

5.9 LAND USE AND PLANNING

This section of the Draft Environmental Impact Report (EIR) describes the affected environment and regulatory setting for land use and planning on the proposed project site. It also describes the impacts on land use and planning that would result from implementation of the proposed project, including consistency with relevant plans and programs that have jurisdiction within the project area and compatibility with surrounding land uses, and provides mitigation measures that would reduce these impacts, as appropriate. The following analysis of the potential environmental impacts related to land use and planning is also derived from the following sources available for review at the City of Redding Development Services Department, Planning Division:

- City of Redding. *2000 – 2020 General Plan*. October 2000.
- City of Redding. *Parks, Trails and Open Space Master Plan*. August 2018.
- City of Redding. *Redding Municipal Code Title 18, Zoning*. March 2018.
- City of Redding. *Redding Riverfront Specific Plan*. December 1992.

The following section discusses the existing land uses in the proposed project area, in addition to land use conditions, such as type of use and/or densities adjacent to the proposed project that would influence land use compatibility. The environmental setting of the proposed project site consists of the physical conditions or existing land uses on the project site and in the surrounding areas.

5.9.1 ENVIRONMENTAL SETTING

The proposed project is located within a developed area of Southeast Redding designated in the City of Redding *2000-2020 General Plan (General Plan)* as “General Office” (GO), “General Commercial” (GC), and “Greenway” (GWY), and is zoned “General Office” (GO), “General Commercial” (GC), and “Open Space” (OS). The *General Plan* divides the City’s Planning Areas into five primary sectors, each of which is shaped by its unique characteristics, history, and issues. The proposed project is located in the South Redding Planning Area, which extends generally from Cypress Avenue south to South Bonnyview Road.

The project area is bounded on the west by the Henderson Open Space, the eastern and a portion of the southern boundary is generally defined by an existing primarily vacant shopping center, referenced as the Cobblestone (formerly Raley’s) Shopping Center; on the north by Cypress Bridge; the southwest by two vacant lots; and the south by Parkview Avenue.

ONSITE LAND USES

The proposed project encompasses approximately 10.55 acres and is currently partially developed with two small buildings, foundation remnants, gravel surfaced areas, and undeveloped vacant land. Site topographic elevations range from approximately 497 feet above mean sea level (msl) in the northeastern corner of the site adjacent to Hartnell Avenue to approximately 467 feet msl in the southern portion of the site around Parkview Avenue (South). Onsite plant communities/wildlife habitats consist of a riparian woodland, annual grassland, and urban habitat; individual or small stands of valley oaks, interior live oaks, blue oaks, and tree of heaven are present in places; however, they do not form a distinct oak woodland community.

EXISTING GENERAL PLAN CLASSIFICATIONS

The City's General Plan Diagram graphically depicts the *General Plan's* development policies by showing the desired arrangement and location of land uses. The classifications shown on the Diagram designate the types of uses that are allowed within the City. The *General Plan* classifies the proposed project site as "General Office" (GO), "General Commercial" (GC), and "Greenway" (GWY). The following provides a brief description of the land use classifications:

General Office (GO)

This classification provides sites for professional and business offices and personal-service businesses with appropriate and compatible accessory uses. This classification may also be used for rest homes; nursing homes; day-care facilities; hospitals; religious, educational, cultural, and public-utility uses; multiple-family housing; and financial institutions. Ancillary retail uses, such as pharmacies, are appropriate as are "sit-down" restaurants. Approximately 7.62 acres onsite are classified as "General Office" (GO).

General Commercial (GC)

This classification is intended for existing commercial strips on arterial streets and interchange areas where commercial concentrations are desirable. Allowable uses include retail stores, offices, and personal-service establishments. Financial institutions, private schools, day-care facilities, convalescent hospitals, automobile sales and service, and similar uses also may be permitted subject to appropriate standards. Scale of development, including individual buildings, will be at a smaller scale than that found in developments servicing a regional market. Approximately 1.56 acres onsite are classified as "General Commercial" (GC).

Greenway (GWY)

"Greenway" (GWY) is natural open space and includes slopes in excess of 20 percent and the 100-year floodplain of the Sacramento River and its tributary creeks and streams. Natural open space is located predominantly along the Sacramento River, its tributary streams, and the bluffs and creeks of West and East Redding. Because of the inherent dangers to life and property and irrevocable damage to the natural environment, these natural land and water areas should not be urbanized or significantly altered. The specific limits of "Greenway" (GWY) on any property must be determined by a topographic or flooding analysis particular to that property. These natural areas are an important local resource and serve as places in which flora or fauna can be maintained in its natural state. In addition, these areas provide relief from urbanization, reduce siltation from excessive grading, buffer various land use activities and transportation routes, are an important visual resource, and can be part of the City's urban trail system. Approximately 1.34 acres onsite are classified as "Greenway" (GWY).

EXISTING ZONING DISTRICT DESIGNATIONS

Redding Municipal Code (RMC) Title 18 contains the City's *Zoning Ordinance*. Currently the site's zoning district designations are identified as "General Office" (GO) and "General Commercial" (GC). The following provides a brief description of the site's existing zoning district designations:

General Office (GO)

The specific purposes of the "General Office" (GO) districts are to:

- Provide appropriately located areas for a full range of office uses needed by the city's businesses and workers;
- Minimize the impact of commercial development on adjacent residential districts.

Additionally, the purpose of the "General Office" (GO) district is to *"provide sites for professional, business, and personal-service businesses with appropriate and compatible accessory uses. Provide for other compatible uses including: rest homes, nursing homes, day-care facilities, hospitals; religious, educational, cultural and public utility uses; and financial institutions. Ancillary retail uses, such as pharmacy and sit-down restaurants, are also appropriate."*

General Commercial (GC)

The specific purposes of the "General Commercial" (GC) districts are to:

- Provide for a full range of commercial uses;
- Strengthen the city's economic base and provide employment opportunities for residents of the city;
- Identify appropriate standards for reviewing proposals for new development and redevelopment, where appropriate in commercial areas;
- Ensure the provision of services and facilities needed to accommodate planned population densities;
- Encourage the creation of neighborhood activity centers as focal points along transportation corridors;
- Define the types of uses that are appropriate in each zoning district and, if applicable, zoning subdistrict.

Additionally, the purpose of the "General Commercial" (GC) district is to *"maintain areas on arterial streets, near interchanges, and in existing commercial strips for commercial uses. Certain general commercial areas are identified for "visitor" and "retail" uses on the zoning map to assist in achieving the policies of the General Plan."*

SURROUNDING LAND USES

Commercial shopping center development represents predominate land uses immediately east and southeast (Cobblestone Shopping Center) of the proposed project with Hartnell Avenue abutting those uses. Offices are located further south of the shopping center. Two undeveloped parcels of 4.42 acres and 2.10 acres are located south of the Parkview Avenue (Open Space Access) to the Henderson Open Space and west of the southern portion of the project site between Henderson Road and the Cobblestone Shopping Center to the east. South of the 2.10-acre parcel are six residential dwelling units located on an approximate 0.47-acre parcel located west of the Henderson Road (North) and Parkview Avenue (South) intersection. These commercial use parcels are classified as "General Office" (GO) on the *General Plan* and zoned likewise. Refer to Figure 3-2, AERIAL PHOTOGRAPH and Figure 3-4, EXISTING GENERAL PLAN CLASSIFICATIONS, and Figure 3-5, EXISTING ZONING DISTRICTS, in Section 3.0, PROJECT DESCRIPTION.

North

To the north of the proposed project is Cypress Avenue and then an office building with open space to the west. On the east side of the Cypress Avenue and Hartnell Avenue intersection is Lithia Motors. The developed land is classified as “General Commercial” (GC) and the open space is “Greenway” (GWY).

East

Immediately to the east of the proposed project site is the Cobblestone Shopping Center much of which is vacant. However, a new owner is remodeling and actively pursuing tenants. South of the main portion of the project site is a project area of approximately 1.14 acres between Henderson Road (North) to the west and the Cobblestone Shopping Center to the east. The parcel abuts Parkview Avenue to the south.

South

South of the main project area is Parkview Avenue that intersects with Henderson Road (South). West of Henderson Road is a vacant 2.09-acre parcel and then another vacant 4.50-acre parcel both of which are classified as “General Office” (GO) on the *General Plan* and zoned as such. Immediately west of the 4.50-acre parcel is the Henderson Open Space classified as “Greenway” (GWY) and zoned “Open Space” (OS) The 1.14 acres of the project that lies between Henderson Road and the Cobblestone Shopping Center abuts Parkview Avenue to the south. Beyond Parkview Avenue is a small vacant office building and an auto repair facility.

West

Land immediately west of the main portion of the proposed project is the Henderson Open Space that is designated “Greenway” (GWY) and zoned “Open Space” (OS) with the Sacramento River further west.

5.9.2 REGULATORY SETTING

The following is a description of State and local environmental laws and policies that are relevant to the California Environmental Quality Act (CEQA) review process.

STATE

The California Environmental Quality Act (CEQA) establishes that a significant effect on the environment involves an adverse change to the physical environment. Pursuant to the State *CEQA Guidelines*, a project’s impact related to land use planning is evaluated in terms of compatibility with existing land uses and consistency with local plans and other local land use controls (i.e., general plans, zoning codes, specific plans, etc.). For some projects, State agencies are involved in land use regulation and planning, including the California Department of Transportation (Caltrans), California Department of Forestry and Fire Protection (CAL FIRE), California Department of Conservation, California Department of Fish and Wildlife (CDFW), and the State Water Resources Control Board (SWRCB).

California Government Code §65860 requires zoning to be consistent with an agencies’ general plan. Consistency with the general plan is possible only if the local government, in this case the City of

Redding, has officially adopted a general plan. The current *General Plan* was adopted in October 2000. The land uses authorized in the City's *Zoning Ordinance* must then be compatible with the objectives, policies, general land uses, and programs specified in the *General Plan*.

Land use and planning decisions within and adjacent to the project site are regulated by a variety of jurisdictional planning agencies, programs, and documents including the City's *General Plan* and the *Zoning Ordinance*. The *General Plan* contains goals, objectives, and policies and provides an overall foundation for establishing land use patterns. This Draft EIR section lists all relevant goals, objectives, policies, and implementation measures related to the proposed land use. Relevant goals, policies, and implementation measures related to other resource areas are included in their respective sections of this Draft EIR. The City's *Zoning Ordinance* contains regulations through which the *General Plan's* provisions are implemented.

LOCAL

City of Redding General Plan

Under California law, cities and counties must adopt a comprehensive, long-term general plan, which consists of a set of goals and policies that guide local land use decisions. The general plan must, at a minimum, contain seven elements – land use, circulation, housing, conservation, open space, noise, and safety. The general plan must also contain a map or diagram within the land use element illustrating land use distribution by type of use, such as commercial, residential, and open space. A jurisdiction may choose to organize their general plan with the mandatory elements in the order that meets the communities' needs. Mandatory elements may also be combined, as is often the case with open space and conservation or noise and safety. A jurisdiction may adopt additional elements to address unique needs of the community.

The City of Redding *2000 - 2020 General Plan*, last amended in 2004, serves as the overall guiding policy document for land use, development, and environmental quality in the City of Redding. The *General Plan* includes policies, standards, implementation programs, quantified objectives (for housing), the General Plan Diagram, and circulation diagrams. The *General Plan* comprises a set of interrelated and internally consistent components ("elements") specific to various attributes of either the physical or cultural environment. These elements are: Community Development and Design, Transportation, Natural Resources, Health and Safety, Noise, Housing, Recreation, Economic Development, Public Facilities and Services, and Air Quality.

The General Plan Diagram, together with the policies and implementation programs in the Community and Design Element, determine the location, intensity, design, and quality of new development, as well as the preservation of those natural assets that are key to Redding's identity. These policies also provide the foundation for policies in other element of the *General Plan*. The two principal components of the Community and Design Element are land use and design of the City's built environment. Land use policies and the General Plan Diagram determine how people can use and develop their land. A key feature of this element is community design, which achieves a proper balance between the natural environment and the built environment. While land use policies establish the balance of land uses in the City, community design policies establish guidelines for the shape and form of the City.

The *General Plan* was utilized throughout this EIR as the fundamental planning document governing development on the proposed project site. Background information and policy information for the *General Plan* are cited in several sections of the EIR.

City of Redding Zoning Ordinance

The *Zoning Ordinance* and Zoning Map of the City of Redding, found in Title 18 of the RMC, provide specific development and land use regulations for the City. The *Zoning Ordinance* is designed to implement the *General Plan* and promote and protect public health, safety, peace, comfort, and general welfare of the City of Redding. The purposes of the *Zoning Ordinance* provisions are:

- To direct growth with a priority on those areas where infrastructure and urban services can be economically provided.
- To ensure consistency between *General Plan* land use designations and policy and zoning districts.
- To maintain and enhance the appearance and function of both new and existing development.
- To provide compatibility between land uses.
- To establish standards regulating the use and physical development of land.

Each zoning district in the City has permitted and prohibited uses. A use permit, if approved by the Planning Commission, allows a property owner or project applicant to engage in specified activities or conduct a business under special conditions designed to protect the neighborhood and the community. The Planning Commission must certain findings, including a finding that the use will not have an adverse effect on the community.

Each zoning district within the City establishes specific development standards such as setbacks or building height. There are occasions, however, when the strict application of such standards may be inappropriate because of special characteristics of the property. The Variance procedure is designed to permit minor adjustments to the zoning regulations when there are special or extraordinary circumstances, applying to a parcel of land or a building that prevent the property from being used to the extent intended by the zoning. Similar to the use permit process, the Planning Commission must make certain findings to approve a variance.

In addition to each zoning district having permitted and prohibited uses, the *Zoning Ordinance* identifies under *Division IV*, regulations that apply to all zoning districts in the City. Chapters 18.40 through 18.48 identify the various regulations including, but not limited to; development and site regulations, off-street parking and loading, signs, tree management, landscape standards and river/creek corridor development.

City of Redding Parks, Trails and Open Space Master Plan

The intent of the *Parks, Trails and Open Space Master Plan* is to identify the issues and opportunities for improving the provision of parks, trails, and open space throughout the City. The plan outlines a set of strategies and recommendations for meeting current and future community needs based on changing trends in recreation, new patterns for recreation participation, and new areas of growth and development in the City. Refer to Section 5.13, RECREATION, for additional discussion.

Redding Riverfront Specific Plan

The *Redding Riverfront Specific Plan* comprises approximately 500 acres along both sides of the Sacramento River in the center of the City of Redding. It stretches from the Civic Auditorium area in the north to Parkview Avenue, just below the Cypress Avenue Bridge in the south. The *Redding Riverfront Specific Plan* establishes land uses and their locations and intensities. It includes major policies that guide future site plan relationships and design quality, protection, and enhancement of significant natural resources, and the public and private uses within each subarea. The Specific Plan is organized geographically by two distinct, but interrelated, subareas: Turtle Bay and Park Marina Drive. These subareas are further divided into specific project areas. The policies set forth augment and refine the Community and Design Element of the City's *General Plan*.

SHASTA COUNTY

Shasta County Air Quality Management District

The proposed project is within the Shasta County Air Quality Management District (SCAQMD), which is part of the Sacramento Valley Air Basin. The Sacramento Valley Air Basin has been further divided into two planning areas called the Northern Sacramento Valley Air Basin (NSVAB) and the Greater Sacramento Air region. Shasta County is located in the NSVAB.

The Air Pollution Control Districts and Air Quality Management Districts for the counties located in the northern portion of the Sacramento Valley together comprise the Northern Sacramento Valley Planning Area (NSVPA). The NSVPA *2015 Air Quality Attainment Plan* (AQAP) identifies those portions of the NSVPA designated as "non-attainment" for the State ambient air quality standards. The AQAP identifies the air pollution problems which are to be cooperatively addressed on as many fronts as possible in order to make the region a healthier place to live now and in the future. The 2015 AQAP focuses on the adoption and implementation of control measures for stationary sources, area wide sources, and indirect sources, and addresses public education and information programs. The 2015 AQAP also addresses the effect that pollutant transport has on the ability of the NSVPA to meet and attain State standards. Refer to Section 5.2, AIR QUALITY, for additional discussion.

Shasta County Regional Transportation Plan

The Shasta Regional Transportation Agency (SRTA) is the agency responsible for transportation planning for the Shasta County region, including the three cities and the unincorporated area. The planning process is in compliance with the laws and guidelines developed by Caltrans and the Federal Department of Transportation. This responsibility includes development and adoption of transportation policy direction, review and coordination of transportation planning, and preparation of a Regional Transportation Plan (RTP), a Regional Transportation Improvement Plan (RTIP), and a Federal Transportation Improvement Plan (FTIP). Refer to Section 5.14, TRAFFIC AND CIRCULATION.

5.9.3 STANDARDS OF SIGNIFICANCE

SIGNIFICANCE CRITERIA

In accordance with State *CEQA Guidelines*, the effects of a project are evaluated to determine whether they would result in a significant adverse impact on the environment. An EIR is required to focus on these effects and offer mitigation measures to reduce or avoid any significant impacts that are identified. The criteria used to determine the significance of impacts may vary depending on the nature of the project. The following significance thresholds related to land use and planning have been derived from Appendix G of the State *CEQA Guidelines*:

- *Physically divide an established community.* Refer to AREAS OF NO PROJECT IMPACT, below.
- *Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.* Refer to Impact 5.9-1, below.
- *Conflict with any applicable habitat conservation plan or natural community conservation plan.* Refer to AREAS OF NO PROJECT IMPACT, below.

General plan consistency does not mean strict conformity of a project with each and every general plan objective and policy. Rather, a project is consistent if it is in agreement or harmony with the general plan considered as a whole. In other words, a project may not have to strictly or substantially conform to a particular general plan policy or policies.

Notwithstanding the significance criteria stated above, it should be noted that the mere fact that a project might be inconsistent in some manner with particular policies in a general plan or zoning ordinance does not, per se, amount to a significant environmental effect. In the context of land use and planning, significant impacts occur when a conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project results in an adverse physical environmental impact.

Based on these standards, the effects of the proposed project have been categorized as either a less than significant impact or a potentially significant impact. Mitigation measures are recommended for potentially significant impacts. If a potentially significant impact cannot be reduced to a less than significant level through the application of mitigation, it is categorized as a significant and unavoidable impact.

AREAS OF NO PROJECT IMPACT

In June 2018, the City conducted an Initial Study to determine significant effects of the proposed project. In the course of this evaluation, certain impacts of the proposed project were found to not be significant because of the inability of a project of this scope to create such impacts or the absence of project characteristics producing effects of this type. The effects determined not to be significant are not required to be included in primary analysis sections of the Draft EIR. As such, the following impacts either are not applicable to the proposed project or are not reasonably foreseeable and are not addressed further within this section (refer to Section 10.0, EFFECTS FOUND NOT TO BE SIGNIFICANT):

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

5.9.4 POTENTIAL IMPACTS AND MITIGATION MEASURES

METHODOLOGY

For the purposes of this analysis, relevant planning documents, particularly the *General Plan* and the RMC Title 18, *Zoning*, were consulted. The proposed project was qualitatively assessed to determine whether it would conflict with any applicable land use plan, policy, or regulations, including habitat conservation plans. If the proposed project was determined to conflict with a relevant plan, a determination was then made as to whether the conflict or inconsistency would result in a significant physical environmental impact that would otherwise be mitigated or avoided without implementation of the proposed project. Land use and planning impacts are analyzed below according to topic. Mitigation measures directly correspond with an identified impact.

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.

Significance: Less Than Significant Impact.

Impact Analysis: As described in Section 3.0, PROJECT DESCRIPTION, the project applicant proposes the construction of three buildings totaling approximately 129,600 square feet for a wellness and prevention center in a campus-like setting on the 10.55-acre project site. Refer to Figure 3-6a, PROPOSED SITE PLAN, and Figures 3-6b, ENLARGED SITE PLAN – BUILDINGS ‘A’ & ‘C’, and Figure 3-6c, ENLARGED SITE PLAN – BUILDING ‘B’.

All development proposed in the City is reviewed for consistency with land use controls and development standards during the course of the project review and approval process. As described in detail below, the proposed project would be consistent with applicable land use plans, policies, and regulations of the City. Consistency with other plans such as the City of Redding *Parks, Trails and Open Space Master Plan*, 2015 *Regional Transportation Plan* for Shasta County, and the NSVPA 2015 *Air Quality Attainment Plan* are addressed in the respective resource sections of this Draft EIR.

The project proposes a general plan amendment and rezone to change the designation/zoning of the project site to “Public Facilities” (PF-I) and “Public Facilities” (PF), respectively. These entitlements are evaluated in detail below under subheading *General Plan Consistency* and *Zoning Consistency*. In addition, the required land use and planning entitlements for the development of the proposed project include the issuance of a use permit and parcel map.

- *Use Permit.* The use permit process is designed to provide sufficient flexibility to determine whether a use will be compatible with its surroundings and with the goals of the *General Plan*. Related to the proposed project, the requested use permit would allow for onsite development

and a portion of the parking lot to encroach into the Federal Emergency Management Agency (FEMA) regulated 100-year floodplain of the Sacramento River.

- *Parcel Map.* A parcel map is evaluated for its consistency with the *General Plan* and zoning designation and the compatibility of the proposed parcel configuration and public improvements with surrounding development. Special attention is focused on the preservation of natural topographic features of value and the integration of the development to existing terrain and land forms. The proposed parcel map would combine the various parcels to create four separate parcels for the proposed project with a focus of minimizing impacts to the adjacent Sacramento River riparian corridor.

With regards to land use compatibility, a project's compatibility with surrounding uses is largely based on the interaction of the proposed use and the extent to which adjacent land uses would be affected by this interaction. Land use compatibility impacts can be measured in terms of specific environmental effects such as noise, air quality, visual resources, and traffic. Short-term impacts associated with these issues are discussed in detail in the respective sections this Draft EIR document (refer to Section 5.2, AIR QUALITY, and Section 5.10, NOISE). Concerns associated with aesthetics (including lighting), traffic, and noise impacts on nearby residents are specifically addressed in Section 5.1, AESTHETICS, Section 5.10, NOISE, and Section 5.14, TRAFFIC AND CIRCULATION. The following provides a review of the proposed project's consistency with the City's *General Plan* and *Zoning Ordinance* and includes a discussion of the project's overall relationship to the adjacent *Redding Riverfront Specific Plan*.

General Plan Consistency

CEQA requires a project be evaluated for consistency with applicable plans that have been implemented to protect the environment. The City's *General Plan* is one such plan that includes policies for the protection of various environmental resources of the City. The proposed project's current *General Plan* land use classification is "General Office" (GO), "General Commercial" (GC), and "Greenway" (GWY). Allowable uses in the "General Office" (GO) classification include professional and business offices and personal-service businesses with appropriate and compatible accessory uses. This classification may also be used for rest homes; nursing homes; day-care facilities; hospitals; religious, educational, cultural, and public-utility uses; multiple-family housing; and financial institutions. Ancillary retail uses, such as pharmacies, are appropriate as are "sit-down" restaurants. Allowable uses within the "General Commercial" (GC) land use classification include retail stores, offices, and personal-service establishments. Financial institutions, private schools, day-care facilities, convalescent hospitals, automobile sales and service, and similar uses also may be permitted subject to appropriate standards.

The proposed project would require a general plan amendment on the entire 10.55-acre site to "Public Facilities" (PF-I) to allow for the development of the 129,600 square-foot wellness campus. The City's Community Development and Design Element of the *General Plan* identifies that the "Public Facilities" (PF-I) land use classification is intended for public and quasi-public facilities, including, but not limited to, government services and facilities, fire stations, wastewater treatment facilities, electrical substations, airports, domestic water treatment and storage, landfills, and similar uses. The "Public Facilities" (PF-I) classification is also appropriate for institutional uses, such as schools and accredited secondary educational facilities, hospitals, and cemeteries, as well as appropriate lands controlled by philanthropic and nonprofit organizations for existing or future public uses. The proposed project is consistent with the uses considered appropriate for the "Public Facilities" (PF-I) land use classification.

The overall direction of land use policy within the City is guided by the Community and Design Element of the *General Plan*. A key feature of this element is community design, which achieves a proper balance between the natural environment and the built environment. While land use policies establish the balance of land uses in the City, community design policies establish guidelines for the shape and form of the City. Each major goal of the *General Plan* is achieved by implementing specific policies as identified in the Community and Design Element. Conflicts with applicable policies that result in adverse physical impacts may be considered significant impacts under CEQA.

The State *CEQA Guidelines* require an EIR to “discuss” any potential inconsistencies with applicable plans, but they do not explicitly require that an EIR reach a conclusion on whether a conflict exists (see State *CEQA Guidelines* §15125[d]). Because the policy language found in any local agency’s general plan and other applicable land use plans is susceptible to varying interpretations, it is often difficult to determine, in the context of an EIR, whether a proposed project is consistent or inconsistent with applicable plan policies. The analysis of general plan consistency serves to present decision-makers and the public with information and background regarding the relationship of the proposed project to applicable land use plans, in this case the City of Redding *General Plan*. It is recognized that not every general plan policy is applicable to or affected by implementation of the proposed project. For this reason, the analysis in Table 5.9-1, CONSISTENCY WITH APPLICABLE CITY OF REDDING GENERAL PLAN GOALS AND POLICIES FOR LAND USE AND PLANNING, is limited to those general plan policies that govern or inform development of the proposed land use at the project site.

Case law interpreting planning and zoning law (Government Code §65000 et seq.) makes it clear (i) that the meaning of land use plan policies is to be determined by the city council, as opposed to city staff, EIR consultants, applicants, or members of the public, and (ii) that the city council’s interpretations of applicable plan policies will prevail if they are “reasonable,” even though other reasonable interpretations are also possible (see *No Oil, Inc. v. City of Los Angeles* (1987) 196 Cal.App.3d 223, 245–246, 249). Consistency does not require full compliance with all plan policies. Courts have recognized that a general plan must try to accommodate a wide range of competing interests—including those of developers, neighboring homeowners, prospective homebuyers, environmentalists, current and prospective business owners, jobseekers, taxpayers, and providers and recipients of all types of municipal services—and to present a clear and comprehensive set of principles to guide development decisions. Once a general plan is in place, it is the province of elected officials to examine the specifics of a proposed project to determine whether it would be “in harmony” with the policies stated in the plan (see *Sequoyah Hills Homeowners Association v. City of Oakland* (1993) 23 Cal.App.4th 704, 719).

Courts have further recognized that, because general plans often contain numerous policies emphasizing differing and at times contrasting legislative goals, a development project may be “consistent” with a general plan, taken as a whole, even though the project appears to be inconsistent or arguably inconsistent with some individual policies (see *Sequoyah Hills Homeowners Association*, supra). Furthermore, courts strive to “reconcile” or “harmonize” seemingly disparate general plan policies (see *No Oil*, supra, 196 Cal.App.3d at p. 244). An inconsistency between a proposed project and an applicable plan is a legal determination, not a physical impact on the environment. However, to the extent to which physical effects could occur with development of the proposed project, as facilitated by the proposed project, those effects are addressed throughout the Draft EIR.

Applicable goals and policies relative to the proposed project site are listed in Table 5.9-1 followed by a brief explanation of how the proposed project complies with the goals and policies. Because the proposed project would be consistent with the goals and policies relevant to the proposal, as identified

in Table 5.9-1, the proposed project would also be consistent with the overall intent of the *General Plan*. Although the natural setting of the area would be changed as a result of the implementation of the proposed project, this change from an undeveloped character to a developed urban character for this site is planned for and supported by the City's *General Plan*. *Less than significant* impacts are anticipated in this regard.

Amendment to Onsite "Greenway" (GWY) Classification. It is important to note that approximately 1.34 privately owned acres onsite is classified as "Greenway" (GWY) in the City's *General Plan* (refer to Figure 3-4, EXISTING GENERAL PLAN CLASSIFICATIONS, and Table 3-4, EXISTING GENERAL PLAN AND ZONING, in Section 3.0, PROJECT DESCRIPTION). The "Greenway" (GWY) classification is primarily associated with APNs 107-500-018, 107-500-019, 107-500-020, 107-500-024, and 107-500-025 and were previously disturbed by past onsite development (e.g. concrete plant, storage yard, commercial building).

As described above in Subsection 5.9.1, *Environmental Setting*, the "Greenway" (GWY) *General Plan* classification includes slopes in excess of 20 percent and the 100-year floodplain of the Sacramento River and its tributary creeks and streams. According to the *General Plan*, the specific limits of "Greenway" (GWY) on any property must be determined by a topographic or flooding analysis particular to that property. Section 5.8, HYDROLOGY AND WATER QUALITY, describes the existing 100-year floodplain for the Sacramento River related to the proposed project based on existing FEMA mapping. Currently, the existing maps produced by FEMA identify approximately 3.58 acres of the proposed project site within the 100-year floodplain of the Sacramento River, including the 1.34 acres of "Greenway" (GWY).

Based on the existing condition, the proposed project was reevaluated to determine the precise location of floodway limits onsite as allowed for by the "Greenway" (GWY) *General Plan* classification. This evaluation concluded that due to incorrect backwater modeling, the existing extent of the mapped floodway is not considered a reliable delineation of the floodway limits onsite. The results of the site specific and updated backwater modeling evaluation determined that the proposed Building 'A' and parking lot previously identified within the floodway would be entirely located outside the floodway, within the floodway fringe. The floodway fringe captures the area between the floodway and the flood limit, rather than within the floodway. To make the floodway correction with FEMA, a Letter of Map Revision (LOMR) dated February 14, 2017 was prepared and submitted. Based on this reevaluation, the existing limits of the "Greenway" (GWY) classification onsite have not been accurately reflected in the *General Plan* or associated mapping.

With implementation of the proposed project the existing 1.34 acres of "Greenway" (GWY) classification onsite would be amended to the "Public Facilities" (PF-I) *General Plan* classification and ultimately improved to accommodate site landscaping, parking areas, and a portion of Building 'A'. A significant portion of onsite parking adjoins the City's recently approved Henderson Open Space and Kayak project and parking area located immediately to the west. Proposed project improvements to Parkview Avenue (Henderson Open Space Access) would serve to facilitate access to this public amenity identified in the City's *Parks, Trails and Open Space Master Plan*. With regards to the accessibility of "Greenway" (GWY) areas west of the site, project implementation would not impede use of, or access to, the existing unimproved Wolf Crain Trail located immediately adjacent to the future Parkview Avenue (Henderson Open Space Access) extension. Upon completion of the proposed project this trail will be maintained and enhanced in accordance with the Henderson Open Space Trail and Kayak Access project.

Table 5.9-1
CONSISTENCY WITH APPLICABLE CITY OF REDDING GENERAL PLAN
GOALS AND POLICIES FOR LAND USE AND PLANNING

General Plan Goals and Policies	Consistency Analysis
GENERAL PLAN GOAL CDD1 ENCOURAGE URBAN GROWTH TO OCCUR WITHIN THE CITY AND PROVIDE A DEVELOPMENT PATTERN THAT ESTABLISHES AN ORDERLY URBAN SERVICE AREA.	
<p>Policy CDD1A: Utilize the designated Primary and Secondary Growth Areas so that there is a balance among the following:</p> <ul style="list-style-type: none"> - The need for future urban expansion areas. - The costs associated with annexing areas that contain existing substandard development. - Rural/Urban interface conflicts. - The ability of the City to provide urban services. 	<p>Consistent. The proposed project is entirely within the City’s established Primary Growth Area within Redding’s corporate limits and would not require annexation. Refer to Section 5.12, PUBLIC SERVICES, and Section 5.16, UTILITIES AND SERVICE SYSTEMS, for a discussion of urban services. Mitigation measures proposed throughout this EIR would serve to minimize impacts to <i>less than significant</i> levels.</p>
<p>Policy CDD1D: Refer all development applications that have the potential to impacts lands or facilities in the unincorporated area to Shasta County for review and comment.</p>	<p>Consistent. The County of Shasta has received information including the CEQA Initial Study and Draft EIR for comment regarding the proposed project.</p>
<p>Policy CDD1F: Generally oppose development of community septic systems or temporary sewage disposal facilities within the Sphere of Influence.</p>	<p>Consistent. The proposed project will not use septic systems or temporary sewage disposal facilities, but will connect to the City’s wastewater collection and treatment system.</p>
GENERAL PLAN GOAL CDD2 ENSURE THE ABILITY OF THE CITY; SCHOOL DISTRICTS, AND OTHER PUBLIC-SERVICE PROVIDERS TO EFFICIENTLY PROVIDE EXPECTED AND NECESSARY PUBLIC FACILITIES AND SERVICES TO THEIR CONSTITUENTS.	
<p>Policy CDD2A: Require construction of private development projects to be coordinated with the timing and location of public services. Ensure through a combination of development fees and other appropriate funding mechanisms that development pays its fair share of the costs of constructing/providing new facilities and services as determined by the direct impacts that such development has on these essential services.</p>	<p>Consistent. The development of the proposed project will be coordinated with infrastructure improvements. In addition, the proposed project will contribute fair share funding for public services as required by the through payment of development impact and connection fees, as required. Refer to Section 5.12, PUBLIC SERVICES, Section 5.14, TRAFFIC AND CIRCULATION, and Section 5.16, UTILITIES AND SERVICE SYSTEMS.</p>
<p>Policy CDD2B: Ensure that new development will not degrade public services below established service levels that it contributes to the enhancement of services as appropriate, and that the costs of providing services do not exceed anticipated revenue from the development of the project over the long term.</p>	<p>Consistent. Public service agencies have been contacted to identify required services to accommodate the project. The proposed project would also contribute toward infrastructure improvements and the payment of development impact and connection fees. Refer to Section 5.12, PUBLIC SERVICES, Section 5.14, TRAFFIC AND CIRCULATION, and Section 5.16, UTILITIES AND SERVICE SYSTEMS, for a discussion of urban services.</p>
<p>Policy CDD2C: Evaluate public-service impacts as part of environmental review for proposed development projects and require applicants to obtain “will-serve” letters from service providers prior to receiving approval of a final subdivision map, or, in the absence of the need for a final subdivision map, prior to receiving approval of any required building permits.</p>	<p>Consistent. This EIR evaluates public service impacts. The City will provide water, wastewater, storm drainage, electrical, solid waste management, police and fire services. Also, refer to the Consistency Analysis for Policy CDD2B.</p>
<p>Policy CDD2D: Work with school districts in the Planning Area on a continuous basis to determine appropriate sites for new schools; assist Districts by reserving sites as a condition of development approval in accordance with applicable State law.</p>	<p>Consistent. The proposed project will not require the construction of a new school facility. In accordance with California Government Code §65995(h) and §65996(b), existing fee mechanisms would fully mitigate the financial effects of the potential impact to public schools associated with the proposed project.</p>
<p>Policy CDD2E: Maintain adequate capacity for urban growth by continuously monitoring and, when required, increasing the capacity of the City’s water, sewer, storm drainage, electric, and solid waste disposal systems.</p>	<p>Consistent. Refer to Consistency Analysis for Policy CDD2C which identifies City and other public service agencies that have been contacted to identify required services to accommodate the proposed project (refer to Section 5.16, UTILITIES AND SERVICE SYSTEMS, regarding the systems identified by the policy). The proposed project would also contribute their fair share toward infrastructure improvements including the payment of connection and development impact fees, as necessary.</p>

Table 5.9-1
CONSISTENCY WITH APPLICABLE CITY OF REDDING GENERAL PLAN
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General Plan Goals and Policies	Consistency Analysis
<p><u>GENERAL PLAN GOAL CDD3</u></p> <p>ENSURE A PROPER BALANCE BETWEEN DEVELOPMENT AREAS AND THE NATURAL ENVIRONMENT.</p>	
<p>Policy CDD3A: Prohibit development in natural floodplains or on hillsides with slope areas exceeding 20 percent. Minor encroachments into these areas for new developments may be authorized without a General Plan amendment if necessary to facilitate installation of infrastructure, or otherwise provide emergency-access opportunities, or otherwise facilitate construction of the project as approved by the City. (See Policy NR10A.) Where an entire site designated for residential use is subject to flooding or has slopes over 20 percent, a density of 1.0 dwelling unit per 20 acres may be permitted by use permit subject to appropriate standards.</p>	<p>Consistent. Approximately 3.58 acres of the proposed project’s western parking lot area, south of Building ‘A’ and west of Building ‘C’ abutting the Henderson Open Space area, will encroach into the currently mapped FEMA 100-year floodplain as shown on Figures 3-13a and 3-13b, GRADING AND DRAINAGE PLANS. The City has a “no rise” policy requiring that new development not encroach within the 100-year floodplain and if it does, that the project applicant demonstrate that the new encroachment will not increase the water surface elevation during the most probable 100-year flood either upstream or downstream. A Conditional Letter of Map Revision based on Fill (CLOMR-F) will need to be approved prior to issuing a grading permit for fill in the floodway fringe. A LOMR dated February 14, 2017 was prepared and subsequently submitted to FEMA by the City after their review and approval. Once the LOMR is approved, the CLOMR-F will be prepared and submitted to FEMA. The proposed project will be designed consistent with RMC Chapter 16.12, <i>Clearing, Grading, Fills and Excavation</i>, requirements to minimize the flow of stormwater during project operation. Refer to Section 5.8, HYDROLOGY AND WATER QUALITY.</p>
<p>Policy CDD3B: Require buffer areas between development projects and significant watercourses, riparian vegetation, and wetlands in accordance with the Natural Resources Element.</p>	<p>Consistent. Land immediately west of the main portion of the proposed project is the Henderson Open Space that is designated “Greenway” (GWY) and zoned “Open Space” (OS) with the Sacramento River further west. Per the RMC, setbacks from the Sacramento River would ensure a proper relationship between this water feature and the proposed development.</p> <p>RMC Chapter 18.48, <i>River/Creek Corridor Development</i>, calls for waterway corridor setbacks for most properties adjoining certain waterways identified in the <i>General Plan</i>. For the Sacramento River, the average corridor buffer requirement is 75 feet inland from the edge of the riparian zone, or 150 feet inland from the top of bank, whichever is greater. Reduced setbacks are allowed for bluff areas located along the Sacramento River between the North Market Street Bridge and the future Parkview Bridge. Up to a 50 percent buffer reduction is also allowed throughout the City if specific conditions are met.</p> <p>Based on site reconnaissance and aerial photograph review, the average setback of the development site from the east bank of the Sacramento River is approximately 442 feet and the average setback from the riparian zone is approximately 89 feet. Therefore, the proposed project is in compliance with the requirements of RMC Chapter 18.48.</p>
<p>Policy CDD3C: Preserve natural corridors and linkages between habitat types through project design, key open space acquisitions, floodplain and slope dedications and easements, and similar mechanisms.</p>	<p>Consistent. A pedestrian walkway commencing approximately 200 feet west of the intersection of Henderson Road (North) and Hartnell Avenue, will provide pedestrian access to the northerly portion of the Henderson Open Space and Sacramento River. This walkway will also provide pedestrian access from the existing Cypress Avenue stairway to the proposed project site and the Henderson Open Space. The construction of Parkview Avenue (Open Space Access) will provide vehicular and also pedestrian access to the Henderson Open Space. Refer to Figure 3-6a, SITE PLAN, and Figures 3-6b and 3-6c, ENLARGED SITE PLANS.</p>

Table 5.9-1
CONSISTENCY WITH APPLICABLE CITY OF REDDING GENERAL PLAN
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General Plan Goals and Policies	Consistency Analysis
GENERAL PLAN GOAL CDD4 PROTECT AND ENHANCE THE RELATIONSHIP BETWEEN THE CITY AND THE SACRAMENTO RIVER.	
Policy CDD4A: Preserve significant trees and other vegetation along the banks of the Sacramento River, while emphasizing passive recreation and providing opportunities for active uses.	Consistent. The project site is not adjacent to the Sacramento River. The City of Redding’s Henderson Open Space is located between the project site and the river, and provides for tree retention and recreational opportunities.
Policy CDD4B: Continue acquisition of key lands along the review and other area waterways to provide passive, non motorized public access and to preserve important ecological values and habitats. This may be accomplished by a combination of public and private land purchases, donations, dedications granting of public easements, the use of life estates, and similar mechanisms.	Consistent. Refer to Consistency Analysis for Policy CDD3C which establishes pedestrian/bicycle links to the Henderson Open Space and Sacramento River.
Policy CDD4C: Continue to develop active and passive public-use facilities and trails along of the riverfront as generally depicted on Figure 1-2. Expand public-use areas and pedestrian and bicycle trails as additional lands are made available, while limiting impacts to existing wildlife habitat and developed properties.	Consistent. Refer to the Consistency Analysis for Policy CDD3C which establishes pedestrian/bicycle links to the Henderson Open Space and Sacramento River. In January 2017, a property line adjustment (PLA) transferred from Dignity Health to the City Parks and Recreation Department portions of three parcels for inclusion in the Henderson Open Space. The transfer increased the City’s open space area west of the proposed project and near the Cypress Avenue bridge, and to accommodate a trail from Cypress Avenue to the Henderson Open Space and the Sacramento River through the project site. The transfer provided the City the ability to maximize river core area management.
Policy CDD4D: Establish public open space and pedestrian/bicycle links between the river and parks, activity centers, schools, and other major open space areas such as stream corridors.	Consistent. Refer to the Consistency Analysis for Policy CDD3C which establishes pedestrian/bicycle links to the Henderson Open Space and Sacramento River.
Policy CDD4F: Design open space access was to complement existing development, and, where applicable, protect the privacy of adjoining residences.	Consistent. Refer to Consistency Analysis for Policy CDD3C which establishes pedestrian/bicycle links to the Henderson Open Space and Sacramento River. The Henderson Open Space complements existing residential development in the area and also the proposed project.
GENERAL PLAN GOAL CDD5 ENSURE A PROPER RELATIONSHIP BETWEEN STREAM CORRIDORS AND URBAN DEVELOPMENT.	
Policy CDD5A: Establish appropriate development standards along those stream corridors depicted in Figure 1-3 in order to: <ul style="list-style-type: none"> - Promote the aesthetic value of the adjacent natural area. - Provide public views and access to the stream corridor. - Protect the privacy and security of adjacent residents. 	Consistent. The proposed project site is located on land that is visible as viewed along Cypress Avenue, the Sacramento River and across the River along Park Marina Drive. The proposed project was designed with three buildings interspersed on the site and visually “tied together” in a campus like setting with landscaping, both adjacent to the buildings and within the parking areas, that provide visual corridors primarily of the existing riparian areas within the Henderson Open Space and beyond to the Sacramento River to the west and northwest. Hardscape pathways are proposed throughout the project site linking buildings and parking areas to each other and providing access to the various streets, the Cypress Avenue bridge and the Henderson Open Space. The City’s Planning Division reviewed the site design and building elevations and determined the proposed design is in conformance with the City’s <i>General Plan</i> and <i>Zoning Ordinance</i> .
GENERAL PLAN GOAL CDD7 RETAIN THE NATURAL APPEARANCE OF STEEP HILLSIDE AREAS AND DESIGNATED RIDGE LINES.	
Policy CDD7A: Protect the visual integrity of prominent ridge lines that can be viewed from key public gathering areas, the river, visitor destinations, and community gateways. Utilize one or more of the following measures to	Consistent. Project implementation would result in nominal view blockage of background ridgelines primarily located to the west and northwest due to the location of the proposed project site and surrounding environs.

Table 5.9-1
CONSISTENCY WITH APPLICABLE CITY OF REDDING GENERAL PLAN
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General Plan Goals and Policies	Consistency Analysis
<p>avoid or minimize development impacts: Public or private purchase of lands, the use of conservation easements, or similar measures. Performance standards, including limitations on building heights and/or increased ridgeline setbacks and standards for use of appropriate building forms, colors, and materials that blend into their surroundings.</p>	<p>The Cypress Avenue bridge to the northwest effectively blocks views of ridge lines from the western portions of the project site. Furthermore, views of the ridges are blocked by the height of mature trees located both within the Henderson Open Space, but also along the Sacramento River. During the summer view blockage is greater since deciduous trees Cottonwoods and some Oak species are in full bloom. In some instances, views from Henderson Road (North and South) will be blocked by the proposed project buildings but visual corridors between various buildings provide views of the ridge lines. Furthermore, the primary public gathering space is the Henderson Open Space where views of the ridges are not impacted by the proposed project. Overall distant views toward City-designated ridgelines would remain and impacts in this regard would be <i>less than significant</i>. Refer to Section 5.1, AESTHETICS.</p>
<p>GENERAL PLAN GOAL CDD8</p> <p>PROMOTE THE DEVELOPMENT OF A COHESIVE, WELL-DEFINED CITY.</p>	
<p>Policy CDD8A: Maintain well-defined community edges using open-space buffers, greenbelts, agricultural lands, stream courses, clustered development, and other appropriate types of landscape and design features.</p>	<p>Consistent. The site plan for the proposed project illustrates how the project’s edges are defined using open space buffers, landscaping and the careful siting of the proposed buildings interspersed throughout the project site. Through the use of distinct landscape, hardscape, and design features throughout the site, open space areas are more clearly defined. Refer to Figure 3-6a, PROPOSED SITE PLAN, Figures 3-6b and 3-6c, ENLARGED SITE PLANS, Figure 3-11a LANDSCAPE LAYOUT, and subsequent Figures 3-11c through 3-11f, PLANTING PLAN.</p>
<p>Policy CDD8B: Provide community "gateway" treatments, including signage and landscape, particularly in locations depicted on Figure 1-5. Provide Downtown "gateway" treatments at appropriate locations.</p>	<p>Consistent. The proposed project does not impede any linkages from the Henderson Open Space and/or the Sacramento River to and through the Downtown. Connection to Downtown from Henderson Road (North and South) is facilitated through the provision sidewalks and pathway through the project leading to the stairs that access the Cypress Avenue bridge. Pedestrians can then proceed to Downtown.</p>
<p>GENERAL PLAN GOAL CDD9</p> <p>PRESERVE EXISTING COMMUNITY CHARACTER AND FABRIC AND PROMOTE THE DEVELOPMENT OF LIVABLE AND COHESIVE NEIGHBORHOODS AND DISTRICTS.</p>	
<p>Policy CDD9C: Establish design standards for new development that will create more livable and aesthetically pleasing neighborhoods. Promote compatibility between land uses by minimizing impacts to privacy, views, and noise and from intrusion of non-neighborhood traffic.</p>	<p>Consistent. Refer to the Consistency Analysis for Policy CDD5A. The Consistency Analysis for Transportation Policy T9E states that the most expedient routes that vehicular traffic will utilize to access the proposed project is from Hartnell Avenue to either Henderson Road (North) or Henderson Road (South) via Parkview Avenue (South). These streets essentially “route through traffic” around the existing Henderson Road (South) residential neighborhood south of Parkview Avenue (South). Except for the Henderson Open Space directly to the west of the project site, surrounding land uses are commercial.</p>
<p>GENERAL PLAN GOAL CDD19</p> <p>HAVE BUILDING SETBACKS AND HEIGHTS REFLECT THE ROLE AND CHARACTER OF THE VARIOUS DISTRICTS OF THE CITY.</p>	
<p>Policy CDD19A: Establish appropriate standards for buildings, massing, height, and setbacks for residential and commercial developments on arterial and collector streets that will define and reinforce the character of development districts in the City.</p>	<p>Consistent. The policy references residential and commercial developments, which have height and setback limitations unless developed as Planned Developments. As an example, a general commercial use cannot exceed a height of 45 feet and minimum front yard setbacks of 15 feet and side yard setbacks of 10 feet. An office building cannot exceed a height of 50 feet and setbacks of 10 feet. In comparison Public Facility uses do not have building height or setback limitations. However, the proposed project considered building locations, massing, height and setbacks on arterial streets. The proposed project abuts Cypress Avenue to the north and</p>

Table 5.9-1
CONSISTENCY WITH APPLICABLE CITY OF REDDING GENERAL PLAN
GOALS AND POLICIES FOR LAND USE AND PLANNING

General Plan Goals and Policies	Consistency Analysis
<p>Policy CDD19B: Utilize Figure 1-5, in conjunction with the appropriate Focus Area maps and policies, to establish the appropriate locations for "mid-rise" and "high-rise" buildings in the community. High-rise buildings are only appropriate in the Downtown core area.</p>	<p>Hartnell Avenue to the east. Building 'A' varies between 64 feet and 72 feet in height and has four stories, Building 'B' heights vary between 52 feet and 58 feet and is three stories high, and Building 'C' heights vary between 36 feet and 44 feet and has two stories. The maximum heights reflect the parapet heights which are used to conceal rooftop mechanical equipment. The varying building heights of each building, height and distance relationship between the three building assist to reduce potential "massing" appearances were the building all the same height or in close proximity to each other. Building 'B' which is three stories is located approximately 255 feet from Building 'A' which has four stories. Building 'A' with four stories is located approximately 130 feet from Building 'C' which has two stories.</p> <p>Building 'C' is sited in close proximity to Cypress Avenue and the associate bridge over the Sacramento River, however to provide height compatibility with the bridge structure, Building 'C' is two stories with top of parapet heights varying between 36 feet and 44 feet which is less than the maximum heights allowed were Building 'C' and office building. (It should be noted that parapet heights can exceed by up to 10 feet the maximum building height of an office building provided that the area the parapet encloses in no more than 20 percent of the top floor roof area). If Building 'C' was sited parallel to Cypress Avenue, the frontage could appear to be potentially "massive," however the building was skewed so that the northeastern corner of the building is approximately 70 feet from the Cypress Avenue right-of-way and the northwest corner is approximately 125 feet from the right-of-way. The southeastern corner of Building 'C' is located approximately 285 feet from the Hartnell Avenue right-of-way. For comparison purposes, the building located in the northwestern area of the intersection of Cypress Avenue and Hemsted Drive is approximately 10 feet to 15 feet from the northern edge of the Cypress Avenue sidewalk.</p> <p>The <i>General Plan</i> notes that "Cypress Avenue provides the freeway traveler with services and also gives visitors and residents another entrance into Central Redding. Here, stately trees should replace overhead utility lines, and median landscaping should be provided. Plantings are needed to reduce the expanse and bleakness of large parking lots." The site plan for the proposed project illustrates how the project's building are interspersed throughout the site thereby effectively creating a series of parking lots instead of one large parking lot surrounding the buildings. Refer to Figure 3-11a, LANDSCAPE LAYOUT, and subsequent Figures 3-11c through 3-11f, PLANTING PLAN.</p> <p>As noted under the Consistency Analysis for Policy CDD5A, the City's Planning Division reviewed the site design and building elevations and determined that the proposed design is in conformance with the City's <i>General Plan</i> and <i>Zoning Ordinance</i>. Refer to Figure 3-8a, PERSPECTIVE RENDERING, and Figures 3-8b through 3-8d, ELEVATIONS, for Buildings 'A', 'B', and 'C', respectively.</p> <p>Consistent. Review of <i>General Plan</i> Figure 1-5, <i>Community Design Plan</i>, does not affect the proposed project site. The <i>General Plan</i> identifies a "mid-rise" building to be up to 75 feet above ground to accommodate six habitable floors. Whereas, Building 'A' has varying heights to the top of parapets ranging between 64 and 75 feet, the building is four stories. Refer to the Consistency Analysis for Policy CCD19A.</p>

Table 5.9-1
CONSISTENCY WITH APPLICABLE CITY OF REDDING GENERAL PLAN
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General Plan Goals and Policies	Consistency Analysis
<p>Policy CDD19C: Establish appropriate standards and design criteria for mid-rise and high-rise buildings. The standards and criteria should address, among other items, the following:</p> <ul style="list-style-type: none"> - Definition and support of adjacent streets and open spaces. - Integration with other buildings and open space on the block or in the area. - Provision of high-quality pedestrian amenities. - Recognition of the importance and role of the three main parts of tall buildings: the base, middle (shaft), and top. 	<p>Consistent. Building 'A' could be considered a mid-rise building due to height to the parapets, however, it is limited to four floors. Regardless, the Consistency Analysis for Policies CDD3C, CDD4A, CDD5A, CDD7A, CDD9C, and CDD19A identify how appropriate standards and design criteria are met. As previously noted, the City's Planning Division reviewed the site design and building elevations and determined the proposed design is in conformance with the City's <i>General Plan</i> and <i>Zoning Ordinance</i>.</p>
<p>Source: City of Redding. <i>2000 – 2020 General Plan</i>. October 2000.</p>	

Given the past historic use and disturbance within the existing “Greenway” (GWY) classification onsite, the reevaluation of onsite floodway mapping, and a site design that intentionally avoids access limitations or restrictions to adjacent public lands classified as “Greenway” (GWY), the ultimate conversion of 1.34 acres of private land from “Greenway” (GWY) to “Public Facilities” (PF-I) is not considered inconsistent with the overall intent of the *General Plan*.

Zoning Consistency

Surrounding zoning districts consist of the following: “General Commercial” (GC), “General Office” (GO), and “Open Space” (OS) to the north; “Shopping Center” (SC), “General Commercial” (GC), and “General Office” (GO) to the east; “General Commercial” (GC), “General Office” (GO), and “Open Space” (OS) to the south; and “Limited Office” (LO), “General Commercial” (GC), “Open Space-Specific Plan” (OS-SP) to the west across the Sacramento River. Refer to Figure 3-5, EXISTING ZONING DISTRICTS, in Section 3.0, PROJECT DESCRIPTION.

The City’s *Zoning Ordinance* is codified as RMC Title 18. The purpose of this title is to promote the public health, safety, and welfare of the City and to provide the economic and social advantages, which result from an orderly, planned use of the environment. The *Zoning Ordinance* implements the City’s *General Plan* and Specific Plans, and establishes regulations governing the use, placement, spacing, and size of land and buildings. The *Zoning Ordinance* also describes various permits and approvals required to allow development within the City.

As previously noted, the existing onsite zoning district designations are proposed to be rezoned from “General Office” (GO) and “General Commercial” (GC) to “Public Facilities” (PF). Table 3-4, EXISTING AND PROPOSED GENERAL PLAN & ZONING, in Section 3.0, PROJECT DESCRIPTION, identifies the existing and proposed zoning district designations and associated acreages by current Assessor’s Parcel Number (APN). It should be noted that the “Public Facilities” (PF) zoning district designation does not limit the maximum building heights allowed as does the “General Commercial” (GC) or “General Office” (GO) zoning with limits of 45 feet and 50 feet, respectively. Chapter 18.36 of the RMC states that the specific purposes of the “Public Facilities” (PF) district are to:

- Provide areas for public and quasi-public facilities that are appropriate for educational facilities, cultural and institutional uses, health services, specialized housing and care facilities, parks and recreation, general government operations, airports, utility and public service needs, and other similar and related supporting uses.
- Recognize the unique nature of public and quasi-public uses by requiring site development permits or use permits for most uses and activities within the “public facilities” district.
- Ensure the provision of services and facilities needed to accommodate planned population densities.

As stated in Section 3.0, PROJECT DESCRIPTION, the project proposes the construction of three buildings totaling approximately 129,600 square feet for a wellness and prevention center in a campus-like setting on a 10.55-acre partially disturbed site in a commercial area of south Redding served by adequate utilities and public services (refer to Section 5.12, PUBLIC SERVICES, and Section 5.16, UTILITIES AND SERVICE SYSTEMS). Proposed buildings would vary in height, ranging between two to four stories with

maximum building elevations between 44 and 72 feet. The proposed buildings, including typical building elevations are included in Section 3.0, PROJECT DESCRIPTION (Figures 3-8b through 3-8d) and are evaluated in Section 5.1, AESTHETICS.

The proposed project would also require the issuance of a use permit to allow onsite development including a portion of the parking lot to encroach into FEMA regulated 100-year floodplain of the Sacramento River (refer to Section 5.8, HYDROLOGY AND WATER QUALITY). A parcel map would also be required, creating one parcel for each of the three buildings, including a fourth parcel to be held in common by each building parcel. The three buildings are interspersed onsite and visually “tied together” in a campus-like setting with landscaping, both adjacent to the buildings and within the parking areas, that provide visual corridors primarily of the existing riparian areas within the Henderson Open Space and beyond to the Sacramento River to the west and northwest.

In addition, the proposed project is sited along existing arterial roadways (i.e., Cypress Avenue and Hartnell Avenue) with local access to I-5, in an existing commercial, office, retail area that is experiencing both commercial redevelopment and growth. The proposed project, as sited and designed, is considered consistent with the general density and character of these adjacent and nearby commercial and office facilities and is consistent with RMC Chapter 18.36, *Public Facilities District. Less than significant* impacts would occur.

Redding Riverfront Specific Plan

The *Redding Riverfront Specific Plan* (Specific Plan) comprises approximately 500 acres along both sides of the Sacramento River from the Civic Auditorium area in the north to Parkview Avenue, just below the Cypress Avenue Bridge. The proposed project is not included within the Specific Plan area; however, the site is located adjacent to the southeast boundary of the Specific Plan across the Sacramento River, and south of the Specific Plan’s Park Marina subarea that terminates at the Cypress Avenue bridge.

As depicted in Specific Plan Figure 7, *Land Use Plan*, the area immediately west of the proposed project is designated for recreational and trail uses and is has been improved as the Parkview Riverfront Park consistent with land use goals of the Specific Plan. Within this area, the Specific Plan conceptually identifies the future Parkview Avenue alignment extension across the Sacramento River that would ultimately connect existing Parkview Avenue located on the east side of the river to Park Marina Drive on the west. In anticipation of this connection, the proposed project has been sited and designed in an effort to accommodate this future planned extension of Parkview Avenue. Additionally, the proposed project is consistent with Specific Plan designated office and retail land uses located along the east side of Park Marina Drive between Cypress Avenue and South Street, approximately 700 feet northwest of the site.

The project as proposed would not hinder the successful implementation of the Specific Plan or be incompatible with designated land uses or preservation and enhancement objectives identified within the Specific Plan. As an adjacent use, the proposed project is considered complimentary to the uses envisioned by the *Redding Riverfront Specific Plan* and would not conflict with the Plan’s established goals or long-term land use objectives. No impact has been identified in this regard.

Mitigation Measures: No mitigation measures are required.

Level of Significance After Mitigation: No mitigation measures are required. Impacts are *less than significant*.

5.9.5 CUMULATIVE SETTING, IMPACTS, AND MITIGATION MEASURES

The analysis of cumulative impacts focuses on those effects that, when combined together with other similar activities or projects could result in a large enough effect or impact that would be considered cumulatively significant. If the individual project's contribution is substantial enough, it may be considered cumulatively significant. In some instances, a project-specific impact may not combine with effects from other activities, in which case, the project's contribution to a cumulative effect would be less than considerable.

The geographic scope for cumulative impacts related to land use includes closely related past, present, and reasonably foreseeable future projects located in the surrounding area. The area influenced by cumulative land use effects related to adjacent parcels and the surrounding planned development areas is described in Section 4.0, BASIS OF CUMULATIVE ANALYSIS. Related land use projects in the surrounding areas have been: 1) submitted for plan processing; 2) approved by the City of Redding; and/or 3) engaged in active construction programs. This geographic extent is appropriate as land use impacts are generally localized and individual impacts of any future projects would be addressed on a project-by-project basis.

IMPACT 5.9-2	<i>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.</i>
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Significance: Less Than Significant Impact.

Impact Analysis: The proposed project is in concurrence and consistent with the land uses identified in the *General Plan*. With regard to conflicts with any land use plan, policies, or regulations, approval of the proposed project and implementation of the proposed mitigation measures identified in this Draft EIR would ensure that the proposed project complies with applicable goals, policies, and regulations implemented by the City. Therefore, relative to potential land use and planning related impacts, the proposed project's incremental contribution is not considered cumulatively considerable.

With regard to cumulative impacts, as shown in Table 4-1 in Section 4.0, BASIS OF CUMULATIVE ANALYSIS, the cumulative projects considered include mixed-use commercial and office developments, a new commercial center (Costco), as well as miscellaneous smaller-scale land development projects in the surrounding local vicinity. Potential land use impacts may include inconsistencies with the *General Plan* or *Zoning Ordinance*, as well as incompatibilities with existing land uses generally within a mile of a proposed development.

The anticipated project impacts, in conjunction with cumulative development in the site vicinity, would increase urbanization and result in the loss of existing undeveloped land in the local vicinity. Potential

land use impacts are site-specific and require evaluation on a case-by-case basis. The City would require review of all future land development within the project area through the discretionary permit process (and/or to ensure conformance with City development standards and regulations) to demonstrate consistency with the *General Plan* (as applicable) and *Zoning Ordinance*. This is true with regard to land use compatibility impacts, which are generally a function of the relationship between the interactive effects of a specific development site and those of its immediate environment.

The City of Redding recognized that buildout of the *General Plan* land uses would result in the permanent conversion of vacant undeveloped areas to urban, suburban, and open space uses resulting in a change in the community character. The *General Plan* established a number of policies to reduce impacts as a result of land use changes. These policies (CDD1A, -1B, -1C, -1D, -1E, -1I, -1J, -3B, -4F, -5A, -7A, -8A, -9B, -9C, -9D, -10A, -11B, -11H, -13B, -13C, -14A, MN-1, MN-3, T-5A, N2C, -2F, -3A, -3B, and -3D) encourage appropriate development siting throughout the City's Primary and Secondary Growth Areas established in the *General Plan*. The policies further encourage the appropriate use of setback requirements from sensitive uses and environments, including the use of property line transitional techniques. These policies were determined in the *General Plan EIR* to reduce any conflicts with adjacent land use or the intensity of existing land use patterns to a *less than significant* level.

As the proposed project would not result in significant land use or planning conflicts, it would not contribute to an overall increase of cumulative land use or planning conflicts in the area. Planned or future projects in the area would also be subject to applicable federal, State, and local regulations to ensure that land use conflicts do not occur. Any such cumulative impacts would be reduced through the implementation of mitigation measures on a project-by-project basis, as appropriate, and through adherence with applicable *General Plan* policies. Thus, potential cumulative effects would be cumulatively *less than significant*.

Mitigation Measures: No mitigation measures are required.

Level of Significance After Mitigation: No mitigation measures are required. Impacts would be cumulatively *less than significant*.