

8.0 OTHER CEQA CONSIDERATIONS

This section of the Draft Environmental Impact Report (EIR) provides an overview of the significant and unavoidable impacts of the proposed project, as well as significant irreversible changes that would result from implementation of a proposed project. A more detailed analysis of the effects the proposed project would have on the environment, and proposed mitigation measures to minimize significant environmental impacts, are provided in Sections 5.1 through 5.17 of this EIR.

8.1 SIGNIFICANT AND UNAVOIDABLE IMPACTS

Section 15126(b) of the California Environmental Quality Act (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 EIR, the issue areas were analyzed to determine whether project implementation would result in a significant adverse environmental impact. Refer to those discussions for further details and analysis of the *significant and unavoidable* impacts identified below. Should the City of Redding approve the proposed project, the City shall be required to cite its findings in accordance with State *CEQA Guidelines* §15091 and prepare a Statement of Overriding Considerations in accordance with State *CEQA Guidelines* §15093.

AESTHETICS (Section 5.1)

IMPACT 5.1-2	<i>Implementation of the proposed project could potentially degrade the existing visual character or quality of the site and its surroundings.</i>
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Although the project's earth tone colors, setbacks, landscaping, and variation in building heights and massing would minimize changes in visual character, Building 'A' and Building 'C' would encroach on public views of the tree-lined banks of the Sacramento River (Key View 2), which is designated as a visual resource by the *General Plan*; refer to Figure 4.1-4. To minimize the project's impacts to visual character/quality of the project site and surrounding area as seen from Key View 2, **MM 5.5-1** would be required. **MM 5.5-1** would require the project applicant to submit updated landscape plan to the City of Redding which incorporates reasonable and feasible landscaping and architectural features that would screen public views of the proposed project from recreational users along the Sacramento River. Examples of features that may be incorporated could include tree species that would provide screening of buildings or color treatments to blend buildings with the riparian corridor, among others. Implementation of **MM 5.5-1**, as well as compliance with the City's site planning and architectural design review process, would reduce the project's impacts to visual character/quality of the site, as seen from the Sacramento River. However, as the resultant effects of implementation of **MM 5.5-1** are not measurable, impacts to the degradation of character/quality along the Sacramento River would remain *significant and unavoidable*.

IMPACT 5.1-5	<i>Project development, together with cumulative projects, could potentially degrade the visual character/quality of the project site.</i>
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Cumulative development would occur within the project site’s vicinity, including development of the Henderson Open Space Trail and Kayak Project and Cobblestone Shopping Center. Development of these cumulative projects would be evaluated on a project- and site-specific basis, including proximity to visually sensitive receptors and the visual sensitivity of the respective development sites. Each project would undergo site planning and architectural design review, as required, with accompanying design elements and landscaping. However, as with the proposed project, development of the Henderson Open Space Trail and Kayak Project could have the potential to encroach on public views of the tree-lined banks of the Sacramento River, which is designated as a visual resource by the *General Plan*. As such, development of cumulative projects would result in a *significant* impact pertaining to the degradation of visual character and quality along the Sacramento River.

The proposed project would result in a *significant and unavoidable* cumulative contribution to the degradation of character and quality along the Sacramento River. As a result, overall cumulative impacts of from past, present, or reasonably foreseeable projects would result in cumulatively *significant and unavoidable* impacts.

AIR QUALITY (Section 5.2)

IMPACT 5.2-1	<i>Implementation of the proposed project would conflict with or obstruct implementation of the 2015 Air Quality Attainment Plan.</i>
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Table 5.2-10, LONG-TERM MITIGATED OPERATIONAL EMISSIONS, in Section 5.2, AIR QUALITY, shows the ozone precursors and particulate matter that would be released as part of the proposed project. Section 3.0, Project DESCRIPTION, describes the existing *General Plan* land use designation for the proposed project site as "General Office" (GO), "General Commercial" (GC), and "Greenway" (GWY) to "Public Facilities" (PF-I). The general plan amendment would result in an increase of emissions that were not evaluated in the *2015 Air Quality Attainment Plan*. This may result in a conflict with implementation of the *2015 Air Quality Attainment Plan* by resulting in an increase of ozone precursor emissions.

The majority of project emissions would be generated by mobile sources, which cannot be regulated by the City. While there are no feasible mitigations that would reduce vehicle trips the proposed project would implement a variety of voluntary trip reduction programs and ridesharing programs for employees. Additionally, the project buildings would be more energy efficient with Energy Star efficient appliances and onsite renewable energy generation. Nevertheless, there are no feasible mitigations that would reduce ozone precursor emissions consistent with the *2015 Air Quality Attainment Plan*, and this impact is considered *significant and unavoidable*.

IMPACT 5.2-8	<i>Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).</i>
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While the proposed project’s emissions would be below Shasta County Air Quality Management District (SCAQMD) thresholds, the project conflicts with the *2015 Air Quality Attainment Plan* equate to cumulative ozone precursor impacts since the *Air Quality Attainment Plan* addresses ozone precursor pollutants in the Northern Sacramento Valley Air Basin (NSVAB). The proposed project would conflict

with implementation of the *2015 Air Quality Attainment Plan* by resulting in an increase of ozone precursor emissions beyond that anticipated. Therefore, impacts are cumulatively *significant and unavoidable*.

NOISE (Section 5.10)

**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.

Typical construction activities are predicted to generate maximum noise levels in the range of 63-68 dBA L_{max} depending on the exact location of construction activity and the type of equipment being used. Existing maximum noise levels at the nearest sensitive receptors was found to be in the range of 65-67 dBA L_{max} . Therefore, typical maximum construction noise levels would be within the range of existing maximum ambient noise levels. The Federal Highway Administration’s Roadway Construction Noise Model indicates that maximum noise levels from the typical construction equipment will occur between 20 percent and 40 percent of an hour. Therefore, the predicted hourly Leq is expected to be approximately 66 dBA at the nearest residences during construction activities. Based upon background noise levels conducted at the nearest residences, the existing typical background noise levels are 49 dBA Leq . Therefore, the predicted noise levels due to construction activities could be up to 17 dBA Leq higher than the measured existing noise levels.

The predicted construction noise levels at the nearest residences would exceed the exterior noise level standards contained in the City’s Noise Ordinance. In addition, although maximum noise levels due to construction activities would be consistent with those which were measured at the nearest residences, the hourly Leq noise levels would be considerably higher than existing background noise levels. This is considered to be a *significant* impact. Implementation of **MM 5.10-1a** and **MM 5.10-1b** would further reduce project construction noise at sensitive receptors; however, this impact would remain *significant and unavoidable*.

8.2 SIGNIFICANT IRREVERSIBLE CHANGES

Section 15126.2(c) of the State *CEQA Guidelines* requires an EIR to discuss the significant irreversible environmental changes that would result from implementation of a proposed project. These may include current or future uses of non-renewable resources, and secondary or growth-inducing impacts that commit future generations to similar uses. CEQA dictates that irretrievable commitments of resources should be evaluated to assure that such current consumption is justified. The State *CEQA Guidelines* describe three distinct categories of significant irreversible changes: 1) changes in land use that would commit future generations; 2) irreversible changes from environmental actions; and 3) consumption of nonrenewable resources.

The underlying purpose of the proposed project is to provide for a “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. These facilities strive to provide adults with the tools to manage and maintain optimum health. As the proposed project would contribute to the health and well-being of the people in and around Redding who seek health

care from Dignity Health, the consumption of non-renewable resources, as described in this EIR, is considered justified.

CHANGES IN LAND USE WHICH WOULD COMMIT FUTURE GENERATIONS

The City's *General Plan* was adopted in October 2000 and serves as the overall guiding policy document for land use, development, and environmental quality in the City of Redding for the next 20 years. The *General Plan* includes policies, standards, implementation programs, quantified objectives, the General Plan Diagram, and circulation diagrams. The *General Plan* planning area is divided into five primary sectors, each of which is shaped by its unique characteristic, history, and issues. The proposed project is located in the Southeast Redding Planning Area and carries a land use classification of "General Office" (GO), "General Commercial" (GC), and "Greenway" (GWY), and is zoned "General Office" (GO), "General Commercial" (GC), and "Open Space" (OS).

The purpose of the proposed project is to construct and operate a wellness center for ambulatory medical offices and clinics. Implementation of the proposed project would result in the construction of three buildings totaling approximately 129,600 square feet with associated parking, landscaping and infrastructure on the 10.55-acre project site, subject to approval of a use permit, parcel map, general plan amendment, and rezone by the City. The development of the proposed project site would constitute a permanent commitment of land that would be physically altered to support the proposed institutional-type development. It is unlikely that circumstances would arise that would justify the return of the land to its original condition. Alteration of the proposed project site is consistent with the land use designation, goals, objectives, and policies of the City of Redding *General Plan*.

IRREVERSIBLE CHANGES FROM ENVIRONMENTAL ACCIDENTS

No significant irreversible environmental damage, such as what could occur as a result of an accidental spill or explosion of hazardous materials, is anticipated due to implementation of the proposed project. Construction of the project would result in the use of commercially-available hazardous materials, such as gas, oil, paints, and solvents. Compliance with federal, State and local regulations would reduce to a *less than significant* level the possibility that the use of hazardous substances within the proposed project site would cause significant environmental damage. Operation of the medical wellness center on the site would not be expected to result in the substantial use of hazardous materials. Therefore, operation of the proposed project would not be expected to pose the threat of an environmental accident.

CONSUMPTION OF NONRENEWABLE RESOURCES

Consumption of nonrenewable resources includes conversion of agricultural lands, loss of access to mining reserves, and use of nonrenewable energy sources. The proposed project site has not been historically used for agricultural purposes, nor does it possess soils that are prime for agricultural production. The site is not located within an area of Prime Farmland as identified by the California Department of Conservation's Important Farmland Series Mapping and Monitoring Program.

The proposed project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a City's *General Plan* or other land use plan. The proposed project is not identified in the *General Plan* as having any known mineral resource value, or as being located within any "Critical Mineral Resource Overlay" area.

Construction of the proposed project would require the use of energy, including energy produced from non-renewable resources. Energy consumption would also occur during the operational period of the proposed project due to the use of automobiles and appliances, and for heating and cooling. Therefore, new structures would increase consumption of nonrenewable fuel sources when compared to existing conditions.

As evaluated in Section 5.17, ENERGY CONSUMPTION, the proposed project's increase in electricity usage would constitute an approximate 0.15 percent increase in the typical annual electricity consumption and an approximate 0.11 percent increase in the typical annual natural gas consumption attributable to all nonresidential buildings in Shasta County. The increase in automotive fuel, including the one-time construction of the project, would increase use in the County by less than one percent.

The proposed project would be required to comply with Title 24 Building Energy Efficiency Standards, which provide minimum efficiency standards related to various building features, including appliances, water and space heating and cooling equipment, building insulation and roofing, and lighting. Implementation of the Title 24 standards significantly reduces energy usage. Furthermore, the electricity provider in Redding, the Redding Electric Utility (REU), is subject to California's Renewables Portfolio Standard (RPS). The RPS requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020 and to 50 percent of total procurement by 2030. Renewable energy is generally defined as energy that comes from resources which are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat. The increase in reliance of such energy resources further ensures projects would not result in the waste of the finite energy resources.

The proposed project's increase in electricity, natural gas, and automotive fuel consumption over existing conditions would be minimal (less than 1 percent). For the reasons described above, the proposed project would not consume a significant amount of nonrenewable energy resources.