7.0 ALTERNATIVES TO THE PROPOSED PROJECT

The *California Environmental Quality Act* (CEQA) requires that "an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives" (State *CEQA Guidelines* §15126.6). This chapter identifies potential alternatives to the proposed project and evaluates them, as required by CEQA. Key provisions of the State *CEQA Guidelines* on alternatives (§15126.6(a) through (f)) are summarized below to explain the foundation and legal requirements for the alternatives analysis in the Draft EIR.

- *"The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly" (§15126.6(b)).*

- *"The specific alternative of 'no project' shall also be evaluated along with its impact" (§15126.6(e)). "The no project analysis shall discuss the existing conditions at the time the Notice of Preparation is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives" (§15126.6(e)(2)).*

- *"The range of alternatives required in an EIR is governed by a 'rule of reason' that require the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project" (§15126.6(f)).*

- *"Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)" (§15126.6(f)(1)).*

- *For alternative locations, "only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR" (§15126.6(f)(2)(A)).*

- *"An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative" (§15126.6(f)(3)).*

Per the State *CEQA Guidelines* §15126.6(d), additional significant effects of the alternatives are discussed in less detail than the significant effects of the project as proposed. For each alternative, the analysis: 1) describes the alternative; 2) analyzes the impact of the alternative as compared to the proposed project; 3) identifies the impacts of the project which would be avoided or lessened by the

alternative; 4) assesses whether the alternative would meet most of the basic project objectives; and 5) evaluates the comparative merits of the alternative and the project.

7.1 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.

7.2 SIGNIFICANT ENVIRONMENTAL IMPACTS

This Draft EIR discloses that the proposed project would have the following *significant and unavoidable* environmental impacts:

- Aesthetics (Project Level & Cumulative)
- Air Quality (Project Level & Cumulative)
- Noise (Project Level)

Per §15126.6 (b) of the State *CEQA Guidelines*, the discussion of alternatives shall focus on alternatives to a project (or its location) that are capable of avoiding or substantially lessening significant impacts of a project, even if the alternatives would impede to some degree the attainment of the project objectives or would be more costly. This alternatives analysis, therefore, focuses on project alternatives that could avoid or substantially lessen environmental impacts of the proposed project related to the environmental categories listed above.

7.3 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 requirement that an EIR evaluate alternatives to the proposed project or alternatives to the location of the proposed project is a broad one; the primary intent of the alternatives analysis is to disclose other ways that the objectives of the project could be attained while reducing the magnitude of, or avoiding, the environmental impacts of the proposed project. Alternatives that are included and evaluated in the EIR must be feasible alternatives. However, the State *CEQA Guidelines* require the EIR to *"set forth only those alternatives necessary to permit a reasoned choice."* The State *CEQA Guidelines* provide a definition for "a range of reasonable alternatives" and thus limit the number and type of alternatives that may need to be evaluated in a given EIR. According to the State *CEQA Guidelines* §15126.6(f): *The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determined could feasibly attain most of the basic objectives of the project.*

First and foremost, alternatives in an EIR must be potentially feasible. Section 15126.6(a) states that *"An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible."* Section 15126.6(f)(1) adds that *"Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries…and whether the proponent can reasonably acquire control or otherwise have access to the alternative site. Finally, an EIR is not required to analyze alternatives when the effects of the alternative "cannot be reasonably ascertained and whose implementation is remote and speculative."*

No one of these factors establishes a fixed limit on the scope of reasonable alternatives. However, the California Supreme Court has stated that lead agencies, not project opponents, have the burden to formulate alternatives for inclusion in an EIR.

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)). Alternative site evaluations are most relevant for projects carried out by public agencies and other entities that hold large tracts of land in multiple locations, where there is a choice in project placement. For example, a power plant or highway alignment may be located in different areas on public land and achieve the same objectives.

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.

Prior to initiating formal planning and engineering studies for the proposed project, preliminary site screening due diligence efforts were undertaken. Table 7-1, APPLICANT'S PREVIOUSLY CONSIDERED SITES, provides a summary of locations throughout the City of Redding previously considered by the project applicant. Remarks are provided to explain why further consideration of the various locations was not pursued.

In addition to the noted remarks in Table 7-1, the ability to substantially meet the stated objectives as provided below in Subsection 7.1, *Project Objectives*, was another key consideration in the screening of available properties.

In consideration of State *CEQA Guidelines* §15126.6(f)(1), Subsection 7.4, *Project Alternatives*, 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).

Table 7-1
APPLICANT'S PREVIOUSLY CONSIDERED SITES

Site Location	Approximate Acreage	General Plan & Zoning	Remarks
4032 South Bonnyview Road	14.5	SC / SC	Property not for sale at the time of inquiry. Project site is currently proposed as the future relocation site for Costco.
905 Cypress Avenue	3.85	GC / GC	Site was determined to be an undesirable location for medical facilities. The site was the location of the Meeks Lumber and Hardware Store and would require the demolition of existing structures. The site is too small to accommodate the proposed project.
1910 Cypress Avenue	20.56	RM GO / RM-9	Site is not centrally located and was determined to be an undesirable location for medical facilities. Development would require wetlands to be filled. Due to topographic constraints and if wetlands were to be avoided, the effective area for development would be approximately 11.2 acres which could accommodate the proposed project.
4531 Hillmonte Drive	NA	SC / SC	Property owner sold to Churn Creek Marketplace.
955 Palisades Avenue	4.13	GO / GO	The site was considered to have poor accessibility and not large enough for the proposed project. Approximately 2.5 acres has slopes exceeding 17 percent which would require the mass grading.
9 Hilltop Drive	10.08	RM 10-20 / RM-15-PD	The site is not centrally located and abuts residential development to the east and south. The property owner has intentions of developing an assisted living facility on the site in the future.
10 Lake Boulevard	5.5	GC / GC	The site is not centrally located and abuts multi-family residential development to the east. The site is not large enough to accommodate the proposed project.
413 North Market Street	6.17	GC & GWY / GC-VR-BH	Site was purchased by another buyer. The entire site is also located in the Sulphur Creek floodplain and is not large enough for the proposed project. Sulphur Creek abuts the northern and eastern boundaries of the parcel.
3480 Hartnell Avenue	14.94	GC / GC	In addition to the site not being centrally located, jurisdictional Waters of the U.S. and in particular, vernal pools would constrain development of the site if they were avoided. Vernal pool fairy shrimp are known to exist in the area.
18820 Old Oasis Road	7.12	GC / GC	The site is not centrally located and is not large enough to accommodate the proposed project. Approximately one-acre is located within the Churn Creek floodplain.
930 Canby Road	5.98	RM 10-20 / RM-12	In addition to the property not being large enough, there are topographic constraints that would require mass grading to accommodate the proposed project. Nine percent slopes affect approximately 4.3 acres of the site.
2800 Rancho Road	9.92	SC / SC	The site is not centrally located and jurisdictional Waters of the U.S. constrain development of the site. A vernal pool is located in the southwest corner of the site. The area has known habitat for vernal pool fairy shrimp .

Source: Dignity Health Redding. 2018; City of Redding GIS. 2018.

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).

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, ALTERNATIVE SITE CONFIGURATION, 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:

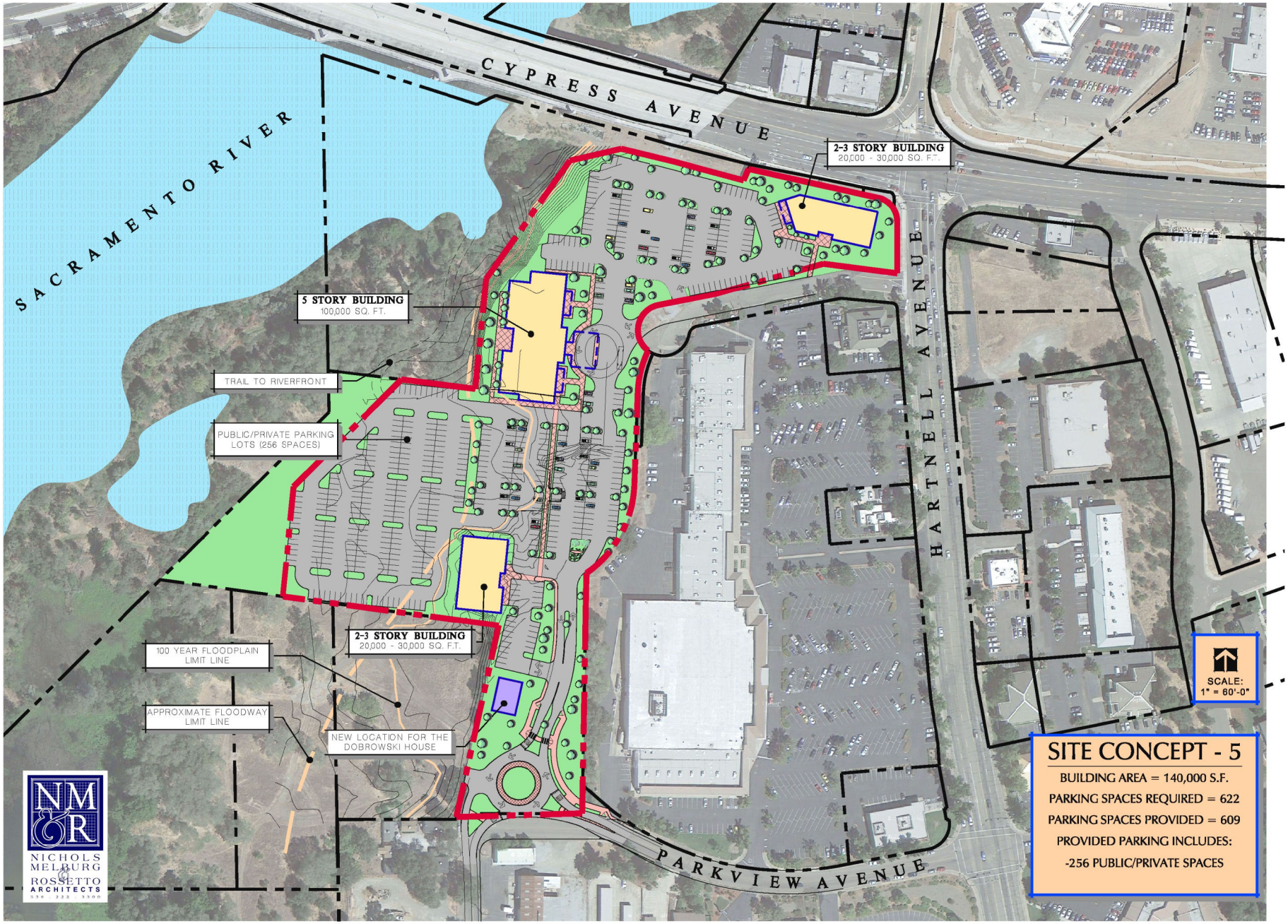
- Building 'A' – 5 stories – 100,000 sq. ft. – Height varies from 90 to 100 feet
- Building 'B' – 2 to 3 stories – 20,000 to 30,000 sq. ft. – Height varies from 36 to 58 feet
- Building 'C' – 2 to 3 stories – 20,000 to 30,000 sq. ft. – Height varies from 36 to 58 feet
- 609 parking spaces (622 parking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

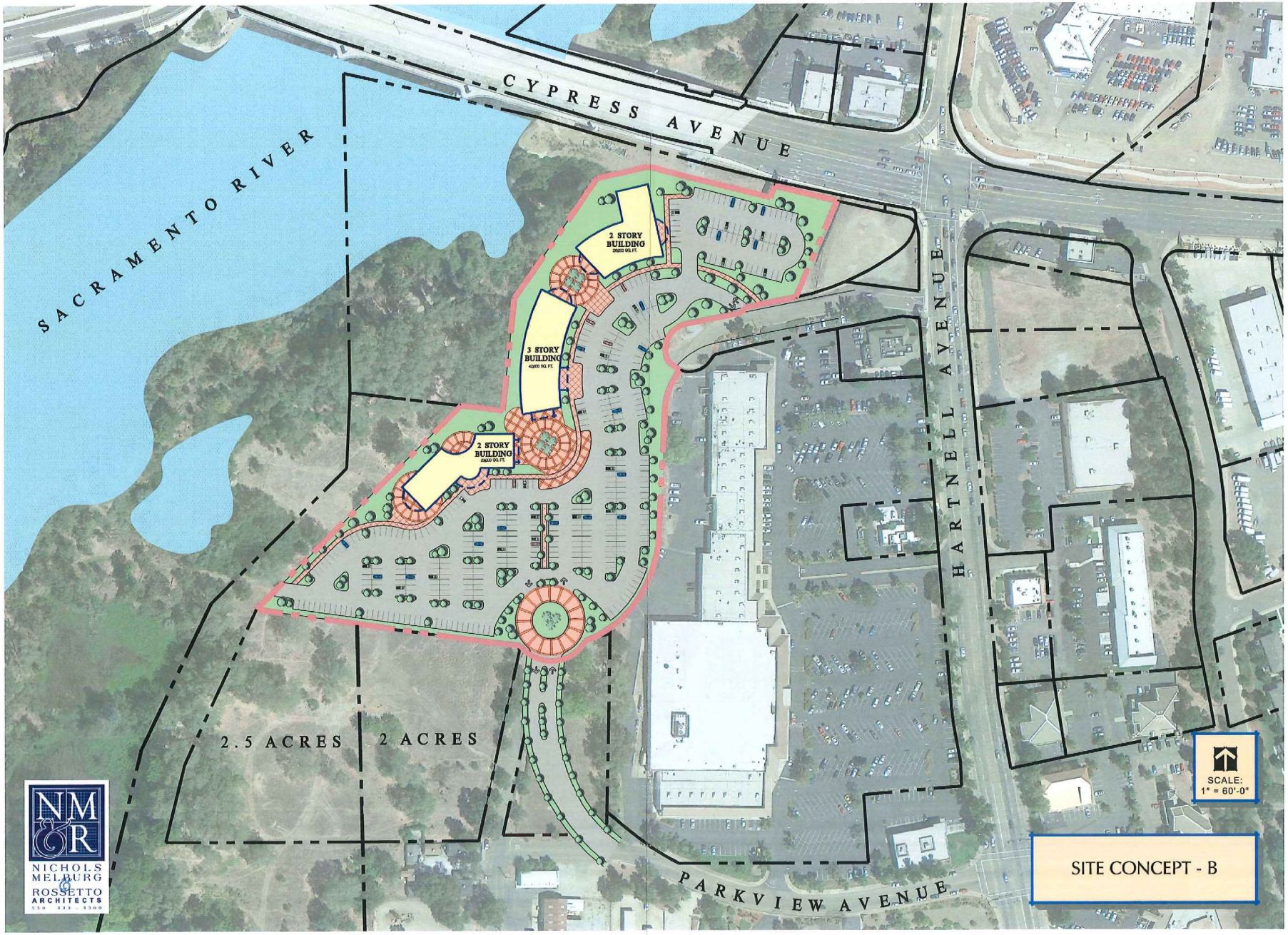
REDUCED SITE PLAN

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). 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.

This alternative proposes three buildings to be closely grouped 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.



SHN	Dignity Health North State Pavilion Project	Alternative Site Configuration Figure 7-1



SHN	Dignity Health North State Pavilion Project	Reduced Site Plan Figure 7-2

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.

7.4 PROJECT ALTERNATIVES

Alternatives that would avoid or substantially lessen any of the significant effects of the project and that would feasibly attain most of the basic project objectives are analyzed below. Each alternative is discussed with respect to its relationship to the proposed project and the project objectives. In addition, impacts associated with each alternative, as they relate to the impacts associated with the proposed project are also provided in the analysis below. The alternatives analyzed individually include the following:

- "No Project – Existing General Plan & Zoning" Alternative
- "Reduced Intensity" Alternative
- "Mercy Oaks Campus" Alternative

Specifically, as previously discussed, per the State *CEQA Guidelines* §15126.6(d), additional significant effects of the alternatives are discussed in less detail than the significant effects of the project as proposed. For each alternative, the ensuing analysis describes the alternative, analyzes the impacts of the alternative as compared to the proposed project, identifies significant impacts of the proposed project that would be ***avoided*** or ***reduced*** by the alternative, assesses the alternative's ability to meet most of the project objectives, and evaluates the comparative merits of the alternative and the proposed project (provided in Subsection 7.5, *Environmentally Superior Alternative*).

"NO PROJECT – EXISTING GENERAL PLAN & ZONING" ALTERNATIVE

Description of Alternative

State *CEQA Guidelines* §15126.6, subdivision (e)(2), states that "[t]he "no project" analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, *as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.*

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. State *CEQA Guidelines* §15126.6 (e)(3)(A) states:

> "When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the 'no project' alternative will be the continuation of the existing plan, policy or operation into the future. Typically, this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan."

As previously described in Section 3.0, PROJECT DESCRIPTION, the *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 based on the approved Use Permit Site Plan dated April 1997 by Weld-Brower and Associates); 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 (refer to Figure 7-3, SITE PLAN UP-29-97). This "No Project – Existing General Plan & Zoning" alternative will utilize these specific land uses and square-footages on 3.66 acres of the proposed project site. The *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 previously approved Use Permit 29-97 site plan for the 3.66 acres and where the approximate 6.89 acres of "General Commercial" (GC) and "General Office" (GO) land use could be generally located in the northwestern portion of the proposed project site.

In order to determine the amount of additional development or building intensity that could occur on the remaining 6.89 acres, floor area ratio (FAR) measurement, which is the ratio of a building or project's floor area to its land area, was used. When the FAR is "high the property isn't being used to its fullest potential. When it's low, the property is at full capacity."[1] The same source noted that "the average (FAR) is between 2.5:1 to 3.5:1." Therefore, for this "No Project – Existing General Plan & Zoning" Alternative evaluation, the mid-point or, 3.0:1 is the FAR used to determine building square footage for the 6.89 acres regardless of the eventual "General Commercial" (GC) or "General Office" (GO) land use classification. As a point of information, the approximate 35,600 square feet of development approved for the 3.66 acres has a FAR of 4.5:1, which is considered high.

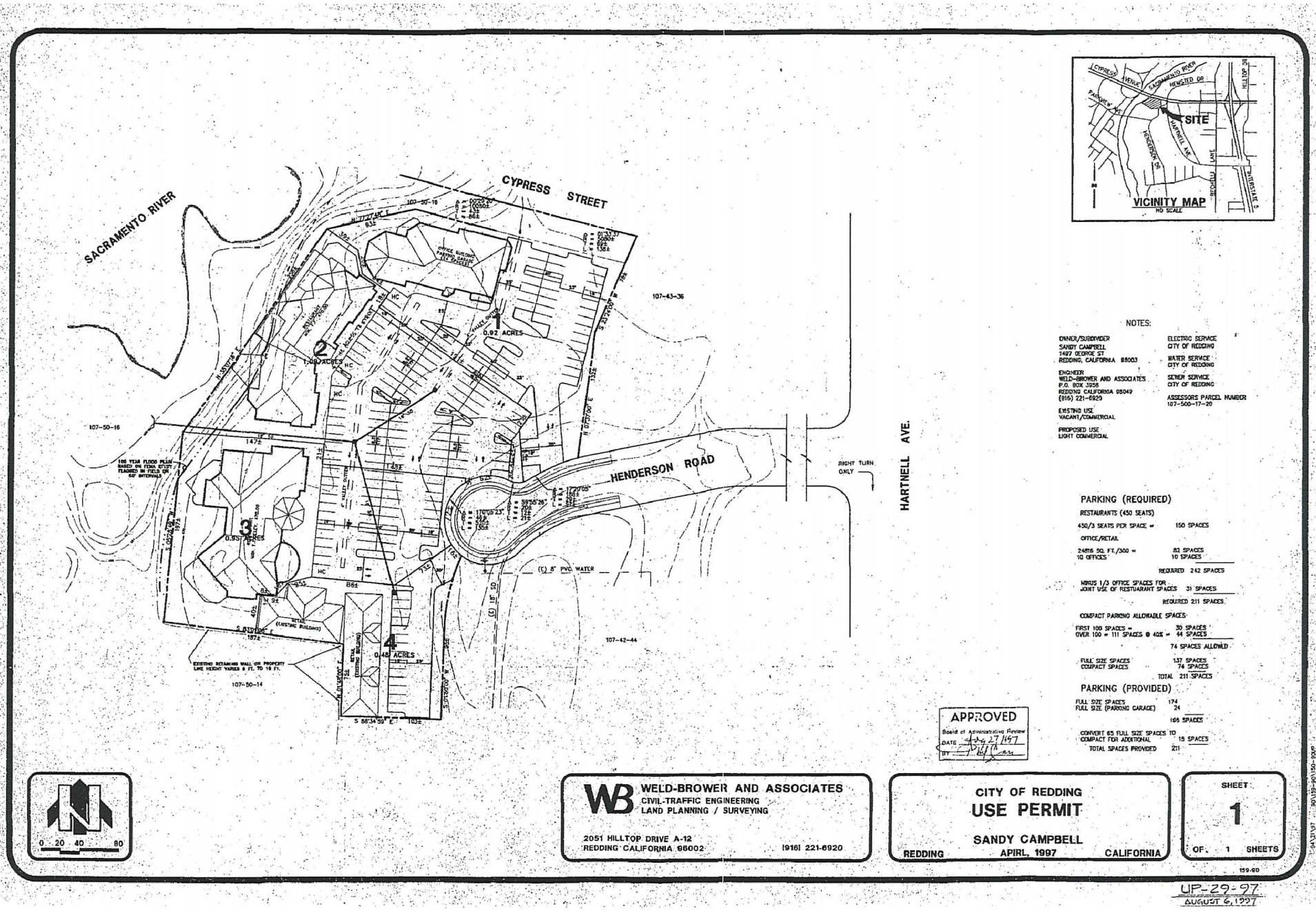
Based on a FAR of 3.0:1 approximately 99,043 square feet of "General Commercial" (GC) and "General Office" (GO) land use could be developed on the remaining 6.89 acres. Combining this square footage with the approximate 35,600 square feet previously approved yields a building area total of approximately 134,600 square feet that could be developed on the 10.55-acre site. Overall, a FAR of 3.4:1 is realized which is at the higher end of the average FAR range.

Table 7-2, NO PROJECT – EXISTING GENERAL PLAN & ZONING, identifies the various land uses and associated building square footages and acreages.

Impacts Compared to Project Impacts

The following is an evaluation of the potential environmental impacts of the "No Project – Existing General Plan & Zoning" alternative, as compared to those of the proposed project, is provided as follows.

[1] Kimmon, James. Updated September 9, 1918. *The Balance Small Business – How to Calculate the Land to Building Ratio*. [Online]: https://www.thebalancesmb.com/how-to-calculate-the-land-to-building-ratio-2866427. Accessed: February 10, 2019.



Dignity Health North State Pavilion Project

Site Plan UP-29-97

Figure 7-3

Table 7-2
NO PROJECT – EXISTING GENERAL PLAN & ZONING ALTERNATIVE LAND USES

Land Use	Building Size (sq. ft.)	Acres
Restaurant	10,800	3.66
General Office	19,200	
General Retail	5,500	
General Commercial	22,800	1,60
General Office	76,200	5.29
Totals	**134,600**	**10.55**

Aesthetics

As illustrated on Figure 7-1, view corridors of and from the Sacramento River would be potentially impacted, although building heights would be limited to one story for the retail and restaurant buildings and two stories for the office building where a parking garage would be located on what would be considered the first floor.

Impacts discussed for the proposed project in Impact 5.1-1 regarding scenic vistas would be similar, but *reduced*, under the "No Project – Existing General Plan & Zoning" alternative given maximum building heights allowed under the "General Commercial" (GC) and "General Office" (GO) zoning would limit maximum heights of buildings to 45 feet and 50 feet, respectively. Similar to the proposed project, impacts would be *less than significant,* and no mitigation measures would be required.

As discussed in Impact 5.1-2, the proposed project 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*, and degrade the existing visual character and quality of the site and its surroundings area as seen from Key View 2 resulting in impacts that are *significant and unavoidable* even after application of **MM 5.1-1**.

Due to the increase in the building square footage under the "No Project – Existing General Plan & Zoning" alternative, resultant visual character impacts would be greater when compared to that of the proposed project. Under this alternative, the increased building square footage onsite could potentially result in additional structures along the site's westerly edge adjacent to the Sacramento River resulting in *increased* impacts to public views along this visual resource. Similar to the proposed project, implementation of **MM 5.1-1** would be required; however, the level of significance after mitigation for this impact would remain *significant and unavoidable* for this alternative.

The proposed project has the potential to create a new source of substantial light or glare as identified in Impact 5.1-3, which could adversely affect day or nighttime views in the area due to exterior parking, street and building lighting (and potential interior lighting) at night, and window glare during the day. Implementation of **MM 5.1-1a** and **MM 5.1-1b** would reduce impacts to *less than significant* levels. Similar to the proposed project, even with the increase in square footage, the "No Project – Existing General Plan & Zoning" alternative would result in similar light and glare impacts requiring implementation of **MM 5.1-1a** and **MM 5.1-1b**, which would reduce impacts to a *less than significant* level. As a result, the "No Project – Existing General Plan & Zoning" alternative would result in similar, although *increased*, impacts when compared to the proposed project.

Cumulative Impacts

Cumulative impacts to scenic vistas discussed for the proposed project in Impact 5.1-4, would be *increased*, due to the additional building square footage under the "No Project – Existing General Plan & Zoning" alternative. Similar to the proposed project, cumulative impacts under this alternative would be *less than significant* and no mitigation measures would be required.

Similarly, for the proposed project and the "No Project – Existing General Plan & Zoning" alternative, Impact 5.1-5 identifies that project development together with impacts from past, present, or reasonably foreseeable projects cumulative projects in the area could potentially degrade the visual character/quality of the project site and area, particularly along the Sacramento River. However, even after application of **MM 5.1-1**, the cumulative impact for the proposed project would remain cumulatively *significant and unavoidable*. Cumulative impacts associated with implementing the "No Project – Existing General Plan & Zoning" alternative in this regard would be *increased* when compared to the proposed project.

Impact 5.1-6 determined that the proposed project, 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. Implementation of **MM 5.1-1a** and **MM 5.1-1b** would reduce cumulative impacts to *less than significant* levels. Implementation of the "No Project – Existing General Plan & Zoning" alternative would require implementation of these noted mitigation measures. Cumulative light and glare impacts associated with the "No Project – Existing General Plan & Zoning" alternative would be similar to the proposed project, although *increased*, and cumulatively *less than significant*.

Air Quality

As discussed in Impact 5.2-1, with implementation of **MM 5.6-1**, the proposed project would result in a *significant and unavoidable* impact related to consistency with the *2015 Air Quality Attainment Plan*. As noted for the "No Project – Existing General Plan & Zoning" alternative, the 10.55-acre site would develop as allowed under the City's existing *General Plan* land use classifications and *Zoning* designations for the property. Under the existing *General Plan* and *Zoning* and the land uses approved by UP-29-97, development of approximately 134,600 square feet of buildings could occur, whereas, the proposed project would develop 129,600 square feet which is 5,000 square feet less than the alternative. The alternative would have 670 fewer daily vehicle trips when compared to the proposed project.

To conduct an assessment of overall vehicle miles traveled (VMT) the Shasta County Regional Travel Demand Model (SCRTDM) was utilized. For the "No Project – Existing General Plan & Zoning" alternative a select zone analysis was conducted using the SCRTDM model whereby all tips generated by the alternative were tracked through the transportation system. As a result, the "No Project – Existing General Plan & Zoning" alternative would generate a total VMT of 19,221 compared to the proposed project (23,084 VMT), an approximate reduction of 3,863 VMT. This reduction is associated with different land uses that generate fewer vehicle trips. Although similar measures to **MM 5.6-1** would be required under this alternative, implementation of the "No Project – Existing General Plan & Zoning" alternative would result in *reduced* impacts to those of the proposed project related to the successful implementation of the *2015 Air Quality Attainment Plan*. However, impacts would remain *significant and unavoidable* under this alternative.

Under the "No Project – Existing General Plan & Zoning" alternative, construction maximum daily emissions would be increased when compared to the proposed project (Impact 5.2-2) due to the additional building area. It is expected that there would be an increase in truck haul trips and vendor/material delivery trips during construction. Due to the additional building area, there would be more painted surfaces and associated ROG emissions from architectural coatings. Impacts would remain below the SCAQMD's Threshold B Level of 137 pounds per day. As with the proposed project, implementation of SCAQMD BAMMs and SMMs (provided in **MM 5.2-1**) would be required under the "No Project – Existing General Plan & Zoning" alternative. Compared to the proposed project, construction impacts associated with the "No Project – Existing General Plan & Zoning" alternative would be similar, although *increased*.

Operational emissions associated with the proposed project were found to be *less than significant* with implementation of **MM 5.6-1** as noted in Impact 5.2-3. The "No Project – Existing General Plan & Zoning" alternative total daily vehicle trips would be reduced by 670 trips when compared to the proposed project's 4,697 daily trips.

Table 7-3, LONG-TERM UNMITIGATED OPERATIONAL EMISSIONS FOR NO PROJECT – EXISTING GENERAL PLAN & ZONING ALTERNATIVE, provides the unmitigated operational emissions associated with this alternative.

Table 7-3
LONG-TERM UNMITIGATED OPERATIONAL EMISSIONS FOR NO PROJECT – EXISTING GENERAL PLAN & ZONING ALTERNATIVE

Source	Pollutant (pounds/day)[1]				
	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO_X)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)	Carbon Monoxide (CO)
Summer Emissions					
Area Source	3.87	0.0007	0.0003	0.0003	0.08
Energy Use	0.14	1.28	0.10	0.10	1.07
Mobile Source	10.74	67.84	24.74	6.83	94.88
Total	**14.75**	**69.11**	**24.84**	**6.92**	**96.03**
Winter Emissions					
Area Source	3.87	0.0007	0.0003	0.0003	0.08
Energy Use	0.14	1.28	0.10	0.10	1.07
Mobile Source	7.96	69.70	24.74	6.83	87.76
Total	**11.97**	**70.97**	**24.84**	**6.93**	**88.90**
Potentially Significant Impact Threshold (Daily Emissions)	**25/137**	**25/137**	**80/137**	**None**	**None**
Exceed Daily Threshold?	**No/No**	**Yes/No**	**No/No**	**NA**	**NA**

Notes:
1. Emissions calculated using CalEEMod version 2016.3.2.

Refer to Appendix 15.2, AIR QUALITY EMISSIONS DATA, for daily emission model outputs.

Table 7-4, LONG-TERM MITIGATED OPERATIONAL EMISSIONS FOR NO PROJECT – EXISTING GENERAL PLAN & ZONING ALTERNATIVE, provides the alternative's emissions.

Table 7-4
LONG-TERM MITIGATED OPERATIONAL EMISSIONS FOR
NO PROJECT – EXISTING GENERAL PLAN & ZONING ALTERNATIVE

Source	Pollutant (pounds/day)[1]				
	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO_X)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)	Carbon Monoxide (CO)
Summer Emissions					
Area Source	3.87	0.0007	0.0003	0.0003	0.08
Energy Use	0.14	1.28	0.10	0.10	1.07
Mobile Source	9.93	61.18	18.77	5.19	76.37
Total	**13.95**	**62.46**	**18.87**	**5.28**	**77.51**
Winter Emissions					
Area Source	3.87	0.0007	0.0003	0.0003	0.08
Energy Use	0.14	1.28	0.10	0.10	1.07
Mobile Source	7.20	62.34	18.77	5.19	73.15
Total	**11.21**	**63.62**	**18.87**	**5.28**	**74.30**
Potentially Significant Impact Threshold (Daily Emissions)	**25/137**	**25/137**	**80/137**	**None**	**None**
Exceed Daily Threshold?	**No/No**	**Yes/No**	**No/No**	**NA**	**NA**

Notes:
1. Emissions calculated using CalEEMod version 2016.3.2.

Refer to Appendix 15.2, AIR QUALITY EMISSIONS DATA, for daily emission model outputs.

Both Table 7-3 and Table 7-4 identify that the alternative would not reduce operational emissions below the SCAQMD's Level A thresholds for NO_X. As with the proposed project, mitigated operational emissions would not exceed Level B thresholds. Similar to the proposed project, with implementation of **MM 5.6-1**, operational impacts would be *less than* significant. When compared to the proposed project, operational emissions associated with the "No Project – Existing General Plan & Zoning" alternative would be similar, although *reduced*, when compared to the proposed project.

As discussed in Impact 5.2-4, the proposed project would not create a CO hotspot at any intersections near sensitive receptors or near any project study intersections. As noted above, the "No Project – Existing General Plan & Zoning" alternative would have 670 fewer daily vehicle trips when compared to the proposed project's 4,697 daily vehicle trips. This reduction is associated with different land uses that generate fewer vehicle trips. As a result, impacts related to CO hotspots near sensitive receptors would be *less than significant* under this alternative. Compared to the proposed project, the impact is considered similar, however *reduced*.

Under Impact 5.2-5, impacts related to health risks associated with substantial toxic air contaminant concentrations during construction would be *less than significant*. Implementation of the "No Project – Existing General Plan & Zoning" alternative would represent an increase of approximately 5,000 square-feet (approximately 3.9 percent) greater building area than the proposed project. The resultant increase in construction activities under this alternative would not exceed thresholds identified in Table 5.2-11, CONSTRUCTION RISK, in Section 5.2, AIR QUALITY. Impacts related to health risks associated with substantial toxic air contaminant concentrations during construction for the "No Project – Existing General Plan & Zoning" alternative would be *less than significant*. When compared to the proposed project this impact is considered similar, but *increased*.

As discussed in Impact 5.2-6, impacts related to health risks associated with substantial toxic air contaminant concentrations during project operation (e.g. area source) would be *less than significant*. The "No Project – Existing General Plan & Zoning" alternative would result in an increased contaminant concentrations during project operation due to the increase in building square footage under this alternative; however, similar to the proposed project this impact would be *less than significant* and no mitigation would be required. When compared to the proposed project this impact is considered similar, but *increased.*

As discussed in Impact 5.2-7, the proposed project would result in *less than significant* impacts with regard to the creation of objectionable odors. Although there would be a slight increase in building square footage under the "No Project – Existing General Plan & Zoning" alternative, proposed uses commonly considered to be sources of odorous emissions (e.g. wastewater treatment plants, sanitary landfills, composting/green waste facilities, recycling facilities, petroleum refineries, chemical manufacturing plants, painting/coating operations, rendering plants, and food packaging plants) would not occur under this alternative. Odor impacts under this alternative would be *similar* to the proposed project and no mitigation measures would be required.

Cumulative Impacts

As discussed in Impact 5.2-8, the proposed project would conflict with implementation of the *2015 Air Quality Attainment Plan* by resulting in an increase of ozone precursor emissions. With implementation of the "No Project – Existing General Plan & Zoning" alternative, there would be an exceedence of the Level A thresholds for NOx, an ozone precursor emission; however, this exceedence is *reduced* when compared to the proposed project. As a result, it can be reasonably assumed that the "No Project – Existing General Plan & Zoning" alternative would likely conflict with the *2015 Air Quality Attainment Plan* related to cumulative ozone precursor impacts within the NSVAB as that of the proposed project. Even with compliance with SMMs and BAMMs provided in **MM 5.2-1**, the "No Project – Existing General Plan & Zoning" alternative's incremental contribution to this cumulative impact would be similar, although *reduced* when compared to that of the proposed project and considered cumulatively *significant and unavoidable*.

Cumulative impacts discussed for the proposed project under Impact 5.2-9, 5.2-10, 5.2-11, 5.2-12, 5.2-13, and 5.2-14 would be similar, although *increased*, under the "No Project – Existing General Plan & Zoning" alternative. Similar to the proposed project, cumulative impacts described under the noted impacts would be cumulatively *less than significant* and no mitigation measures would be required.

Biological Resources

Impact 5.3-1 discusses how the proposed project could have a substantial impact, 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. Implementation of the "No Project – Existing General Plan & Zoning" alternative would result in similar biological impacts as described in Impact 5.3-1 and similar to the proposed project, require implementation of mitigation measures to reduce impacts to *less that significant* levels.

Under this alternative, potential impacts on bat species would be reduced through the implementation of **MM 5.3-1a** and **MM 5.3-1b**. Mitigation measure **MM 5.3-1c** mitigates potential impacts associated with tree removal. Regarding potential impacts on the western pond turtle, **MM 5.3-1d** would be required. To mitigate for nesting bald eagles and migratory bird species, **MM 5.3-1e** would be implemented. Measures identified in **MM 5.3-1f** would avoid the introduction and spread of weeds, and implementation of **MM 5.3-1g** would minimize bird strikes on the proposed project buildings. With regard to this impact, the "No Project – Existing General Plan & Zoning" alternative would be *similar* to the proposed project.

With regard to impacts on riparian habitat and other sensitive natural communities 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 5.3-2), the proposed project would result in a *less than* significant impact with implementation of **MM 5.3-2a** and **MM 5.3-2b**. The "No Project – Existing General Plan & Zoning" alternative would impact onsite riparian habitat and with implementation of **MM 5.3-2a** and **MM 5.3-2b** would result in *less than significant* impacts. When compared to the proposed project, this impact would be *similar* for the alternative.

Impact 5.3-3 for the proposed project, addresses potential impacts that may interfere with the movement of native resident or migratory fish or wildlife species. With implementation of **MM 5.3-2a** and **MM 5.3-2b**, this impact would be reduced to a *less than significant* level. The implementation of the "No Project – Existing General Plan & Rezoning" alternative would require similar mitigation to reduce the significance of this impact. As a result, this impact is considered *similar* to the proposed project.

Under Impact 5.3-4 regarding potential conflicts with any local policies or ordinances protecting biological resources, such as the City of Redding's tree preservation ordinance, impacts under the proposed project would be similar for the "No Project – Existing General Plan & Zoning" alternative. With regard to this impact, both the proposed project and the alternative would be developed in accordance with Redding Municipal Code (RMC) Chapter 18.45, *Tree Management*. Impacts would be *less than significant* and no mitigation measures would be required. Compared the proposed project, this impact is considered *similar*.

As described under Impact 5.3-5, the proposed project has the potential 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. This impact would be *similar* for the "No Project – Existing General Plan & Rezoning" alternative and would require the implementation of **MM 5.3-1** and **MM 5.3-2** to reduce impacts to a *less than significant* level.

Cumulative Impacts

As discussed in 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. Implementation of the "No Project – Existing General Plan & Zoning" alternative would have *similar* impacts to the proposed project. However, with implementation of similar measures as described in **MM 5.3-1a** and **MM 5.3-1g,** impacts would be *less than significant*.

Impact 5.3-7 discusses that 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. Implementation of **MM 5.3-2a** and **MM 5.3-2b** for the proposed project would reduce impacts to *less than significant* levels. Compare to the proposed project, the "No Project – Existing General Plan & Zoning" alternative would have *similar* impacts and with implementation of similar measures as described in **MM 5.3-2a** and **MM 5.3-2b**, impacts would be *less than significant*.

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. Similar to the proposed project, implementation of **MM 5.3-2a** and **MM 5.3-2b** would be required to reduce impacts to *less than significant* levels. Impacts in this regard would be *similar* for the "No Project – Existing General Plan & Zoning" alternative.

Implementation of **MM 5.3-2b** for the proposed project, would reduce potential cumulative conflicts with local policies or ordinances protecting biological resources, such as the City's tree preservation ordinance as discussed for Impact 5.3-9. The impact and mitigation measure for the proposed project are *similar* for the "No Project – Existing General Plan & Zoning" alternative, whereby **MM 5.3-2b** reduces the potential impacts to a *less that significant* level. Relative to this impact, the "No Project – Existing General Plan & Zoning" alternative is considered *similar* to the proposed project.

As discussed in Impact 5.3-10, the proposed 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. Implementation of the "No Project – Existing General Plan & Zoning" alternative would result in *similar* impacts to the proposed project and require implementation of **MM 5.3-1** and **MM 5.3-2** to reduce impacts to *less than significant* levels. Relative to this impact, the "No Project – Existing General Plan & Zoning" alternative is considered *similar* to the proposed project.

Cultural Resources

Based on cultural resource studies completed, the proposed project and likewise the "No Project – Existing General Plan & Zoning" alternative would result in a potentially significant impact to impact historic, unique archaeological or prehistoric resources as discussed in Impact 5.4-1. The implementation of **MM 5.4-1a** through **MM 5.4-1e** mitigate potentially significant impacts to a *less than significant* level for the proposed project and the "No Project – Existing General Plan & Zoning" alternative. Relative to this impact, the "No Project – Existing General Plan & Zoning" alternative is considered *similar* to the proposed project.

Implementation of **MM 5.4-1a** would reduce potential damage or destruction of undiscovered paleontological resources discussed in Impact 5.4-2 for the proposed project to a *less than significant* level. Implementation of the "No Project – Existing General Plan & Zoning" alternative also would require **MM 5.4-1a** to reduce the impact to a *less than significant* level. Relative to this impact, the alternative is considered *similar* to the proposed project.

Under Impact 5.4-3 for the proposed project, implementation of **MM 5.4-1d** would reduce impacts associated with potential disturbance of human remains, including those interred outside of formal

cemeteries to a *less that significant* level. Implementation of the "No Project – Existing General Plan & Zoning" alternative would also require **MM 5.4-1d** to reduce this impact to a *less than significant* level. Relative to this impact, the "No Project – Existing General Plan & Zoning" alternative is considered *similar* to the proposed project.

Cumulative Impacts

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 (Impact 5.4-4); potential damage or destruction of undiscovered paleontological resources (Impact 5.4-5); and, potentially disturb human remains, including those interred outside of formal cemeteries (Impact 5.4-6). Similar to the proposed project, the "No Project – Existing General Plan & Zoning" alternative would require implementation of **MM 5.4-1a** through **MM 5.4-1e** to reduce cumulative cultural resource impacts to *less than significant* levels. When compared to the proposed project, cumulative impacts related to cultural resources would be *similar* for the "No Project – Existing General Plan & Zoning" alternative.

Geology and Soils

Impacts 5.5-1 and 5.5-2 as described for the proposed project would be similar to the "No Project – Existing General Plan & Zoning" alternative as grading and associated site disturbance activities would occur on the 10.55-acre site as a result of project construction. Implementation of the "No Project – Existing General Plan & Zoning" alternative would result in impacts associated with soil stability and potential erosion impacts that are similar to those impacts associated with the proposed project. Additionally, the "No Project – Existing General Plan & Zoning" alternative 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 5.5-1) or soil that has the potential to be substantially expansive (Impact 5.5-2). Similar to the proposed project, geology and soil impacts associated with the "No Project – Existing General Plan & Zoning" alternative would be *less than significant* and no mitigation would be required. Relative to this impact, the "No Project – Existing General Plan & Zoning" alternative is considered *similar* to the proposed project.

Cumulative Impacts

As discussed for 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. Implementation of the "No Project – Existing General Plan & Zoning" alternative would be similar given that existing site geology would remain unchanged. In addition, Impact 5.5-4 related to cumulative expansive soils would be similar to the "No Project – Existing General Plan & Zoning" alternative. No mitigation is required for either the proposed project or this alternative since both impacts would be *less than significant*. Relative to cumulative geology and soil impacts, the "No Project – Existing General Plan & Zoning" alternative is considered *similar* to the proposed project.

Greenhouse Gases and Climate Change

As discussed under Impact 5.6-1, for the proposed project, greenhouse gas emissions generated by the proposed project, either directly or indirectly, would have a potentially significant impact on the environment. The "No Project – Existing General Plan & Zoning" alternative would support an estimated 496 jobs (employees) and an estimated 1,012 residents (patients) per day resulting in a service population of 496. This service population is applicable to both the 2024 and 2035 analysis years.

The "No Project – Existing General Plan & Zoning" alternative's construction activities are estimated to generate approximately 620 MT CO_2e. When annualized over an assumed 30-year project lifespan, construction would generate approximately 20.7 MT CO_2e per year. The impact is less than the proposed project's annualized GHG emission of 31.5 MT CO_2e per year.

The "No Project – Existing General Plan & Zoning" alternative's operational emissions in years 2024 and 2035 are shown in Table 7-5, ANNUAL NO PROJECT – EXISTING GENERAL PLAN & ZONING ALTERNATIVE GREENHOUSE GAS EMISSIONS. The annualized landscaping sequestration rate for year 2024 and year 2035 is -2.8 MT CO_2e. This alternative would generate approximately 3,061 MT CO_2e per year in 2024. With a service population of 496, the alternative would achieve an efficiency metric of 6.17 MT CO_2e per service population, which is greater than the significance threshold of 3.7 MT CO_2e per service population. Therefore, the alternative would result in a potentially significant impact in year 2024.

This alternative would generate approximately 2,763 MT CO_2e per year in 2035. With a service population of 496, this project alternative would achieve an efficiency metric of 5.57 MT CO_2e per service population, which exceeds the significance threshold of 1.7 MT CO_2e per service population. Therefore, the alternative would result in a potentially significant impact in year 2035.

Table 7-5
ANNUAL NO PROJECT – EXISTING GENERAL PLAN & ZONING
ALTERNATIVE GREENHOUSE GAS EMISSIONS

	MT CO_2e Year 2024	**MT CO_2e Year 2035**
Area	<0.1	<0.1
Energy	356.3	356.3
Mobile	2,615.4	2,317.7
Waste	31.1	31.1
Water	39.9	39.9
Sequestration (annualized)	-2.8	-2.8
Construction (annualized)	20.7	20.7
Total Emissions	**3,060.6**	**2,762.9**
Service Population	496	496
Project Efficiency (MT CO_2e / Service Population)	6.17	5.57
Threshold of Significance	3.7	1.7
Significant Impact?	**Yes**	**Yes**

Source: GHD. *North State Pavilion Project Greenhouse Gas Report.* Appendix C. May 2019. Refer to Appendix 15.5, GREENHOUSE GAS REPORT.

Table 7-6, COMPARISON OF THE NO PROJECT – EXISTING GENERAL PLAN & ZONING ALTERNATIVE AND PROPOSED PROJECT GREENHOUSE GAS IMPACTS, identifies that the "No Project – Existing General Plan & Zoning" alternative would have greater greenhouse gas emissions per service population than the proposed project, as measured in MT CO2e per service population.

Table 7-6
COMPARISON OF THE NO PROJECT – EXISTING GENERAL PLAN & ZONING ALTERNATIVE AND PROPOSED PROJECT GREENHOUSE GAS IMPACTS

Parameter	MT CO_2e/SP	
	Year 2024	**Year 2035**
Threshold Applied	3.7	1.7
Proposed Project Impact	2.51	2.25
No Project – Existing GP & Zoning	**6.19**	**5.59**

Source: GHD. *North State Pavilion Project Greenhouse Gas Report.* Appendix C. May 2019. Refer to Appendix 15.5, GREENHOUSE GAS REPORT.

Similar to the proposed project, **MM 5.6-1** would also be implemented for the "No Project – Existing General Plan & Zoning" alternative to reduce greenhouse gas emissions by preparing and implementing a Greenhouse Gas Reduction Plan (GGRP) that contains specific design features and actions to be implemented prior to year 2035. Implementation of **MM 5.6-1** would reduce greenhouse gas emissions to *less than significant* levels. However, when compared to the proposed project, implementation of the "No Project – Existing General Plan & Zoning" alternative would result in *increased* greenhouse gas emissions.

Under the discussion for Impact 5.6-2, the proposed project would not conflict with an applicable greenhouse gas reduction plan, policy, or regulation including the 2015 Regional Transportation Plan/Sustainable Communities Strategy and with the California Air Resources Board's Scoping Plan. Therefore, implementation of the "No Project – Existing General Plan & Zoning" alternative in this regard would be *less than significant,* and no mitigation measures would be required. Compared to the proposed project, the "No Project – Existing General Plan & Zoning" alternative would result in *increased* greenhouse gas emissions.

Cumulative Impacts

Impact 5.6-3 discusses that greenhouse gas emissions generated by the proposed project would have a potentially significant impact on global climate and requires the implementation of **MM 5.6-1** to reduce impacts to *less than significant* levels. Similarly, implementation of the "No Project – Existing General Plan & Zoning" alternative would require implementation of **MM 5.6-1** to ensure cumulative greenhouse gas impacts are *less than significant*. However, when compared to the proposed project, the "No Project – Existing General Plan & Zoning" alternative would result in *increased* greenhouse gas emissions.

Hazards and Hazardous Materials

The discussion under Impact 5.7-1 determined that the proposed project would create a *less than significant* hazard to the public or the environment through the routine transport, use, or disposal of hazardous material and therefore, no mitigation measures are required. When compared to the proposed project, impacts associated with the "No Project – Existing General Plan & Zoning" alternative for this impact would be *less than significant* and no mitigation is required. As a result, this impact is *similar* to the proposed project.

Impact 5.7-2 identified that proposed project construction activities would create a potentially significant hazard to the public through foreseeable upset and accidental conditions. As a result, **MM 5.7-1** is required prior to issuance of a demotion or grading permit to reduce the hazards to a *less than significant* level. Similar to the proposed project, implementation of the "No Project – Existing General

Plan & Zoning" alternative would also require **MM 5.7-1** to reduce impacts to *less than significant* levels. When compared to the proposed project in this regard, the "No Project – Existing General Plan & Zoning" alternative would be *similar*.

As discussed in 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. Impacts would be *less than significant* and no mitigation is required. In addition, 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 5.7-4). Impacts are also *less than significant* and no mitigation is required. When compared to the proposed project in this regard, the "No Project – Existing General Plan & Zoning" alternative would result *similar* impacts.

Cumulative Impacts

Impacts discussed for the proposed project and the "No Project & Existing General Plan & Zoning" alternative are similar for Impact 5.7-5 where 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 and Impact 5.7-6 where impacts were determined to be *less than significant* and no mitigation is required. Similarly, the cumulative discussion in Impact 5.7-7 and Impact 5.7-8 would be *less than significant* for the proposed project and this alternative. As a result, the "No Project – Existing General Plan & Zoning" alternative impacts are *similar* in this regard to the proposed project and therefore considered *less than significant* and no mitigation measures are necessary.

Hydrology and Water Quality

Under Impact 5.8-1, implementation of the proposed project would potentially violate water quality standards or waste discharge requirements; however, this impact is mitigated through implementation of **MM 5.8-1a** and **MM 5.8-1b** that requires preparation of a Storm Water Pollution Prevention Plan (SWPPP), including an erosion control plan to reduce impacts to a *less than significant* level. Implementation of the "No Project – Existing General Plan & Zoning" alternative would result in onsite disturbance activities similar to that of the proposed project. Implementation of **MM 5.8-1a** and **MM 5.8-1b** would be required under the "No Project – Existing General Plan & Zoning" alternative to reduce impacts to *less than significant* levels. When compared to the proposed project, impacts would be *similar* in this regard.

Under Impact 5.8-2, implementation of the proposed project would result in a *less than significant* impact related to depleting groundwater supplies or interfering with groundwater discharge and no mitigation is required for the proposed project. Implementation of the "No Project– Existing General Plan & Zoning" alternative would result in a slight decrease in water demand from 12 acre feet (AF) to approximately 10.5 AF water given the anticipated uses under this alternative would be adequately served based overall availability of water supplies as documented in the City's *2015 Urban Water Management Plan*. Similar to the proposed project, no mitigation measures would be required for this impact. For this impact, implementation of the "No Project – Existing General Plan & Zoning" alternative would be *less than significant*; however, *reduced* when compared to the proposed project.

As discussed under Impact 5.8-3, implementation of the proposed project could substantially alter the existing drainage pattern of the site or area, through the alteration of the course of the Sacramento River, in a manner which would result in substantial erosion or siltation on or offsite. Given that the entire 10.55-acre site would be developed under the "No Project – Existing General Plan & Zoning" alternative, similar to the proposed project, implementation of **MM 5.8-1a** and **MM 5.8-1b** would be required to reduce impacts to *less than significant* levels. When compared to the proposed project, impacts in this regard are considered *similar*.

As described under Impact 5.8-4, implementation of the proposed project would result in a *less than significant* impact since the existing drainage pattern of the site or area would not be substantially altered. Similar to the proposed project, implementation of the "No Project - Existing General Plan & Zoning" alternative would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite. The "No Project – Existing General Plan & Zoning" alternative would also be developed in accordance with RMC Chapter 16.12, *Clearing, Grading, Fills and Excavation*. Impacts are therefore considered *similar* when compared to that of the proposed project.

As evaluated under Impact 5.8-5, drainage studies undertaken for the proposed project determined that polluted runoff could be treated onsite prior to discharge into the Sacramento River would *be less than significant*. The studies also determined that 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. Since implementation of the "No Project – Existing General Plan & Zoning" alternative would result in the development of impervious surfaces onsite similar to that of the proposed project, impacts are considered *similar*.

As identified for Impact 5.8-6, implementation of the proposed project could potentially degrade water quality; however, with implementation of **MM 5.8-1a** and **MM 5.8-1b** impacts are reduced to *less than significant* levels. Implementation of the "No Project – Existing General Plan & Zoning" alternative would also require **MM 5.8-1a** and **MM 5.8-1b** to reduce the potential impacts to a *less than significant* level. Impacts in this regard are considered *similar* to the proposed project.

With regards to Impact 5.8-7, this impact is considered not applicable to either the proposed project or "No Project – Existing General Plan & Zoning" alternative since neither proposed the placement of structures within the 100-year flood hazard area which would impede or redirect flows.

As discussed under Impact 5.8-8, future onsite structures and associated people would not be exposed to a significant risk of loss injury, or death involving flooding, including flooding as a result of the failure of a levee or dam. With implementation of the "No Project - Existing General Plan & Zoning" alternative, impacts would be *similar* to the proposed project.

Cumulative Impacts

For the proposed project, implementation of **MM 5.8-1a** and **MM 5.8-1b** would reduce potential cumulative impacts to *less than significant* levels associated with the following: violating water quality standards or waste discharge requirements (Impact 5.8-9); the alternation of drainage patters, in a manner which would result in substantial erosion or siltation on or offsite (Impact 5.8-11); the contribution of runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff (Impact 5.8-12). Implementation of the "No Project – Existing General Plan & Zoning" alternative would require **MM 5.8-**

1a and **MM 5.8-1b** to reduce these cumulative impacts to *less than significant* levels as the entire 10.55-acre site would be developed with a similar type development and associated impervious surfaces. Cumulative hydrology and water quality impacts in this regard for the "No Project – Existing General Plan & Zoning" alternative would be *similar* when compared to the proposed project**.**

As discussed in Impact 5.8-10 the proposed project would not result in significant cumulative impacts related to water supply and no mitigation is required. Implementation of the "No Project – Existing General Plan & Zoning" alternative would result in similar cumulative impacts when compared to that of the proposed project.

As described under Impact 5.8-13, cumulative effects of placing structures within a 100-year flood hazard area would not be significant for the proposed project. Implementation of the "No Project– Existing General Plan & Zoning" alternative would result in *similar* impacts that would also be *less than significant* and would not require mitigation.

Land Use and Planning

Implementation of either the proposed project or the "No Project– Existing General Plan & Zoning" would require a general plan amendment, rezone, use permit and a parcel map. As discussed in Impact 5.9-1 the proposed project would not conflict with the City of Redding *General Plan*, Zoning Ordinance, Tree Management Ordinance, Parks, Trails and Open Space Master Plan, and other applicable policies and/or regulations of the City and any other applicable agency (Shasta County Air Quality Management District and the Shasta Regional Transportation Agency). Therefore, the impact would be *less than* significant, and no mitigation measures are warranted. Implementation of the alternative would also not conflict with the land use and planning documents and applicable policies and/or regulations and oversight by regulatory agencies. Therefore, the "No Project – Existing General Plan & Zoning" alternative impact is *similar* to those of the proposed project.

Cumulative Impacts

The discussion for cumulative Impact 5.9-2 for the proposed project identifies that 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. Implementation of the "No Project – Existing General Plan & Zoning" alternative is similar to the proposed project in this regard, as development onsite consistent with the City's underlying general plan and zoning designations would not 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. Impacts would be *less than significant* and no mitigation would be required. Cumulative impacts of the "No Project – Existing General Plan & Zoning" alternative related to land use and planning are therefore considered *similar* to the proposed project.

Noise

Under the discussion for Impact 5.10-1 the proposed project would not generate noise levels or expose persons to noise levels in excess of standards established in the City of Redding *General Plan* or noise ordinance, or applicable standards of other agencies. Therefore, the potential impact is considered *less than significant* and no mitigation is required. When compared to the proposed project, impacts

associated with the "No Project – Existing General Plan & Zoning" alternative would also be considered less *than significant* requiring no mitigation. When compared to the proposed project, the "No Project – Existing General Plan & Zoning" alternative impacts would be ***similar***.

Discussion in Impact 5.10-2 identifies that implementation of the proposed project would not expose persons to or generate excessive ground borne vibration or ground borne noise levels. The potential impact is considered *less than significant* and no mitigation is required. Given similar construction would occur onsite under this alternative this impact would also be *less than significant* and no mitigation would be required. Relative to this impact, the "No Project – Existing General Plan & Zoning" alternative is considered ***similar*** to the proposed project.

Discussion under Impact 5.10-3 determined that implementation of the proposed project may result in a temporary increase in noise levels due to construction in excess of standards permitted in the noise ordinance which would be considered a *significant*. The implementation of measures **MM 5.10-1a** and **MM 5.10-1b** would not reduce construction related impacts to a *less than significant* level. Therefore, the impact is considered *significant and unavoidable* for the proposed project. Implementation of the "No Project – Existing General Plan & Zoning" alternative, would result in similar impacts to the proposed project and likewise would be considered *significant and unavoidable* even after implementation of **MM 5.10-1a** and **MM 5.10-1b**. The "No Project – Existing General Plan & Zoning" alternative would result in a ***similar*** temporary increase in noise levels when compared to the proposed project. Impacts in this regard would remain *significant and unavoidable* under the "No Project – Existing General Plan & Zoning" alternative.

The discussion in Impact 5.10-4 identifies that implementation of the proposed project may result in a substantial permanent increase in ambient noise levels in excess of standards permitted in the noise ordinance. Implementation of **MM 5.10-2a** through **MM 5.10-2c** would reduce impacts to a *less than significant* level. The "No Project – Existing General Plan & Zoning" alternative would also require the implementation of these noted mitigation measures. Impacts associated with the "No Project – Existing General Plan & Zoning" alternative are ***similar*** to the proposed project.

Cumulative Impacts

The discussion in Impact 5.10-5 identifies that implementation of the proposed project, combined with other past, present, and reasonably foreseeable future development, may potentially increase the ambient noise levels in the project vicinity resulting in a potentially significant impact. Implementation and compliance with mitigation measures **MM 5.10-1** and **MM 5.10-2** reduce this cumulative impact to a *less than significant* level. Impacts associated with the "No Project – Existing General Plan & Zoning" alternative would also require these mitigation measures to reduce impacts to *less than significant* levels. Cumulative impacts would therefore be ***similar*** to that of the proposed project.

Population and Housing

The discussion under Impact 5.11-1 determined that the proposed project would not induce substantial population growth in the area, either directly or indirectly and that the impact was *less than significant,* and therefore, no mitigation measures are required. When compared to the proposed project, the increase in population associated with employment under the "No Project – Existing General Plan & Zoning" alternative (assuming all new employees would come from outside the City of Redding) would likely be similar to that of the proposed project (180 new employees resulting in an 428 increase in

population). Similar to the proposed project, the potential increase of 428 residents would represent a 0.4 percent increase in the current population for the City and a 0.2 percent increase for the current population for the County as a whole.

The addition of 180 full time employees under the "No Project – Existing General Plan & Zoning" alternative could potentially increase the demand for housing in the City of Redding. Similar to the proposed project the new employees would either be permanent residents in the City of Redding, or in nearby unincorporated areas of Shasta County. The City has an estimated 39,679 housing units (27,116 single-family units), with a vacancy rate of 5.5 percent and the County as a whole has an estimated 78,745 housing units (57,355 single-family units), with a vacancy rate of 8.1 percent. When compared to the proposed project, implementation of the "No Project – Existing General Plan & Zoning" alternative would result in *less than significant* impacts related to population and housing *similar* to the proposed project.

Cumulative Impacts

Cumulative Impact 5.11-2 identifies that development of the proposed project, along with approved and proposed development, would not result in increased population in the City of Redding and therefore, the impact is *less than significant,* and mitigation is not required. When compared to the proposed project, impacts for the "No Project – Existing General Plan & Zoning" alternative would also be *less than significant* and not require mitigation. As a result, this impact is *similar* to the proposed project.

Public Services

Per the discussion for Impact 5.12-1, for the proposed project, the impact is *less than significant* and no mitigation is required since the proposed project would not 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 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. Implementation of the "No Project – Existing General Plan & Zoning" alternative would also result in *less than significant* impacts in this regard and no mitigation is required. Relative to this impact, the "No Project – Existing General Plan & Zoning" alternative is considered *similar* to the proposed project.

Cumulative Impacts

The Impact 5.12-2 discussion for the proposed project, combined with other past, present, and reasonably foreseeable future development, identifies that there would not be a demand in public services and therefore the impact is *less than significant,* and no mitigation is warranted. Similarly, impacts from the "No Project– Existing General Plan & Zoning" are *less than significant* and mitigation is not required. The "No Project – Existing General Plan & Zoning" alternative is *similar* to the proposed project.

Recreation

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 as discussed in Impact 5.13-1. Therefore, the proposed project will result

in *less than significant* impacts that do not require mitigation. Likewise, implementation of the "No Project – Existing General Plan & Zoning" will not require mitigation since potential impacts will be *less than significant* and *similar* to the proposed project.

With regard to construction or expansion of recreational facilities which might have an adverse physical effect on the environment as discussed in Impact 5.13-2, implementation of the proposed project will result in impacts that would be *less than significant*. Implementation of the "No Project – Existing General Plan & Zoning" will also result in *less than significant* impacts in this regard. Relative to this impact, the "No Project – Existing General Plan & Zoning" alternative is considered *similar* to the proposed project.

Cumulative Impacts

As discussed under Impact 5.13-3, implementation of the proposed project, combined with cumulative development, 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. Impacts would be *less than significant* requiring no mitigation. Implementation of the "No Project – Existing General Plan & Zoning" alternative will also result in *less than significant* impacts in this regard. Relative to this impact, the "No Project – Existing General Plan & Zoning" alternative is considered *similar* to the proposed project.

Under the discussion of Impact 5.13-4, it was determined that the proposed project, when combined with cumulative development, does not require the construction or expansion of recreational facilities which might have an adverse effect on the environment resulting in *less than significant* impacts. Therefore, no mitigation is required. Similar to the proposed project, the "No Project – Existing General Plan & Zoning" alternative, when combined with cumulative development, also does not require the construction or expansion of recreational facilities. Cumulative recreation impacts associated with the "No Project – Existing General Plan & Zoning" would be *less than significant* and no mitigation is required. Relative to this impact, the "No Project – Existing General Plan & Zoning" alternative is considered *similar* to the proposed project.

Traffic and Circulation

The "No Project – Existing General Plan & Zoning" alternative is projected to increase peak hour trips from 311 AM and 330 PM peak hour trips under the proposed project to 323 AM and 455 PM peak hour trips. However, when compared to the proposed project, the "No Project – Existing General Plan & Zoning" alternative generates a total of 4,027 daily trips[2], approximately 670 trips less than the proposed project's 4,697 daily trips.

Under the discussion for Impact 5.14-1, it is identified that implementation of the proposed project under existing conditions may cause an increase in traffic which exceeds significance criteria established in the City of Redding's *Traffic Impact Assessment Guidelines*. Specifically, the Hartnell Avenue & Cypress Avenue (Intersection #10) requires the construction intersection improvements identified in **MM 5.14-1** to reduce the impact at this intersection to a *less than significant* level.

[2] GHD. *Technical Memorandum No. 4 – Traffic Impacts at Intersections No. 8 and No. 10 for Existing General Plan Project Alternative and Reduced Intensity Project Alternative*. March 13, 2019.

Implementation of the "No Project – Existing General Plan & Zoning" alternative creates a potentially significant impact at Hartnell Avenue & Cypress Avenue (Intersection #10) by increasing the westbound left queue from 10 to 19 cars for the AM peak hour. The available storage capacity for westbound left movement is nine cars. With implementation of **MM 5.14-1**, impacts associated with the "No Project – Existing General Plan & Zoning" alternative would be *less than significant* for this intersection. Compared to the proposed project this impact would be *similar*.

As discussed in Impact 5.14-2, the proposed project would not create temporary traffic delays or increase hazards due to a design features such as sharp curves or dangerous intersections. However, some traffic delays can be expected during project construction; however, the traffic impacts during construction are temporary in nature and will cease upon completion of construction activities. To address the impact, **MM 5.14-2** requires preparation of a Traffic Management Plan (TMP) to address safety and traffic concerns for the various streets and associated vehicle/bicyclist/pedestrian rerouting. Being that the proposed project impact is *similar* to the "No Project – Existing General Plan & Zoning" alternative, implementation of **MM 5.14-2** is applicable to reduce temporary traffic impacts to *less than significant* levels.

Discussion in Impact 5.14-3 determined that implementation of the proposed project would result in a *less than significant* impact related to the potential conflict with adopted policies, plans or programs supporting alternative transportation (e.g. bus turnouts, bicycle racks) and the impact was *less than significant,* and mitigation was not required. Implementation of the "No Project – Existing General Plan & Zoning" alternative would be *less than significant* and *similar* to the proposed project.

Cumulative Impacts

As discussed in Impact 5.14-3 implementation of the proposed project could result in increased traffic volumes at study area intersections under year 2040 cumulative plus project conditions. Specifically, the Hartnell Avenue & Cobblestone Shopping Center (Main Driveway – Intersection #8) and the Hartnell Avenue & Cypress Avenue (Intersection #10) would require improvements to reduce impacts. Specifically, **MM 5.14-3** calls for turn lane and turn pocket restriping to mitigate Intersection No. 8 and **MM 5.14-4** requires payment of pro-rata construction costs for intersection improvements. Implementation of the mitigation measures will reduce cumulative impact to *less than significant* level. Similar to the proposed project, implementation of the "No Project – Existing General Plan & Zoning" alternative would require the same intersection improvements (**MM 5.14-3** and **MM 5.14-4)** in order to reduce impacts to *less than significant* levels. When compared to the proposed project, year 2040 cumulative traffic impacts associated with the "No Project – Existing General Plan & Zoning" alternative would be *similar*.

Tribal Cultural Resources

The discussion under Impact 5.15-1 determined that for the proposed project, ground disturbing activities could result in the unanticipated discovery of prehistoric archaeological sites, which may be considered to be Tribal Cultural Resources (TCRs) Implementation of **MM 5.4-1a** through **MM 5.4-1e** in Section 5.4, CULTURAL RESOURCES, would reduce the potential impacts to *less than significant* levels. Similar to the proposed project, implementation of the "No Project – Existing General Plan & Zoning" alternative would require implementation of **MM 5.4-1a** through **MM 5.4-1e** to reduce potential impacts to TCR's to *less than significant* levels. Impacts of the "No Project – Existing General Plan & Zoning" alternative would be *similar* to the proposed project in this regard.

Cumulative Impacts

Impact 5.15-2 discusses that implementation of the proposed project, combined with planned and reasonably foreseeable development within the City of Redding would could result in the unanticipated discovery of prehistoric archaeological sites, which may be considered TCRs. Implementation of **MM 5.4-1a** through **MM 5.4-1e** would reduce cumulative impacts to *less than significant* levels. Similar to the proposed project, implementation of the "No Project – Existing General Plan & Zoning" alternative would require implementation of **MM 5.4-1a** through **MM 5.4-1e** to reduce potential cumulative TCR impacts to *less than significant* levels. When compared to the proposed project, the "No Project – Existing General Plan & Zoning" alternative would result in *similar* cumulative impacts related to TCRs.

Utilities and Service Systems

Discussions under Impacts 5.16-1, 5.16-2, 5.16-3, 5.16-4, 5.16-5, 5.16-6 and 5.16-7 addressed proposed project utilities and service system impacts. It was determined that the impacts would be *less than significant* and no mitigation measures would be required. Similar to the proposed project, utilities and service system impacts would be similar for the "No Project – Existing General Plan & Zoning" alternative and result in *less than significant* impacts and would not require mitigation.

Impact 5.16-1 evaluates the potential for wastewater treatment requirements of the Central Valley RWQCB to be exceeded. Wastewater generation associated with "No Project – Existing General Plan & Zoning" alternative would be *reduced* when compared to that of the proposed project as this alternative would decrease wastewater generation by approximately 1 percent due the decreased in water use associated with the land uses. Similar to the proposed project there exists sufficient capacity at the Clear Creek Wastewater Treatment Plant to serve this alternative.

Impact 5.16-2 evaluates the construction of new water or wastewater treatment facilities or expansion of existing facilities. Implementation of the "No Project – Existing General Plan & Zoning" alternative, similar to the proposed project, would be served by sufficient existing water and wastewater facilities. Impacts of this alternative are *less than significant* and considered to be *similar* to the proposed project.

Similar to the proposed project evaluated in Impact 5.16-3, implementation of the "No Project – Existing General Plan & Zoning" alternative would not require or result in the construction or expansion of new stormwater drainage facilities. Impacts of this alternative are *less than significant* and considered to be *similar* to the proposed project.

Similar to the proposed project as evaluated in Impact 5.16-4, implementation of the "No Project – Existing General Plan & Zoning" alternative would have sufficient water supplies from existing entitlements and resources. The City projects sufficient water supplies to meet projected demands during multiple dry years through year 2035. Compared to the proposed project the "No Project – Existing General Plan & Zoning" alternative would require approximately 10.5 AF, a reduction of approximately 1.5 AF. Similar to the proposed project, the water demand of this alternative is well within the City's projected surplus of 8,400 AF. Therefore, impacts in this regard are *reduced* when compared to the proposed project. Impacts are *less than significant* and no mitigation is required for this alternative.

Similar to the proposed project as evaluated in Impact 5.16-5, the "No Project – Existing General Plan & Zoning" alternative would not result in inadequate wastewater capacity within the Clear Creek Basin Service Area. As noted for Impact 5.16-1, the Clear Creek Wastewater Treatment Plant has adequate

treatment capacity. Impacts of this alternative are *less than significant* and considered to be similar, although *reduced*, when compared to the proposed project.

Similar to the proposed project as evaluated in Impact 5.16-6, implementation of this alternative would increase the demand for solid waste. The "No Project – Existing General Plan & Zoning" alternative would generate approximately 21,702 additional pounds of construction waste associated with the increase square footage of this alternative. This represents an approximate 3 percent increase from the project's new construction waste estimate of 562,462. Using a similar employee generation as the proposed project, this alternative would generate approximately 1.03 tons of solid waste each day which is less than 1 percent of the daily intake volume of 500 tons at the Richard W. Curry West Central Landfill. Even with an employee population onsite greater than the 180 employees that would occur under the proposed project, sufficient landfill capacity exists. As a result, overall long-term solid waste generation would be *similar* for the "No Project – Existing General Plan & Zoning" alternative and *less than significant*.

City and State regulations and requirements address Impact 5.16-7 to ensure compliance with federal, State, and local statutes and regulations related to solid waste. As a result, this *less than significant* impact would be *similar* for the "No Project – Existing General Plan & Zoning" alternative.

Cumulative Impacts

Discussion for Impact 5.16-8 concludes that 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 and that impacts are *less than significant*. Cumulative utility and service system impacts associated with the "No Project– Existing General Plan & Zoning" alternative are similar, although *reduced*, when compared to those of the proposed project. Cumulative impacts in this regard would be *less than significant* and no mitigation measures are required.

Energy Consumption

Impact 5.17-1 discusses that the implementation of the proposed project would not use fuel or energy in a wasteful manner and therefore, no mitigation measures are necessary to address this *less than significant* impact. When compared to the proposed project, the increase in development associated with the "No Project – Existing General Plan & Zoning" alternative would result in an incremental increase in the demand on electricity and natural gas. However, construction and operational fuel consumption would be incrementally lower. Infrastructure improvements would be similar to those required for the proposed project.

Table 7-7, NO PROJECT – EXISTING GENERAL PLAN & ZONING ALTERNATIVE ENERGY CONSUMPTION, shows that energy demands would increase proportionately for electricity, natural gas, and decrease for fuel.

Table 7-7
NO PROJECT – EXISTING GENERAL PLAN AND ZONING ALTERNATIVE ENERGY CONSUMPTION

Energy Type	Annual Energy Consumption	Shasta County Annual Energy Consumption	Percentage Increase of the No Project – Existing GP & Zoning Alternative (Countywide)	Percentage Increase of the Proposed Project (Countywide)
Electricity Consumption[1]	1,741,166 kWh	816,000,000 kWh	0.21%	0.15%
Natural Gas Consumption[1]	4,752 million BTU	1,573,381 million BTU	0.30%	0.11%
Fuel Consumption[2]				
Project Construction	28,839 gallons	44,817,175 gallons	0.06%	0.09%
Project Operations	405,195 gallons	111,222,696 gallons	0.36%	0.45%
Total	431,543 gallons	156,039,871 gallons	0.28%	0.35%

Notes: The projected increases in electricity and natural gas consumption are compared with all of the nonresidential buildings in Shasta County in 2016. The projected increases in gas and fuel consumption are compared with the countywide fuel consumption in 2017.

Sources: [1] CalEEMod v. 2016.3.2; [2] EMFAC2017 (CARB 2017).

Table 7-7 shows the alternative project's electricity usage would constitute an approximate 0.21 percent increase in the typical annual electricity consumption and an approximate 0.30 percent increase in the typical annual natural gas consumption attributable to all nonresidential buildings in Shasta County. Vehicular fuel, including the two-phase construction of the project would increase use in the County by 0.28 percent and when compared to the proposed project, there is a countywide increase for this alternative. Regardless, similar to the proposed project, this *less than significant* does not require mitigation. The magnitude of energy consumption under the "No Project – Existing General Plan & Zoning" alternative would be similar, although *increased*, when compared to that of the proposed project.

As evaluated in Impact 5.17-2, the proposed project design and operation would comply with Title 24 State Building Energy Efficiency Standards, appliance efficiency regulations, and green building standards. Similar to the proposed project, "No Project – Existing General Plan & Zoning" alternative would require adherence to similar building standards which serve to minimize inefficient, wasteful or unnecessary energy use. Similar to the proposed project impacts would be *less than significant* for this alternative. Additionally similar to the proposed project, the Redding Electric Utility (REU) would provide electrical service to the site under this alterative. 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 60 percent of total procurement by 2030 (as required by SB 100). Energy impacts associated with the "No Project – Existing General Plan & Zoning" alternative similar, although *increased*, when compared to that of the proposed project. Similar to the proposed project energy impacts associated with this alternative would be *less than significant* and no mitigation measures are required.

Cumulative Impacts

Discussions for Impact 5.17-3 and 5.17-4 address how the proposed project with respect to cumulative development in Shasta County would not utilize fuel or energy in a wasteful manner or result in a conflict with a state or local plan for renewable or energy efficiency. Although the implementation of the "No Project – Existing General Plan & Zoning" alternative would result in an increase in energy consumption when compared to the proposed project, the magnitude of energy consumption under this

alternative would be similar to the proposed project. Overall, cumulative energy impacts would be similar, although *increased*, under this alternative and *less than significant*.

Conclusion

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

Description of the 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.

Table 7-8, COMPARISON OF THE PROPOSED PROJECT & REDUCED INTENSITY ALTERNATIVE, identifies the buildings, associated square footages, number of stories and footprint for each building. Similar to the proposed project general building locations remain the same. 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 shown on Figure 3-12, PROPOSED TREE REMOVAL PLAN, could be preserved.

Table 7-8
COMPARISON OF THE PROPOSED PROJECT & REDUCED INTENSITY ALTERNATIVE

Building	Proposed Project			Reduced Intensity Alternative		
	Square Feet	Stories	Footprint Square Feet	Square Feet	Stories	Footprint Square Feet
'A'	80,000	4	20,000	59,400	3	19,800
'B'	27,800	3	9,267	27,800	3	9,267
'C'	21,800	2	10,900	21,800	2	10,900
Totals	**129,600**		**40,167**	**109,000**		**39,967**

Compared to the proposed project, Table 7-8 identifies 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.

Impacts Compared to Project Impacts

The following provides an evaluation of the potential environmental impacts of the "Reduced Intensity" alternative, as compared to those of the proposed project.

Aesthetics

Impacts discussed for the proposed project in Impact 5.1-1 regarding scenic vistas would be similar, although *reduced*, under the "Reduced Intensity" alternative and *less than significant*. This is primarily due to the reduction of the height of Building 'A' from 72 feet to 58 feet. Similar to the proposed project no mitigation measures would be required.

As discussed in Impact 5.1-2, the proposed project would result in a *significant and unavoidable* impact related to degrading the existing visual character or quality of the site and its surroundings, particularly views of the site from the Sacramento River. Similar to the proposed project, under the "Reduced Intensity" alternative, the onsite topography and vegetation would be modified from their existing state resulting in similar visual character impacts from the Sacramento River.

With the reduction of Building 'A' from four to three-stories under the "Reduced Intensity" alternative, the maximum building height adjacent to the riparian and river corridor would be reduced from 72 feet to 58 feet. As a result of this height reduction resultant impacts under the "Reduced Intensity" alternative related to the existing visual character or quality of the site would be *reduced* when compared to that of the proposed project. Implementation of **MM 5.1-1** would also be required for this alternative to further reduce this impact. Therefore, the "Reduced Intensity" alternative would substantially *reduce* the impact to the existing visual character the area (as viewed from the Sacramento River) to *less than significant* levels.

The proposed project has the potential to create a new source of substantial light or glare as identified in Impact 5.1-3, which could adversely affect day or nighttime views in the area due to exterior parking, street and building lighting at night and window glare during the day. Through a reduction in the height Building 'A' light and glare impacts would be reduced when compared to the proposed project. Implementation of **MM 5.1-2a** and **MM 5.1-2b** would reduce this impact to a *less than significant* level for both the proposed project and "Reduced Intensity" alternative. As a result, the "Reduced Intensity" alternative would result in similar, although *reduced*, light and glare impacts when compared to the proposed project.

Cumulative Impacts

Cumulative impacts to scenic vistas discussed for the proposed project in Impact 5.1-4, would be similar, although *reduced*, under the "Reduced Intensity" alternative. Similar to the proposed project, cumulative impacts under the "Reduced Intensity" alternative would be cumulatively *less than significant* and no mitigation measures would be required.

Impact 5.1-5 identifies that project development together with cumulative projects could degrade the visual character/quality of the project site and area resulting in a *significant and unavoidable* cumulative impact. With implementation the "Reduced Intensity" alternative overall cumulative impacts to the overall quality and character of the area would be cumulatively *less than significant*. Cumulative impacts

associated with this impact would be substantially *reduced* when compared to that of the proposed project.

Impact 5.1-6 determined that the proposed project and would result in cumulative short-term and long-term light and glare impacts that through implementation of **MM 5.1-2a** and **MM 5.1-2b** would be cumulatively *less than significant*. Implementation of the "Reduced Intensity" alternative would adjust the height of Building 'A' and, similar to the proposed project, require implementation of these noted mitigation measures. Cumulative light and glare impacts associated with the "Reduced Intensity" alternative would be similar*,* although *reduced*, when compared to that of the proposed project and considered cumulatively *less than significant*.

Air Quality

As discussed in Impact 5.2-1, with implementation of **MM 5.6-1**, the proposed project would result in a *significant and unavoidable* impact related to consistency with the *2015 Air Quality Attainment Plan*. As previously noted, the "Reduced Intensity" alternative would develop the 9.72 acres which is 0.83 acres less than the proposed project area. This alternative is 20,600 square feet less in building square footage than the proposed project and would result in 723 fewer daily vehicle trips when compared to the proposed project's 4,697 daily trips. To conduct an assessment of overall vehicle miles traveled (VMT) the Shasta County Regional Travel Demand Model (SCRTDM) was utilized. For the "Reduced Intensity" alternative a select zone analysis was conducted using the SCRTDM model whereby all tips generated by the alternative were tracked through the transportation system. In addition, the "Reduced Intensity" alternative would generate a total VMT of 18,944 compared to the proposed project (23,084 VMT), an approximate reduction of 4,140 VMT. Similar measures to **MM 5.6-1** would be required for this alternative; however, implementation of the "Reduced Intensity" alternative would result in similar, but *reduced,* impacts related to the successful implementation of the *2015 Air Quality Attainment Plan*. Impacts would remain *significant and unavoidable* under this alternative.

Under the "Reduced Intensity" alternative, maximum daily construction emissions would be decreased when compared to the proposed project (Impact 5.2-2) due to the decreased building area. It is expected that there would be a decrease in truck haul trips and vendor/material delivery trips during construction. Due to the reduction of approximately 20,600 square feet in building area under this alternative, it is also expected that there would be less painted surfaces and associated ROG emissions from architectural coatings. Impacts would remain below the SCAQMD's Level B threshold of 137 pounds per day. As with the proposed project, implementation of SCAQMD BAMMs and SMMs (provided in **MM 5.2-1**) would be required under the "Reduced Intensity" alternative, resulting in *less than significant* impacts. Construction impacts associated with the "Reduced Intensity" alternative would be similar, although *reduced*, when compared to the proposed project.

Operational emissions associated with the proposed project were found to be *less than significant* with implementation of **MM 5.6-1** as noted in Impact 5.2-3. The "Reduced Intensity" alternative would have 723 fewer daily vehicle trips when compared to the proposed project's 4,697 daily vehicle trips. This reduction is associated with the type of land uses allowable under the "General Office" (GO) and "General Commercial" (GC) land use classifications and zoning districts.

Table 7-9, LONG-TERM UNMITIGATED OPERATIONAL EMISSIONS FOR REDUCED INTENSITY ALTERNATIVE, provides the unmitigated operational emissions associated with this alternative.

Table 7-9
LONG-TERM UNMITIGATED OPERATIONAL EMISSIONS FOR REDUCED INTENSITY ALTERNATIVE

Source	Pollutant (pounds/day)[1]				
	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO_X)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)	Carbon Monoxide (CO)
Summer Emissions					
Area Source	3.14	0.0005	0.0002	0.0002	0.05
Energy Use	0.04	0.38	0.03	0.03	0.32
Mobile Source	10.26	65.84	26.28	7.25	98.00
Stationary Source	1.23	3.44	0.18	0.18	3.14
Total	**14.67**	**69.67**	**26.49**	**7.46**	**101.52**
Winter Emissions					
Area Source	3.14	0.0005	0.0002	0.0002	0.05
Energy Use	0.04	0.38	0.03	0.03	0.32
Mobile Source	7.72	67.98	26.28	7.25	89.02
Stationary Source	1.23	3.44	0.18	0.18	3.14
Total	**12.12**	**71.80**	**26.49**	**7.46**	**92.54**
Potentially Significant Impact Threshold (Daily Emissions)	**25/137**	**25/137**	**80/137**	**None**	**None**
Exceed Daily Threshold?	**No/No**	**Yes/No**	**No/No**	**NA**	**NA**

Notes:
1. Emissions calculated using CalEEMod version 2016.3.2.

Refer to Appendix 15.2, AIR QUALITY EMISSIONS DATA, for daily emission model outputs.

Table 7-10, LONG-TERM MITIGATED OPERATIONAL EMISSIONS FOR REDUCED INTENSITY ALTERNATIVE, identifies the alternative's emissions.

Table 7-10
LONG-TERM MITIGATED OPERATIONAL EMISSIONS FOR REDUCED INTENSITY ALTERNATIVE

Source	Pollutant (pounds/day)[1]				
	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO_X)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)	Carbon Monoxide (CO)
Summer Emissions					
Area Source	3.14	0.0005	0.0002	0.0002	0.05
Energy Use	0.04	0.33	0.02	0.02	0.28
Mobile Source	9.41	57.77	19.94	5.51	79.33
Stationary Source	1.23	3.44	0.18	0.18	3.14
Total	**13.81**	**62.54**	**20.15**	**5.71**	**81.79**
Winter Emissions					
Area Source	3.14	0.0005	0.0002	0.0002	0.05
Energy Use	0.04	0.33	0.02	0.02	0.27
Mobile Source	6.91	60.16	19.94	5.51	79.50
Stationary Source	1.23	3.44	0.18	0.18	3.14
Total	**11.31**	**63.93**	**20.15**	**5.71**	**76.97**
Potentially Significant Impact Threshold (Daily Emissions)	**25/137**	**25/137**	**80/137**	**None**	**None**
Exceed Daily Threshold?	**No/No**	**Yes/No**	**No/No**	**NA**	**NA**

Notes:
1. Emissions calculated using CalEEMod version 2016.3.2.

Refer to Appendix 15.2, AIR QUALITY EMISSIONS DATA, for daily emission model outputs.

Both Table 7-9 and Table 7-10 identify that the alternative would not reduce operational emissions below the SCAQMD's Level A thresholds for NO_X. As with the proposed project, mitigated operational emissions would not exceed Level B thresholds. Similar to the proposed project, with implementation of **MM 5.6-1** operational impacts of the "Reduced Intensity" alternative would be *less than significant*. When compared to the proposed project, operational emissions associated with the "Reduced Intensity" alternative would similar, although *reduced*.

As discussed in Impact 5.2-4, the proposed project would not create a CO hotspot at any intersections near sensitive receptors, or near any project study intersections. As previously noted, the "Reduced Intensity" alternative would have 723 fewer daily vehicle trips when compared to the proposed project's 4,697 daily vehicle trips, an approximate 15.4 percent decrease. This reduction is associated with the reduced building area that generates fewer vehicle trips. As a result, impacts related to CO hotspots near sensitive receptors would be *less than significant* under this alternative. This impact is considered similar, although *reduced*, when compared to the proposed project.

As discussed in Impact 5.2-5, impacts related to health risks associated with substantial toxic air contaminant concentrations during construction of the proposed project would be *less than significant*. Implementation of the "Reduced Intensity" alternative would represent a decrease in approximately 20,600 square feet (or approximately 15.9 percent) less building area than the proposed project. The resultant decrease in construction activities under this alternative would not exceed thresholds identified in Table 5.2-11, CONSTRUCTION RISK, in Section 5.2, AIR QUALITY. The "Reduced Intensity" alternative would result in a decrease in contaminant concentration during construction and would be *less than significant.* When compared to the proposed project, the "Reduced Intensity" alternative this impact is considered similar, although *reduced*.

As discussed in Impact 5.2-6, impacts related to health risks associated with substantial toxic air contaminant concentrations during project operation would be *less than significant* for the proposed project. The "Reduced Intensity" alternative would result in a reduced contaminant concentration during project operation due to the reduction in vehicle trips associated with this alternative; however, similar to the proposed project this impact would be *less than significant,* and no mitigation would be required under the "Reduced Intensity" alternative. This impact is considered similar, although *reduced*, when compared to the proposed project.

As discussed in Impact 5.2-7, the proposed project would result in *less than significant* impacts with regards to the creation of objectionable odors. Although there would be a decrease in building square footage under the "Reduced Intensity" alternative, proposed uses commonly considered to be sources of odorous emissions (e.g. wastewater treatment plants, sanitary landfills, composting/green waste facilities, recycling facilities, petroleum refineries, chemical manufacturing plants, painting/coating operations, rendering plants, and food packaging plants) would not occur under this alternative. Odor impacts under this alternative would be *similar* to the proposed project and no mitigation measures would be required.

Cumulative Impacts

As discussed in Impact 5.2-8, the proposed project would conflict with implementation of the *2015 Air Quality Attainment Plan* by resulting in an increase of ozone precursor emissions. With implementation of the "Reduced Intensity" alternative, there would be an exceedence of the Level A thresholds for NOx, an ozone precursor emission; however, this exceedence is *reduced* when compared to the proposed

project. As a result, it can be reasonably assumed that the "Reduced Intensity" alternative would likely conflict with the *2015 Air Quality Attainment Plan* related to cumulative ozone precursor impacts within the NSVAB. Even with compliance with SMMs and BAMMs provided in **MM 5.2-1**, the "Reduced Intensity" alternative's incremental contribution to this cumulative impact would be similar to that of the proposed project, although *reduced*, and considered cumulatively *significant and unavoidable*.

Cumulative impacts discussed for the proposed project in Impact 5.2-9, 5.2-10, 5.2-11, 5.2-12, 5.2-13, and 5.2-14 would be similar, but *reduced* under the "Reduced Intensity" alternative. Similar to the proposed project, cumulative impacts described under the noted impacts would be cumulatively *less than significant* and no mitigation measures would be required.

Biological Resources

Impact 5.3-1 discusses how the proposed project could have a substantial impact, 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. Implementation of the "Reduced Intensity" alternative would result in similar biological impacts as described in Impact 5.3-1 and, similar to the proposed project, require the implementation of mitigation measures to reduce impacts to *less than significant* levels.

Under this alternative, potential impacts on bat species would be reduced through the implementation of **MM 5.3-1a** and **MM 5.3-1b**. Mitigation measure **MM 5.3-1c** mitigates potential impacts associated with tree removal. Regarding potential impacts on the western pond turtle, **MM 5.3-1d** would be required. To mitigate nesting bald eagles and migratory bird species, **MM 5.3-1e** would be implemented. Measures identified in **MM 5.3-1f** would avoid the introduction and spread of weeds and implementation of **MM 5.3-1g** would minimize bird strikes on the proposed onsite buildings. With regards to this impact, the "Reduced Intensity" alternative would be *reduced* when compared to the proposed project.

With regards to impacts to 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 5.3-2), the proposed project would result in a *less than significant* impact with implementation of **MM 5.3-2a** and **MM 5.3-2b**. The "Reduced Intensity" alternative would reduce impacts to onsite riparian habitat through the reduction required parking and preserve nine Fremont cottonwood trees. As a result, impacts to onsite riparian habitat under this alternative would be *less than significant*. When compared to the proposed project, this impact would be *reduced* under the "Reduced Intensity" alternative.

Impact 5.3-3 addresses the project's potential to interfere with the movement of native resident or migratory fish or wildlife species. With implementation of **MM 5.3-2a** and **MM 5.3-2b** this impact would be reduced to a *less than significant* level. Implementation of the "Reduced Intensity" alternative would require similar mitigation to reduce the significance of this impact. As a result, this impact is considered *similar* to that of the proposed project.

Conflicts with any local policies or ordinances protecting biological resources, such as the City's tree preservation ordinance for the proposed project discussed in Impact 5.1-4, would be *similar* for the "Reduced Intensity" alternative. Relative to this impact, both the proposed project and the "Reduced Intensity" alternative would be *less than significant* and no mitigation measures would be required.

As described under Impact 5.3-5, the proposed 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. Impacts as evaluated under Impact 5.3-5 would be similar, but *reduced* for the "Reduced Intensity" alternative. Implementation of the proposed **MM 5.3-1** and **MM 5.3-2** would be required under this alternative to reduce impacts to *less than significant* levels.

Cumulative Impacts

As discussed in 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. Implementation of the "Reduced Intensity" alternative would have similar, but *reduced*, impacts to the proposed project. However, with implementation o **MM 5.3-1a** and **MM 5.3-1g** for the "Reduced Intensity" alternative, impacts would be *less than significant*.

As evaluated in Impact 5.3-7, the proposed project combined with cumulative development could potentially have a substantial adverse effect on 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. Cumulative impacts were determined to be cumulatively *less than significant* with implementation of **MM 5.3-2a** and **MM 5.3-2b**. Although this cumulative impact would be similar under the "Reduced Intensity" alternative, the impact is *reduced* when compared to the proposed project. Similar to the proposed project implementation of **MM 5.3-2a** and **MM 5.3-2b** would be required to reduce impacts to *less than significant* levels.

The proposed project, along with cumulative development, could potentially interfere with the movement of native resident or migratory fish or wildlife species and migratory bird corridors. Impact 5.3-8 would be *similar* for the "Reduced Intensity" alternative and similar to the proposed project implementation of **MM 5.3-2a** and **MM 5.3-2b** would be required to reduce impacts to *less than significant* levels.

Implementation of **MM 5.3-2b** for the proposed project would reduce the cumulative impact related to the City's tree preservation ordinance, as identified for Impact 5.3-9. The impact and mitigation measure for the proposed project are similar for the "Reduced Intensity" alternative whereby **MM 5.3-2b** reduces the potential impacts to a *less that significant* level. Relative to this impact, the "Reduced Intensity" alternative is considered similar to the proposed project, but *reduced*, given the preservation of nine Freemont cottonwood trees achieved under this alternative.

As discussed in Impact 5.3-10, the proposed 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. Implementation of the "Reduced Intensity" alternative would result in similar impacts when compared to the proposed project and require implementation of **MM 5.3-1** and **MM 5.3-2** to reduce impacts to *less than significant* levels. Relative to this impact, the "Reduced Intensity" alternative is considered similar, but *reduced*, when compared to the proposed project.

Cultural Resources

Based on cultural resource studies undertaken, the proposed project and likewise the "Reduced Intensity" alternative could cause a potentially significant impact to historic, unique archaeological or prehistoric resources as discussed for Impact 5.4-1. The implementation of **MM 5.4-1a** through **MM 5.4-1e** mitigate potentially significant impacts to a *less than significant* level for the proposed project and the "Reduced Intensity" alternative, particularly with respect to undiscovered cultural resources and/or human remains due to construction grading for the proposed project or the alternative. Relative to this impact, the "Reduced Intensity" alternative is considered *similar* to the proposed project.

With regard to the potential damage or destruction of undiscovered paleontological resources discussed in Impact 5.4-2, implementation of the proposed project requires **MM 5.4-1a** to reduce this impact to a *less than significant* level. Implementation of the "Reduced Intensity" alternative also would require **MM 5.4-1a** and result in *less than significant* impacts in this regard. Relative to this impact, the "Reduced Intensity" alternative is considered *similar* to the proposed project.

With regard to the potential disturbance to human remains, including those interred outside of formal cemeteries as discussed in Impact 5.4-3, implementation of the proposed project requires **MM 5.4-1d** to reduce this impact to a *less than significant* level. Implementation of the "Reduced Intensity" alternative would also require **MM 5.4-1d** and result in *less than significant* impacts in this regard. Relative to this impact, the "Reduced Intensity" alternative is considered *similar* to the proposed project.

Cumulative Impacts

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 (Impact 5.4-4); potential damage or destruction of undiscovered paleontological resources (Impact 5.4-5); and, potentially disturbing human remains, including those interred outside of formal cemeteries (Impact 5.4-6). Similar to the proposed project, the "Reduced Intensity" alternative would require implementation of **MM 5.4-1a** through **MM 5.4-2e**, to reduce cumulative impacts to *less than significant* levels. When compared to the proposed project, cumulative impacts related to cultural resources impacts would be *similar* for the "Reduced Intensity" alternative.

Geology and Soils

Impacts 5.5-1 and 5.5-2 as described for the proposed project would be similar to the "Reduced Intensity" alternative whereby, grading and associated site disturbance activities would still occur as a result of project construction. Implementation of the "Reduced Intensity" alternative would result in impacts associated with soil stability and potential erosion impacts that are similar to those impacts associated with the proposed project. Additionally, the "Reduced Intensity" alternative 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 5.5-1) or soil that has the potential to be substantially expansive (Impact 5.5-2). Similar to the proposed project, geology and soil impacts associated with the "Reduced Intensity" alternative would be *less than significant* and no mitigation is required. Relative to this impact, the "Reduced Intensity" alternative is considered ***similar*** to the proposed project.

Cumulative Impacts

As discussed for Impact 5.5-3, implementation of the proposed project which is similar to this alternative, 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. Also, Impact 5.5-4 related to cumulative expansive soil impacts would be similar to the "Reduced Intensity" alternative. No mitigation is required for either the proposed project or this alternative since both impacts are *less than significant*. Relative to these cumulative geology and soil impacts, the "Reduced Intensity" alternative is considered ***similar*** to the proposed project.

Greenhouse Gases and Climate Change

As discussed under Impact 5.6-1, for the proposed project, greenhouse gas emissions generated by the project, either directly or indirectly, would have a potentially significant impact on the environment. The "Reduced Intensity" alternative would support an estimated 151 jobs (employees) and an estimated 1,012 residents (patients) per day resulting in a service population of 1,163. This service population is applicable to both the 2024 and 2035 analysis years. The "Reduced Intensity" alternative's operational emissions in year 2024 and year 2035 are provided in Table 7-11, ANNUAL REDUCED INTENSITY ALTERNATIVE GREENHOUSE GAS EMISSIONS 2024 & 2035.

Table 7-11
ANNUAL REDUCED INTENSITY ALTERNATIVE
GREENHOUSE GAS EMISSIONS 2024 & 2035

	MT CO_2e	
Emissions Category	**Year 2024**	**Year 2035**
Area	<0.1	<0.1
Energy	137.9	137.9
Mobile	2,635	2,319.9
Stationary	28.7	28.7
Waste	148.0	148.0
Water	3.6	3.6
Sequestration (annualized)	-5.1	-5.1
Construction (annualized)	18.7	18.7
Total Project Emissions	**2,966.7**	**2,651.7**
Service Population	1,163	1,163
Project Efficiency (MT CO_2e / Service Population)	2.55	2.28
Threshold of Significance	3.7	1.7
Significant Impact?	No	**Yes**

Source: GHD. *North State Pavilion Project Greenhouse Gas Report.* Appendix C. May 2019. Refer to Appendix 15.5, GREENHOUSE GAS REPORT.

The "Reduced Intensity" alternative's construction activities are estimated to generate approximately 562 MT CO_2e. When annualized over an assumed 30-year project lifespan, construction would generate approximately 18.7 MT CO_2e per year. This impact is reduced when compared to the proposed project's annualized GHG emission of 31.5 MT CO_2e per year.

Proposed landscaping is estimated to result in a total 118.37 MT CO_2e of sequestration over 20 years, or approximately -5.1 MT CO_2e per year. This alternative would generate approximately 2,967 MT CO_2e per year in 2024. With a service population of 1,163 (151 employees plus 1,012 clients or patients), applicable to both the 2024 and 2035 analysis years this alternative would achieve an efficiency metric of 2.55 MT CO_2e per service population, which is less than the significance threshold of 3.7 MT CO_2e per service population. Therefore, similar to the proposed project, this alternative would result in a *less than significant* impact in 2024.

The "Reduced Intensity" alternative would generate approximately 2,652 MT CO_2e per year in 2035. With a service population of 1,163, this alternative would achieve an efficiency metric of 2.28 MT CO_2e per service population, which exceeds the significance threshold of 1.7 MT CO_2e per service population. Therefore, this alternative would result in a potentially *significant* impact in 2035.

Table 7-12, COMPARISON OF REDUCED INTENSITY ALTERNATIVE AND PROPOSED PROJECT GREENHOUSE GAS IMPACTS, shows that the "Reduced Intensity" alternative would result in greater greenhouse gas emissions than the proposed project in year 2024 and in year 2035, as measured in MT CO_2e per service population (SP). This is primarily because alternative does not have the parking reduction component applied to the proposed project's emissions analysis.

Table 7-12
COMPARISON OF REDUCED INTENSITY ALTERNATIVE AND PROPOSED PROJECT GREENHOUSE GAS IMPACTS

Parameter	MT CO_2e/SP	
	2024	**2035**
Threshold Applied	3.7	1.7
Proposed Project Impact	2.51	2.25
Reduced Intensity Alternative Impact	**2.55**	**2.28**

Source: GHD. *North State Pavilion Project Greenhouse Gas Report.* Appendix C. May 2019. Refer to Appendix 15.5, GREENHOUSE GAS REPORT.

Similar to the proposed project, **MM 5.6-1** would also be implemented for the "Reduced Intensity" alternative to reduce cumulative greenhouse gas emissions by preparing and implementing a Greenhouse Gas Reduction Plan (GGRP) that contains specific design features and actions to be implemented prior to year 2035. Implementation of **MM 5.6-1** would reduce greenhouse gas emissions to *less than significant* levels. When compared to the proposed project, implementation of the "Reduced Intensity" alternative would result in similar, but *increased,* impacts related to greenhouse gas emissions.

Under the discussion for Impact 5.6-2, the proposed project would not conflict with an applicable greenhouse gas reduction plan, policy, or regulation including the *2015 Regional Transportation Plan/Sustainable Communities Strategy* and with the *California Air Resources Board's Scoping Plan*. Therefore, implementation of the "Reduced Intensity" alternative in this regard would be *less than significant* and no mitigation measures would be required. Compared to the proposed project this impact would be *increased* under the "Reduced Intensity" alternative.

Cumulative Impacts

Impact 5.6-3 discusses that greenhouse gas emissions generated by the proposed project would have a potentially *significant* impact on global climate and requires the implementation of **MM 5.6-1** to reduce impacts to *less than significant* levels. Similarly, implementation of the "Reduced Intensity" alternative would require implementation of **MM 5.6-1** to ensure cumulative greenhouse gas impacts are cumulatively *less than significant*. When compared to the proposed project, the "Reduced Intensity" alternative would result in similar, although ***increased***, impacts related to greenhouse gas emissions.

Hazards and Hazardous Materials

The discussion under Impact 5.7-1 determined that the proposed project would create a *less than significant* hazard to the public or the environment through the routine transport, use, or disposal of hazardous material and therefore, no mitigation measures are required. When compared to the proposed project, impacts associated with the "Reduced Intensity" alternative for this impact would be *less than significant* and no mitigation is required. As a result, this impact is ***similar*** to the proposed project.

Impact 5.7-2 identified that project construction activities could create a potentially significant hazard to the public through foreseeable upset and accidental conditions and that to mitigate the potential impacts **MM 5.7-1** is to be implemented prior to issuance of a demotion or grading permit. Implementation of the "Reduce Intensity" alternative would require **MM 5.7-1** to reduce impacts to *less than significant* levels. When compared to the proposed project in this regard, the "Reduced Intensity" alternative would be ***similar***.

As discussed in Impact 5.7-3, the proposed project would result in a *less than significant* impact related to impairing the implementation of, or physically interfering with an adopted emergency response plan or emergency evacuation plan. No mitigation measures are required. 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 5.7-4). Impacts would also be *less than significant* and no mitigation is required. Implementation of the "Reduced Intensity" alternative would result in ***similar*** impacts that and no mitigation is required.

Cumulative Impacts

Impacts discussed for the proposed project and the "Reduced Intensity" alternative are similar for Impact 5.7-5 where 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 and Impact 5.7-6 where impacts were determined to be *less than significant* and no mitigation is required. Similarly, the cumulative discussion in Impact 5.7-7 and Impact 5.7-8 would be *less than significant* for the proposed project and this alternative. The "Reduced Intensity" alternative cumulative impacts are ***similar*** to the proposed project and therefore considered *less than significant* and no mitigation measures are necessary.

Hydrology and Water Quality

Under Impact 5.8-1, implementation of the proposed project would potentially violate water quality standards or waste discharge requirements; however, this impact is mitigated through implementation of **MM 5.8-1a** and **MM 5.8-1b** that requires preparation of a Storm Water Pollution Prevention Plan (SWPPP), including an erosion control plan to reduce impacts to a *less than significant* level. Implementation of the "Reduced Intensity" alternative would result in onsite disturbance activities similar to that of the proposed project. Implementation of **MM 5.8-1a** and **MM 5.8-1b** would be required under the "Reduced Intensity" alternative to reduce impacts to *less than significant* levels. When compared to the proposed project, impacts would be *similar* in this regard.

Under Impact 5.8-2, implementation of the proposed project would result in a *less than significant* impact related to depleting groundwater supplies or interfering with groundwater discharge and no mitigation is required for the proposed project. Assuming a 15 percent reduction in building footprint and associated landscaping, implementation of the "Reduced Intensity" alternative would require approximately 10.2 AF water. This demand is approximately 1.8 AF less water than the proposed project's water demand of 12 AF per year. Similar to the proposed project, impacts would be *less than significant* and no mitigation measures would be required as sufficient water supplies are available as documented in the City's *2015 Urban Water Management Plan*. For this impact, implementation of the "Reduced Intensity" alternative would be similar, but *reduced* when compared to the proposed project.

As discussed under Impact 5.8-3, implementation of the proposed project could substantially alter the existing drainage pattern of the site or area, through the alteration of the course of the Sacramento River, in a manner which would result in substantial erosion or siltation on or offsite. Given that the approximately 9.72 acres of the 10.55-acre site would be developed under the "Reduced Intensity" alternative, similar to the proposed project, implementation of **MM 5.8-1a** and **MM 5.8-1b** would be required to reduce impacts to *less than significant* levels. When compared to the proposed project, impacts in this regard are considered similar, but *reduced*.

As described under Impact 5.8-4, implementation of the proposed project would result in a *less than significant* impact since the existing drainage pattern of the site or area would not be substantially altered. Similar to the proposed project, implementation of the "Reduced Intensity" alternative would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite. The "Reduced Intensity" alternative would also be developed in accordance with RMC Chapter 16.12, *Clearing, Grading, Fills and Excavation*. Impacts are therefore considered similar, but *reduced*, when compared to that of the proposed project.

As evaluated under Impact 5.8-5, drainage studies undertaken for the proposed project determined that polluted runoff could be treated onsite prior to discharge into the Sacramento River would *be less than significant*. The studies also determined that 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. Since implementation of the "Reduced Intensity" alternative would result in approximately 0.83 acres less of impervious surfaces onsite, impacts are considered similar, but *reduced,* and is *less than significant*.

As identified for Impact 5.8-6, implementation of the proposed project could potentially degrade water quality; however, with implementation of **MM 5.8-1a** and **MM 5.8-1b** impacts are reduced to *less than significant* levels. Implementation of the "Reduced Intensity" alternative would also require **MM 5.8-1a**

and **MM 5.8-1b** to reduce the potential impacts to a *less than significant* level. When compared to the proposed project, impacts in this regard are considered similar, but *reduced*.

With regards to Impact 5.8-7, this impact is considered *less than significant* for both the proposed project and "Reduced Intensity" alternative since neither proposed the placement of structures within the 100-year flood hazard area which would impede or redirect flows. Impacts would therefore be *similar* under this alternative.

As discussed under Impact 5.8-8, future onsite structures and associated people would not be exposed to a significant risk of loss injury, or death involving flooding, including flooding as a result of the failure of a levee or dam. With implementation of the "Reduced Intensity" alternative, impacts would be *similar* and *less than significant*.

Cumulative Impacts

For the proposed project, implementation of **MM 5.8-1a** and **MM 5.8-1b** would reduce potential cumulative impacts to *less than significant* levels associated with the following: violating water quality standards or waste discharge requirements (Impact 5.8-9); the alternation of drainage patters, in a manner which would result in substantial erosion or siltation on or offsite (Impact 5.8-11); the contribution of runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff (Impact 5.8-12). Implementation of the "Reduced Intensity" alternative would require **MM 5.8-1a** and **MM 5.8-1b** to reduce these cumulative impacts to *less than significant* levels as 9.72 acres of the 10.55-acre site would be developed with a similar type development and associated impervious surfaces. Cumulative hydrology and water quality impacts in this regard for the "Reduced Intensity" alternative would be similar, but *reduced,* when compared to the proposed project**.**

As discussed in Impact 5.8-10 the proposed project would not result in significant cumulative impacts related to water supply and no mitigation is required. Implementation of the "Reduced Intensity" alternative would result in similar, but *reduced,* cumulative impacts when compared to that of the proposed project.

As described under Impact 5.8-13, cumulative effects of placing structures within a 100-year flood hazard area would not be significant for the proposed project. Implementation of the "Reduced Intensity" alternative would result in *similar* impacts that would also be *less than significant* and would not require mitigation.

Land Use and Planning

Development of either the proposed project or the "Reduced Intensity" alternative will require identical entitlements; general plan amendment, rezone, use permit and a parcel map. Consistency findings identified in Table 5.9-1, CONSISTENCY ANALYSIS WITH CITY OF REDDING GENERAL PLAN GOALS AND POLICIES FOR LAND USE AND PLANNING, in Section 5.9, LAND USE AND PLANNING, are applicable to this alternative.

Provided that the necessary entitlements were obtained for the proposed project and for the "Reduced Intensity", alternative Impact 5.9-1 discusses that the proposed project and the similar "Reduced Intensity" alternative would not conflict with City of Redding *General Plan*, Zoning Ordinance, Tree

Management Ordinance, Parks, Trails and Open Space Master Plan, and other applicable policies and/or regulations of the City and any other applicable agency (Shasta County Air Quality Management District and the Shasta Regional Transportation Agency) with jurisdiction over the proposed project and alternative adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be *less than significant* and *similar* to that of the proposed project and therefore, mitigation is not required.

Cumulative Impacts

The discussion for cumulative Impact 5.9-2 for the proposed project identifies that 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. Implementation of the "Reduced Intensity" alternative is similar to the proposed project in this regard, as development onsite consistent with the City's underlying general plan and zoning designations would not 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. Impacts would be *less than significant* and no mitigation would be required. Cumulative impacts of the "Reduced Intensity" alternative related to land use and planning are therefore considered *similar* to the proposed project.

Noise

It has been identified under the discussion for Impact 5.10-1 that implementation of the proposed project would not generate noise levels or expose persons to noise levels in excess of standards established in the City of Redding general plan or noise ordinance, or applicable standards of other agencies. This potential impact would be similar, although *reduced*, for the "Reduced Intensity" alternative and would be considered less *than significant* requiring no mitigation.

Discussion in Impact 5.10-2 identifies that implementation of the proposed project would not expose persons to or generate excessive ground borne vibration or ground borne noise levels. The potential impact is considered *less than significant* and no mitigation is required. This potential impact under the "Reduced Intensity" alternative would also be *less than significant* and, similarly, no mitigation would be required. Relative to this impact, the "Reduced Intensity" alternative is considered similar to the proposed project, although *reduced* due to the reduced onsite building activity.

Discussion under Impact 5.10-3 determined that implementation of the proposed project may result in a temporary or periodic increase in noise levels due to construction in excess of standards permitted in the noise ordinance which would be considered a *significant*. The implementation of measures **MM 5.10-1a** and **MM 5.10-1b** would not reduce construction related impacts to a *less than significant* level. Therefore, the impact is considered *significant and unavoidable* for the proposed project. Implementation of the "Reduced Intensity" alternative would result in similar temporary construction noise impacts. Although the "Reduced Intensity" alternative decreases the amount of building square footage and the project site, this decrease only reduces the time over which construction will occur and not the noise impacts attributed to construction. As a result, the increase in temporary construction noise attributable to implementation of the "Reduced Intensity" alternative would be considered *significant and unavoidable* even after implementation of **MM 5.10-1a** and **MM 5.10-1b**. Therefore, "Reduced Intensity" alternative would result in a *similar* temporary increase in noise levels when compared to the proposed project.

The discussion in Impact 5.10-4 identifies that implementation of the proposed project may result in a substantial permanent increase in ambient noise levels in excess of standards permitted in the noise ordinance. Implementation of **MM 5.10-2a** through **MM 5.10-2c** would ensure that impacts related to a substantial permanent increase in ambient noise levels associated with onsite sources of noise, would be reduced to *less than significant* levels. The "Reduce Intensity" alternative would also require the implementation of these noted mitigation measures. Impacts associated with the "Reduced Intensity" alternative are *similar* to the proposed project and *less than significant*.

Cumulative Impacts

The discussion in Impact 5.10-5 identifies that implementation of the proposed project, combined with other past, present, and reasonably foreseeable future development, may potentially increase the ambient noise levels in the project vicinity resulting in a potentially significant impact. Implementation and compliance with **MM 5.10-1** and **MM 5.10-2** reduce this cumulative impact to a *less than significant* level. Impacts associated with the "Reduced Intensity" alternative would also require these mitigation measures to reduce impacts to *less than significant* levels. Cumulative impacts would therefore be *similar* to that of the proposed project.

Population and Housing

The discussion for Impact 5.11-1 for the proposed project notes that the implementation of the proposed project would not induce substantial population growth in the area, either directly or indirectly. Implementation of the "Reduced Intensity" alternative would reduce the building area and proportionally reduce the number of onsite employees. When compared to the proposed project, implementation of the "Reduced Intensity" alternative would result in *reduced*, although similar *less than significant* impacts related to population and housing.

Cumulative Impacts

Cumulative Impact 5.11-2 identifies that development of the proposed project, along with approved and proposed development, would not result in increased population in the City of Redding and therefore, the impact is *less than significant,* and mitigation is not required. When compared to the proposed project, impacts for the "Reduced Intensity" alternative would also be *less than significant* and not require mitigation. Given the reduction in building square footage and proportional reduction in the amount of onsite employees required, this cumulative impact is considered to be *reduced* when compared to the proposed project.

Public Services

Per the discussion for Impact 5.12-1, for the proposed project, the impact is *less than significant* and no mitigation is required since the proposed project would not 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 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. Implementation of the "Reduced Intensity" alternative would also result in *less than significant* impacts in this regard and no mitigation is required. Relative to the demand on public services, the "Reduced Intensity" alternative is similar, but *reduced*, when compared to that of the proposed project.

Cumulative Impacts

The Impact 5.12-2 discussion for the proposed project, combined with other past, present, and reasonably foreseeable future development, identifies that there would not be a demand in public services and therefore the impact is *less than significant,* and no mitigation is warranted. Similarly, impacts from the "Reduced Intensity" alternative are *less than significant* and mitigation is not required. Given the reduction in building square footage this cumulative impact is considered to be *reduced* when compared to the proposed project.

Recreation

Implementation of the proposed project would not result in an increased use of existing neighborhood or regional parks or other recreation facilities such that substantial physical deterioration of the facility would occur or be accelerated as discussed in Impact 5.13-1. Therefore, the proposed project will result in *less than significant* impacts and mitigation is not required. Given the reduced number of new employees potentially residing in the Redding area that would utilize recreational facilities under this alternative, similar to the proposed project impacts would be *less than significant* and no mitigation measures would be required. Impacts in this regard are considered similar to the proposed project; however, given the proportional reduction in new employees and resultant population in the area, this impact is considered to be *reduced* when compared to the proposed project.

With regard to construction or expansion of recreational facilities which might have an adverse physical effect on the environment as discussed in Impact 5.13-2, implementation of the proposed project will result in impacts that would be *less than significant*. Implementation of the "Reduced Intensity" will also result in *less than significant* impacts in this regard. Impacts in this regard are considered similar to the proposed project; however, given the proportional reduction in new employees and resultant population in the area, this impact is considered to be *reduced* when compared to the proposed project.

Cumulative Impacts

As discussed under Impact 5.13-3, implementation of the proposed project, combined with cumulative development, 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. Impacts would be *less than significant* requiring no mitigation. Implementation of the "Reduced Intensity" alternative will also result in *less than significant* impacts in this regard. Impacts in this regard are considered similar to the proposed project; however, given the proportional reduction in new employees and resultant population in the area, this cumulative impact is considered to be *reduced* when compared to the proposed project.

Under the discussion of Impact 5.13-4, it was determined that the proposed project, when combined with cumulative development, does not require the construction or expansion of recreational facilities which might have an adverse effect on the environment resulting in *less than significant* impacts. Therefore, no mitigation is required. Similar to the proposed project, the "Reduced Intensity" alternative, when combined with cumulative development, also does not require the construction or expansion of recreational facilities. Cumulative recreation impacts associated with the "Reduced Intensity" would be *less than significant* and no mitigation is required. Impacts in this regard are considered similar to the proposed project; however, given the proportional reduction in new

employees and resultant population in the area, this cumulative impact is considered to be *reduced* when compared to the proposed project.

Traffic and Circulation

The "Reduced Intensity" alternative is projected to decrease peak hour trips from 311 AM and 330 PM peak hour trips under the proposed project to 263 AM and 279 PM peak hour trips. Overall, the proposed project generates 4,697 daily trips and the alternative generates 3,974[3] daily trips.

Under the discussion for Impact 5.14-1, it is identified that implementation of the proposed project under existing conditions may cause an increase in traffic which exceeds significance criteria established in the City of Redding's *Traffic Impact Assessment Guidelines*. Specifically, the Hartnell Avenue & Cypress Avenue (Intersection #10) requires the construction intersection improvements identified in **MM 5.14-1** to reduce the impact at this intersection to a *less than significant* level.

Similar to the proposed project, implementation of the "Reduced Intensity" alternative creates a potentially significant impact at Hartnell Avenue & Cypress Avenue (Intersection #10) by increasing the westbound left queue from 10 to 17 cars for the AM peak hour. The available storage capacity for westbound left movement is nine cars. With implementation of **MM 5.14-1**, impacts associated with the "Reduced Intensity" alternative would be *less than significant* for this intersection. Compared to the proposed project this impact would be *similar*.

As discussed in Impact 5.14-2, the proposed project would not create temporary traffic delays or increase hazards due to a design features such as sharp curves or dangerous intersections. However, some traffic delays can be expected during project construction; however, the traffic impacts during construction are temporary in nature and will cease upon completion of construction activities. To address the impact, **MM 5.14-2** requires preparation of a Traffic Management Plan (TMP) to address safety and traffic concerns for the various streets and associated vehicle/bicyclist/pedestrian rerouting. Implementation of the "Reduced Intensity" alternative would result in similar temporary construction impacts as the proposed project and require the implementation of **MM 5.14-2** to reduce temporary traffic impacts to *less than significant* levels. When compared to the proposed project, the "Reduced Intensity" alternative would result in *similar* temporary construction impacts.

Discussion in Impact 5.14-3 determined that implementation of the proposed project would result in a *less than significant* impact related to the potential conflict with adopted policies, plans or programs supporting alternative transportation (e.g. bus turnouts, bicycle racks) and the impact was *less than significant,* and mitigation was not required. Implementation of the "Reduced Intensity" alternative would be *less than significant* and *similar* to the proposed project.

Cumulative Impacts

As discussed in Impact 5.14-3 implementation of the proposed project could result in increased traffic volumes at study area intersections under year 2040 cumulative plus project conditions. Specifically, the Hartnell Avenue & Cobblestone Shopping Center (Main Driveway – Intersection #8) and the Hartnell Avenue & Cypress Avenue (Intersection #10) would require improvements to reduce impacts.

[3] GHD. *Technical Memorandum No. 4 – Traffic Impacts at Intersections No. 8 and No. 10 for Existing General Plan Project Alternative and Reduced Intensity Project Alternative*. March 13, 2019.

Specifically, **MM 5.14-3** calls for turn lane and turn pocket restriping to mitigate Intersection No. 8 and **MM 5.14-4** requires payment of pro-rata construction costs for intersection improvements. Implementation of the mitigation measures will reduce year 2040 cumulative impacts to *less than significant* level. Similar to the proposed project, implementation of the "Reduced Intensity" alternative would require the same intersection improvements (**MM 5.14-3** and **MM 5.14-4**) in order to reduce impacts to *less than significant* levels. When compared to the proposed project, year 2040 cumulative traffic impacts associated with the "Reduced Intensity" alternative would be *similar*.

Tribal Cultural Resources

The discussion under Impact 5.15-1 determined that for the proposed project, ground disturbing activities could result in the unanticipated discovery of prehistoric archaeological sites, which may be considered to be Tribal Cultural Resources (TCRs). Implementation of **MM 5.4-1a** through **MM 5.4-1e** would reduce the potential impact to *less than significant* levels. Similar to the proposed project the "Reduced Intensity" alternative would require implementation of **MM 5.4-1a** through **MM 5.4-1e** to reduce potential impacts to TCRs to *less than significant* levels. Impacts of the "Reduced Intensity" alternative would therefore be *similar* to the proposed project in this regard.

Cumulative Impacts

Impact 5.15-2 discusses that implementation of the proposed project, combined with planned and reasonably foreseeable development within the City of Redding would result in the unanticipated discovery of prehistoric archaeological sites, which may be considered TCRs. Implementation of **MM 5.4-1a** through **MM 5.4-1e** would reduce impacts to *less than significant* levels. Similarly, implementation of the "Reduced Intensity" alternative would require implementation of **MM 5.4-1a** through **MM 5.4-1e** to ensure potential impacts to TCRs remain *less than significant*. When compared to the proposed project, the "Reduced Intensity" alternative would result in *similar* cumulative impacts related to TCRs.

Utilities and Service Systems

Discussions under Impacts 5.16-1, 5.16-2, 5.16-3, 5.16-4, 5.16-5, 5.16-6 and 5.16-7 addressed proposed project utilities and service system impacts. It was determined that the impacts would be *less than significant* and no mitigation measures would be required. When compared to that of the proposed project, implementation of the "Reduced Intensity" alternative would result in similar, but *reduced* impacts to utilities and service systems. The "Reduced Intensity" alternative would result in *less than significant* impacts to utilities and service systems and would not require mitigation.

Impact 5.16-1 evaluates the potential for wastewater treatment requirements of the Central Valley RWQCB to be exceeded. There exists sufficient capacity at the Clear Creek Wastewater Treatment Plant to serve the "Reduced Intensity" alternative. When compared to that of the proposed project, wastewater generation associated with "Reduced Intensity" alternative would be *reduced* due to the decrease in onsite wastewater generation.

Impact 5.16-2 evaluates the construction of new water or wastewater treatment facilities or expansion of existing facilities. Implementation of the "Reduced Intensity" alternative, similar to the proposed project, would be served by sufficient existing water and wastewater facilities. Impacts of the "Reduced

Intensity" alternative are *less than significant* and considered to be *reduced* when compared to the proposed project.

Similar to the proposed project evaluated in Impact 5.16-3, implementation of the "Reduced Intensity" alternative would not require or result in the construction or expansion of new stormwater drainage facilities. Impacts of this alternative are *less than significant* and considered to be *similar* to the proposed project.

Similar to the proposed project as evaluated in Impact 5.16-4, implementation of the "Reduced Intensity" alternative would have sufficient water supplies from existing entitlements and resources. The City projects sufficient water supplies to meet projected demands during multiple dry years through year 2035. Compared to the proposed project the "Reduced Intensity" alternative would require approximately 10.2 AF of water or approximately 1.8 AF less than the proposed project. The water demand of this alternative remains well within the City's projected surplus of 8,400 AF. Implementation of the "Reduced Intensity" alternative is considered similar, but *reduced*, in this regard when compared to the proposed project.

Similar to the proposed project as evaluated in Impact 5.16-5, the "Reduced Intensity" alternative would not result in inadequate wastewater capacity within the Clear Creek Basin Service Area. As noted for Impact 5.16-1, the Clear Creek Wastewater Treatment Plant has adequate treatment capacity. Impacts of this alternative are *less than significant* and considered to be similar, although *reduced*, when compared to the proposed project.

Similar to the proposed project as evaluated in Impact 5.16-6, implementation of this alternative would increase the demand for solid waste. The "Reduced Intensity" alternative would reduce the amount of new building construction waste by approximately 44.7 tons associated with the reduced building square footage of this alternative. This represents an approximate 15.8 percent decrease from the project's new construction waste estimation of 281.2 tons. Sufficient landfill capacity exists at the Richard W. Curry West Central Landfill. This alternative would also generate less daily waste when compared to the approximate 1.03 tons of solid waste generated each day by the proposed project (which is less than 1 percent of the daily intake volume of 500 tons at the Richard W. Curry West Central Landfill). As a result solid waste generation associated with the "Reduced Intensity" alternative would be *less than significant* and *reduced* when compared to the proposed project.

City and State regulations and requirements address Impact 5.16-7 to ensure compliance with federal, State, and local statutes and regulations related to solid waste. As a result, this *less than significant* impact would be *similar* for the "Reduced Intensity" alternative

Cumulative Impacts

Discussion for Impact 5.16-8 concludes that 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 and that impacts are *less than significant*. Similar cumulative impacts associated with the "Reduced Intensity" alternative are *less than significant* and *reduced* when compared to those of the proposed project. Similar to the proposed project no mitigation measures are necessary to address cumulative utility and service system impacts of the "Reduced Intensity" alternative.

Energy Consumption

Impact 5.17-1 discusses that the implementation of the proposed project would not use fuel or energy in a wasteful manner and therefore, no mitigation measures are necessary to address this *less than significant* impact.

When compared to the proposed project, the reduction in development associated with the "Reduced Intensity" alternative would result in an incremental reduction in the demand on energy. Infrastructure improvements would be similar to those needed for the proposed project. Table 7-13, REDUCED INTENSITY ALTERNATIVE ENERGY CONSUMPTION, shows that energy demands would be reduced roughly proportionately for electricity, natural gas, and fuel. As with the proposed project, it is anticipated that impacts would be *less than significant* without mitigation.

Table 7-13
REDUCED INTENSITY ALTERNATIVE ENERGY CONSUMPTION

Energy Type	Annual Energy Consumption	Shasta County Annual Energy Consumption	Percentage Increase of the Reduced Intensity Alternative (Countywide)	Proposed Project Percentage Increase (Countywide)
Electricity Consumption[1]	1,013,739 kWh	816,000,000 kWh	0.12%	0.15%
Natural Gas Consumption[1]	1,220 million BTU	1,573,381 million BTU	0.08%	0.11%
Fuel Consumption[2]				
Construction	26,348 gallons	44,817,175 gallons	0.06%	0.09%
Operations	257,225 gallons	111,222,696 gallons	0.23%	0.45%
Total	283,573 gallons	156,039,871 gallons	0.18%	0.35%

Notes: The projected increases in electricity and natural gas consumption are compared with all of the nonresidential buildings in Shasta County in 2016. The projected increases in gas and fuel consumption are compared with the countywide fuel consumption in 2017.

Sources: [1] CalEEMod v. 2016.3.2; [2] EMFAC2017 (CARB 2017).

Table 7-13 shows the "Reduced Intensity' alternative's electricity usage would constitute an approximate 0.12 percent increase in the typical annual electricity consumption and an approximate 0.08 percent increase in the typical annual natural gas consumption attributable to all nonresidential buildings in Shasta County. Vehicular fuel, including the two-phase construction of the project would increase use in the County by 0.18 percent and when compared to the proposed project, there is a countywide increase for the alternative. Regardless, similar to the proposed project, this *less than significant* does not require mitigation. Energy consumption associated with the "Reduced Intensity" alternative would be similar, but *reduced*, when compared to the proposed project.

As evaluated in Impact 5.17-2, the proposed project design and operation would comply with Title 24 State Building Energy Efficiency Standards, appliance efficiency regulations, and green building standards. Similar to the proposed project, the Redding Electric Utility (REU) would provide electrical service to the site. 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 60 percent of total procurement by 2030 (as required by SB 100).

Similar to the proposed project, the "Reduced Intensity" would require implementation of **MM 5.6-1** that requires a Greenhouse Gas Reduction Plan (GGRP) be prepared and implemented. The GGRP must include measures such as implementation of voluntary trip reduction program as well as a voluntary

ride-sharing program for all employees that would serve to reduce fuel consumption. Additionally, the "Reduced Intensity" alternative would be required to comply with the 2016 Title 24 Building Codes, which would result in a 5 percent increase in energy efficiency in commercial buildings when compared with the 2013 Title 24 Building Codes. Therefore, energy consumption associated with the "Reduced Intensity" alternative is considered similar, but *reduced*, and *less than significant* when compared to those of the proposed project.

Cumulative Impacts

Discussions for Impact 5.17-3 and 5.17-4 address how the proposed project with respect to cumulative development in Shasta County would not utilize fuel or energy in a wasteful manner or result in a conflict with a state or local plan for renewable or energy efficiency. Implementation of the "Reduced Intensity" alternative would result in proportional decrease in energy consumption when compared to the proposed project. Energy consumption impacts would be *less than significant* under this alternative. As a result, cumulative energy impacts would be similar, but *reduced*, when compared to the proposed project.

Conclusion

Avoid or Substantially Lessen Project Impacts

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. 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

Description of the 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.

Current land uses within the area consist of Simpson College to the west, a City of Redding electrical substation to the northeast, Shasta College to the northeast, rural residential development to the east and south and urban residential development west of Simpson College.

Elevations within the 54.86-acre parcel range from approximately 658 feet above mean sea level (msl) from the west to 600 feet above msl to the southeast. The parcel contains intermittent drainages that flow in a southeasterly direction to a major drainage tributary to Stillwater Creek. Onsite vegetation includes blue oak-foothill pine woodland and annual grassland.

Mercy Oaks Drive provides access to the western portion of the parcel that has been developed. Mercy Oaks Drive is approximately 1,200 feet long running in a north-south and then partially in an eastern direction. The street provides direct access to an approximate 3.41-acre parcel (2355 McAuley Way) also owned by Dignity where the approximate 51,500 square-foot Mercy Oak Village 63 unit accessible senior housing project is located. The building height is approximately 49 feet. This parcel is not located within the 54.86-acre Mercy Oaks Campus where the "Mercy Oaks Campus" alternative is located.

Approximately seven acres of the 54.86-acre parcel has been developed with two buildings; the Shasta Senior Nutrition Center (25,500 square feet) and the Golden Umbrella (11,500 square feet). Both buildings share common driveways and lighted parking areas. The buildings range in height from 23 to 49 feet. The Shasta Nutrition Center and Golden Umbrella provide onsite senior services, including multi-purpose senior services, computer classes, exercise classes, line dancing, art classes and Bingo. Shasta Nutrition Center also provides opportunities for the public to rent the banquet hall or other rooms for special events for up to 300 people.

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.

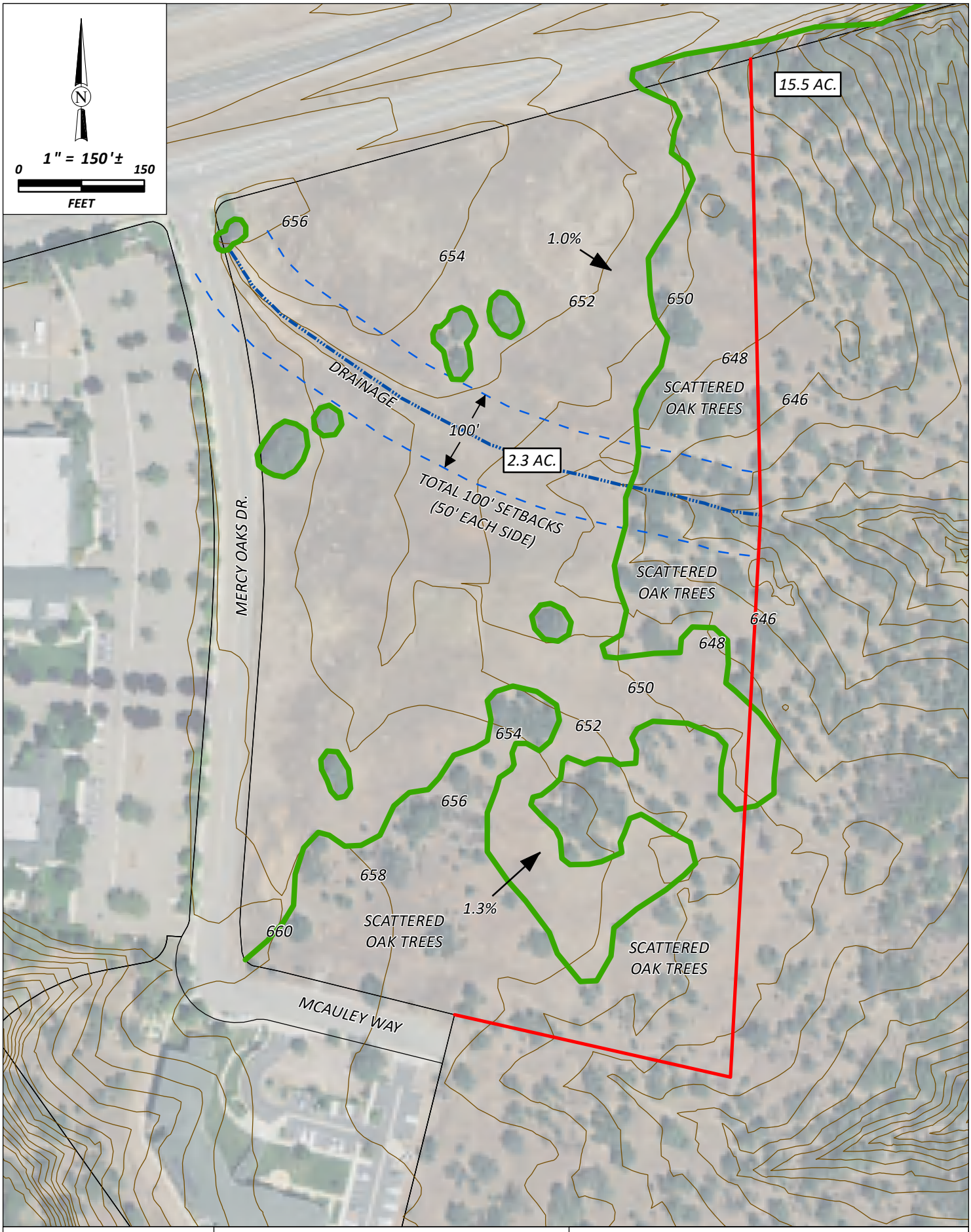
The "Mercy Oaks Campus" alternative would locate the proposed project's three buildings with 129,600 square feet, the building's, the 548 parking spaces that assumes the RABA parking space reduction credit since a RABA bus stop (for current Route 6N) is located within 400 feet of this alternative at 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. An approximate 15.5-acre area was identified where approximately 13.2 acres could possibly be suitable for the location of the alternative; however, approximately 10.9 acres would be suitable for development as described below. Refer to Figure 7-4, MERCY OAKS CAMPUS ALTERNATIVE. The general parcel configuration was determined by utilizing the eastern extension of McAuley Way as the southern boundary and topographic and drainage constraints to the east.

Elevations within the "Mercy Oaks Campus" alternative 13.2-acre site range from 658 feet above msl to 646 feet above msl from west to east. Slope gradients are gentle ranging from approximately 1 to 1.3 percent over a distance of 1,000 to 1,100 feet. A drainage swale beginning in the northwest corner of the parcel flows in a southeasterly direction and exits this alternative's project site just above the mid-eastern boundary. Fifty-foot setbacks from the centerline of the drainage swale would provide adequate protection for the jurisdictional Waters of the U.S. which would be under U.S. Army Corp of Engineers (Corps) jurisdiction.

This drainage and immediately adjacent areas do not appear to currently support riparian habitat; however, the 50-foot setbacks provide 100-foot wide corridor resulting in 2.3 acres of a wetland area to be avoided. This results in an effective "Mercy Oaks Campus" alternative of 10.9 acres which is similar to the 10.55-acre proposed project site area.

Impacts Compared to Project Impacts

An evaluation of the potential environmental impacts of the "Mercy Oaks Campus" alternative, as compared to those of the proposed project, is provided as follows.



SHN	Dignity Health North State Pavilion Project	Mercy Oaks Campus Alternative Figure 7-4

Aesthetics

Impacts discussed for the proposed project in Impact 5.1-1 regarding scenic vistas would result in *less than significant* impacts. With implementation of the "Mercy Oaks Campus" alternative a similar wellness center campus would be constructed offsite on a 10.9-acre site located at 100 Mercy Oaks Drive in east Redding which is directly accessed from College View Drive.

With development under the "Mercy Oaks Campus" alternative some blockage of background views toward mountain features would occur; however, overall distant views toward City-designated ridgelines would remain intact. Similar to the proposed project impacts, related to scenic vistas would be *less than significant* and no mitigation measures would be required. When compared to that of the proposed project, impacts to scenic vistas as a result of the "Mercy Oaks Campus" alternative would be *similar*.

As discussed in Impact 5.1-2, the proposed project would potentially degrade the existing visual character and quality of the site and its surroundings resulting in impacts that were determined to be *significant and unavoidable*. Due to the location of the "Mercy Oaks Campus" alternative site, which is not in close proximity to a major significant aesthetic feature like the Sacramento River impacts would be *less than significant* in this regard. When compared to that of the proposed project, implementation of the "Mercy Oaks Campus" alternative would avoid and thereby *reduce* the *significant and unavoidable* impact of the proposed project in this regard.

The proposed project has the potential to create a new source of substantial light or glare as identified in Impact 5.1-3, which could adversely affect day or nighttime views in the area due to exterior parking, street and building lighting (and potential interior lighting) at night, and window glare during the day. Implementation of **MM 5.1-1a** and **MM 5.1-1b** would reduce impacts to *less than significant* levels. Similar to the proposed project, with relocation of the proposed project to the east side of Redding, the "Mercy Oaks Campus" alternative would result in similar light and glare impacts requiring implementation of **MM 5.1-1a** and **MM 5.1-1b**, which would reduce impacts to a *less than significant* level. As a result, the "Mercy Oaks Campus" alternative would result in *reduced* light and glare impacts when compared to the proposed project.

Cumulative Impacts

Cumulative impacts to scenic vistas discussed for the proposed project in Impact 5.1-4 would be *similar* under the "Mercy Oaks Campus" alternative. Cumulative impacts would be *less than significant* and no mitigation measures would be required.

As discussed in Impact 5.1-5, project development together with impacts from past, present, or reasonably foreseeable cumulative projects would result in a *significant and unavoidable* impact related to degradation of visual character/quality of the project site and area. Due to the location of the "Mercy Oaks Campus" alternative site on the east side of Redding, far removed from a major significant aesthetic feature like the Sacramento River, the overall contribution to this cumulative impact is avoided and therefore *less than cumulatively considerable*. When compared to that of the proposed project, implementation of the "Mercy Oaks Campus" alternative would *reduce* the *significant and unavoidable* cumulative impact of the proposed project in this regard.

Impact 5.1-6 determined that the proposed project, 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. Implementation of **MM 5.1-1a** and **MM 5.1-1b** would result in cumulatively impacts becoming *less than significant*. Development of the "Mercy Oaks Campus" alternative would require implementation of these noted mitigation measures. Cumulative light and glare impacts associated with the "Mercy Oaks Campus" alternative would be *similar* to the proposed project and cumulatively *less than significant*.

Air Quality

As discussed in Impact 5.2-1, with implementation of **MM 5.6-1**, the proposed project would result in a *significant and unavoidable* impact related to consistency with the *2015 Air Quality Attainment Plan*. Similar to the proposed project, 129,600 square feet of building square footage would be provided by this alternative generating the same number of 4,697 daily vehicle trips. However, the major difference when compared to the proposed project would be with respect to vehicle miles traveled between this alternative's location and Mercy Medical Center which is approximately 5.8 miles whereas, the proposed project's distance to Mercy Medical Center is approximately 1.9 miles. The distance to Shasta Regional Medical Center is approximately 4.8 miles compared to the proposed project's distance of approximately 1.6 miles to Shasta Regional.

To conduct an assessment of overall vehicle miles traveled (VMT) the Shasta County Regional Travel Demand Model (SCRTDM) was utilized. For the "Mercy Oaks Campus" alternative a select zone analysis was conducted using the SCRTDM model whereby all tips generated by the alternative were tracked through the transportation system. As a result, the "No Mercy Oaks Campus" alternative would generate a total of 27,376 VMT compared to the proposed project (23,084 VMT), an approximate increase of 4,292 VMT. Similar mitigation to **MM 5.6-1** would be required under this alternative; however, implementation of the "Mercy Oaks Campus" alternative would result in *increased* impacts related to the successful implementation of the *2015 Air Quality Attainment Plan* as a result of the increased VMT. Impacts would remain *significant and unavoidable* under this alternative.

Under the "Mercy Oaks Campus" alternative, construction maximum daily emissions would be similar to those of the proposed project (Impact 5.2-2) due to the same building square footage and general site development area. The same number of truck haul trips and vendor/material delivery trips would occur during construction. The same painted surface areas and associated ROG emissions from architectural coatings would result. Therefore, implementation of the "Mercy Oaks Campus" alternative would result in *similar* impacts and remain below the SCAQMD's Level B threshold of 137 pounds per day. As with the proposed project, implementation of SCAQMD BAMMs and SMMs (provided in **MM 5.2-1**) would be required under the "Mercy Oaks Campus" alternative. Compared to the proposed project construction impacts associated with the "Mercy Oaks Campus" alternative would result in *similar* impacts.

The proposed project's operational emissions were found to be *less than significant* with implementation of **MM 5.6-1** as noted for Impact 5.2-3. The "Mercy Oaks Campus" alternative would have the same daily vehicle trips as the proposed project's 4,697 daily vehicle trips. The added distances noted above and increase VMT compared to that of the proposed project results in *increased* mobile emissions.

Table 7-14, LONG-TERM UNMITIGATED OPERATIONAL EMISSIONS FOR MERCY OAKS CAMPUS ALTERNATIVE, provides the unmitigated operational emissions associated with this alternative.

Table 7-14
LONG-TERM UNMITIGATED OPERATIONAL EMISSIONS FOR MERCY OAKS CAMPUS ALTERNATIVE

Source	Pollutant (pounds/day)[1]				
	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO_X)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)	Carbon Monoxide (CO)
Summer Emissions					
Area Source	3.73	0.0006	0.0003	0.0003	0.07
Energy Use	0.05	0.46	0.03	0.03	0.38
Mobile Source	12.01	76.79	30.00	8.28	112.61
Stationary Source	6.60	0.51	0.04	0.04	17.19
Total	**22.39**	**77.76**	**30.07**	**8.35**	**130.25**
Winter Emissions					
Area Source	3.73	0.0006	0.0003	0.0003	0.07
Energy Use	0.05	0.46	0.03	0.03	0.38
Mobile Source	9.00	79.19	30.00	8.28	102.72
Stationary Source	6.60	0.51	0.04	0.04	17.19
Total	**19.38**	**80.15**	**30.08**	**8.35**	**120.36**
Potentially Significant Impact Threshold (Daily Emissions)	**25/137**	**25/137**	**80/137**	**None**	**None**
Exceed Daily Threshold?	**Yes/No**	**Yes/No**	**No/No**	**NA**	**NA**

Notes:
1. Emissions calculated using CalEEMod version 2016.3.2.

Refer to Appendix 15.2, AIR QUALITY EMISSIONS DATA, for daily emission model outputs.

Table 7-15, LONG-TERM MITIGATED OPERATIONAL EMISSIONS FOR MERCY OAKS ALTERNATIVE identifies the alternative's emissions after the implementation of **MM 5.6-1**.

Table 7-15
LONG-TERM MITIGATED OPERATIONAL EMISSIONS FOR MERCY OAKS CAMPUS ALTERNATIVE

Source	Pollutant (pounds/day)[1]				
	Reactive Organic Gases (ROG)	Nitrogen Oxide (NO_X)	Coarse Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)	Carbon Monoxide (CO)
Summer Emissions					
Area Source	3.73	0.0006	0.0003	0.0003	0.07
Energy Use	0.05	0.46	0.03	0.03	0.38
Mobile Source	11.93	76.12	29.40	8.11	134.97
Stationary Source	6.60	0.51	0.04	0.04	17.19
Total	**22.31**	**77.09**	**29.47**	**8.18**	**128.39**
Winter Emissions					
Area Source	3.73	0.0006	0.0003	0.0003	0.07
Energy Use	0.05	0.46	0.03	0.03	0.38
Mobile Source	8.92	79.45	29.41	8.11	101.26
Stationary Source	6.60	0.51	0.04	0.04	17.19
Total	**19.30**	**79.41**	**29.48**	**8.19**	**118.90**
Potentially Significant Impact Threshold (Daily Emissions)	**25/137**	**25/137**	**80/137**	**None**	**None**
Exceed Daily Threshold?	**No/No**	**Yes/No**	**No/No**	**NA**	**NA**

Notes:
1. Emissions calculated using CalEEMod version 2016.3.2.

Refer to Appendix 15.2, AIR QUALITY EMISSIONS DATA, for daily emission model outputs.

Both Table 7-14 and Table 7-15 identify that the proposed project and the alternative would not reduce operational emissions below the SCAQMD's Level A thresholds for NO_X. Similar to the proposed project, operational impacts of this alternative would not exceed Level B thresholds. Also, similar to the proposed project, with implementation of **MM 5.6-1** operational emissions would *less than significant*. When compared to the proposed project, operational emission impacts associated with the "Mercy Oaks Campus" alternative would similar, although *increased*, when compared to the proposed project.

As discussed in Impact 5.2-4, the proposed project would not create a CO hotspot at any intersections near sensitive receptors or near any project study intersections. As previously noted, the "Mercy Oaks Campus" alternative would have the same number of daily vehicle trips as the proposed project's 4,697 daily vehicle trips. Review of the Final EIR for the Bethel Church of Redding Collyer Drive Campus Planned Development (SCH No 2016012052) (September 2017) confirmed that the future Bethel Campus project located immediately northwest of the project site across SR-299, which would contribute 6,500 weekday trips and 9,600 Sunday trips, would not increase traffic volumes at any intersection to more than 100,000 vehicles per day and therefore not result in a violation of CO standards[4]. Similarly, implementation of the "Mercy Oaks Campus" alternative would not result in the addition of vehicles at any intersection to more than 100,000 vehicles per day. Therefore, the potential impact is considered *less than significant* and no mitigation would be required and impact is considered *similar* for the "Mercy Oaks Campus" alternative when compared to the proposed project.

As discussed in Impact 5.2-5, the proposed project's impact related to health risks associated with substantial toxic air contaminant concentrations during construction would be *less than significant*. Implementation of the "Mercy Oaks Campus" alternative has the same building area as the proposed project. The resultant construction activities under the "Mercy Oaks Campus" alternative would not exceed thresholds identified in Table 5.2-11, CONSTRUCTION RISK, in Section 5.2, AIR QUALITY, for the proposed project. The "Mercy Oaks Campus" alternative would result in similar contaminant concentration during construction and would be *less than significant.* When compared to the proposed project the "Mercy Oaks Campus" alternative is considered *similar* in this regard.

As discussed for the proposed project in Impact 5.2-6, impacts related to health risks associated with substantial toxic air contaminant concentrations during proposed project operation would be *less than significant*. The "Mercy Oaks Campus" alternative would result in similar contaminant concentrations during project operation due to the same number of vehicle trips associated with this alternative. Similar to the proposed project this impact would be *less than significant,* and no mitigation would be required under the "Mercy Oaks Campus" alternative. This impact would be considered *similar* for the "Mercy Oaks Campus" alternative when compared to the proposed project.

As discussed in Impact 5.2-7, the proposed project would result in *less than significant* impacts with regards to the creation of objectionable odors since there would be the same building square footage under the "Mercy Oaks Campus" alternative. Proposed uses commonly considered to be sources of odorous emissions (e.g. wastewater treatment plants, sanitary landfills, composting/green waste facilities, recycling facilities, petroleum refineries, chemical manufacturing plants, painting/coating operations, rendering plants, and food packaging plants) would not occur under the proposed project or this alternative. Odor impacts under this alternative would be *similar* to the proposed project and no mitigation measures would be required.

[4] City of Redding. *Bethel Church of Redding Collyer Drive Campus Planned Development Draft Environmental Impact Report (SCH No. 2016012052)*. Page 5.2-17. February 2017.

Cumulative Impacts

As discussed in Impact 5.2-8, the proposed project would conflict with implementation of the *2015 Air Quality Attainment Plan* by resulting in an increase of ozone precursor emissions. With implementation of the "Mercy Oaks Campus" alternative, there would be the same square footage and daily vehicular trips. There would also be an increase in VMT associated with this alternative as noted above. As a result, the "Mercy Oaks Campus" alternative would likely conflict with the *2015 Air Quality Attainment Plan* related to cumulative ozone precursor impacts within the NSVAB. Even with compliance with SMMs and BAMMs provided in **MM 5.2-1**, the "Mercy Oaks Campus" alternative's incremental contribution to this cumulative impact would be *increased* when compared to that of the proposed project and considered cumulatively *significant and unavoidable*.

The cumulative impact of the proposed project discussed in Impact 5.2-10 would be *less than significant* with implementation of MM 5.2-1. With the "Mercy Oaks Campus" alternative operational air emissions would be greater than the proposed project. However, with implementation of **MM 5.2-1**, the cumulative impacts of the "Mercy Oaks Campus" alternative for this impact would be *less than significant*. When compared to the cumulative impact of the proposed project, the "Mercy Oaks Campus" alternative would result in an *increased* cumulative impact in this regard.

Cumulative impacts discussed for the proposed project under Impacts 5.2-9, 5.2-11, 5.2-12, 5.2-13, and 5.2-14 would be *similar* under the "Mercy Oaks Campus" alternative. Similar to the proposed project, cumulative impacts described under the noted impacts would be cumulatively *less than significant* and no mitigation measures would be required.

Biological Resources

Impact 5.3-1 discusses how the proposed project could have a substantial impact, 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. With implementation of the "Mercy Oaks Campus" alternative, impacts to onsite riparian habitat would be avoided and therefore *reduced* when compared to the proposed project.

With the exception of riparian impacts which are avoided under this alternative, implementation of the "Mercy Oaks Campus" alternative would result in similar biological impacts as described in Impact 5.3-1 and, similar to the proposed project, require the implementation of the following mitigation measures to reduce impacts to *less than significant* levels: Potential impacts on bat species would be reduced through the implementation of **MM 5.3-1a** and **MM 5.3-1b**. Mitigation measure **MM 5.3-1c** mitigates potential impacts associated with tree removal. Regarding potential impacts on the western pond turtle, **MM 5.3-1d** would be required. To mitigate for nesting bald eagles and migratory bird species, **MM 5.3-1e** would be implemented. Measures identified in **MM 5.3-1f** would avoid the introduction and spread of weeds, and implementation of **MM 5.3-1g** would minimize bird strikes on the proposed project buildings. With regard to this impact, the "Mercy Oaks Campus" alternative would be *similar* to the proposed project.

The proposed project would impact riparian habitat and other sensitive natural communities identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service as discussed in Impact 5.3-2. The proposed project would result in a *less*

than significant impact with implementation of **MM 5.3-1a** and **MM 5.3-1b**. Implementation of the "Mercy Oaks Campus" alternative would avoid the riparian impacts associated with the proposed project. In addition, development of the "Mercy Oaks Campus" would avoid the onsite drainage ditch and through a non-development buffer. As a result, impacts to onsite riparian habitat under this alternative would be *less than significant*. When compared to the proposed project, impacts to riparian areas would be avoided and therefore *reduced* under the "Mercy Oaks Campus" alternative.

As discussed in Impact 5.3-3 for the proposed project, impacts on movement of native resident or migratory fish and wildlife species, or with established native resident or migratory wildlife corridors would result in a *less than significant* impact with implementation of **MM 5.3-2a** and **MM 5.3-2b**. Implementation of the "Mercy Oaks Campus" alternative would not require similar mitigation as the alternative site avoids impacts to riparian areas and would avoid impacts on movement of native resident or migratory fish when compared to that of the proposed project. Terrestrial wildlife would not be significantly affected by this alternative impeding or displacing seasonal movements. The proposed project site is currently bounded by College View Drive and SR-299 to the north and Mercy Oaks Drive and the Shasta Senior Nutrition Center to the west, and the Golden Umbrella to the south. These existing roadways and developments inhibit wildlife movement, although large tracts of undeveloped land are located to the east and south. As a result, the impact to wildlife movement associated with the "Mercy Oaks Campus, alternative would be *reduced* when compared to the proposed project.

Under Impact 5.3-4 regarding potential conflicts with any local policies or ordinances protecting biological resources, such as the City of Redding's tree preservation ordinance, impacts under the proposed project would generally be similar for the "Mercy Oaks Campus" alternative where some oak trees would likely be removed. With regard to this impact, both the proposed project and the alternative would be developed in accordance with RMC Chapter 18.45, *Tree Management*, where candidate trees for preservation would be identified. Impacts would be *less than significant* and no mitigation measures would be required. However, with the avoidance of 29 Fremont Cottonwood trees that would be achieved under this alternative, compared the proposed project this impact is considered substantially *reduced*.

As described under Impact 5.3-5, the proposed project has the potential 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. This impact would be *reduced* for the "Mercy Oaks Campus" alternative, although several mitigation measures noted above would be applicable to the this alternative to reduce impacts to a *less than significant* level.

Cumulative Impacts

As discussed in 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. With implementation of **MM 5.3-1a** and **MM 5.3-1g** implementation of the "Mercy Oaks Campus" alternative would be cumulatively *less than significant*. Compared to the proposed project, implementation of the "Mercy Oaks Campus" alternative would have overall *reduced* cumulative biological impacts in this regard.

Impact 5.3-7 discusses that 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. The "Mercy Oaks Campus" alternative would have similar cumulative biological impacts, except for direct riparian habitat impacts, which will be avoided under this alternative. With implementation of **MM 5.3-2a** and **MM 5.3-2b** development of the "Mercy Oaks Campus" alternative would be cumulatively *less than significant*. Compared to the proposed project, implementation of the "Mercy Oaks Campus" alternative would have overall *reduced* cumulative biological impacts in this regard.

The proposed project, along with cumulative development, could potentially interfere with the movement of native resident or migratory fish or wildlife species or migratory wildlife corridors. This cumulative Impact 5.3-8 for the proposed project would be *reduced* for the "Mercy Oaks Campus" alternative and similar to the proposed project, implementation of **MM 5.3-2a** and **MM 5.3-2b** would reduce the alternative's impacts to be *less than significant*.

Implementation of **MM 5.3-2b** for the proposed project would reduce the project's cumulative impact of potentially conflicting with local policies or ordinances protecting biological resources, such as the City's tree preservation ordinance, as identified for Impact 5.3-9. The impact and mitigation measure for the proposed project would be similar for the "Mercy Oaks Campus" alternative. However, given the preservation of Freemont Cottonwood trees, relative to this cumulative impact, the "Mercy Oaks Campus" alternative is considered to result in *reduced* cumulative impacts in this regard when compared to the proposed project.

As discussed in Impact 5.3-10, the proposed 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. Implementation of the "Mercy Oaks Campus" alternative would result in reduced impacts when compared to the proposed project, although implementation of **MM 5.3-1** and **MM 5.3-2** would be required to reduce impacts to *less than significant* levels. Relative to this cumulative impact, the "Mercy Oaks Campus" alternative is considered *reduced* when compared to the proposed project, given that this alternative would result in the preservation of riparian habitat along the biologically diverse Sacramento River corridor.

Cultural Resources

The proposed project could cause a potentially significant impact to historic, unique archaeological or prehistoric resources as discussed for Impact 5.4-1. The implementation of **MM 5.4-1a** through **MM 5.4-1e** mitigate potentially significant impacts to a *less than significant* level for the proposed project. The "Mercy Oaks Campus" alternative, particularly with respect to undiscovered cultural resources and/or human remains due to construction grading for the proposed project, would have *similar* impacts as the proposed project and therefore, would require the implementation of **MM 5.4-1a** through **MM 5.4-1e** to reduce impacts to a *less than significant* level. Relative to this impact, the "Mercy Oaks Campus" alternative is considered *similar* to the proposed project.

Implementation of mitigation measure **MM 5.4-1a** would reduce potential damage or destruction of undiscovered paleontological resources discussed under Impact 5.4-2 for the proposed project to a *less than significant* level. The "Mercy Oaks Campus" alternative would also require **MM 5.4-1a** to reduce the impact to a *less than significant* level. Relative to this impact, the alternative is considered *similar* to the proposed project.

As discussed in Impact 5.4-3 for the proposed project, implementation of **MM 5.4-1d** would reduce impacts related to the disturbance of human remains to *less than significant* levels. Development of the "Mercy Oaks Campus" alternative would also require **MM 5.4-1d** to reduce impacts to *less than significant* levels for this impact. The "Mercy Oaks Campus" alternative is considered *similar* to the proposed project in this regard.

Cumulative Impacts

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 (Impact 5.4-4); potential damage or destruction of undiscovered paleontological resources (Impact 5.4-5); and, potentially disturbing human remains, including those interred outside of formal cemeteries (Impact 5.4-6). Similar to the proposed project, the "Mercy Oaks Campus" alternative would require implementation of **MM 5.4-1a** through **MM 5.4-1e**, to reduce cumulative cultural resource impacts to *less than significant* levels. The "Mercy Oaks Campus" alternative when compared to the proposed project is considered *similar*.

Geology and Soils

Impacts 5.5-1 and 5.5-2 as described for the proposed project would be similar to the "Mercy Oaks Campus" alternative whereby, grading and associated site disturbance activities would still occur as a result of project construction.

The "Mercy Oaks Campus" alternative is located in an area designated in the Health and Safety Element of the *General Plan* as having low ground-shaking potential from earthquakes. The proposed project site is not located within an Alquist-Priolo Earthquake Fault Zone and no active faults have been identified to pass through the project site. Similar to the proposed project, the design and construction of this alternative must conform to CBC seismic safety standards, which are based on factors such as occupancy type, the types of soil and rock onsite, and the strength of ground motion. Because the City requires a geotechnical report as part of the building permit process, and the building must be designed to meet seismic standards consistent with the CBC, this impact would is considered *less than significant*.

Implementation of the "Mercy Oaks Campus" alternative would result in impacts associated with soil stability and potential erosion impacts that are similar to those impacts associated with the proposed project. Additionally, the "Mercy Oaks Campus" alternative 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 5.5-1) or soil that has the potential to be substantially expansive (Impact 5.5-2). Similar to the proposed project, geology and soil impacts associated with the "Mercy Oaks Campus" alternative would be *less than significant,* and no mitigation is required. Relative to this impact, the "Mercy Oaks Campus" alternative is considered *similar* to the proposed project.
Cumulative Impacts

As discussed for Impact 5.5-3, implementation of the proposed project which is similar to this alternative, 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. Also, Impact 5.5-4 related to cumulative expansive soil impacts would be similar, to the "Mercy Oaks Campus" alternative. No mitigation is required for either the proposed project or this alternative since both impacts are less *than significant*. Relative to these cumulative geology and soil impacts, the "Mercy Oaks Campus" alternative is considered *similar* to the proposed project.

Greenhouse Gases and Climate Change

As discussed under Impact 5.6-1, for the proposed project, greenhouse gas emissions generated by the proposed project, either directly or indirectly, would have a potentially significant impact on the environment. The "Mercy Oaks Campus" alternative would support an estimated 180 jobs (employees) and an estimated 1,207 residents (patients) per day resulting in a service population of 1,207. This service population is applicable to both the 2024 and 2035 analysis years.

Construction activities for the "Mercy Oaks Campus" alternative is assumed to be identical to the construction activity for the proposed project, except there would be no demolition required with the this alternative. The "Mercy Oaks Campus" alternative's construction activities are estimated to generate approximately 607 MT CO_2e. When annualized over an assumed 30-year project lifespan, construction would generate approximately 20.2 MT CO_2e per year. The impact is less than the proposed project's annualized GHG emission of 31.5 MT CO_2e per year. The "Mercy Oaks Campus" alternative's operational emissions in years 2024 and 2035 are provided in Table 7-16, ANNUAL MERCY OAKS CAMPUS ALTERNATIVE GREENHOUSE GAS EMISSIONS 2024 & 2035.

Table 7-16
ANNUAL MERCY OAKS CAMPUS ALTERNATIVE
GREENHOUSE GAS EMISSIONS 2024 & 2035

	MT CO_2e	
Emissions Category	**Year 2024**	**Year 2035**
Area	<0.1	<0.1
Energy	164.9	164.9
Mobile	3,737.6	3,267.8
Stationary	28.7	28.7
Waste	176.0	176.0
Water	4.2	4.2
Sequestration (annualized)	-5.5	-5.5
Construction (annualized)	20.2	18.9
Total Project Emissions	**4,126.2**	**3,656.3**
Service Population	1,387	1,387
Project Efficiency (MT CO_2e / Service Population)	2.97	2.64
Threshold of Significance	3.7	1.7
Significant Impact?	No	**Yes**

Source: GHD. *North State Pavilion Project Greenhouse Gas Report.* Appendix C. May 2019. Refer to Appendix 15.5, GREENHOUSE GAS REPORT.

Planned landscaping is estimated to result in a total 110.66 MT CO2e of sequestration over 20 years, or approximately -5.5 MT CO2e per year. This alternative would generate approximately 4,126 MT CO_2e per year in 2024. With a service population of 1,387 (180 employees plus 1,207 clients or patients), applicable to both the 2024 and 2035 analysis years this alternative would achieve an efficiency metric

of 2.97 MT CO_2e per service population, which is less than the significance threshold of 3.7 MT CO_2e per service population. Therefore, the alternative would result in a *less than significant* impact in 2024.

The alternative would generate approximately 3,656 MT CO_2e per year in 2035. With a service population of 1,387, this alternative would achieve an efficiency metric of 2.64 MT CO_2e per service population, which exceeds the significance threshold of 1.7 MT CO_2e per service population. Therefore, this alternative would result in a potentially significant impact in 2035. Table 7-17, COMPARISON OF MERCY OAKS CAMPUS ALTERNATIVE AND PROPOSED PROJECT GREENHOUSE GAS IMPACTS shows that the "Mercy Oaks Campus" alternative would have greater greenhouse gas emission than the proposed project in 2024 and in 2035, as measured in MT CO_2e per service population (SP). This is primarily because alternative does not have the parking reduction component applied to the proposed project's emissions analysis.

Table 7-17
COMPARISON OF MERCY OAKS CAMPUS ALTERNATIVE & PROPOSED PROJECT GREENHOUSE GAS IMPACTS

Parameter	MT CO_2e/SP	
	2024	2035
Threshold Applied	3.7	1.7
Proposed Project Impact	2.51	2.25
Mercy Oaks Campus Alternative	2.97	2.64

Source: GHD. *North State Pavilion Project Greenhouse Gas Report.* Appendix C. May 2019. Refer to Appendix 15.5, GREENHOUSE GAS REPORT.

Similar to the proposed project, **MM 5.6-1** would also be implemented for the "Mercy Oaks Campus" alternative to reduce cumulative greenhouse gas emissions implementing a Greenhouse Gas Reduction Plan (GGRP) that contains specific design features and actions to be implemented prior to year 2035. Implementation of **MM 5.6-1** would reduce greenhouse gas emissions to *less than significant* levels. When compared to the proposed project, implementation of the "Mercy Oaks Campus" alternative would result in *increased* greenhouse gas emissions.

Under the discussion for Impact 5.6-2, the proposed project would not conflict with an applicable greenhouse gas reduction plan, policy, or regulation including the 2015 Regional Transportation Plan/Sustainable Communities Strategy and with the California Air Resources Board's Scoping Plan. Therefore, implementation of the "Mercy Oaks Campus" alternative in this regard would be *less than significant,* and no mitigation measures would be required. Compared to the proposed project, implementation of the "Mercy Oaks Campus" alternative would result in *increased* greenhouse gas emissions.

Cumulative Impacts

Impact 5.6-3 discusses that greenhouse gas emissions generated by the proposed project would have a potentially *significant* impact on global climate and requires the implementation of **MM 5.6-1** to reduce impacts to *less than significant* levels. Similarly, implementation of the "Mercy Oaks Campus" alternative would require implementation of **MM 5.6-1** to ensure cumulative greenhouse gas impacts are *less than significant*. When compared to the proposed project, the "Mercy Oaks Campus" alternative would result in *increased* impacts related to greenhouse gas emissions.

Hazards and Hazardous Materials

The discussion under Impact 5.7-1 determined that the proposed project could create a *less than significant* hazard to the public or the environment through the routine transport, use, or disposal of hazardous material and therefore, no mitigation measures are required. When compared to the proposed project, impacts associated with the "Mercy Oaks Campus" alternative for this impact would be *less than significant* and no mitigation is required. As a result, this impact is *similar* to the proposed project.

Impact 5.7-2 identified that proposed project construction activities could create a potentially significant hazard to the public through foreseeable upset and accidental conditions and that to mitigate the potential impacts **MM 5.7-1** is necessary to reduce the hazards so that they are *less than significant*. Implementation of the "Mercy Oaks Campus" alternative would not require implementation of **MM 5.7-1** since there are no structures or buildings on the alternative site). When compared to the proposed project in this regard, the "Mercy Oaks Campus" alternative would be similar, but *reduced*, impacts in this regard.

It was determined that the proposed project and the "Mercy Oaks Campus" alternative would not impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan as discussed under Impact 5.7-3 for the proposed project. Implementation of the "Mercy Oaks Campus" alternative does not involve a use or activity that could interfere with emergency response or emergency evacuation plans for the area. *General Plan* Figure 4-9, Evacuation Routes, Flooding and Figure 4-10, *Evacuations Routes, Wildland Fires* of the Health and Safety Element identify those routes in, through and out of the City that are considered the most suitable for certain mass evacuations. As illustrated in Figures 4-9 and 4-10, SR-299 is designated as an evacuation route associated with flooding and Old Oregon Trail is designated as an evacuation route associated with flooding and wildland fires. The "Mercy Oaks Campus" alternative would not interfere with emergency response or evacuation plans and emergency access to the project site and no mitigation is required. When compared to the proposed project in this regard, the "Mercy Oaks Campus" alternative would be *similar* in this regard.

Under Impact 5.7-4 implementation of the proposed project would not expose people and structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas. Impacts are considered *less than significant* for the proposed project and no mitigation is required. The "Mercy Oaks Campus" alternative site abuts heavily wooded areas including ravines to the east and south of the requiring implementation of mitigation measures including, but not limited to, creating buffers where the underbrush is cleared and trees are thinned out, in addition to imposing building setbacks from these natural areas. Such mitigations would reduce potential impacts to a *less than significant* level. However, when compared to the proposed project, the "Mercy Oaks Campus" alternative would result in an *increased* impact in this regard.

Cumulative Impacts

Impacts discussed for the proposed project determined that the proposed project and the "Mercy Oaks Campus" alternative are similar for Impact 5.7-5 where 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. The impact is considered *less than significant* for the

proposed project and the "Mercy Oaks Campus" alternative and no mitigations are required for either. As a result, this impact for this alternative is *similar* to the proposed project.

Discussion for Impact 5.7-6 for the proposed project, which is also applicable to the "Mercy Oaks Campus" alternative, determined that construction activities combined with cumulative development, could create a significant hazard to the public through foreseeable upset and accidental conditions, however, impacts were determined to be *less than significant* for the proposed project, and in turn the alternative. Therefore, no mitigation is required for either. When compared to the proposed project, this impact is *similar* for the "Mercy Oaks Campus" alternative.

For Impact 5.7-7 it was determined that for 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. The impact is considered *less than significant* for the proposed project and not mitigation would be required. This impact is similar for the "Mercy Oaks Campus" alternative and also considered *less than significant* requiring no mitigation. Compared to the proposed project, this impact is *similar* for the "Mercy Oaks Campus" alternative.

Under the discussion for 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. This results in a *less than significant* impact and no mitigation was required for the proposed project. However, for the "Mercy Oaks Campus" alternative, this impact has the potential to be a significant since to the east and south of the alternative's site, there are areas of heavily wooded areas including ravines requiring implementation of mitigation measures including, but not limited to, creating buffers where the underbrush is cleared and trees are thinned out, in addition to building setbacks from these natural wooded areas. Such mitigations would reduce potential cumulative impacts to a *less than significant* level. The cumulative impact for the "Mercy Oaks Campus" alternative in this regard is considered to be *increased* when compared to the proposed project.

Hydrology and Water Quality

Under Impact 5.8-1, implementation of the proposed project would potentially violate water quality standards or waste discharge requirements; however, this impact is mitigated through implementation of **MM 5.8-1a** and **MM 5.8-1b** that requires preparation of a Storm Water Pollution Prevention Plan (SWPPP), including an erosion control plan to reduce impacts to a *less than significant* level.

The "Mercy Oaks Campus" alternative has an existing drainage swale traversing the site in a northerly to southeasterly direction flowing off-site where the flows eventually make their way downstream to a tributary to East Stillwater Creek. To mitigate the potential impact, in addition to implementing **MM 5.8-1a** and **MM 5.8-1b** a 50-foot setback from the centerline of the onsite drainage swale would provide adequate protection for the drainage waters which are also potential jurisdictional Waters of the U.S. Implementation of these mitigation measures would reduce impacts to a *less than significant* level. Relative to this impact, the "Mercy Oaks Campus" alternative is considered *similar* to the proposed project.

Under Impact 5.8-2, implementation of the proposed project would result in a *less than significant* impact related to depleting groundwater supplies or interfering with groundwater discharge and no mitigation is required for the proposed project.

The "Mercy Oaks Campus" alternative would have similar construction-related impacts on water supplies as the proposed project due to the similarities for construction activities, equipment, and potential duration, as well as construction area. With respect to long-term operation, the "Mercy Oaks Campus" alternative is located within the water service area of the Bella Vista Water District (BVWD). Similar to the proposed project, the "Mercy Oaks Campus" alternative would require approximately 12 AFY. Since the "Mercy Oaks Campus" alternative would result in less than an equivalent of 500 dwelling units, a Senate Bill (SB) 610 Water Supply Assessment would not be necessary.

Based on BVWD's *Urban Water Management Plan Update 2015* (December 2016) water supplies are projected to be insufficient to meet existing and projected water demand within BVWD's service area under a multiple-dry year period. The additional demand of 12 AFY of water would further impact dry-year water supplies within BVWD's service area and, as a result of not being included within BVWD's existing water delivery baseline, would be served with water supplies calculated and distributed based on allocations established prior to the project. Therefore, absent the delivery of a supplemental water supply to BVWD during dry-year periods, the proposed project would utilize water that would otherwise be available to existing BVWD customers and further exacerbate dry-year water shortages. To mitigate this effect to *less than significant* levels, similar to other recent large developments with BVWD's service area, the "Mercy Oaks Campus" alternative would be required to provide an alternative water supply source during dry-year conditions. Therefore, the "Mercy Oaks Campus" alternative has *increased*, but *less than significant* impacts on water supply in this regard when compared to the proposed project.

Impact 5.8-3 addresses whether the proposed project could substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or offsite. Implementation of **MM 5.8-1a** and **MM 5.8-1b** would reduce the proposed project impact to a *less than significant* level. Implementation of the "Mercy Oaks Campus" alternative also would require **MM 5.8-1a** and **MM 5.8-1b** and result in a *less than significant* impact in this regard. Relative to this impact, the "Mercy Oaks Campus" alternative is considered *similar* to the proposed project.

As described under Impact 5.8-4, implementation of the proposed project would result in a *less than significant* impact since the existing drainage pattern of the site or area would not be substantially altered. Similar to the proposed project, implementation of the "Mercy Oaks Campus" alternative would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite. In addition, onsite drainages would not be altered and the City's requirements to prepare drainage studies demonstrating that existing rates and amount of runoff cannot exceed historical levels and that onsite and offsite flooding will not occur provide necessary protection. The "Mercy Oaks Campus" alternative would also be developed in accordance with RMC Chapter 16.12, *Clearing, Grading, Fills and Excavation*. Impacts are therefore considered *similar* when compared to that of the proposed project.

As evaluated under Impact 5.8-5, drainage studies undertaken for the proposed project determined that polluted runoff could be treated onsite prior to discharge into the Sacramento River would be *less than significant* and 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. Since implementation of the "Mercy Oaks Campus" alternative would result in approximately 10.9 acres of impervious surfaces. Similar to the proposed project, the "Mercy Oaks Campus" alternative would be developed in accordance with RMC Chapter 16.12, *Clearing, Grading, Fills*

and Excavation. Impacts are therefore considered *similar* when compared to that of the proposed project.

As identified for Impact 5.8-6, implementation of the proposed project could potentially degrade water quality; however, with implementation of **MM 5.8-1a** and **MM 5.8-1b** impacts are reduced to *less than significant* levels. Implementation of the "Mercy Oaks Campus" alternative would also require **MM 5.8-1a** and **MM 5.8-1b** to reduce the potential impacts to a *less than significant* level. Impacts in this regard are considered *similar*.

With regards to Impact 5.8-7, this impact is not considered applicable to either the proposed project or "Mercy Oaks Campus" alternative since neither proposed the placement of structures within the 100-year flood hazard area which would impede or redirect flows.

Impact 5.8-8 that 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. The alternative site is not located within the *City of Redding Shasta Dam Failure Inundation Map* (Figure 4-5) contained in the Health and Safety Element of the City's *General Plan*. Impacts would be *reduced* under the "Mercy Oaks Campus" alternative.

Cumulative Impacts

For the proposed project, implementation of **MM 5.8-1a** and **MM 5.8-1b** would reduce potential cumulative impacts to *less than significant* levels associated with the following: violating water quality standards or waste discharge requirements (Impact 5.8-9); the alternation of drainage patters, in a manner which would result in substantial erosion or siltation on or offsite (Impact 5.8-11); the contribution of runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff (Impact 5.8-12). Implementation of the "Mercy Oaks Campus" alternative would require **MM 5.8-1a** and **MM 5.8-1b** to reduce these cumulative impacts to *less than significant* levels as the 10.9-acre site would be developed with a similar type development and associated impervious surfaces as the proposed project. Cumulative hydrology and water quality impacts in this regard for the "Mercy Oaks Campus" alternative would be *similar* when compared to the proposed project**.**

As discussed for Impact 5.8-10, the proposed project would not result in significant impacts when combined with other past, present, and reasonably foreseeable future development, that 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 since the proposed project is provided water by the City of Redding water delivery system. As noted above, water supplies are projected to be insufficient to meet existing and projected water demand within BVWD's service area under a multiple-dry year period. To mitigate this effect to *less than significant* levels, similar to other recent large developments with BVWD's service area, the "Mercy Oaks Campus" alternative would be required to provide an alternative water supply source during dry-year conditions.

Water supply provided to BVWD under any future transfer agreement associated with the "Mercy Oaks Campus" alternative (including any new or upgraded conveyance infrastructure, if necessary) must demonstrate conformance with applicable CEQA and/or NEPA requirements, as well as any other permitting or regulatory requirements stipulated in the BVWD's contract with the USBR, including any

State or federal biological opinions/agreements in affect at that time. This review would ensure that potential CVP surface water or groundwater impacts associated with the temporary transfer, including potential impacts to sensitive species and habitats, would be *less than significant*. Any transfer involving groundwater resources within the Redding Area Groundwater Basin would be required to demonstrate consistency with basin's Groundwater Management Plan (GMP) and, if necessary, the future Groundwater Sustainability Plan (GSP) for the Enterprise Sub-Basin. Therefore, the cumulative impact with regards to groundwater supply of the "Mercy Oaks Campus" alternative is considered to result in *less than significant*, although *increased*, groundwater impacts when compared to the proposed project.

The discussion for Impact 5.8-13 for the proposed project identifies that cumulative effects would also not be significant since structures would not be placed within a 100-year flood hazard area that could impede or redirect flows. The potential impact for the proposed project was *less than significant* and no mitigation is required. The impact is not applicable to the "Mercy Oaks Campus" alternative since the alternative site is not located within a 100-year flood hazard area. Compared to the proposed project, the impact is *reduced*.

Land Use and Planning

Development of the proposed project requires a general plan amendment, rezone, use permit and a parcel map. The "Mercy Oaks" alternative will require a use permit and a parcel map to create the approximate 15.5-acre parcel where the 10.9-acre project site would be located.

As discussed in Impact 5.9-1 the proposed project would not conflict with the City of Redding General Plan, Zoning Ordinance, Tree Management Ordinance, Parks, Trails and Open Space Master Plan, and other applicable policies and/or regulations of the City and any other applicable agency (Shasta County Air Quality Management District and the Shasta Regional Transportation Agency) with jurisdiction over the proposed project. Therefore, the impact would be *less than* significant and mitigation measures are not required. Implementation of the "Mercy Oaks Campus" alternative would also not conflict with the land use and planning documents and applicable policies and/or regulations and oversight by regulatory agencies. Related to land use and planning, the "Mercy Oaks Campus" alternative is considered *similar* to that of the proposed project.

Cumulative Impacts

The discussion for cumulative Impact 5.9-2 for the proposed project identifies that 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. Implementation of the "Mercy Oaks Campus" alternative is similar to the proposed project in this regard, as development onsite consistent with the City's underlying general plan and zoning designations would not 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. Impacts would be *less than significant* and no mitigation would be required. Cumulative impacts of the "Mercy Oaks Campus" alternative related to land use and planning are therefore considered *similar* to the proposed project.

Noise

Under the discussion for Impact 5.10-1 the proposed project would not generate noise levels or expose persons to noise levels in excess of standards established in the City of Redding general plan or noise ordinance, or applicable standards of other agencies. Therefore, the potential impact is considered *less than significant,* and no mitigation is required. When compared to the proposed project, impacts associated with the "Mercy Oaks Campus" alternative would also be considered *less than significant* requiring no mitigation. When compared to the proposed project, the "Mercy Oaks Campus" alternative impacts would be *similar*.

Discussion in Impact 5.10-2 identifies that implementation of the proposed project would not expose persons to or generate excessive ground borne vibration or ground borne noise levels. The potential impact is considered *less than significant,* and no mitigation is required. When compared to the proposed project, construction activities would be similar and resultant ground borne vibrations or ground borne noise levels associated with the "Mercy Oaks Campus" alternative would also be considered *less than significant* requiring no mitigation. When compared to the proposed project, implementation of the "Mercy Oaks Campus" alternative would be *similar* in this regard.

Discussion under Impact 5.10-3 determined that implementation of the proposed project may result in a temporary adverse increase in noise levels due to construction in excess of standards permitted in the noise ordinance which would be considered a significant. The implementation of measures **MM 5.10-1a** and **MM 5.10-1b** would not reduce construction related impacts to a *less than significant* level. Therefore, the impact is considered *significant and unavoidable* for the proposed project.

The 63-unit Mercy Oak Village senior housing project located approximately 150 feet to the northeast of the "Mercy Oaks Campus" alternative would be directly impacted by short-term construction impacts. Similar to the proposed project, the implementation of measures **MM 5.10-1a** and **MM 5.10-1b** would not reduce construction related impacts to a *less than significant* level. Implementation of the "Mercy Oaks Campus" alternative would result in similar impacts to the proposed project and likewise would be considered *significant and unavoidable* even after implementation of **MM 5.10-1a** and **MM 5.10-1b**. The "Mercy Oaks Campus" alternative would result in *similar significant and unavoidable* impacts when compared to the proposed project.

The discussion in Impact 5.10-4 identifies that implementation of the proposed project may result in a substantial permanent increase in ambient noise levels in excess of standards permitted in the noise ordinance. Implementation of **MM 5.10-2a** through **MM 5.10-2c** would reduce impacts to a *less than significant* level. The "Mercy Oaks Campus" alternative would also require the implementation of these noted mitigation measures. Impacts associated with the "Mercy Oaks Campus" alternative are therefore *similar* to the proposed project.

Cumulative Impacts

The discussion in Impact 5.10-5 identifies that implementation of the proposed project, combined with other past, present, and reasonably foreseeable future development, may potentially increase the ambient noise levels in the project vicinity resulting in a potentially significant impact. Implementation and compliance with mitigation measures **MM 5.10-1** and **MM 5.10-2** reduce this cumulative impact to a *less than significant* level. Impacts associated with the "Mercy Oaks Campus" alternative would also

require these mitigation measures to reduced impact to *less than significant* levels. Cumulative impacts would therefore be *similar* to that of the proposed project.

Population and Housing

The discussion under Impact 5.11-1 determined that the proposed project would not induce substantial population growth in the area, either directly or indirectly and that the impact was *less than significant,* and therefore, no mitigation measures are required. When compared to the proposed project, the increase in population associated with employment under the "Mercy Oaks Campus" alternative (assuming all new employees would come from outside the City of Redding) would be similar to that of the proposed project (180 new employees resulting in an 428 increase in population). Similar to the proposed project, the potential increase of 428 residents would represent a 0.4 percent increase in the current population for the City and a 0.2 percent increase for the current population for the County as a whole.

Similar to the proposed project, the addition of 180 full time employees under the "Mercy Oaks Campus" alternative could potentially increase the demand for housing in the City of Redding. Similar to the proposed project the new employees would either be permanent residents in the City of Redding, or in nearby unincorporated areas of Shasta County. The City has an estimated 39,679 housing units (27,116 single-family units), with a vacancy rate of 5.5 percent and the County as a whole has an estimated 78,745 housing units (57,355 single-family units), with a vacancy rate of 8.1 percent. When compared to the proposed project, implementation of the "Mercy Oaks Campus" alternative would result in *less than significant* impacts related to population and housing and is considered *similar* to the proposed project in this regard.

Cumulative Impacts

Cumulative Impact 5.11-2 identifies that development of the proposed project, along with approved and proposed development, would not result in increased population in the City of Redding and therefore, the impact is *less than significant,* and mitigation is not required. When compared to the proposed project, impacts for the "Mercy Oaks Campus" alternative would also be *less than significant* and not require mitigation. As a result, this impact is *similar* to the proposed project.

Public Services

Per the discussion for Impact 5.12-1 for the proposed project, there would not be a need for, or result in the need for the construction of new or to physically alter existing 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.

The "Mercy Oaks Campus" alternative site is located within an area owned and operated by Dignity Health known as the Mercy Oaks Campus. As previously described above, approximately seven acres of the 54.86-acre parcel has been developed with two buildings; the Shasta Senior Nutrition Center and the Golden Umbrella. The Shasta Nutrition Center and Golden Umbrella provide onsite senior services, including multi-purpose senior services, computer classes, exercise classes, line dancing, art classes and Bingo. Shasta Nutrition Center also provides opportunities for the public to rent the banquet hall or

other rooms for special events for up to 300 people. The 54.86-acre Mercy Oaks Campus is currently served by the Redding Fire Department and Police Department.

Fire and law enforcement services are monitored by the City Council on a regular basis. If additional services are need, the City Council will allocate resources to address the need as funding is identified. There is nothing unique about the "Mercy Oaks Campus" alternative that would require significantly greater fire and law enforcement service or result in a need for new or altered facilities. Similar to the proposed project, developer fees would be collected for the "Mercy Oaks Campus" alternative. Compared to the proposed project this alternative would pay equivalent school impact fees, approximately $79,056. Implementation of the "Mercy Oaks Campus" alternative would result in *less than significant* public service impacts and no mitigation is required. Relative to this impact, the "Mercy Oaks Campus" alternative is considered *similar* to the proposed project.

Cumulative Impacts

The Impact 5.12-2 discussion for the proposed project, combined with other past, present, and reasonably foreseeable future development, determined that there would not be a demand in public services requiring the need to construct or physically alter existing facilities 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, which would result in a *less than significant* impact requiring no mitigation. Impacts associated with the "Mercy Oaks Campus" alternative would also be *less than significant* and not require mitigations. In this regard, the cumulative impacts of the "Mercy Oaks Campus" alternative are *similar* to the proposed project.

Recreation

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 as discussed in Impact 5.13-1. Therefore, the proposed project will result in *less than significant* impacts that do not require mitigation. Likewise, implementation of the "Mercy Oaks Campus" alternative will not require mitigation since potential impacts will be *less than significant* and *similar* to the proposed project.

With regard to construction or expansion of recreational facilities which might have an adverse physical effect on the environment as discussed in Impact 5.13-2, implementation of the proposed project will result in impacts that would be *less than significant*. Implementation of the "Mercy Oaks Campus" alternative will also result in *less than significant* impacts in this regard. Relative to this impact, the "Mercy Oaks Campus" alternative is considered *similar* to the proposed project.

Cumulative Impacts

The proposed project which is similar to this alternative, combined with cumulative development, 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 as discussed under Impact 5.13-3; and, would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment per the discussion under Impact 5.13-4. Similar to the proposed project, recreation impacts associated with the "Mercy Oaks Campus"

alternative would be *less than significant* and no mitigation is required. Relative to this impact, the "Mercy Oaks Campus" alternative is considered *similar* to the proposed project.

Traffic and Circulation

The "Mercy Oaks Campus" alternative is projected to generate up to approximately 311 AM and 455 PM peak hour trips, whereas, the proposed project is projected to generate approximately 311 AM and 330 PM peak hour trips. Overall, the proposed project and the "Mercy Oaks Campus" alternative generate the same 4,697 daily trips.

Under the discussion in Impact 5.14-1, implementation of the proposed project would cause an increase in traffic volumes which exceeds significance criteria established in the City of Redding's *Traffic Impact Assessment Guidelines*. To reduce Impact 5.14-1 to *less than significant levels*, implementation of traffic improvements at one intersection is required (Hartnell Avenue & Cypress Avenue [Intersection #10] identified in **MM 5.14-1**).

The following five intersections would likely be significantly impacted under the "Mercy Oaks Campus" alternative. In order to reduce these impacts to *less than significant* levels, each of these intersections would require the construction of intersection improvements as identified or fair share payments towards the improvements consistent with the City's *Traffic Impact Assessment Guidelines*.

- College View Drive & Shasta View Drive – Mitigation: Install a traffic signal or roundabout.
- Old Oregon Trail & College View Drive – Mitigation: Install a traffic signal or roundabout.
- Churn Creek Road & College View Drive – Mitigation: Add additional traffic lanes.
- Hawley Road & SR-299 WB Ramps – Mitigation: Install a traffic signal or roundabout.
- Churn Creek Road & Canby Road – Mitigation: Add additional traffic lanes.

In addition to the intersections listed above, there could be significant impacts on Shasta View Drive south of College View Drive that would need to be mitigated to reduce the level of impact to *less than significant*. Traffic impacts associated with "Mercy Oaks Campus" alternative would be *increased* when compared to the proposed project.

As discussed in Impact 5.14-2, the proposed project would not create temporary traffic delays or increase hazards due to a design features such as sharp curves or dangerous intersections. However, some traffic delays can be expected during project construction; however, the traffic impacts during construction are temporary in nature and will cease upon completion of construction activities. To address the impact, **MM 5.14-2** requires preparation of a Traffic Management Plan (TMP) to address safety and traffic concerns for the various streets and associated vehicle/bicyclist/pedestrian rerouting. Being that the proposed project impact is *similar* to the "Mercy Oaks Campus" alternative, implementation of **MM 5.14-2** is applicable to reduce temporary traffic impacts to *less than significant* levels.

Discussion in Impact 5.14-3 determined that implementation of the proposed project would result in a *less than significant* impact related to the potential conflict with adopted policies, plans or programs supporting alternative transportation (e.g. bus turnouts, bicycle racks) and the impact was *less than significant,* and mitigation was not required. Implementation of the "Mercy Oaks Campus" alternative, being similar to the propose project, would result in *similar less than significant* impacts in this regard.

Cumulative Impacts

The discussion in Impact 5.14-4 identifies that the proposed project could result in increased traffic volumes at study area intersections under year 2040 cumulative plus project conditions. The impact is considered potentially significant requiring mitigation to reduce the impact to a *less than significant* level thereby, requiring implementation of **MM 5.14-3** and **MM 5.14-4** where improvements are to be constructed prior to occupancy so that the impact is *less than significant*.

Similar to the proposed project under year 2040 cumulative plus project conditions, implementation of the "Mercy Oaks Campus" alterative would be required to implement traffic improvements or provide fair share toward implementation of the improvements prior to occupancy consistent with the City's *Traffic Impact Assessment Guidelines.* Although cumulative traffic impacts would be mitigated to a *less than significant* level under this alternative, when compared to the proposed project the "Mercy Oaks Campus" alternative would result in an ***increased*** number of intersections requiring improvements.

Tribal Cultural Resources

The discussion under Impact 5.15-1 determined that for the proposed project, ground disturbing activities could result in the unanticipated discovery of prehistoric archaeological sites, which may be considered to be Tribal Cultural Resources (TCRs). Implementation of **MM 5.4-1a** through **MM 5.4-1e** would reduce the potential impacts to *less than significant* levels. Implementation of the "Mercy Oaks Campus" alternative would also require implementation of **MM 5.4-1a** through **MM 5.4-1e** to reduce potential impacts to TCRs to *less than significant* levels. Impacts of the "Mercy Oaks Campus" alternative would be ***similar*** to the proposed project in this regard.

Cumulative Impacts

Impact 5.15-2 discusses that implementation of the proposed project, combined with planned and reasonably foreseeable development within the City of Redding would could result in the unanticipated discovery of prehistoric archaeological sites, which may be considered TCRs. Implementation of **MM 5.4-1a** through **MM 5.4-1e** would reduce impacts to *less than significant* levels. Similarly, implementation of the "Mercy Oaks Campus" alternative would require implementation of **MM 5.4-1a** through **MM 5.4-1e** in Section 5.4, CULTURAL RESOURCES to ensure TCRs impacts are *less than significant*. When compared to the proposed project, the "Mercy Oaks Campus" alternative would result in ***similar*** cumulative impacts related to TCRs.

Utilities and Service Systems

Discussions under Impacts 5.16-1, 5.16-2, 5.16-3, 5.16-4, 5.16-5, 5.16-6 and 5.16-7 addressed proposed project utilities and service system impacts. It was determined that the impacts would be *less than significant* and no mitigation measures would be required. Utilities and service system impacts would be similar for the "Mercy Oaks Campus" alternative and result in *less than significant* impacts and would require no mitigation measures, except with regard to Impact 5.16-4 regarding the availability of sufficient water supply.

Impact 5.16-1 evaluates the potential for wastewater treatment requirements of the Central Valley RWQCB to be exceeded. Wastewater generation associated with the "Mercy Oaks Campus" alternative would be ***similar*** to that of the proposed project as this alternative does not change the overall

wastewater generation. There exists sufficient capacity at the Stillwater Wastewater Treatment Plant to serve this alternative.

Impact 5.16-2 where construction of new water or wastewater treatment facilities or expansion of existing facilities would not be needed by the Bella Vista Water District (BVWD) and therefore not result in construction that could create potential environmental effects. Impacts of this alternative are *less than significant* and considered to be *similar* to the proposed project.

Impact 5.16-3 where the construction of new stormwater drainage facilities would occur onsite as required by the City for all development to not create offsite drainage impacts. There would be no need to expand existing facilities offsite facilities, thereby avoiding construction which could create potential environmental effects. Impacts of this alternative are *less than significant* and considered to be *similar* to the proposed project.

As described in Impact 5.16-4 there would be sufficient water supply available from the City of Redding to serve the proposed project from existing entitlements and resources and new or expanded entitlements were not needed. Impacts for the proposed project would be *less than significant* and no mitigation would be required. However, for the "Mercy Oaks Campus" alternative, given its location within the service area of BVWD, there could be insufficient water supplies available during sustained drought periods.

BVWD water sources include surface water from the Sacramento River and groundwater from five wells which supply approximately 5.8 percent of the total supply. Surface water from the Sacramento River, based on U.S. Bureau of Reclamation yearly water allocations for the Central Valley Project, comprised 94.2 percent of the treated water supply. The BVWD captured and recycled approximately 178.4 million gallons (547 acre-feet) of filter backwash water, supplying approximately 5.9 percent of the treated water supply in 2017.[5]

Similar to the proposed project, the "Mercy Oaks Campus" alternative would require approximately 12 acre-feet per year (AFY). Based on BVWD's *Urban Water Management Plan Update 2015* (December 2016) water supplies are projected to be insufficient to meet existing and projected water demand within BVWD's service area under a multiple-dry year period. The additional demand of 12 AFY of water would further impact dry-year water supplies within BVWD's service area and, as a result of not being included within BVWD's existing water delivery baseline, would be served with water supplies calculated and distributed based on allocations established prior to the project. Therefore, absent the delivery of a supplemental water supply to BVWD during dry year periods, the proposed project would utilize water that would otherwise be available to existing BVWD customers and further exacerbate dry-year water shortages. To mitigate this effect the BVWD would require, as BVWD requires of all development projects within the District, that the "Mercy Oaks Campus" alternative provide an alternative water supply source during dry-year conditions. Therefore, the "Mercy Oaks Campus" alternative would result potential impacts on water supply and mitigation would be required to reduce this impact to *less that significant* levels. Therefore, the impact of the "Mercy Oaks Campus" alternative related to available water supply is *increased* when compared to the proposed project.

[5] Bella Vista Water District. *Consumer Confidence Report*. 2017.

Similar to the proposed project as evaluated in Impact 5.16-5, the "Mercy Oaks Campus" alternative would not result in inadequate wastewater capacity within the Stillwater Basin Service Area. As noted for Impact 5.16-1, the Stillwater Wastewater Treatment Plant has adequate treatment capacity. Impacts of this alternative are *less than significant* and considered to be *similar* to the proposed project.

Similar to the proposed project as evaluated in Impact 5.16-6, implementation of this alternative would increase the demand for solid waste. However, the "Mercy Oaks" alternative would generate same amount of construction waste given a similar sized campus would be developed onsite. Construction demolition waste would be decreased by approximately 6,128.5 tons as no demolition would be required under this alternative. The employee waste generation would be the same as the proposed project since 180 employees would work onsite. As a result annual solid waste generation would be *similar* for the proposed alternative and *less than significant*.

City and State regulations and requirements address Impact 5.16-7 to ensure compliance with federal, State, and local statutes and regulations related to solid waste. As a result, *this less than significant* impact would be *similar* for the "Mercy Oaks Campus" alternative.

Cumulative Impacts

Discussion for Impact 5.16-8 concludes that implementation of the proposed project, combined with other past, present, and reasonably foreseeable future development, would not contribute to cumulative demands for wastewater, and solid waste disposal and that impacts are *less than significant*. Cumulative impacts associated with the "Mercy Oaks Campus" alternative when compared to the proposed project are similar for the provision of all but one of the utilities and service facility systems. Impacts are also *less than significant* and would not require mitigation except for potable water supply, as discussed for Impact 5.16-4. The "Mercy Oaks Campus" alternative, combined with other past, present, and reasonably foreseeable future development could result in significant impacts on water supply when compared to the proposed project during multiple dry year periods. Mitigation would be required to reduce this impact to cumulatively *less than significant* levels. As a result, cumulative water supply impacts associated with the "Mercy Oaks Campus" alternative would be *increased* when compared to the proposed project.

Energy Consumption

Impact 5.17-1 discusses that the implementation of the proposed project would not use fuel or energy in a wasteful manner and therefore no mitigation measures would be required. This impact is considered *less than significant*. Table 7-18, MERCY OAKS CAMPUS ALTERNATIVE ENERGY CONSUMPTION, shows the energy demands for the "Mercy Oaks Campus" alternative. Construction fuel consumption impacts would be less than what would be required for the proposed project. Operational fuel consumption impacts would be greater than the proposed project due to more vehicle miles traveled. Operational electricity and natural gas consumption impacts would be similar compared to the proposed project. Infrastructure improvement impacts would be similar to those needed for the proposed project. As with the proposed project, it is anticipated that impacts would be *less than significant,* and mitigation would not be required. Compared to the proposed project, the "Mercy Oaks Campus" alternative would result in overall similar energy consumption.

Table 7-18
MERCY OAKS CAMPUS ALTERNATIVE ENERGY CONSUMPTION

Energy Type	Annual Energy Consumption	Shasta County Annual Energy Consumption	Percentage Increase of the Mercy Oaks Campus Alternative (Countywide)	Proposed Project Percentage Increase of (Countywide)
Electricity Consumption[1]	1,262,460 kWh	816,000,000 kWh	0.15%	0.15%
Natural Gas Consumption[1]	1,697 million BTU	1,573,381 million BTU	0.11%	0.11%
Fuel Consumption[2]				
Project Construction	28,225 gallons	44,817,175 gallons	0.06%	0.09%
Project Operations	593,021 gallons	111,222,696 gallons	0.53%	0.45%
Total	621,246 gallons	156,039,871 gallons	0.40%	0.35%

Notes: The projected increases in electricity and natural gas consumption are compared with all of the nonresidential buildings in Shasta County in 2016. The projected increases in gas and fuel consumption are compared with the countywide fuel consumption in 2017.
Sources: [1] CalEEMod v. 2016.3.2; [2] EMFAC2017 (CARB 2017).

As evaluated in Impact 5.17-2, the proposed project design and operation would comply with Title 24 State Building Energy Efficiency Standards, appliance efficiency regulations, and green building standards. Similar to the proposed project, the Redding Electric Utility (REU) would provide electrical service to the site. 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 60 percent of total procurement by 2030 (as required by SB 100).

Similar to the proposed project, the "Mercy Oaks Campus" alternative would require implementation of **MM 5.6-1** that requires a Greenhouse Gas Reduction Plan (GGRP) implemented. The GGRP must include measures such as implementation of voluntary trip reduction program as well as a voluntary ride-sharing program for all employees that would serve to reduce fuel consumption. Additionally, the "Mercy Oaks Campus" alternative would be required to comply with the 2016 Title 24 Building Codes, which would result in a 5 percent increase in energy efficiency in commercial buildings when compared with the 2013 Title 24 Building Codes. Therefore, long-term energy consumption associated with the "Mercy Oaks Campus" alternative is considered <u>*similar*</u> and *less than significant* when compared to those of the proposed project.

Cumulative Impacts

Discussions for Impact 5.17-3 and 5.17-4 address how the proposed project with respect to cumulative development in Shasta County would not utilize fuel or energy in a wasteful manner or result in a conflict with a state or local plan for renewable or energy efficiency. Implementation of the "Mercy Oaks" alternative would result in a similar consumption of energy when compared to the proposed project. Energy consumption impacts would be *less than significant* under this alternative. As a result, cumulative energy impacts under the "Mercy Oaks Campus" alternative would be <u>*similar*</u> when compared to the proposed project.

Conclusion

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 <u>*lessen*</u> 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.

7.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The environmentally superior alternative is the one that would result in the fewest or least significant environmental impacts. Table 7-19, COMPARISON OF ALTERNATIVE ENVIRONMENTAL IMPACTS WITH THE PROPOSED PROJECT, provides a comparison of each alternative's impact in relation to the proposed project, as analyzed above in Subsection 7.4, *Project Alternatives*.

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. According to Table 7-19, 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, 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.

Table 7-19
COMPARISON OF ALTERNATIVE ENVIRONMENTAL IMPACTS WITH THE PROPOSED PROJECT

Impact	Proposed Project Level of Significance After Mitigation	Alternative		
		No Project - Existing General Plan & Zoning	**Reduced Intensity**	**Mercy Oaks Campus**
Section 5.1 – Aesthetics				
Impact 5.1-1: Implementation of the proposed project would not have a substantial adverse effect on a scenic vista.	Less Than Significant	**REDUCED (Less Than Significant)**	**REDUCED (Less Than Significant)**	SIMILAR (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.	Significant and Unavoidable	INCREASED (Significant and Unavoidable)	**REDUCED (Less Than Significant)**	**REDUCED (Less Than Significant)**
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.	Less Than Significant	INCREASED (Less Than Significant)	**REDUCED (Less Than Significant)**	**REDUCED (Less Than Significant)**
Impact 5.1-4: Project development, together with cumulative projects, may result in cumulative impacts to scenic vistas.	Less Than Significant	INCREASED (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (Less Than Significant)
Impact 5.1-5: Project development, together with cumulative projects, could potentially degrade the visual character/quality of the project site.	Significant and Unavoidable	INCREASED (Significant and Unavoidable)	**REDUCED (Less Than Significant)**	**REDUCED (Less Than Significant)**
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.	Less Than Significant	INCREASED (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (Less Than Significant)
Section 5.2 – Air Quality				
Impact 5.2-1: Implementation of the proposed project would conflict with or obstruct implementation of the 2015 Air Quality Attainment Plan.	Significant and Unavoidable	**REDUCED (Significant and Unavoidable)**	**REDUCED (Significant and Unavoidable)**	INCREASED (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.	Less Than Significant	INCREASED (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (Less Than Significant)
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.	Less Than Significant	**REDUCED (Less Than Significant)**	**REDUCED (Less Than Significant)**	INCREASED (Less Than Significant)
Impact 5.2-4: Project implementation would not expose sensitive receptors to substantial carbon monoxide pollutant concentrations.	Less Than Significant	**REDUCED (Less Than Significant)**	**REDUCED (Less Than Significant)**	SIMILAR (Less Than Significant)
Impact 5.2-5: Implementation of the proposed project could potentially expose sensitive receptors to substantial toxic air	Less Than Significant	INCREASED (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (Less Than Significant)

Impact	Proposed Project Level of Significance After Mitigation	Alternative		
		No Project - Existing General Plan & Zoning	**Reduced Intensity**	**Mercy Oaks Campus**
contaminant concentrations during project construction.				
Impact 5.2-6: Project implementation would not expose sensitive receptors to substantial toxic air contaminant concentrations during project operations.	Less Than Significant	INCREASED (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (Less Than Significant)
Impact 5.2-7: Project implementation would not create objectionable odors affecting a substantial number of people.	Less Than Significant	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)
Impact 5.2-8: 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).	Significant and Unavoidable	**REDUCED (Significant and Unavoidable)**	**REDUCED (Significant and Unavoidable)**	INCREASED (Significant and Unavoidable)
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.	Less Than Significant	INCREASED (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (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	INCREASED (Less Than Significant)	**REDUCED (Less Than Significant)**	INCREASED (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	INCREASED (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (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	INCREASED (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (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	INCREASED (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (Less Than Significant)
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.	Less Than Significant	INCREASED (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (Less Than Significant)

Impact	Proposed Project Level of Significance After Mitigation	Alternative		
		No Project - Existing General Plan & Zoning	**Reduced Intensity**	**Mercy Oaks Campus**
Section 5.3 – Biological Resources				
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.	Less Than Significant	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	**REDUCED (Less Than Significant)**
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.	Less Than Significant	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	**REDUCED (Less Than Significant)**
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.	Less Than Significant	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	**REDUCED (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	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	**REDUCED (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.	Less Than Significant	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	**REDUCED (Less Than Significant)**
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 Service.	Less Than Significant	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	**REDUCED (Less Than Significant)**
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,	Less Than Significant	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	**REDUCED (Less Than Significant)**

Impact	Proposed Project Level of Significance After Mitigation	Alternative		
		No Project - Existing General Plan & Zoning	**Reduced Intensity**	**Mercy Oaks Campus**
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.	Less Than Significant	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	**REDUCED (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.	Less Than Significant	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	**REDUCED (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 or threatened species.	Less Than Significant	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	**REDUCED (Less Than Significant)**
5.4 – Cultural Resources				
Impact 5.4-1: Implementation of the proposed project may cause a significant impact to historic, unique archaeological or prehistoric resources.	Less Than Significant	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)
Impact 5.4-2: Implementation of the proposed project could result in the potential damage or destruction of undiscovered paleontological resources.	Less Than Significant	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)
Impact 5.4-3: Implementation of the proposed project could potentially disturb human remains, including those interred outside of formal cemeteries.	Less Than Significant	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)
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.	Less Than Significant	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (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.	Less Than Significant	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)

Impact	Proposed Project Level of Significance After Mitigation	Alternative		
		No Project - Existing General Plan & Zoning	Reduced Intensity	Mercy Oaks Campus
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.	Less Than Significant	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)
5.5 – 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.	Less Than Significant	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)
Impact 5.5-2: The proposed project is not located on soil that has potential to be substantially expansive.	Less Than Significant	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)
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	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (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	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)
5.6 – 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.	Less Than Significant	INCREASED (Less Than Significant)	INCREASED (Less Than Significant)	INCREASED (Less Than Significant)
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	INCREASED (Less Than Significant)	INCREASED (Less Than Significant)	INCREASED (Less Than Significant)
Impact 5.6-3: Greenhouse gas emissions generated by the project would not have a significant impact on global climate change.	Less Than Significant	INCREASED (Less Than Significant)	INCREASED (Less Than Significant)	INCREASED (Less Than Significant)
5.7 – 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.	Less Than Significant	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)

Impact	Proposed Project Level of Significance After Mitigation	Alternative		
		No Project - Existing General Plan & Zoning	**Reduced Intensity**	**Mercy Oaks Campus**
Impact 5.7-2: Project construction activities could create a significant hazard to the public through foreseeable upset and accidental conditions.	Less Than Significant	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**
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	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (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	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	INCREASED (Less Than Significant)
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	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)
Impact 5.7-6: Project construction activities, combined with cumulative development, could create a significant hazard to the public through foreseeable upset and accidental conditions.	Less Than Significant	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)
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	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (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	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	INCREASED (Less Than Significant)
5.8 – Hydrology and Water Quality				
Impact 5.8-1: Implementation of the proposed project may violate water quality standards or waste discharge requirements.	Less Than Significant	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)
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	Less Than Significant	**REDUCED (Less Than Significant)**	**REDUCED (Less Than Significant)**	INCREASED (Less Than Significant)

Impact	Proposed Project Level of Significance After Mitigation	Alternative		
		No Project - Existing General Plan & Zoning	**Reduced Intensity**	**Mercy Oaks Campus**
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.	Less Than Significant	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (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	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (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	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (Less Than Significant)
Impact 5.8-6: Implementation of the proposed project could otherwise substantially degrade water quality.	Less Than Significant	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (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	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (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	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**
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.	Less Than Significant	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (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	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	INCREASED (Less Than Significant)

Impact	Proposed Project Level of Significance After Mitigation	Alternative		
		No Project - Existing General Plan & Zoning	**Reduced Intensity**	**Mercy Oaks Campus**
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.	Less Than Significant	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (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.	Less Than Significant	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (Less Than Significant)
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	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**
5.9 – 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.	Less Than Significant	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)
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	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)
5.10 – 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.	Less Than Significant	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (Less Than Significant)

Impact	Proposed Project Level of Significance After Mitigation	Alternative		
		No Project - Existing General Plan & Zoning	**Reduced Intensity**	**Mercy Oaks Campus**
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	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (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.	Significant and Unavoidable	SIMILAR (Significant and Unavoidable)	SIMILAR (Significant and Unavoidable)	SIMILAR (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.	Less Than Significant	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)
Impact 5.10-5: Implementation of the proposed project, combined with other past, present, and reasonably foreseeable future development, may potentially increase the ambient noise levels in the project vicinity.	Less Than Significant	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)
5.11 – 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.	Less Than Significant	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (Less Than Significant)
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	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (Less Than Significant)
5.12 – 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.	Less Than Significant	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (Less Than Significant)
Impact 5.12-2: Implementation of the proposed project, combined with other past, present, and reasonably foreseeable future development, could increase the demand for public services.	Less Than Significant	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (Less Than Significant)

Impact	Proposed Project Level of Significance After Mitigation	Alternative		
		No Project - Existing General Plan & Zoning	**Reduced Intensity**	**Mercy Oaks Campus**
5.13 – 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.	Less Than Significant	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (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	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (Less Than Significant)
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	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (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	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (Less Than Significant)
5.14 – Traffic and Circulation				
Impact 5.14-1: Implementation of the proposed project may cause an increase in traffic which exceeds significance criteria established in the City of Redding's Traffic Impact Assessment Guidelines.	Less Than Significant	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	INCREASED (Less Than Significant)
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	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (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	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)
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.	Less Than Significant	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	INCREASED (Less Than Significant)
5.15 – Tribal Cultural Resources				
Impact 5.15-1: Ground disturbing activities could result in the unanticipated discovery of prehistoric archaeological sites,	Less Than Significant	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)

Impact	Proposed Project Level of Significance After Mitigation	Alternative		
		No Project - Existing General Plan & Zoning	**Reduced Intensity**	**Mercy Oaks Campus**
which may be considered to be 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.	Less Than Significant	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)
5.16 – Utilities and Service Systems				
Impact 5.16-1: Implementation of the proposed project would not exceed wastewater treatment requirements of the Central Valley RWQCB.	Less Than Significant	**REDUCED (Less Than Significant)**	**REDUCED (Less Than Significant)**	SIMILAR (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	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (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	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)
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	**REDUCED (Less Than Significant)**	**REDUCED (Less Than Significant)**	INCREASED (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	**REDUCED (Less Than Significant)**	**REDUCED (Less Than Significant)**	SIMILAR (Less Than Significant)
Impact 5.16-6: Project implementation would increase the demand for solid waste disposal services.	Less Than Significant	SIMILAR (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (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	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)	SIMILAR (Less Than Significant)
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	**REDUCED (Less Than Significant)**	**REDUCED (Less Than Significant)**	INCREASED (Less Than Significant)

Impact	Proposed Project Level of Significance After Mitigation	Alternative		
		No Project - Existing General Plan & Zoning	**Reduced Intensity**	**Mercy Oaks Campus**
5.17 – Energy Consumption				
Impact 5.17-1: Project implementation would not use fuel or energy in a wasteful manner.	Less Than Significant	INCREASED (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (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	INCREASED (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (Less Than Significant)
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.	Less Than Significant	INCREASED (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (Less Than Significant)
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	INCREASED (Less Than Significant)	**REDUCED (Less Than Significant)**	SIMILAR (Less Than Significant)
Attainment of Project Objectives		Meets Most of the Project Objectives (6 of 9)	Meets Most of the Project Objectives (7 of 9)	Meets Most of the Project Objectives (6 of 9)
No. of Impacts Reduced		**8**	**50**	**14**
No. of Significant & Unavoidable Impacts Reduced or Eliminated		**2**	**4**	**2**