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use.

Biological Resources

- 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.

- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community, Conservation Plan, or other approved local, regional, or State habitat conservation plan.

Geology and Soils

- Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

Hazards and Hazardous Materials

- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 6596.5 and, as a result, would create a significant hazard to the public or the environment.

- 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, the project would result in a safety hazard for people residing or working in the project area.

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

Hydrology and Water Quality

- Inundation by seiche, tsunami, or mudflow.

- Place housing within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate map or other flood hazard delineation map.

Land Use and Planning

- Physically divide an established community.
- Conflict with any applicable habitat conservation plan or natural community conservation plan.

Mineral Resources

- 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.
- 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.

Noise

- 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, expose people residing or working in the project area to excessive noise levels.
- For a project within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels.

Population and Housing

- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.
- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

Traffic and Circulation

- Exceed, either individually or cumulatively, a level of service standard established by the County congestion management agency for designated roads or highway.
- 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 risk.
- Result in inadequate emergency access.
- Result in inadequate parking capacity.

IMPACTS OF THE PROPOSED PROJECT

Potential environmental effects of the proposed project and mitigation measures are discussed in detail in Section 5.0 of this Draft EIR.

Less Than Significant Impacts

After full analysis, the following effects were determined to have *less than significant* impacts:

Aesthetics

Impact 5.1-1: Implementation of the proposed project would not have a substantial adverse effect on a scenic vista.

Air Quality

Impact 5.2-4: Project implementation would not expose sensitive receptors to substantial carbon monoxide pollutant concentrations.

Impact 5.2-6: Project implementation would not expose sensitive receptors to substantial toxic air contaminant concentrations during project operations.

Impact 5.2-7: Project implementation would not create objectionable odors affecting a substantial number of people.

Impact 5.2-11: Implementation of the proposed project, along with foreseeable development in the project vicinity, would not expose sensitive receptors to substantial carbon monoxide pollutant concentrations.

Impact 5.2-12: Implementation of the proposed project, along with foreseeable development in the project vicinity, would not potentially expose sensitive receptors to substantial toxic air contaminant concentrations during project construction.

Impact 5.2-13: Implementation of the proposed project, along with foreseeable development in the project vicinity, would not expose sensitive receptors to substantial toxic air contaminant concentrations during project operations.

Impact 5.2-14: Implementation of the proposed project, along with foreseeable development in the project vicinity, would not create objectionable odors affecting a substantial number of people.

Biological Resources

Impact 5.3-4: The proposed project could conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Energy Consumption

Impact 5.17-1: Project implementation would not use fuel or energy in a wasteful manner.

Impact 5.17-2: Project implementation would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Impact 5.17-3: The proposed project, in combination with cumulative development within Shasta County, would not use fuel or energy in a wasteful manner.

Impact 5.17-4: Project implementation, along with foreseeable development in the project vicinity, would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Geology and Soils

Impact 5.5-1: Implementation of the proposed project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; and landslides.

Impact 5.5-2: The proposed project is not located on soil that has potential to be substantially expansive.

Impact 5.5-3: Implementation of the proposed project, combined with future development, would not result in increased short-term impacts such as erosion and sedimentation, and long-term seismic-related impacts within the project area.

Greenhouse Gases and Climate Change

Impact 5.6-2: Implementation of the proposed project would not conflict with an applicable greenhouse gas reduction plan, policy, or regulation.

Hazards and Hazardous Materials

Impact 5.7-1: The proposed project could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Impact 5.7-3: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Impact 5.7-4: Implementation of the proposed project would not 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.

Impact 5.7-5: The proposed project, combined with other cumulative projects, would not increase hazardous material or wildfire exposure to the public.

Hydrology and Water Quality

Impact 5.8-1: Implementation of the proposed project may violate water quality standards or waste discharge requirements.

Impact 5.8-2: The proposed project could substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).

Impact 5.8-3: The proposed project could substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or offsite.

Impact 5.8-4: Implementation of the proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite.

Impact 5.8-5: Implementation of the proposed project would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.

Impact 5.8-6: Implementation of the proposed project could otherwise substantially degrade water quality.

Impact 5.8-7: Implementation of the proposed project could place within a 100-year flood hazard area structures which would impede or redirect flows.

Impact 5.8-8: Implementation of the proposed project could 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.

Impact 5.8-9: The proposed project, in combination with other cumulative projects, could result in increased degradation of surface water quality and flooding impacts in the area.

Land Use and Planning

Impact 5.9-1: The proposed project would not conflict with an 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 coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

Impact 5.9-2: Implementation of the proposed project, combined with other past, present, and reasonably foreseeable future development, would not physically divide an established community, conflict with any applicable land use plan, policy, or regulation, or conflict with any applicable habitat or natural community conservation plan.

Noise

Impact 5.10-1: Implementation of the proposed project would not expose persons to, or generate, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Impact 5.10-2: Implementation of the proposed project would not expose persons to or generate excessive ground borne vibration or ground borne noise levels.

Population and Housing

Impact 5.11-1: Implementation of the proposed project would not induce substantial population growth in an area, either directly or indirectly.

Impact 5.11-2: Development of the proposed project, along with approved and proposed development, would result in increased population in the City of Redding.

Public Services

Impact 5.12-1: The proposed project could result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities and/or result in the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts to maintain acceptable service ratios, response times, or other performance objectives for any of the public services, which include fire protection, police protection, schools, and parks.

Impact 5.12-2: Implementation of the proposed project, combined with cumulative development within the City of Redding would increase the demand for public services. Increased demand for public services may be expected for the Redding Police Department, Fire Department and other public services.

Recreation

Impact 5.13-1: Implementation of the proposed project would not result in increased use of existing neighborhood and regional parks or other recreation facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Impact 5.13-2: Implementation of the proposed project would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Traffic and Circulation

Impact 5.14-2: Project implementation could increase hazards due to a design feature (e.g., sharp curves or dangerous intersections).

Impact 5.14-3: Implementation of the proposed project would not conflict with adopted policies, plans or programs supporting alternative transportation (e.g. bus turnouts, bicycle racks).

Tribal Cultural Resources

Impact 5.15-2: Implementation of the proposed project, combined with planned and reasonably foreseeable development within the City of Redding could result in the unanticipated discovery of prehistoric archaeological sites, which may be considered to be Tribal Cultural Resources.

Utilities and Service Systems

Impact 5.16-1: Implementation of the proposed project would not exceed wastewater treatment requirements of the Central Valley RWQCB.

Impact 5.16-2: Implementation of the proposed project would not 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.

Impact 5.16-3: Implementation of the proposed project would not result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Impact 5.16-4: Have sufficient water supplies available to serve the project from existing entitlements and resources, or would new or expanded entitlements be needed.

Impact 5.16-5: Project implementation would not result in inadequate wastewater capacity to serve existing and projected demand within the Clear Creek Basin Collection Area.

Impact 5.16-6: Project implementation would increase the demand for solid waste disposal services.

Impact 5.16-7: Implementation of the proposed project would comply with federal, State, and local statutes and regulations related to solid waste.

Impact 5.16-8: Implementation of the proposed project would contribute to cumulative demands for wastewater, domestic water, and solid waste disposal.

Less Than Significant with Incorporation of Mitigation Measures

Potential environmental effects of the proposed project and mitigation measures are discussed in detail in Section 5.0 of this Draft EIR. After full analysis, the following effects were determined to be *less than significant* with the incorporation of mitigation measures.

Aesthetics

Impact 5.1-3: Implementation of the proposed project could create a new source of substantial light or glare, which could adversely affect day or nighttime views in the area.

Air Quality

Impact 5.2-2: Project implementation could potentially violate an air quality standard or contribute substantially to an existing or projected air quality violation during project construction.

Impact 5.2-3: Project implementation could potentially violate an air quality standard or contribute substantially to an existing or projected air quality violation during project operations.

Impact 5.2-5: Implementation of the proposed project could potentially expose sensitive receptors to substantial toxic air contaminant concentrations during project construction.

Impact 5.2-9: Implementation of the proposed project, along with foreseeable development in the project vicinity, could potentially violate an air quality standard or contribute substantially to an existing or projected air quality violation during project construction.

Impact 5.2-10: Implementation of the proposed project, along with foreseeable development in the project vicinity, could potentially violate an air quality standard or contribute substantially to an existing or projected air quality violation during project operations.

Biological Resources

Impact 5.3-1: The proposed project could have a substantial adverse effect, either directly or through habitat modification, including riparian habitat, on any natural community, or 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.

Impact 5.3-2: The proposed project could potentially have a substantial adverse effect on any riparian habitat or other sensitive nature community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

Impact 5.3-3: The proposed project could potentially interfere with the movement of 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.

Impact 5.3-5: Have the potential to substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare or threatened species?

Impact 5.3-6: The proposed project, along with cumulative development, could have a substantial effect, either directly or through habitat modification, on a natural community or on a 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.

Impact 5.3-7: The proposed project, along with cumulative development, could potentially 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 California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

Impact 5.3-8: The proposed project, along with cumulative development, could potentially interfere with the movement of 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.

Impact 5.3-9: The proposed project, along with cumulative development, could conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Impact 5.3-10: The project, along with cumulative development, has the potential to substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare or threatened species.

Cultural Resources

Impact 5.4-1: Implementation of the proposed project may cause a significant impact to historic or prehistoric resources.

Impact 5.4-2: Implementation of the proposed project could result in the potential damage or destruction of undiscovered paleontological resources.

Impact 5.4-3: Implementation of the proposed project could potentially disturb human remains, including those interred outside of formal cemeteries.

Impact 5.4-4: Implementation of the proposed project, along with any foreseeable development in the project vicinity, could result in the potential cumulative impacts to historic or prehistoric resources or the destruction of undiscovered paleontological resources.

Greenhouse Gases and Climate Change

Impact 5.6-1: Greenhouse gas emissions generated by the project, either directly or indirectly, would not have a significant impact on the environment.

Impact 5.6-3: Greenhouse gas emissions generated by the project would not have a significant impact on global climate change.

Hazards and Hazardous Materials

Impact 5.7-2: Project construction activities could create a significant hazard to the public through foreseeable upset and accidental conditions.

Noise

Impact 5.10-4: Implementation of the proposed project could result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

Impact 5.10-5: The proposed project, in combination with other cumulative projects, could potentially increase the ambient noise levels in the project vicinity.

Traffic and Circulation

Impact 5.14-1: Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections).

Impact 5.14-4: Implementation of the proposed project could result in increased traffic volumes at study area intersections under Year 2040 cumulative plus project conditions.

Tribal Cultural Resources

Impact 5.15-1: Ground disturbing activities could result in the unanticipated discovery of prehistoric archaeological sites, which may be considered to be Tribal Cultural Resources.

Significant and Unavoidable Impacts

Section 15126(b) of the State *CEQA Guidelines* requires an EIR to discuss the significant impacts of a proposed project that cannot be reduced to a *less than significant* level. These impacts are referred to as significant and unavoidable impacts of the project. In Sections 5.1 through 5.17 of this Draft EIR, the issue areas were analyzed to determine whether project implementation would result in a significant adverse environmental impact. Based on the analyses given in these sections, the following environmental impacts were determined to be *significant and unavoidable* impacts:

Aesthetics

Impact 5.1-2: Implementation of the proposed project could potentially degrade the existing visual character or quality of the site and its surroundings.

Air Quality

Impact 5.2-1: Implementation of the proposed project would conflict with or obstruct implementation of the 2015 Air Quality Attainment Plan.

Noise

Impact 5.10-3: Result in a substantial temporary or periodic increase in noise levels in excess of standards permitted in the general plan or noise ordinance.

Significant Cumulative Impacts

According to §15355 of the State *CEQA Guidelines*, the term cumulative impacts "...refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Individual effects that may contribute to a cumulative impact may be from a single project or a number of separate projects. Individually, the impacts of a project may be relatively minor, but when considered along with impacts of other closely related or nearby projects, including newly proposed projects, the effects could be cumulatively considerable.

This Draft EIR has considered the potential cumulative effects of the proposed project along with other current and reasonably foreseeable projects. Impacts for the following issue areas have been found to be cumulatively significant:

Aesthetics

Impact 5.1-5: Project development, together with cumulative projects, could potentially degrade the visual character/quality of the project site.

Air Quality

Impact 5.2-8: Implementation of the proposed project, along with foreseeable development in the project vicinity, could potentially conflict with or obstruct implementation of the 2015 Air Quality Attainment Plan.

Growth Inducement

Section 15126 of the State *CEQA Guidelines* requires that an EIR discuss the project's potential to foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. The State *CEQA Guidelines* also indicate that it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

The impacts associated with increased growth are typically "population-based" impacts, such as increased traffic, noise, aesthetic concerns, and the provision of additional public facilities. Project infrastructure would not be sized to accommodate growth beyond that assumed for the proposed project, in addition to the land use assumptions in the *General Plan*. Implementation of the proposed project would not directly or indirectly stimulate additional or new growth in the project area or in the City that has not been planned for by either the City or County. Development within the project area would be responding to growth that was previously planned, rather than creating growth that would require substantial development of unplanned and unforeseen support uses and services. Thus, the proposed project would not directly support or stimulate growth that is not accommodated by the City's *General Plan*. The location of future growth within the City and throughout unincorporated Shasta County would continue to be controlled guided by their respective general plans. Therefore, the proposed project would not have a significant growth-inducing effect. Refer to Section 6.0, GROWTH-INDUCING IMPACTS, for detailed analysis and discussion.

Irreversible Impacts

Section 15126.2(c) of the State *CEQA Guidelines* defines an irreversible impact as an impact that uses nonrenewable resources during the initial and continued phases of the project. Irreversible impacts can also result from damage caused by environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to ensure that such consumption is justified. Buildout of the proposed project would commit nonrenewable resources during project construction and ongoing utility services during project operations. During project operations, oil, gas, and other nonrenewable resources would be consumed. Therefore, an irreversible commitment of nonrenewable resources would occur as a result of long-term project operations. However, assuming that those commitments occur in accordance with the adopted goals, policies, and implementation measures of the *General Plan*, as a matter of public policy, those commitments have been determined to be acceptable. The City of Redding *General Plan* ensures that any irreversible environmental changes associated with those commitments will be minimized.

2.7 ALTERNATIVES TO THE PROPOSED PROJECT

Section 15126.6 of the State *CEQA Guidelines* states that an EIR must address "a range of reasonable alternatives to the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." Several alternatives were considered as summarized below and discussed in detail in Section 7.0, ALTERNATIVES.

ALTERNATIVES ELIMINATED FROM FURTHER CONSIDERATION

Section 15126.6(c) of the State *CEQA Guidelines* permits the elimination of an alternative from detailed consideration due to:

- Failure to meet most of the basic project objectives;
- Infeasibility; and
- Inability to avoid significant environmental impacts.

The following alternatives to the proposed project were initially considered but determined not to be viable and eliminated from further consideration as described.

Alternative Locations

The key question and first step in the decision whether to include in the Draft EIR an analysis of alternative sites is whether any of the significant impacts of the project would be avoided or substantially lessened by relocating the project. Only locations that would avoid or substantially lessen any of the significant impacts of the project need be considered for inclusion in the EIR (State *CEQA Guidelines*, §15126.6(f)(2)(A)).

Relative to the selection of potential alternate locations, it is important to note that State *CEQA Guidelines* §15126.6(f)(1) states that alternative locations only need be considered if the project proponent can reasonably acquire or already owns the identified alternative site. In consideration of State *CEQA Guidelines* §15126.6(f)(1), Section 7.0, ALTERNATIVES TO THE PROPOSED PROJECT, includes

a discussion and evaluation of one alternate site referred to as the "Mercy Oaks Campus" alternative. The approximate 58.2-acre Mercy Oaks Campus property is owned and partially developed and operated by Dignity Health. The property is located at 100 Mercy Oaks Drive, immediately east of the Simpson University campus, in east Redding.

With regards to other potentially available sites within the vicinity of the proposed project, the City has determined that no other feasible offsite locations exist that would result in substantially reduced impacts and hereby discloses the reasons for this conclusion in accordance with State *CEQA Guidelines*, §15126.6(f)(2)(B).

As previously mentioned above, State *CEQA Guidelines* §15126.6(b) requires that only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR. An offsite alternative would involve the construction of the proposed project at an alternative location. However, other sites in the vicinity would likely have equal or greater impacts compared to the proposed project site. For example, the proposed project site is located in an office and commercially developed served by existing utilities and available infrastructure, with large portions of the site previously disturbed by past onsite land uses. In addition, the project site does not contain any aquatic resources or significant sensitive habitat. A comparable offsite undeveloped property could contain water resources, vegetation, or other habitat types, thereby resulting in potentially greater impacts to biological resources. Other available sites that are in the "built environment" (i.e., former office, commercial, retail, or otherwise underutilized properties), could potentially require significant site improvements, rehabilitation, or demolition that could potentially result in greater air quality and hazardous materials impacts.

Alternative Site Configuration

The following alternative site configuration considered the development of a similar, albeit larger, wellness campus on the 10.55-acre project site, including ambulatory medical offices and clinics. Similar to the proposed project, the campus includes three buildings, similarly distributed across the site. This concept increased the total building square footage from 126,900 square feet to approximately 140,000 square feet with associated parking, landscaping and infrastructure (refer to Figure 7-1, ALTERNATIVE SITE CONFIGURATION, in Section 7.0).

Similar to the proposed project, this alternative site configuration would require a use permit to allow for the development of the project and for a portion of the parking lot, approximately 3.6 acres, to encroach into the currently mapped FEMA regulated 100-year floodplain of the Sacramento River. A parcel map would also be required to allow the merging of all onsite parcels into one. This alternative concept also requires a general plan amendment from "General Office" (GO), "General Commercial" (GC), and "Greenway" (GWY) to "Public Facilities" (PF-I) and a rezone from "General Office" (GO) and "General Commercial" (GC) to "Public Facilities" (PF).

As noted in Figure 7-1, Building 'A' continues to be centrally located whereas, Building 'C' is relocated approximately 200 feet east, adjacent to the southwest corner of Cypress Avenue and Hartnell Avenue. Building 'B' remains in its current location however is rotated 90 degrees with the building front facing east. This site concept considered the following number of stories, approximate square footages, and building heights for each building:

- Building 'A' – 5 stories – 100,000 sq. ft. – Height varies from 90 to 100 feet
- Building 'B' – 2 to 3 stories – 20,000 to 30,000 sq. ft. – Height varies from 36 to 58 feet
- Building 'C' – 2 to 3 stories – 20,000 to 30,000 sq. ft. – Height varies from 36 to 58 feet
- 609 parking spaces (622 parking spaces required)

This alternative site configuration was rejected from further consideration based on its inability to meet the required number of parking spaces and increased visual impacts related to the height of Building 'A'.

REDUCED SITE PLAN

A reduced site plan was initially proposed by the project's architect in October 2014. Review of the Site Concept plan shows a project site area of approximately 9.72 acres which is 0.83 acres less than the proposed project area (refer to Figure 7-2, REDUCED SITE PLAN, in Section 7.0). This alternative includes an additional 0.34 acres of the Parkview Avenue (Open Space Access) right-of-way and approximately 0.22 acres of the Henderson Open Space and there is no direct connection to either Henderson Road (South) or to the Henderson Open Space.

The reduced site plan contemplates three buildings grouped closely together along a bluff approximately 15 to 20 feet higher in topographic elevation than the Henderson Open Space with western oriented views of the riparian habitat, located within the Henderson Open Space, the Sacramento River, and the Cypress Avenue bridge to the northwest. The buildings follow a curvilinear path along the bluff thus giving a relatively concentrated, although varied appearance of views due to building heights, from both the river and properties to the west. The proposed project buildings total 129,600 square feet, whereas, this alternative is for 91,000 square feet which is 38,000 square feet less than the proposed project. This alternative shows two-two story buildings and one-three story building.

This reduced site plan was rejected from further consideration based on its increased visual impacts from the Sacramento River as a result of the grouping of buildings in close proximity to each other along the edge of the site.

ALTERNATIVES TO THE PROPOSED PROJECT ANALYZED IN THE DRAFT EIR

"No Project – Existing General Plan & Zoning" Alternative

The "No Project – Existing General Plan & Zoning" is used to evaluate how the 10.55-acre proposed project site could be potentially developed as generally allowed under the existing *General Plan* land use classifications and zoning designations for the property.

The City's *General Plan* identifies approximately 7.6 acres of "General Office" (GO), 1.6 acres of "General Commercial" (GC), and 1.4 acres of "Greenway" (GWY) with an underlying zone designation of "General Office" (GO) and "General Commercial" (GC). It should be noted that the current zoning of the approximate 1.4 acres of *General Plan* classified "Greenway" is zoned "General Office." For the zoning to be consistent with the *General Plan* a general plan amendment would need to be approved, however, this "No Project – Existing General Plan & Zoning" alternative assumes that the amendment would be approved and will be based on 9.0 acres classified and designated as "General Office" (GO) and 1.6 acres of "General Commercial" (GC).

On August 27, 1997, UP-29-97 (formerly UP-39-92) was approved permitting the development of 3.66 acres that would permit: two restaurants totaling 450 seats (approximately 10,800 building square footage); 19,248 square feet of office space; and 5,568 square feet of retail space. A total of approximately 35,600 square feet was approved for development. The "No Project – Existing General Plan & Zoning" alternative utilizes these specific land uses and square-footages on 3.66 acres of the proposed project site. The existing *General Plan* classifications and zoning designations for the balance of the 6.89 acres are "General Commercial" (GC) for the existing 1.6 acres located in the northeast corner of the project site at the intersection of Hartnell Avenue and Henderson Road (North) and "General Office" (GO) for the remaining 5.29 acres. The total building square footage under this alterative is 134,600 square feet.

Avoid or Substantially Lessen Project Impacts

Implementation of the "No Project – Existing General Plan & Zoning" alternative would reduce, but not eliminate significant project-level or cumulative air quality impacts related to implementation of the *2015 Air Quality Attainment Plan* (Impact 5.2-1 and Impact 5.2-8). Impacts would remain *significant and unavoidable*. The "No Project – Existing General Plan & Zoning" alternative would reduce eight impacts associated with aesthetics, air quality, hydrology and water quality, and utilities and service systems.

Attainment of Project Objectives

The "No Project – Existing General Plan & Zoning" alternative satisfies most of the stated objectives as described in Subsection 7.1, *Project Objectives*, including Objective O1, O3, O4, O6, O7, and O9. The following Objectives are not achieved under the "No Project – Existing General Plan & Zoning" alternative.

O2. Provide for a comprehensively planned "Wellness Center" project in a campus-like setting whereby, the buildings are compatible with each other from a site planning, architectural, and landscape design perspective.

O5. Locate the proposed project in an area in relatively close proximity to the City's main hospitals, Mercy Medical Center and Shasta Regional Medical Center, to coordinate services, as necessary.

O8. Create new employment opportunities that contribute to improving the local economy while providing much needed physical and mental health and related educational services.

Comparative Merits

Development of the site utilizing the existing general plan and zoning is expected to result in the development of approximately 134,600 square feet of onsite development with a mix of uses. Under the "No Project – Existing General Plan & Zoning" alternative, physical changes would occur on the project site and there would be the potential for ***similar*** environmental impacts to occur and in instances, ***increased*** impacts, compared to those impacts associated with the proposed project. As noted in Table 7-19, eight impacts within the broader categories of aesthetics, air quality, hydrology and water quality, and utilities and service systems would be ***reduced***.

While the majority of the impacts would be proportionally greater due to the increase in building square footage, when compared to the proposed project, many impacts would remain *less than significant,* while others would require mitigation measures similar to the proposed project to reduce impacts to *less than significant* levels. However, under the "No Project – Existing General Plan & Zoning" alternative impacts will remain *significant and unavoidable*, even after the application of mitigation measures, for the following categories: aesthetics (increased impact), air quality (reduced impact) and temporary construction noise (similar impact).

As noted above, the "No Project – Existing General Plan & Zoning" alternative would accommodate approximately 118,200 square feet off "General Commercial" (GC) and "General Office" (GO) land uses onsite. Additionally, based on a prior development application (UP-29-97) on a portion of the subject site, this alternative reasonably assumes approximately 10,800 square feet of restaurant use and 5,568 square feet of retail space onsite. As a result, Objective O2, O5, and O8 are not achieved under the "No Project – Existing General Plan & Zoning" alternative.

"Reduced Intensity" Alternative

The "Reduced Intensity" alternative revises the amount of project-related building square footage by reducing and adjusting the square feet and building height of Building 'A'. The reduction in square feet for Building 'A' also reduces the amount of parking necessary to meet City code, which in turn reduces riparian habitat impacts.

The primary purpose for the City proposing the evaluation of the "Reduced Intensity" alternative was to advance an alternative to reduce potential environmental impacts, primarily those associated with: aesthetics, riparian habitat, other biological resources, daily vehicle trips, air quality and greenhouse gas emissions, noise, public service and utilities, and energy consumption; while still meeting as many of the applicant's objectives as possible.

Similar to the proposed project general building locations remain the same under this alternative. In addition, the parking lot abutting the Henderson Open Space would be modified so that the nine mature Fremont cottonwood trees located within Detail 'B', to the west of Building 'A' along the boundary with the Henderson Open Space could be preserved.

Compared to the proposed project, this alternative would result in a reduction in total Building 'A' size by 20,600-square feet due to the removal of the fourth-story and a slight reduction of 200 square feet from each floor resulting in a footprint of 19,800 square feet compared to 20,000 square feet for the proposed project. The project site is also reduced from 10.55 acres to approximately 9.72 acres due to a reduction from 549 to 461 parking spaces, an approximate 16 percent decrease. The "Reduced Intensity" alternative has a project area of approximately 9.72 acres which is 0.83 acres less than the proposed project area of 10.55 acres and the proposed project design site features including grading and associated infrastructure and landscaping are would be similar to the proposed project under the "Reduced Intensity" alternative.

Avoid or Substantially Lessen Project Impacts

Implementation of the "Reduced Intensity" alternative would substantially <u>*reduce*</u> the proposed project's *significant and unavoidable* impact related to the change in visual character of the area to *less than significant* levels, both on a project and cumulative level. The "Reduced Intensity" alternative

would result in proportionally *reduced* impacts across most impact categories due to the decrease in onsite building square footage. Under the "Reduced Intensity" alternative impacts associated with air quality and temporary construction noise would be *reduced*, although remain *significant and unavoidable* even after the application of mitigation measures.

Attainment of Project Objectives

The "Reduce Intensity" alternative satisfies most of the stated objectives for the proposed project as described in Subsection 7.1, Project Objectives, including Objective O2, O3, O4, O5, O6, O7, and O9. The Objectives that would not be fully attained are as follows:

O1. Maximize positive tax revenues to the City's General Fund, as well as support the City's economic development goals.

O8. Create new employment opportunities that contribute to improving the local economy while providing much needed physical and mental health and related educational services.

Comparative Merits

Under the "Reduced Intensity" alternative, physical changes would occur on the project site and there would be the potential for *similar* environmental impacts to occur and in instances, *increased* impacts, compared to those impacts associated with the proposed project. As noted in Table 7-19, fifty impacts within the broader categories of aesthetics, air quality, biological resources, hydrology and water quality, noise, population and housing, public services, utilities and service systems, and energy consumption would be *reduced*.

While the majority of the impacts would be proportionally reduced due to the reduction in building square footage, when compared to the proposed project, many impacts would remain *less than significant,* while others would require mitigation measures similar to the proposed project to reduce impacts to *less than significant* levels. However, under the "Reduced Intensity" alternative impacts will remain *significant and unavoidable*, even after the application of mitigation measures, for the following categories: air quality (reduced impact) and temporary construction noise (similar impact). Implementation of the "Reduced Intensity" alternative would substantially *reduce* the proposed project's *significant and unavoidable* impact related to the change in visual character of the area to *less than significant* levels, both on a project and cumulative level.

Compared to the proposed project implementation of the "Reduced Intensity" alternative would reduce the overall building square footage of the site by approximately 20,600 square feet. This would also reduce the Building 'A' from four stories to three stories. The overall footprint of the site would be reduced from approximately 10.55 acres to approximately 9.72 acres due to a reduction from 549 to 461 parking spaces. As a result, Objective O1 and O8 are not fully achieved under the "Reduced Intensity" alternative.

"Mercy Oaks Campus" Alternative

Located in the eastern part of the City of Redding is the approximate 54.86-acre "Mercy Oaks Campus" alternative (owned and operated by Dignity Health) located at 100 Mercy Oaks Drive which is directly accessed from College View Drive. The land use designation for the parcel is "General Office" (GO) as is

the zoning. This site is located east of Interstate 5 (I-5), south of State Highway 299 (SR-299), and west of Old Oregon Trail. Regional access to the site is via SR-299 to either the Churn Creek Road off-ramps to the west or to the Old Oregon Trail off-ramps to the east. College View Drive parallels SR-299 and provides a linkage between Churn Creek Road and Old Oregon Trail. There is alternate access from the south via SR-44 to Old Oregon Trail and then north to College View Drive.

Future development within the 54.86-acre parcel may include, but not limited to business type uses and personal-service businesses consistent with the "General Office" (GO) zoning designation. Other compatible uses may include rest homes, nursing homes, day-care facilities, hospitals, religious, educational, cultural and public utility uses, and financial institutions.

The "Mercy Oaks Campus" alternative would locate the proposed project's three buildings with 129,600 square feet, the building's, the 548 parking spaces that assumes the RABA parking space reduction credit since a RABA bus stop (for current Route 6N) is located within 400 feet of this alternative at College View Drive and Mercy Oaks Drive, and approximately 2.1 acres of landscaping onto an undeveloped portion of the approximate 54.86-acre parcel abutting Mercy Oaks Drive to the west and partially to the south, and College View Drive to the north.

Avoid or Substantially Lessen Project Impacts

Implementation of the "Mercy Oaks Campus" alternative location in east Redding would avoid development along the Sacramento River and, therefore, substantially ***lessen*** the proposed project's *significant and unavoidable* impact related to the change in visual character of the area. For this resource, impacts would be reduced to a *less than significant* level for both project-level and cumulative impacts. In addition, the "Mercy Oaks Campus" alternative would ***avoid*** impacts to riparian habitat through avoidance of this habitat resource. Implementation of the "Mercy Oaks Campus" alternative would reduce the magnitude of 14 impacts while eliminating two *significant and unavoidable* impacts related to aesthetics.

Attainment of Project Objectives

The "Mercy Oaks Campus" alternative satisfies most of the stated objectives for the proposed project as described in Subsection 7.1, Project Objectives, including Objective O1, O2, O4, O6, O8 and O9. The following project objectives would not be met, or partially met under this alternative:

O3. Provide the proposed project in a relatively centralized location within the City to facilitate efficient traffic utilization of existing arterials linking Interstate 5 and State Highways 44, 299 and 273 for access from throughout the City and Shasta County.

O5. Locate the proposed project in an area in relatively close proximity to the City's main hospitals – Mercy Medical Center and Shasta Regional Medical Center to coordinate services, as necessary.

O7. Promote walking as a lifestyle by providing onsite and offsite pedestrian friendly infrastructure to the open space area to the west and shopping center, including restaurants and retail, uses to the east.

Comparative Merits

Compared to the proposed project, implementation of the "Mercy Oaks Campus" alternative would *avoid* the proposed project's *significant and unavoidable* impact related to the change in visual character of the area for both project-level and cumulative impacts. This alternative would also fully *avoid* riparian impacts of the proposed project. As a result, implementation of the "Mercy Oaks Campus" alternative would substantially *reduce* the impacts of the proposed project related to these two resources.

The "Mercy Oaks Campus" alternative results in *similar* or *reduced* impacts related to construction and operational air quality, light and glare, biological resources, cultural resources, hydrology and water quality, operational noise, public services, and utilities and service systems. However, mitigation measures would still need to be imposed to reduce impacts to *less than significant* levels.

Compared to the proposed project, the following impacts would be *increased*, although remain *less than significant*, under the "Mercy Oaks Campus" alternative: mobile air quality emissions, greenhouse gas emissions, water supply availability during drought conditions, energy consumption, and traffic and circulation. Mitigation measures would be required to reduce impacts to *less than significant* levels.

Similar to the proposed project, impacts of the "Mercy Oaks Campus" alternative related to the successful implementation of the *2015 Air Quality Attainment Plan* and temporary construction noise would remain *significant and unavoidable* even after the implementation of similar project mitigation measures.

The "Mercy Oaks Campus" alternative can readily advance the same buildings, square footages, uses, and associated architectural design that could be site planned to create a campus-like project similar to the proposed project. Under the "Mercy Oaks Campus" alternative, physical changes would occur on approximately 10.9 acres of the 15.5-acre site located within the larger Mercy Oaks Campus owned and operated by Dignity Health. However, Objective O3, O5, and O7 would not be met, or partially met under the "Mercy Oaks Campus" alternative.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The environmentally superior alternative is the one that would result in the fewest or least significant environmental impacts.

The context of an environmentally superior alternative is based on the consideration of several factors including the reduction of environmental impacts to a *less than significant* level, the project objectives, and an alternative's ability to fulfill the objectives with minimal impacts to the existing site and surrounding environment. Accordingly, the "Reduced Intensity" alterative would be the environmentally superior alternative because it would substantially reduce or eliminate most of the significant impacts of the proposed project.

As depicted in Table 7-19, COMPARISON OF ALTERNATIVE ENVIRONMENTAL IMPACTS WITH THE PROPOSED PROJECT, in Section 7.0, the "Reduced Intensity" alternative would result in *reduced* aesthetic, air quality, biological resources, hydrology and water quality, noise, population and housing, public services, recreation, utilities and service systems, and energy consumption impacts. Impacts

associated with the remaining environmental factors or categories would be *similar* to those of the proposed project with the exception of greenhouse gas emissions.

2.8 AREAS OF CONTROVERSY

JULY 2017 INITIAL STUDY

Dignity Health of Redding submitted applications for entitlements for the proposed development in January 2017. The City prepared and circulated an Initial Study and proposed Mitigated Negative Declaration (MND) in July 2017 and scheduled for hearing at the City of Redding Planning Commission on August 22, 2017. Based upon comments suggesting that the MND failed to comply with the requirements of CEQA, the Planning Commission continued the meeting indefinitely to allow staff and Dignity Health time to review and assess comments received. Potentially significant impacts including air quality, public health, greenhouse gas emissions, hazards, and biological resources were highlighted as concerns to be evaluated as part of an EIR. To address these issues, in November 2017, Dignity Health of Redding announced their intention to work with the City towards that preparation of an EIR. The City's July 2017 Initial Study and public comments submitted on the adequacy of the document are included in Appendix 15.1, PUBLIC SCOPING REPORT. Submitted public comments are summarized below:

Aesthetics (refer to Section 5.1)

- Lighting fixtures associated with the project should ne downward facing, fully-shielded and designed and installed to minimize photo-pollution.

Air Quality (refer to Section 5.2)

- The City failed to properly analyze air quality impacts and additional mitigation measures are required.
- The project may result in potentially significant impacts to the public health of nearby residents.

Biological Resources (refer to Section 5.3)

- There is substantial evidence of numerous potentially significant impacts to biological resources including bird collisions with buildings, insufficient mitigation for riparian impacts and impacts to migratory and roosting birds.
- Conflict with local ordinances protecting riparian habitat in stream corridors.

Greenhouse Gases and Climate Change (refer to Section 5.6)

- The greenhouse gas threshold was not supported by substantial evidence.

Hazards and Hazardous Materials (refer to Section 5.7)

- A Phase I Environmental Site Assessment should be prepared for the proposed project.

Hydrology and Water Quality (refer to Section 5.8)

- Concerns regarding the proposed parking lot diverting or redirecting flood water and caused increased localized velocities, erosion of neighboring development and undermining of retaining wall footings.

Land Use and Planning (refer to Section 5.9)

- Conversion of Greenway zoned land to "Parking Facility" constitutes a significant negative impact.

JUNE 2018 NOTICE OF PREPARATION

This section summarizes the comments raised by the public and agencies during the scoping process for the proposed project and includes both written and oral comments that were received during the City's 30-day Notice of Preparation (NOP) comment period that circulated from June 8, 2018 through July 9, 2018. All written and oral comments received during the NOP public comment period were reviewed, including those received by the City via email. The NOP comment letters, in their original format as submitted by the commenter, are contained in Appendix 15.1, PUBLIC SCOPING REPORT, of this EIR.

Four (4) comment letters were received during the scoping process, and six (6) individuals presented oral comments during the June 26, 2018 scoping meetings. In addition to private individuals, two (2) government agencies and two (2) private organizations submitted written comments.

The discussion below presents the key issues identified from the written and oral comments received on the proposed project during scoping. In accordance with State *CEQA Guidelines* §15151, an EIR should be prepared with sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonable feasible. As such, the following summary focuses on those comments that raise a concern with potential physical environmental effects of the proposed project.

Where one or more comments address a similar issue or concern, those comments were combined together and summarized to minimize redundancy. All of these issues are addressed in this Draft EIR, in the relevant noted sections. The specific environmental issues raised during the public scoping process are summarized below:

Aesthetics (refer to Section 5.1)

- Ensure aesthetics, light and glare impacts are discussed and appropriately addressed.

Biological Resources (refer to Section 5.3)

- Impact to deer and other wildlife in the adjacent neighborhood due to the increase in cut-through traffic.
- Also see July 3, 2018 letter submitted by California Department of Fish and Wildlife (CDFW).

Cultural Resources (refer to Section 5.4)

- Greenville Rancheria should be included in consultation under AB 52.
- An historical marker onsite was suggested to note prior Wintu use of the site.
- AB 52 and SB 18 tribal consultation compliance.
- Also see June 27, 2018 letter submitted by the Native American Heritage Commission.

Hazards and Hazardous Materials (refer to Section 5.7)

- General concerns submitted regarding the past historical use of the project site and the need to ensure appropriate level of investigation is conducted.
- Removal of residual hazardous materials if encountered.

Hydrology and Water Quality (refer to Section 5.8)

- Ensure delineated floodplain in the parking lot does not cause the downstream base flood elevation to rise.
- Detention basins do not support the planting and growth of trees.
- The project does not address stormwater management during flood events.

Land Use and Planning (refer to Section 5.9)

- The Riverfront Specific Plan should be reviewed to document project interaction with the plan.
- Shasta County Mosquito and Vector Control expressed an interest in maintaining existing access to Henderson Open Space area for continued mosquito and vector control maintenance.

Transportation and Traffic (refer to Section 5.14)

- Concerns related to increased cut-through traffic along Wilshire once the project is completed.
- Two (2) comments suggested the inclusion of speed tables along Wilshire as a form of mitigation.
- Encourage the project to promote intelligent traffic patterns.

2.9 ISSUES TO BE RESOLVED

Section 15123(b)(3) of the State *CEQA Guidelines* requires that an EIR contain issues to be resolved, which includes the choice among alternatives and whether or how to mitigate significant impacts. The following major issues are to be resolved:

- Determine whether the EIR adequately describes the environmental impacts of the proposed project;
- Choose among alternatives;
- Determine whether the recommended mitigation measures should be adopted or modified; and
- Determine whether additional mitigation measures need to be applied to the proposed project.

2.10 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MESURES

Under CEQA, a significant effect on the environment is defined as a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. For these areas, this Draft EIR discusses the impacts and mitigation measures that could be implemented by the City of Redding to reduce potential adverse impacts to a level that is considered *less than significant*. An impact that remains significant after mitigation is considered an unavoidable adverse impact of the proposed project. The mitigation measures presented in the Draft EIR will form the basis of the Mitigation Monitoring and Reporting Program. Table 2-1, PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES, at the end of this chapter, provides a summary of the environmental effects of the proposed project identified in each technical issue chapter. The table consists of the environmental impacts, the significance of the impacts for the project, the proposed mitigation measures, and the significance of the impacts after the mitigation measures are implemented. Table 7-19, COMPARISON OF ALTERNATIVE ENVIRONMENTAL IMPACTS WITH THE PROPOSED PROJECT, in Section 7.0, provides a comparison of each alternative's impact in relation to the proposed project.

Table 2-1
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Section 5.1 – AESTHETICS			
Project Level Impacts			
Impact 5.1-1: Implementation of the proposed project would not have a substantial adverse effect on a scenic vista.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.1-2: Implementation of the proposed project could potentially degrade the existing visual character or quality of the site and its surroundings.	Potentially Significant Impact	**MM 5.1-1:** Prior to issuance of a grading permit, the project applicant shall submit an updated landscape plan for review and approval by the City of Redding Development Services Department. The updated landscape plan shall incorporate reasonable and feasible landscaping and architectural features that would screen the proposed buildings from public views along the Sacramento River.	Significant and Unavoidable
Impact 5.1-3: Implementation of the proposed project could create a new source of substantial light or glare, which could adversely affect day or nighttime views in the area.	Potentially Significant Impact	**MM 5.1-2a:** Prior to issuance of a grading permit, the project applicant shall submit an updated photometric plan for review and approval by the City of Redding Development Services Department. The updated photometric plan shall be based on final site improvement plans and demonstrate that all exterior illumination is shielded and directed away from adjacent residents and the Henderson Open Space and that lighting does not exceed standards and requirements of RMC §18.40.090, at the property line of the proposed project. **MM 5.1-2b:** Prior to issuance of an occupancy permit, the project applicant shall provide an "As-built Photometric Verification Study" demonstrating compliance with applicable standards and requirements of the RMC §18.40.090. A permit to occupy shall not be issued if lighting exceeds the standards and requirements of the code. Appropriate changes may include the relocation of light standards, additional shielding and other mechanisms acceptable to the City of Redding Development Services Department.	Less Than Significant
Cumulative Impacts			
Impact 5.1-4: Project development, together with cumulative projects, may result in cumulative impacts to scenic vistas.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.1-5: Project development, together with cumulative projects, could potentially degrade the visual character/quality of the project site.	Potentially Significant Impact	Implement **MM 5.1-1.**	Significant and Unavoidable
Impact 5.1-6: Project development, together with cumulative projects, could create a new source of substantial light or glare, which could adversely affect day or nighttime views in the area.	Potentially Significant Impact	Implement **MM 5.1-2a** and **MM 5.1-2b**.	Less Than Significant

Table 2-1 (Continued)
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Section 5.2 - AIR QUALITY			
Project Level Impacts			
Impact 5.2-1: Implementation of the proposed project would conflict with or obstruct implementation of the 2015 Air Quality Attainment Plan.	Potentially Significant Impact	Implement **MM 5.6-1** in Section 5.6, GREENHOUSE GASES AND CLIMATE CHANGE.	Significant and Unavoidable
Impact 5.2-2: Project implementation could potentially violate an air quality standard or contribute substantially to an existing or projected air quality violation during project construction.	Potentially Significant Impact	**MM 5.2-1:** Prior to issuance of a grading permit, the project applicant shall submit a grading plan for review and approval by the City of Redding Development Services Department. The following specifications shall be included to reduce short-term air quality impacts attributable to the onsite and offsite construction activities identified in Section 3.0, PROJECT DESCRIPTION, and improvements noted in **MM 5.14-1**, **MM 5.14-3**, and **MM 5.15-4** in Section 5.14, TRAFFIC AND CIRCULATION: • During all construction activities, all diesel-fueled construction equipment, including but not limited to rubber-tired dozers, graders, scrapers, excavators, asphalt paving equipment, cranes, and tractors, shall be California Air Resources Board (CARB) Tier 4 interim or better as set forth in Section 2423 of Title 13 of the California Code of Regulations, and Part 89 of Title 40 of the Code of Federal Regulations. • During all construction activities, all architectural coatings applied shall contain a low content of volatile organic compounds (VOC) (i.e., 100 grams/liter) as required by the Green Building Code and as adopted by the City of Redding. • All construction equipment shall be maintained and properly tuned in accordance with manufacturers' specifications. Equipment maintenance records shall be kept onsite and made available upon request by the City of Redding or Shasta County AQMD. • All material excavated, stockpiled, or graded shall be sufficiently watered to prevent fugitive dust from leaving property boundaries and causing a public nuisance or a violation of an ambient air standard. Watering shall occur at least twice daily with complete site coverage, preferably in the mid-morning and after work is completed each day. • All unpaved areas (including unpaved roads) with vehicle traffic shall be watered periodically or have dust palliatives applied for stabilization of dust emissions. • All onsite vehicles shall be limited to a speed of 15 miles per hour on unpaved roads. • All land clearing, grading, earth-moving, or excavation activities on the project site shall be suspended when sustained winds are expected to exceed 20 miles per hour. • All portions of the development site which have been stripped of vegetation by construction activities and left inactive for more than ten days shall be seeded and/or watered until a suitable grass cover is established. • All trucks hauling dirt, sand, soil, or loose material shall be covered or shall maintain at least 2	Less Than Significant

Table 2-1 (Continued)
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		feet of freeboard (i.e., minimum vertical distance between top of the load and the trailer) in accordance with the requirements of California Vehicle Code Section 23114. This provision will be enforced by local law enforcement agencies. • All material transported offsite shall be either sufficiently watered or securely covered to prevent a public nuisance. • Wheel washers shall be installed where project vehicles and/or equipment enter and/or exit onto paved streets from unpaved roads. Vehicles and/or equipment shall be washed prior to each trip. • Prior to final occupancy, the applicant shall re-establish ground cover on the construction site through seeding and watering. • Off-road construction equipment shall not be left idling for periods longer than 5 minutes when not in use.	
Impact 5.2-3: Project implementation could potentially violate an air quality standard or contribute substantially to an existing or projected air quality violation during project operations.	Potentially Significant Impact	Implement **MM 5.6-1** in Section 5.6, GREENHOUSE GASES AND CLIMATE CHANGE.	Less Than Significant
Impact 5.2-4: Project implementation would not expose sensitive receptors to substantial carbon monoxide pollutant concentrations.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.2-5: Implementation of the proposed project could potentially expose sensitive receptors to substantial toxic air contaminant concentrations during project construction.	Potentially Significant Impact	Implement **MM 5.2-1.**	Less Than Significant
Impact 5.2-6: Project implementation would not expose sensitive receptors to substantial toxic air contaminant concentrations during project operations.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.2-7: Project implementation would not create objectionable odors affecting a substantial number of people.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Cumulative Impacts			
Impact 5.2-8: Implementation of the proposed project, along with foreseeable development in the project vicinity, could potentially conflict with or obstruct	Potentially Significant Impact	Implement **MM 5.2-1.**	Significant and Unavoidable

Table 2-1 (Continued)
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
implementation of the 2015 Air Quality Attainment Plan.			
Impact 5.2-9: Implementation of the proposed project, along with foreseeable development in the project vicinity, could potentially violate an air quality standard or contribute substantially to an existing or projected air quality violation during project construction.	Potentially Significant Impact	Implement **MM 5.2-1.**	Less Than Significant
Impact 5.2-10: Implementation of the proposed project, along with foreseeable development in the project vicinity, could potentially violate an air quality standard or contribute substantially to an existing or projected air quality violation during project operations.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.2-11: Implementation of the proposed project, along with foreseeable development in the project vicinity, would not expose sensitive receptors to substantial carbon monoxide pollutant concentrations.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.2-12: Implementation of the proposed project, along with foreseeable development in the project vicinity, would not potentially expose sensitive receptors to substantial toxic air contaminant concentrations during project construction.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.2-13: Implementation of the proposed project, along with foreseeable development in the project vicinity, would not expose sensitive receptors to substantial toxic air contaminant concentrations during project operations.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.2-14: Implementation of the proposed project, along with foreseeable development in the project vicinity,	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant

Table 2-1 (Continued)
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
would not create objectionable odors affecting a substantial number of people.			
Section 5.3 - BIOLOGICAL RESOURCES			
Project Level Impacts			
Impact 5.3-1: The proposed project could have a substantial effect, either directly or through habitat modification, including riparian habitat, on any natural community, or 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.	Potentially Significant Impact	**MM 5.3-1a:** To prevent direct mortality of bats roosting beneath the roof flashing of the small room connecting the two existing onsite buildings, the following measures shall be implemented prior to building demolition: • A qualified bat biologist (one possessing a Memorandum of Understanding with CDFW for work with bats) shall either conduct, or supervise, the humane eviction of bats from the onsite structures. Work may consist of installation of appropriate blockage materials and one-way exits at the roof flashing and wood fascia or partial dismantling of the structure in a controlled fashion to eliminate bat roosting habitat. • Humane bat eviction shall only be conducted within seasonal periods of bat activity during which specific temperature and precipitation criteria are met. Eviction may be conducted between about March 15th (or after evening temperatures rise above 45°F) and April 30th, or between August 15th and about October 1st (or before evening temperatures fall below 45°F); no eviction work shall be conducted if more than ½-inch of rainfall has occurred within the preceding 24 hours. **MM 5.3-1b:** To avoid the take of colonial bats potentially roosting onsite, removal of Tree B-1 and B-2 as identified on EIR Figure 5.3-2, IDENTIFIED BAT ROOSTING HABITATS, shall be conducted utilizing the following two-step tree removal process during specified seasonal periods: • Removal of bat habitat trees shall be conducted over two consecutive days. All work shall be conducted or supervised by a qualified bat biologist. On the first day, non-habitat features of the trees (e.g., branches without cavities, crevices, or exfoliating bark) shall be removed with chainsaws and be chipped onsite to create high levels of noise and vibration. On the following day, the trees shall be removed from the site. • Two-step removal shall only be conducted within seasonal periods of bat activity during which specific temperature and precipitation criteria are met. Tree removal may be conducted between about March 15th (or after evening temperatures rise above 45°F) and April 30th, or between August 15th and about October 1st (or before evening temperatures fall below 45°F); no eviction work shall be conducted if more than ½-inch of rainfall has occurred within the proceeding 24 hours.	Less Than Significant

Table 2-1 (Continued)
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		MM 5.3-1c: Removal of trees with a diameter at breast height (dbh) of 10 inches or greater shall only be conducted within seasonal periods of bat activity during which specific temperature and precipitation criteria are met. Removal of such trees may be conducted between about March 15th (or after evening temperatures rise above 45°F) and April 30th or between August 15th and about October 1st (or before evening temperatures fall below 45°F); no eviction work shall be conducted if more than ½-inch of rainfall has occurred within the preceding 24 hours. One to two days prior to removal of trees with a dbh of 10 inches or greater, smaller trees and shrubs shall be removed using chainsaws to create noise and vibration disturbance. Additionally, the cuttings shall be chipped onsite to further increase noise and vibration levels. Subsequently, trees larger than 10 inches dbh shall be removed, beginning with smaller trees first. **MM 5.3-1d:** Prior to the initiation of vegetation removal and project construction, the project applicant shall retain a biologist to conduct a pre-construction survey to confirm presence/absence of the western pond turtle onsite. The survey shall be conducted by a qualified biologist (one deemed acceptable by CDFW staff) and shall consist of at least one survey of the project site conducted a maximum of one week prior to the start of vegetation removal. If earth-disturbing construction activities are not initiated immediately following vegetation removal, then a second survey for western pond turtles shall be conducted a maximum of one week prior to the start of earth-disturbing construction activities. If a western pond turtle is found, the biologist shall move it to a safe location within similar habitat. If a western pond turtle nest is found, the biologist shall flag the site and determine if project activities can avoid affecting the nest. If the nest cannot be avoided, it will be excavated and re-buried at a suitable location outside of the active construction zone by a qualified biologist. **MM 5.3-1e:** To the extend feasible, vegetation removal and initiation of intensive site construction activities should occur before January 1st or after August 31st to avoid impacts on nesting bald eagles and migratory birds. If vegetation removal or initiation/re-initiation of intensive site construction occurs during the nesting season, a nesting survey shall be conducted by a qualified biologist (one deemed acceptable by CDFW staff) to identify active nests in and adjacent to the work area. The survey shall be conducted no more than one week prior to the beginning of the onsite activity. If nesting birds are found, the nest shall not be disturbed until after the young have fledged. Further, to prevent nest abandonment and mortality of chicks and eggs, no vegetation removal or construction activities shall occur within 500 feet of an active nest (or no closer than 660 feet from an active bald eagle nest), unless a smaller buffer distance is approved by a qualified biologist. **MM 5.3-1f:** Grading plans prepared by the project applicant shall note the following construction specifications designed to avoid the introduction and spread of weeds:	

Table 2-1 (Continued)
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		• Using only certified weed-free erosion control materials, mulch, and seed. • Precluding the use of rice straw in riparian areas. • Limiting any import or export of fill material to material known to be weed free. • Requiring the construction contractor to thoroughly wash all equipment at a commercial wash facility prior to entering the County. If the equipment has most recently been used within the County, cleaning is not required. • Requiring the construction contractor to thoroughly wash all equipment at a commercial wash facility immediately upon termination of its use at the project site. • The project contractor shall continuously comply with the above stated measures throughout the duration of onsite and offsite construction activities. **MM 5.3-1g:** Prior to the issuance of a building permit, the project applicant shall provide written evidence from a licensed architect that the proposed onsite buildings have been designed with features that serve to minimize bird strikes, such as those described in the San Francisco Planning Department's *Standards for Bird Safe Buildings* (e.g., bird friendly glazing selections, building and fenestration strategies, and/or lighting methods). To ensure compliance, this measure shall be completed to the satisfaction of the City of Redding Development Services Director.	
Impact 5.3-2: The proposed project could potentially 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 California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	Potentially Significant Impact	**MM 5.3-2a:** Direct impacts to riparian habitat and work under the riparian canopy shall be minimized to the extent feasible. Grading plans prepared by the project applicant shall note the following construction specifications designed to avoid to minimize the loss of riparian habitat as well as indirect effects on riparian habitat include the following: • Erect construction fencing along the outer edges of the construction zone as delineated on EIR Figure 5.3-3, TEMPORARY CONSTRUCTION FENCING LOCATIONS, to prevent accidental entry into riparian habitat and/or under riparian canopy. The fencing shall be regularly inspected and maintained throughout the duration of construction, and shall be removed upon completion of construction. • Where work must occur under the canopy of riparian vegetation planned for retention, the lower branches of the trees shall be pruned (not broken) as needed to allow access under the canopy. • Stockpile equipment and materials outside of riparian canopy, in designated staging areas. **MM 5.3-2b:** Prior to the issuance of a grading permit the project applicant shall submit to the City of Redding Development Services Director a planting plan and implementation schedule that addresses the following riparian habitat mitigation:	Less Than Significant

Table 2-1 (Continued)
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		• 20 Fremont cottonwood trees and one valley oak replaced at no less than a 3:1 ratio for a total of 63 trees. Planting should occur as close to the project site as possible and be in close proximity to the Sacramento River or to a large perennial stream. A vegetation planting and management plan shall be prepared that identifies the planting area size and location, mitigation site protections (e.g., conservation easement or deed restrictions), planting objectives in terms of acreage or number of plants by species, planting and maintenance methods, success criteria, duration of monitoring, corrective actions to be taken if success criteria are not met, and reporting requirements. The plan shall be reviewed and approved by the City of Redding and the applicant shall be responsible for ensuring that the planting plan is fully implemented; or • Purchase riparian habitat credits at the Stillwater Plains Mitigation Bank at a 3:1 ratio.	
Impact 5.3-3: The proposed project could potentially interfere with the movement of 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.	Potentially Significant Impact	Implement **MM 5.3-2a** and **MM 5.3-2b**.	Less Than Significant
Impact 5.3-4: The proposed project could conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.3-5: The project has the potential to substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare or threatened species.	Potentially Significant Impact	Implement **MM 5.3-1** and **MM 5.3-2**.	Less Than Significant
Cumulative Impacts			
Impact 5.3-6: The proposed project, along with cumulative development, could have a substantial effect, either	Potentially Significant Impact	Implement **MM 5.3-1a** and **MM 5.3-1g**.	Less Than Significant

Table 2-1 (Continued)
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
directly or through habitat modification, on a natural community or on a 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.			
Impact 5.3-7: The proposed project, along with cumulative development, could potentially 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 California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.	Potentially Significant Impact	Implement **MM 5.3-2a** and **MM 5.3-2b**.	Less Than Significant
Impact 5.3-8: The proposed project, along with cumulative development, could potentially interfere with the movement of 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.	Potentially Significant Impact	Implement **MM 5.3-2a** and **MM 5.3-2b**.	Less Than Significant
Impact 5.3-9: The proposed project, along with cumulative development, could conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	Potentially Significant Impact	Implement **MM 5.3-2b**.	Less Than Significant
Impact 5.3-10: The project, along with cumulative development, has the potential to substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare	Potentially Significant Impact	Implement **MM 5.3-1** and **MM 5.3-2**.	Less Than Significant

Table 2-1 (Continued)
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
or threatened species.			
Section 5.4 – CULTURAL RESOURCES			
Project Level Impacts			
Impact 5.4-1: Implementation of the proposed project may cause a significant impact to historic, unique archaeological or prehistoric resources.	Potentially Significant Impact	**MM 5.4-1a:** In the event that cultural resources including paleontological resources are inadvertently discovered during the project activities, work shall be halted in that area within 100 feet (30 meters) of the find until a qualified archaeologist (36 CFR Part 61) can assess the significance of the find (i.e., whether it includes any historical resources, unique archaeological resources, tribal cultural resources, or unique paleontological resources). Construction activities could continue in other areas. If the discovery proves to include historical resources, unique archaeological resources, and/or unique paleontological resources, additional work, such as data recovery excavation, may be warranted and would be discussed in consultation with Dignity Health or their authorized representative, the City, or any other relevant regulatory agency. This stipulation does not apply to those cultural resources evaluated and determined not Historical Resources/Historic Properties. **MM 5.4-1b:** Should any previously unevaluated prehistoric artifacts, midden soils, human remains, etc. be encountered, the project applicant shall notify the Native American community, specifically, the Wintu Tribe. **MM 5.4-1c:** Prior to the issuance of a grading permit and/or action that would permit project site disturbance (whichever occurs first), the project applicant shall provide written evidence to the City of Redding Development Services Department that the project applicant has retained a tribal (Wintu) monitor to be present during construction, specifically during initial ground disturbance, in the instance that any prehistoric artifacts, midden soils, or human remains are encountered. **MM 5.4-1d:** If human remains are discovered during development of the project, as per State law, all activity within 50 feet of the discovery shall cease immediately, the Contractor shall immediately notify the Shasta County Coroner's Office, and a qualified archaeologist and Native American monitor shall be contacted. Should the Coroner determine the human remains to be Native American, the Native American Heritage Commission shall be contacted pursuant to Public Resources Code §5097.98. Public Resources Code §5097.98(c) specifically states: "The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods." **MM 5.4-1e:** In the event that the project plan changes to include areas not surveyed, additional archaeological reconnaissance may be required.	Less Than Significant

Table 2-1 (Continued)
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 5.4-2: Implementation of the proposed project could result in the potential damage or destruction of undiscovered paleontological resources.	Potentially Significant Impact	Implement **MM 5.4-1a**.	Less Than Significant
Impact 5.4-3: Implementation of the proposed project could potentially disturb human remains, including those interred outside of formal cemeteries.	Potentially Significant Impact	Implement **MM 5.4-1d.**	Less Than Significant
Cumulative Impacts			
Impact 5.4-4: Implementation of the proposed project, combined with other past, present, and reasonably foreseeable future development, could result in potential cumulative impacts to historic, unique archaeological or prehistoric resources.	Potentially Significant Impact	Implement **MM 5.4-1a** through **MM 5.4-1e**.	Less Than Significant
Impact 5.4-5: Implementation of the proposed project, combined with other past, present, and reasonably foreseeable future development, could result in the potential damage or destruction of undiscovered paleontological resources.	Potentially Significant Impact	Implement **MM 5.4-1a.**	Less Than Significant
Impact 5.4-6: Implementation of the proposed project, combined with other past, present, and reasonably foreseeable future development, could potentially disturb human remains, including those interred outside of formal cemeteries.	Potentially Significant Impact	Implement **MM 5.4-1d.**	Less Than Significant
Section 5.5 – GEOLOGY AND SOILS			
Project Level Impacts			
Impact 5.5-1: Implementation of the proposed project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant

Table 2-1 (Continued)
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
rupture of a known earthquake fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; and landslides.			
Impact 5.5-2: The proposed project is not located on soil that has potential to be substantially expansive.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Cumulative Impacts			
Impact 5.5-3: Implementation of the proposed project, combined with future development, would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; and landslides.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.5-4: Implementation of the proposed project, combined with future development, would not result in cumulative impacts related to expansive soils.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Section 5.6 – GREENHOUSE GASES			
Project Level Impacts			
Impact 5.6-1: Greenhouse gas emissions generated by the project, either directly or indirectly, would not have a significant impact on the environment.	Potentially Significant Impact	**MM 5.6-1:** Dignity Health shall prepare and implement a Greenhouse Gas Reduction Plan (GGRP) that contains specific design features and actions to be implemented by the project prior to year 2035, and quantify the emission reductions associated with those features and actions. The GGRP shall demonstrate achievement of a project emissions inventory that is less than the 2035 threshold of 1.7 metric tons of carbon dioxide equivalent (CO_2e) per service population by year 2035. The emissions inventory must be prepared using model(s) and methodology accepted by the Shasta County Air Quality Management District. The GGRP shall be submitted to the City for approval prior to the issuance of grading permits. The GGRP may be updated after City approval to account for emission reductions associated with new regulations, as applicable. Any updates to the GGRP must be submitted to the City for approval. Specific measures may include (but are not limited to): • Implement a voluntary trip reduction program for all employees.	Less Than Significant

Table 2-1 (Continued)
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		• Implement a voluntary ride sharing program for all employees. • Provide a Commute Trip Reduction subsidy for employees consistent with California Air Pollution Control Officer's Association's Greenhouse Gas Measure TRT-4 (CAPCOA 2010). • Utilize high pressure sodium cutoff lights in outdoor lighted areas. • Use Energy Star energy efficient fans and refrigerators. • Utilize 100 percent renewable energy through a community choice aggregate (CCA), buy into 100 percent renewable from the local energy utility, or onsite generation, or a combination thereof. • Generate at least 15 percent of the project's energy demand through onsite renewable energy. • Use 100 percent electric lawnmowers and leafblowers. • Purchase verifiable greenhouse gas offsets. The bullet points listed above are provided as a guide and can be substituted with other measures when shown to achieve the same result of reducing annual emissions to less than 1.7 MT CO_2e per service population by year 2035.	
Impact 5.6-2: Implementation of the proposed project would not conflict with an applicable greenhouse gas reduction plan, policy, or regulation.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Cumulative Impacts			
Impact 5.6-3: Greenhouse gas emissions generated by the project would not have a significant impact on global climate change.	Potentially Significant Impact	Implement **MM 5.6-1.**	Less Than Significant
Section 5.7 – HAZARDS AND HAZARDOUS MATERIALS			
Project Level Impacts			
Impact 5.7-1: The proposed project could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.7-2: Project construction activities could create a significant hazard to the public through foreseeable upset and accidental conditions.	Potentially Significant Impact	**MM 5.7-1:** Prior to the issuance of a demolition or grading permit (whichever occurs first), the project applicant shall complete to the satisfaction of the City of Redding Development Services Department asbestos sampling and analysis to determine the presence of Asbestos Containing Materials (ACM) in existing construction building materials left onsite or within existing buildings. Existing construction materials are considered concrete, mortar, roofing materials, drywall and other known building materials that may contain asbestos.	Less Than Significant

Table 2-1 (Continued)
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		Work shall be overseen by a Certified Asbestos Consultant, or other appropriately trained and certified professional licensed by the California Contractors State Licensing Board. Materials collected and sampled shall be tested by a laboratory certified by the State Water Resources Control Board, Environmental Laboratory Accreditation Program (ELAP). If wastes are discovered containing 1 percent or greater levels of ACM, an asbestos abatement program shall be prepared by a qualified professional to guide the removal and disposal of the ACM. Asbestos waste shall be handled as a hazardous waste in accordance with CCR, Title 22, §66262.11(b)(2) and disposed of at an appropriately licensed landfill site approved for hazardous waste by the California Water Resources Control Board. Hazardous asbestos waste shall be transported by a registered hazardous waste transporter and accompanied by a uniform hazardous waste manifest. Final documentation and reporting shall be provided to the City of Redding Development Services Department.	
Impact 5.7-3: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.7-4: Implementation of the proposed project would not 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.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Cumulative Impacts			
Impact 5.7-5: The proposed project, combined with cumulative development, could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.7-6: Project construction activities, combined with cumulative development, could create a significant	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant

Table 2-1 (Continued)
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
hazard to the public through foreseeable upset and accidental conditions.			
Impact 5.7-7: The proposed project, combined with cumulative development, would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.7-8: The proposed project, combined with cumulative development, would not 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.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Section 5.8 – HYDROLOGY AND WATER QUALITY			
Project Level Impacts			
Impact 5.8-1: Implementation of the proposed project may violate water quality standards or waste discharge requirements.	Potentially Significant Impact	**MM 5.8-1a:** Prior to any ground-disturbing activities begin, the contractor shall apply for and maintain coverage under the General Construction Storm Water Permit. The contractor shall prepare and implement a SWPPP, including an erosion control plan that includes erosion control measures and construction waste containment measures to ensure that waters of the United States and the State are protected during and after project construction. The SWPPP shall include site design measures to minimize offsite stormwater runoff that might otherwise affect surrounding habitats. The Central Valley RWQCB will review and monitor the effectiveness of the SWPPP through mandatory reporting by the City and the contractor as required. The SWPPP shall be prepared with the following objectives: (a) identify all pollutant sources, including sources of sediment, that may affect the quality of stormwater discharges from the construction of the project; (b) identify BMPs that effectively reduce or eliminate pollutants in stormwater discharges and authorized non-stormwater discharges from the site during construction to the Best Available Technology/Best Control Technology standard; (c) provide calculations and design details as well as BMP controls for site run-on that are complete and correct; (d) identify project discharge points and receiving waters; and (e) provide stabilization BMPs to reduce or eliminate pollutants following construction. The contractor shall implement the SWPPP, including all BMPs, and perform inspections of all BMPs during construction. Potential SWPPP BMPs could include, but would not be limited to the	Less Than Significant

Table 2-1 (Continued)
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		following: • Preserve existing vegetation where possible; • Surface roughening of final grades to prevent erosion, decrease run-off, increase infiltration, and aid in vegetation establishment; • Riparian buffers or filter strips along the perimeter of the disturbed area to intercept pollutants prior to offsite discharge; • Placing fiber rolls around onsite drain inlets to prevent sediment and construction-related debris from entering inlets; • Placing fiber rolls along down-gradient disturbed areas of the site to reduce runoff flow velocities and prevent sediment from leaving the site; • Placing silt fences down-gradient of disturbed areas to slow down runoff and retain sediment; • Stabilizing the construction entrance to reduce the tracking of mud and dirt onto public roads by construction vehicles; • Staging excavated and stored construction materials and soil stockpiles in stable areas and covering materials to prevent erosion; and • Stabilizing temporary construction entrances to limit transport/introduction of invasive species and control fugitive dust emissions. **MM 5.8-1b:** Prior to issuance of a grading permit, the project applicant shall submit a final post construction stormwater management plan to the City concurrent with site improvement plans. The report shall be prepared by a Registered Civil Engineer and shall, at a minimum, include: A written text addressing existing conditions, the effects of the proposed improvements, all appropriate calculations, watershed maps, changes in flows and patterns, and proposed on- and offsite improvements and drainage easements to accommodate flows from this project. The report shall identify water quality protection features and methods to be used during construction, as well as long-term post-construction water quality measures.	
Impact 5.8-2: The proposed project could substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted).	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant

Table 2-1 (Continued)
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 5.8-3: The proposed project could substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or offsite.	Potentially Significant Impact	Implement **MM 5.8-1a** and **MM 5.8-1b**.	Less Than Significant
Impact 5.8-4: Implementation of the proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.8-5: Implementation of the proposed project would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.8-6: Implementation of the proposed project could otherwise substantially degrade water quality.	Potentially Significant Impact	Implement **MM 5.8-1a** and **MM 5.8-1b**.	Less Than Significant
Impact 5.8-7: Implementation of the proposed project could place within a 100-year flood hazard area structures which would impede or redirect flows.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.8-8: Implementation of the proposed project could 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.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant

Table 2-1 (Continued)
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Cumulative Impacts			
Impact 5.8-9: Implementation of the proposed project, combined with other past, present, and reasonably foreseeable future development, could potentially violate water quality standards or waste discharge requirements.	Potentially Significant Impact	Implement **MM 5.8-1a** and **MM 5.8-1b**.	Less Than Significant
Impact 5.8-10: Implementation of the proposed project, combined with other past, present, and reasonably foreseeable future development, would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.8-11: Implementation of the proposed project, combined with other past, present, and reasonably foreseeable future development, could substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or offsite.	Potentially Significant Impact	Implement **MM 5.8-1a** and **MM 5.8-1b**.	Less Than Significant
Impact 5.8-12: Implementation of the proposed project, combined with other past, present, and reasonably foreseeable future development, could potentially create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.	Potentially Significant Impact	Implement **MM 5.8-1a** and **MM 5.8-1b**.	Less Than Significant

Table 2-1 (Continued)
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 5.8-13: Implementation of the proposed project, combined with other past, present, and reasonably foreseeable future development, would not place structures within a 100-year flood hazard area structures that would impede or redirect flows.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Section 5.9 – LAND USE AND PLANNING			
Project Level Impacts			
Impact 5.9-1: The proposed project would not conflict with an 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 coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Cumulative Impacts			
Impact 5.9-2: Implementation of the proposed project, combined with other past, present, and reasonably foreseeable future development, would not physically divide an established community, conflict with any applicable land use plan, policy, or regulation, or conflict with any applicable habitat or natural community conservation plan.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Section 5.10 – NOISE			
Project Level Impacts			
Impact 5.10-1: Implementation of the proposed project would not expose persons to, or generate, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant

Table 2-1 (Continued)
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 5.10-2: Implementation of the proposed project would not expose persons to or generate excessive ground borne vibration or ground borne noise levels.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.10-3: Implementation of the proposed project may result in a substantial temporary or periodic increase in noise levels in excess of standards permitted in the general plan or noise ordinance.	Potentially Significant Impact	**MM 5.10-1a:** In addition to permitted hours of operation, project grading and construction plans shall note the following noise control measures to be implemented by the project contractor throughout the duration of onsite and offsite construction activities. The plans shall be subject to the review and concurrence of the City of Redding Development Services Department: • Fixed construction equipment such as compressors and generators shall be placed the greatest possible distance from sensitive receptors, but no closer than 200 feet from existing residences. **MM 5.10-1b:** In addition to permitted hours of operation, project grading and construction plans shall note the following with regards to construction vehicle traffic. The plans shall be subject to the review and concurrence of the City of Redding Development Services Department and implemented by the project contractor throughout the duration of onsite and offsite construction activities: • During all project-related construction activities, construction vehicle parking, material delivery trucks, and heavy trucks used for soil or materials hauling shall be required to avoid local residential streets, including but not limited to, Parkview Avenue and Wilshire Drive.	Significant and Unavoidable
Impact 5.10-4: Implementation of the proposed project may result in a substantial permanent increase of ambient noise levels in excess of standards permitted in the general plan or noise ordinance.	Potentially Significant Impact	**MM 5.10-2a:** Prior to issuance of a building permit, the project applicant shall provide to the satisfaction of the City of Redding Development Services Department, either an acoustical analysis that demonstrates that operational noise levels from the use of emergency generators do not exceed 75 dBA Leq, or manufacturer's data that demonstrates that the emergency generators do not exceed 75 dBA Leq, as measured at a distance of 23 feet from the generator. **MM 5.10-2b:** As a condition of project approval, all onsite generators shall be exercised during daytime hours only; weekdays between 7:00 AM and 10:00 PM. **MM 5.10-2c:** Prior to issuance of an occupancy permit, the City of Redding Development Services Department shall verify through final plan check that all HVAC equipment are roof-mounted and screened by parapets or other acceptable mechanical screening.	Less Than Significant
Cumulative Impacts			
Impact 5.10-5: Implementation of the proposed project, combined with other past, present, and reasonably	Potentially Significant Impact	Implement **MM 5.10-1**and **MM 5.10-2**.	Less Than Significant

Table 2-1 (Continued)
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
foreseeable future development, may potentially increase the ambient noise levels in the project vicinity.			
Section 5.11 – POPULATION AND HOUSING			
Project Level Impacts			
Impact 5.11-1: Implementation of the proposed project would not induce substantial population growth in an area, either directly or indirectly.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Cumulative Impacts			
Impact 5.11-2: Development of the proposed project, along with approved and proposed development, would result in increased population in the City of Redding.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Section 5.12 – PUBLIC SERVICES			
Project Level Impacts			
Impact 5.12-1: The proposed project could result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities and/or result in the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts to maintain acceptable service ratios, response times, or other performance objectives for any of the public services, which include fire protection, police protection, schools, and parks.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Cumulative Impacts			
Impact 5.12-2: Implementation of the proposed project, combined with other	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant

Table 2-1 (Continued)
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
past, present, and reasonably foreseeable future development, could increase the demand for public services.			
Section 5.13 – RECREATION			
Project Level Impacts			
Impact 5.13-1: Implementation of the proposed project would not result in increased use of existing neighborhood and regional parks or other recreation facilities such that substantial physical deterioration of the facility would occur or be accelerated.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.13-2: Implementation of the proposed project would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Cumulative Impacts			
Impact 5.13-3: The proposed project, combined with cumulative projects, would not result in increased use of existing neighborhood and regional parks or other recreation facilities such that substantial physical deterioration of the facility would occur or be accelerated.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.13-4: The proposed project, combined with cumulative development, would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Section 5.14 – TRAFFIC AND CIRCULATION			
Project Level Impacts			
Impact 5.14-1: Implementation of the proposed project may cause an increase in traffic which exceeds significance	Potentially Significant Impact	**MM 5.14-1:** Prior to prior to Certificate of Occupancy for the first building the following improvements shall be completed by the project applicant to the satisfaction of the City of Redding Public Works Department:	Less Than Significant

Table 2-1 (Continued)
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
criteria established in the City of Redding's Traffic Impact Assessment Guidelines.		• *Hartnell Avenue & Cypress Avenue (Intersection #10).* Construct a southbound left turn pocket; construct a southbound thru/right lane; and convert intersection to an eight phase traffic signal.	
Impact 5.14-2: Project implementation would not create temporary traffic delays or increase hazards due to a design features such as sharp curves or dangerous intersections.	Less Than Significant Impact	**MM 5.14-2:** Prior to commencement of any construction activities, the project applicant shall submit a Traffic Management Plan (TMP) to the City of Redding Public Works Department. The TMP shall address temporary safety and traffic concerns along Henderson Road (South), Parkview Avenue (Open Space Access), Henderson Road (North), Parkview Avenue (South) and along the site's northern interface with Cypress Avenue and eastern interface with Hartnell Avenue. At a minimum, the TMP shall include plans clearly denoting any proposed lane closures, proposed vehicle/bicyclist/pedestrian rerouting plans, and a traffic signage plan to ensure adequate circulation during the short-term construction process. The TMP shall be subject to review and approval by the City of Redding City Engineer. In addition, if temporary road or lane closures are determined necessary, notification shall be provided to the Redding Fire Department and Police Department.	Less Than Significant
Impact 5.14-3: Implementation of the proposed project would not conflict with adopted policies, plans or programs supporting alternative transportation (e.g. bus turnouts, bicycle racks).	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Cumulative Impacts			
Impact 5.14-4: Implementation of the proposed project could result in increased traffic volumes at study area intersections under Year 2040 cumulative plus project conditions.	Potentially Significant Impact	**MM 5.14-3:** *Hartnell Avenue & Cobblestone Shopping Center (Main Driveway) (Intersection #8).*Prior to prior to Certificate of Occupancy for the first building the project applicant shall implement one of the following options to the satisfaction of the City of Redding Public Works Department: • Restripe southbound left turn lane to a two-way left turn lane. • Restripe eastbound left/thru/right to a left/thru and right turn pocket. **MM 5.14-4:** *Hartnell Avenue & Cypress Avenue (Intersection #10).* Prior to prior to Certificate of Occupancy for the first building project applicant shall pay the pro-rated cost share representing 33% of the cost of constructing the following intersection improvements: Construct dual left turn pockets for the westbound approach; and expand southbound Hartnell Avenue to accommodate dual left turns from Cypress Avenue. The fee shall be established based on an engineer's cost estimate of the improvements prepared by the project applicant and approved by the City of Redding Public Works Department.	Less Than Significant

Table 2-1 (Continued)
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Section 5.15 – TRIBAL CULTURAL RESOURCES			
Project Level Impacts			
Impact 5.15-1: Ground disturbing activities could result in the unanticipated discovery of prehistoric archaeological sites, which may be considered to be Tribal Cultural Resources.	Potentially Significant Impact	Implement **MM 5.4-1a** through **MM 5.4-1e** in Section 5.4, CULTURAL RESOURCES.	Less Than Significant
Cumulative Impacts			
Impact 5.15-2: Implementation of the proposed project, combined with planned and reasonably foreseeable development within the City of Redding could result in the unanticipated discovery of prehistoric archaeological sites, which may be considered to be Tribal Cultural Resources.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Section 5.16 – UTILITIES AND SERVICE SYSTEMS			
Project Level Impacts			
Impact 5.16-1: Implementation of the proposed project would not exceed wastewater treatment requirements of the Central Valley RWQCB.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.16-2: Implementation of the proposed project would not 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.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.16-3: Implementation of the proposed project would not result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant

Table 2-1 (Continued)
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 5.16-4: Have sufficient water supplies available to serve the project from existing entitlements and resources, or would new or expanded entitlements be needed.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.16-5: Project implementation would not result in inadequate wastewater capacity to serve existing and projected demand within the Clear Creek Basin Collection Area.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.16-6: Project implementation would increase the demand for solid waste disposal services.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.16-7: Implementation of the proposed project would comply with federal, State, and local statutes and regulations related to solid waste.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Cumulative Impacts			
Impact 5.16-8: Implementation of the proposed project, combined with other past, present, and reasonably foreseeable future development, would not contribute to cumulative demands for wastewater, domestic water, and solid waste disposal.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Section 5.17 – ENERGY CONSUMPTION			
Project Level Impacts			
Impact 5.17-1: Project implementation would not use fuel or energy in a wasteful manner.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Impact 5.17-2: Project implementation would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant
Cumulative Impacts			
Impact 5.17-3: The proposed project, in combination with cumulative	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant

Table 2-1 (Continued)
PROJECT IMPACTS AND PROPOSED MITIGATION MEASURES

Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
development within Shasta County, would not use fuel or energy in a wasteful manner.			
Impact 5.17-4: Project implementation, along with foreseeable development in the project vicinity, would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	Less Than Significant Impact	No mitigation measures are required.	Less Than Significant