
5.0 ALTERNATIVES

The alternatives analysis consists of the following components: an overview of California Environmental Quality Act (CEQA) requirements for alternatives analysis, descriptions of the alternatives evaluated, a comparison between the anticipated environmental effects of the alternatives and those of the proposed project, and identification of an “environmentally superior” alternative.

5.1 CEQA REQUIREMENTS FOR ALTERNATIVES

The CEQA Guidelines require that an environmental impact report (EIR) describe a reasonable range of alternatives to a project that would feasibly attain the basic project objectives but would avoid or substantially lessen one or more of the project’s significant effects (CEQA Guidelines Section 15126.6(a)).

In addition, Sections 15126.6(a) and (b) of the CEQA Guidelines require the consideration of alternatives that could reduce or eliminate any significant adverse environmental effects of the proposed project, including alternatives that may be more costly or could otherwise impede the project’s objectives. Section 15126.6(a)) specifies that an EIR “shall describe a range of reasonable alternatives to the project” that would “feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the proposed project, and evaluate the comparative merits of the alternatives.” The range of alternatives considered must include those that offer substantial environmental advantages over the proposed project and may be feasibly accomplished in a successful manner considering economic, environmental, social, technological, and legal factors.

In regard to the selection of alternatives to be analyzed, it further specifies 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. ... There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.”

However, the CEQA Guidelines do require analysis of a “No Project” alternative and identification of the environmentally superior alternative among those analyzed.

5.2 DEVELOPMENT OF PROJECT ALTERNATIVES

This section discusses the reasoning for selecting the alternatives and summarizes the assumptions identified for the alternatives. The range of alternatives included for analysis in an EIR is governed by the “rule of reason.” The primary objective is formulating potential alternatives and choosing which ones to analyze to ensure that the selection and discussion of alternatives fosters informed decision-making and informed public participation. This is accomplished by providing sufficient information to enable readers to reach their own conclusions about such alternatives. This approach avoids assessing an unmanageable number of alternatives or analyzing alternatives that differ too little to provide additional meaningful insights about their environmental effects.

The alternatives addressed in this Draft EIR were selected in consideration of one or more of the following factors:

- The extent to which the alternative would accomplish most of the basic objectives of the project.

5.0 ALTERNATIVES

- The extent to which the alternative would avoid or reduce any of the identified significant effects of the project.
- The feasibility of the alternative, taking into account site suitability and parcel sizes, and consistency with applicable public plans, policies, and regulations.

The alternatives analyzed in this DEIR were ultimately chosen based on each alternative's ability to feasibly attain the basic project objectives while avoiding or reducing one or more of the project's significant effects.

PROJECT OBJECTIVES

In identifying the range of alternatives for analysis in this DEIR, the following project objectives were considered:

- Adopt a Riverside County 2013–2021 Housing Element acceptable to the California Department of Housing and Community Development.
- Continue directing housing and service development to Area Plans and existing services.
- Adopt amendments to the Land Use and Safety Elements of the General Plan in support of the revised Housing Element and to reflect state law.
- Adopt an ordinance to allow housing development at the highest density ranges of the General Plan.
- Adopt an ordinance to allow development of the Mixed Use Area land use designation.
- Rezone property consistent with the Housing Element as necessary to meet the Regional Housing Needs Assessment (RHNA).
- Update existing ordinances to reflect changes in state law.
- Emphasize development potential near transit corridors and existing infrastructure.

SUMMARY OF SIGNIFICANT AND UNAVOIDABLE IMPACTS

The analysis presented in Section 3.0, Countywide Impact Analysis, of this DEIR determined that the significant and unavoidable impacts listed in **Table 5.1** would result as cumulative effects of the proposed project on the county as a whole.

TABLE 5.1
SIGNIFICANT COUNTYWIDE IMPACTS

Section	Impact Analysis Number	Impact
3.0 (Countywide Impact Analysis)	Impact Analysis 3.3.1	Subsequent land use activities associated with implementation of the proposed project could conflict with or obstruct implementation of applicable air quality management plans. This impact is considered to be cumulatively considerable .
3.0 (Countywide Impact Analysis)	Impact Analysis 3.3.2	Subsequent land use activities associated with implementation of the proposed project could result in short-term construction emissions that could violate or substantially contribute to a violation of federal and state standards for ozone and coarse and fine particulate matter. This is considered a cumulatively considerable impact.
3.0 (Countywide Impact Analysis)	Impact Analysis 3.3.3	Subsequent land use activities associated with implementation of the proposed project could result in long-term operational emissions that could violate or substantially contribute to a violation of federal and state standards for ozone and coarse and fine particulate matter. This is considered a cumulatively considerable impact.
3.0 (Countywide Impact Analysis)	Impact Analysis 3.3.4	The project would be considered to have a cumulatively considerable impact if implementation of the proposed project update, in combination with existing, approved, proposed, and reasonably foreseeable development in the South Coast Air Basin, could significantly contribute to cumulative increases in emissions of criteria air pollutants that could contribute to future concentrations of pollutants for which the region is currently designated nonattainment. The impact would be considered cumulatively considerable .
3.0 (Countywide Impact Analysis)	Impact Analysis 3.9.2	At the Countywide level, increased water demand resulting from the project could lead to groundwater extractions cumulatively exceeding groundwater basins' safe yields or causing a net deficit in aquifer volume. This is a cumulatively considerable impact.
3.0 (Countywide Impact Analysis)	Impact Analysis 3.12.1	Future development accommodated by the project would result in a substantial permanent increase in ambient noise levels, as well as exposure of persons to or generation of noise levels in excess of standards established in the County's General Plan or noise ordinance, or in applicable standards of other agencies. This impact would be cumulatively considerable .
3.0 (Countywide Impact Analysis)	Impact Analysis 3.12.3	Project construction could result in the exposure of persons to or generation of short-term construction noise. This impact would be cumulatively considerable .
3.0 (Countywide Impact Analysis)	Impact Analysis 3.13.1	The proposed changes to HHDR and MUA land use designations and zone classifications on approximately 4,972 acres of land would result in an increase in density/intensity potential on those sites and would therefore have the potential to result in more housing units and population in the unincorporated County as a whole. This impact is considered to be cumulatively considerable .
3.0 (Countywide Impact Analysis)	Impact Analysis 3.17.2	Reliable water supply sources cannot be definitively identified for buildout of the project; therefore, potential impacts associated with water supply and demand are considered cumulatively considerable .

COUNTYWIDE IMPACTS AND ALTERNATIVE SELECTION

With the exception of increased water demand, the cumulatively significant impacts identified in **Table 5.1** are associated with the potential for conflict between new construction and existing development. Overall, construction activities have the potential to exceed thresholds for noise, dust, and emissions due to the nature of the activity. Movement of earth, grading of property, and use of heavy equipment will generate noise and dust. Mitigation in the form of compliance with existing policies and procedures can reduce, but not entirely eliminate, the potential for construction to impact existing development.

5.0 ALTERNATIVES

The construction impacts identified in this EIR and in **Table 5.1** are both project- and site-specific, meaning that one project may have no impact because of location, topography, or lack of surrounding development, while a similar project in a different location may have significant impacts for the same reasons. As shown in Chapter 2.3 of this EIR, the existing development review process evaluates each development proposal and would assign the appropriate means of addressing impacts as part of the process. Further, as noted in Section 3.0, this EIR includes mitigation measures that would reduce impacts associated with construction. As the significant impacts identified in this EIR are project-specific, discussion of alternatives in a countywide context is difficult. For example, mandating that development only occur away from existing homes or businesses could result in poor planning or inefficient extension of services, and would not meet the General Plan directive to encourage development in areas with existing services.

Some areas of the County currently lack the water services needed to support the type of development that could occur as a result of the proposed project. County policies require that adequate utility services be demonstrated before a development proposal can be approved, and all subsequent development will be required to comply with this policy. Further, the type of development encouraged by the proposed project is mixed use and multiple family, which would allow for a more efficient use of water than a lower-intensity development pattern. Both the mixed use development and the requirement to demonstrate water services are consistent with existing state laws such as Senate Bill (SB 610) (California Water Code Section 10912), which requires water supply assessments for large projects, and SB 221 (California Government Code Section 66473), which requires water supply be demonstrated for certain subdivisions. Both SB 610 and SB 221 rely on urban water management plans that are specific to the location of the project and the purveyor of water.

In response to the drought, the County has adopted water efficiency requirements for all development, which would reduce water usage for landscaping and construction. And though water is a precious commodity countywide, some areas have more water available for development than others. This EIR identifies areas where lack of water could be an issue for subsequent development. Regardless, while some areas may currently lack the ability to provide services, as a long-range planning document the County recognizes that there may be sufficient interest in development in these areas to encourage extending water services.

5.3 COUNTYWIDE ALTERNATIVES CONSIDERED BUT REJECTED AS INFEASIBLE

CEQA Guidelines Section 15126.6(c) states that an EIR should identify any alternatives that were considered but rejected as infeasible by the lead agency during the scoping process, and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (1) failure to meet most of the stated project objectives; (2) infeasibility; and (3) inability to avoid significant environmental impacts. The alternatives discussed below were considered but rejected from further analysis in the EIR.

Alternative Site

Ordinarily the alternatives section of an EIR would evaluate alternative project sites to determine if another location for a project would reduce its impacts. As the proposed project is a policy document that affects an entire county, an alternative project site is not a feasible alternative. The properties of each of the Area Plans were evaluated to ensure the plans were already identified for development, had adequate utilities, or could easily expand utilities. Specifically, the County used the following to evaluate the sites contained in the project description:

- A) Countywide general evaluation to identify communities in which to locate potential HHDR/MJA sites;
- B) Local community-supportive facilities and services availability;
- C) Intra- and interregional transportation facilities availability;
- D) Availability of supportive on-site and site-edge land use and environmental characteristics;
- E) Primary on-site infrastructure (roads, sewer, and water) availability; and
- F) Flexibility in individual site development options.

These criteria, along with the selection process, are discussed in detail in the proposed Housing Element document. The selected sites were then evaluated within the context of the plans and the goals of the General Plan. During the Notice of Preparation public comment period, nine additional sites were identified by the public and added to the project. (See Revised Notice of Preparation in **Appendix 1.0-1.**) The proposed project contains more sites than are required to meet the RHNA under the assumption that one or more sites may be removed from consideration as part of the public process. With this assumption it was determined that the proposed project represented all of the currently available sites, and that seeking alternative sites would be unnecessary.

Fewer Sites

In developing the parcels that make up the proposed project, care was taken to focus on areas with existing services and development. This both furthers the General Plan goal of reducing development in agricultural areas, and provides for a more efficient use of existing services. The increase in density and intensity of development was also intended to encourage higher ridership on existing transit routes, or to eventually result in the expansion of transit to service residents in more rural areas.

Because the California Department of Housing and Community Development requires land use regulations to establish a minimum density of 20 units to the acre and to allow up to 30 units to the acre, reducing density below this number was not considered. Instead, more property was identified in the proposed project than was needed to meet the County's RHNA numbers. While part of the larger-than-necessary project size was to ensure that housing opportunity is provided throughout the County, the larger size was also in recognition that some properties may be removed from consideration during the public review and adoption process. In this regard, the proposed project represents the maximum potential build, while the actual adopted project is likely to have fewer acres and overall units than evaluated in this EIR, and represent a reduced number of sites.

Concentrating High-Density Housing in Eastern Riverside County

Western Riverside County comprises the majority of the population due to the number and size of incorporated cities and the development in the unincorporated areas between them. Because of the availability of services and the existing population, western Riverside County has a wide variety of housing types. This alternative would focus on more development in eastern Riverside County in order to balance population growth, result in additional services, and increase all types of housing in this area. This alternative was rejected because of the lack of public utilities and the potential to increase the conversion of agricultural land to nonagricultural land uses. Also, even

5.0 ALTERNATIVES

though the project has a potential for mixed-use development, it is not certain that residents of the new units will work or shop in the area if commercial and professional office uses are developed. As a result, if all of the regional housing needs were to be accommodated in eastern Riverside County, it is likely that the existing transportation network would need additional capacity. For these reasons, this alternative was not considered feasible.

Modification to Existing Specific Plans

The proposed project targets vacant land that is within an Area Plan, but not within an adopted specific plan or other approved development. This approach is in recognition of the large investment in time and money needed to get approval for development. Modifications to one or more specific plans would potentially disrupt a project long in the planning and development stage, and could prolong the completion of the proposed project, thereby failing to meet the County's RHNA. Nothing in the proposed project precludes a property owner with an existing entitlement from requesting rezoning or redesignation to a higher density and following the development review process. For purposes of this project, including both the timing and desire to avoid disruption of existing projects, this alternative was rejected.

The analysis presented in the Sections 4.1 through 4.10 of this DEIR determined that the following significant and unavoidable impacts listed in **Table 5.2** would result from the proposed rezonings identified in each of the Area Plans.

TABLE 5.2
AREA PLAN SIGNIFICANT IMPACTS

Section	Impact Analysis Number	Impact
4.1 (Elsinore Area Plan)	Impact Analysis 4.1.10	Future development facilitated by the project could result in an increase in ambient noise levels in the vicinity, as well as exposure of sensitive receptors to noise levels in excess of the Riverside County noise standards. This is a significant impact.
4.1 (Elsinore Area Plan)	Impact Analysis 4.1.17	The proposed increase in density/intensity potential on the neighborhood sites would increase traffic volumes on one roadway segment within the Elsinore Area Plan planning area that is already projected to operate at an unacceptable level under buildout of the General Plan (Bonita Avenue). This is a significant impact.
4.2 (Mead Valley Area Plan)	Impact Analysis 4.2.10	Future development resulting from the project would be required to comply with the March Air Reserve Base Land Use Compatibility Plan. Therefore, the project will not result in an airport-related safety hazard for people residing or working in the project area. However, the density of neighborhoods 1 and 2 cannot be met. Therefore, this is a significant impact.
4.2 (Mead Valley Area Plan)	Impact Analysis 4.2.13	Future development facilitated by the project could expose sensitive receptors to noise levels in excess of the Riverside County noise standards. This is a significant impact.
4.2 (Mead Valley Area Plan)	Impact Analysis 4.2.16	Future development could result in an increase in population and housing growth beyond conditions anticipated for buildout of the neighborhood sites. This is a significant impact.
4.2 (Mead Valley Area Plan)	Impact Analysis 4.2.21	The proposed increase in density/intensity potential on the neighborhood sites would increase traffic volumes on several roadway segments within the Mead Valley Area Plan planning area that are already projected to operate at an unacceptable level under buildout of the General Plan. This is a significant impact.

Section	Impact Analysis Number	Impact
4.3 (Temescal Canyon Area Plan)	Impact Analysis 4.3.10	Future development facilitated by the project could expose sensitive receptors to noise levels in excess of the Riverside County noise standards. This is a significant impact.
4.3 (Temescal Canyon Area Plan)	Impact Analysis 4.3.12	Future development could result in an increase in population and housing growth beyond conditions anticipated for buildout of the neighborhood sites. This is a significant impact.
4.3 (Temescal Canyon Area Plan)	Impact Analysis 4.3.17	The proposed increase in density/intensity potential on the neighborhood sites would increase traffic volumes on two roadway segments in the Temescal Canyon Area Plan planning area that is already projected to operate at an unacceptable level under buildout of the General Plan (Indiana Avenue and McKinley Street). This is a significant impact.
4.4 (Highgrove Area Plan)	Impact Analysis 4.4.11	Future development facilitated by the project could expose sensitive receptors to noise levels in excess of the Riverside County noise standards. This is a significant impact.
4.4 (Highgrove Area Plan)	Impact Analysis 4.4.19	The proposed increase in density/intensity potential on the neighborhood sites would increase traffic volumes on two roadway segments within the Highgrove Area Plan planning area that are already projected to operate at an unacceptable level under buildout of the General Plan. This is a significant impact.
4.4 (Highgrove Area Plan)	Impact Analysis 4.4.14	Future development could result in an increase in population and housing growth beyond conditions anticipated for buildout of the neighborhood sites. This is a significant impact.
4.4 (Highgrove Area Plan)	Impact Analysis 4.4.20	County regulation of the construction of septic tanks in future development resulting from the project would ensure both adequate capacity for wastewater treatment and the protection of water quality consistent with all applicable wastewater treatment requirements; however, the feasibility of such systems is dependent on the specifics of the development proposal and property-specific conditions that cannot be determined at this time. Therefore, this impact would be significant .
4.5 (Harvest Valley/Winchester Area Plan)	Impact Analysis 4.5.11	Future development facilitated by the project could result in an increase in ambient noise levels in the vicinity, as well as exposure of sensitive receptors to noise levels in excess of the Riverside County noise standards. The proposed project could result in groundborne noise vibrations and potentially result in temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. This is a significant impact.
4.5 (Harvest Valley/Winchester Area Plan)	Impact Analysis 4.5.13	Future development could result in an increase in population and housing growth beyond conditions anticipated for buildout of the neighborhood sites under the current land use designations. This is a significant impact.
4.5 (Harvest Valley/Winchester Area Plan)	Impact Analysis 4.5.18	The proposed increase in density/intensity potential on the neighborhood sites would increase traffic volumes on five roadway segments within the Harvest Valley and Winchester Area Plan planning area that are already projected to operate at an unacceptable level under buildout of the General Plan. This is a significant impact.
4.5 (Harvest Valley/Winchester Area Plan)	Impact Analysis 4.5.19	Future development would require construction of an individual or community on-site wastewater treatment system (OWTS) or alternative system, the feasibility of which is uncertain. Therefore, this impact is significant .
4.6 (Southwest Area Plan)	Impact Analysis 4.6.12	Future development facilitated by the project could expose sensitive receptors to noise levels in excess of the Riverside County noise standards. This is a significant impact.

5.0 ALTERNATIVES

Section	Impact Analysis Number	Impact
4.6 (Southwest Area Plan)	Impact Analysis 4.6.20	The proposed increase in density/intensity potential on the neighborhood sites would increase traffic volumes on one roadway segment within the Southwest Area Plan planning area that is already projected to operate at an unacceptable level under buildout of the General Plan (Clinton Keith Road). This is a significant impact.
4.7 (Western Coachella Valley Area Plan)	Impact Analysis 4.7.10	Future development facilitated by the project could expose sensitive receptors to noise levels in excess of the Riverside County noise standards. This is a significant impact.
4.7 (Western Coachella Valley Area Plan)	Impact Analysis 4.7.12	Future development could result in an increase in population and housing growth beyond conditions anticipated for buildout of the neighborhood sites under the current land use designations. This is a significant impact.
4.7 (Western Coachella Valley Area Plan)	Impact Analysis 4.7.17	The proposed increase in density/intensity potential on the neighborhood sites would increase traffic volumes on seven roadway segments within the Western Coachella Valley Area Plan planning area that are already projected to operate at an unacceptable level under buildout of the General Plan. This is a significant impact.
4.7 (Western Coachella Valley Area Plan)	Impact Analysis 4.7.19	Implementation of the proposed project will increase the amount of allowable development in the Western Coachella Valley Area planning area, thereby increasing demand for water supply that could result in significant effects on the physical environment. This is considered a significant impact.
4.8 (Eastern Coachella Valley Area Plan)	Impact Analysis 4.8.6	The proposed project would rezone approximately 525 acres of land in the Mecca Town Center and Oasis Town Center communities that are currently designated/zoned for agricultural uses. This is a significant impact.
4.8 (Eastern Coachella Valley Area Plan)	Impact Analysis 4.8.13	Future development facilitated by the project could expose sensitive receptors to noise levels in excess of the Riverside County noise standards. This is a significant impact.
4.8 (Eastern Coachella Valley Area Plan)	Impact Analysis 4.8.15	Future development of the neighborhood sites could result in an increase in population and housing growth beyond conditions anticipated for buildout of the neighborhood sites under the current land use designations. This is a significant impact.
4.8 (Eastern Coachella Valley Area Plan)	Impact Analysis 4.8.20	The proposed increase in density/intensity potential on the neighborhood sites would result in three roadway segments within the Eastern Coachella Valley Area Plan planning area operating at LOS E or F as a result of project-related traffic volumes. This is a significant impact.
4.9 (Lakeview/Nuevo Area Plan)	Impact Analysis 4.9.12	Future development facilitated by the project could expose sensitive receptors to noise levels in excess of the Riverside County noise standards. This is a significant impact.
4.9 (Lakeview/Nuevo Area Plan)	Impact Analysis 4.9.15	Future development of the neighborhood sites could result in an increase in population and housing growth beyond conditions anticipated for buildout of the neighborhood sites under the current land use designations. This is a significant impact.
4.9 (Lakeview/Nuevo Area Plan)	Impact Analysis 4.9.20	The proposed increase in density/intensity potential on the neighborhood sites would increase traffic volumes on three roadway segments within the Lakeview/Nuevo Area Plan planning area that are already projected to operate at an unacceptable level under buildout of the General Plan. This is a significant impact.
4.9 (Lakeview/Nuevo Area Plan)	Impact Analysis 4.9.22	Implementation of the proposed project will increase the amount of allowable development in the Lakeview and Nuevo Area planning area, thereby increasing demand for water supply that could result in significant effects on the physical environment. This is considered a significant impact.
4.10 (The Pass Area Plan)	Impact Analysis 4.10.9	Future development facilitated by the project could expose sensitive receptors to noise levels in excess of the Riverside County noise standards. This is a significant impact.

Section	Impact Analysis Number	Impact
4.10 (The Pass Area Plan)	Impact Analysis 4.10.11	Future development of the neighborhood sites could result in an increase in population and housing growth beyond conditions anticipated for buildout of the neighborhood sites under the current land use designations. This is a significant impact.
4.10 (The Pass Area Plan)	Impact Analysis 4.10.16	The proposed increase in density/intensity potential on the neighborhood sites would increase traffic volumes on one roadway segment in The Pass Area Plan planning area that is already projected to operate at an unacceptable level under buildout of the General Plan (Bonita Avenue). This is a significant impact.
4.10 (The Pass Area Plan)	Impact Analysis 4.10.17	Future development would require construction of an individual or community on-site wastewater treatment system (OWTS) or alternative system, the feasibility of which is uncertain. This is a significant impact.
4.10 (The Pass Area Plan)	Impact Analysis 4.10.18	Adequate water supplies for all potential future development associated with the project cannot be assured at this time given the lack of information regarding the safe yield and hydrology of the Cabazon Basin. This is a significant impact.

Similar to the countywide impacts shown in Table 5.1, the Area Plan significant impacts can be summarized by common issue as shown in Table 5.3.

**TABLE 5.3
SUMMARY OF SIGNIFICANT IMPACT ISSUES TO AREA PLANS**

EIR Chapter & Area Plan	Noise	Traffic	Population Housing	Sewer	Water	Agriculture	MARB Land Use
4.1 Elsinore	X	X					
4.2 Mead Valley	X	X	X				X
4.3 Temescal Canyon	X	X	X				
4.4 Highgrove	X	X	X	X			
4.5 Harvest Valley/Winchester	X	X	X	X			
4.6 Southwest	X	X					
4.7 Western Coachella Valley	X	X	X		X		
4.8 Eastern Coachella Valley	X	X	X			X	
4.9 Lakeview/Nuevo	X	X	X		X		
4.10 The Pass	X	X	X	X	X		

5.0 ALTERNATIVES

Noise

The identified noise impacts associated with each Area Plan reflect the impacts of construction and then occupancy of units assumed in this EIR. The increase in traffic will result in more road noise in areas that are often very quiet and rural. This type of impact is project- and location-specific, and typically results in noise mitigation such as sound walls and additional insulation. Without a specific development project it is not possible to determine if any of the standard measures would be effective or even if the noise impact would be significant. The determination of the level of impact would be made at the time of application for a development project as part of the environmental review. However, as existing homes and businesses need access to local roadways, there would be gaps in any noise barrier which would reduce its effectiveness. As retrofitting existing buildings to add noise mitigation may not be feasible, the EIR concludes that the proposed project may result in an increase in ambient noise that cannot be mitigated.

Alternatives would include a reduction in density; however, this would not meet the state direction of 30 units to the acre. Another alternative would be to further distribute the land throughout the County, resulting in less incremental increase in traffic at any one location. Spreading out the potential development would move the development potential away from the Area Plans. However, as the Area Plans serve as community and services focal points, it is likely that development in the region would travel to the Area Plan, thus resulting in the same concentration of traffic and associated increase in ambient noise.

Traffic

Traffic impacts are analyzed based on a cumulative analysis that assumes buildout of the General Plan as well as the maximum potential units for each of the affected parcels. While theoretically possible, full buildout is a mathematical construct and not likely to occur. However, as noted in the EIR, several of the existing roadways would experience an increase in delay that would worsen the projected levels of service that are already determined to be significant and unavoidable in the General Plan EIR. Alternatives that could reduce this impact include:

- *Reducing the Number of Potential Dwelling Units.* The potential for dwelling unit reduction was designed into the project by designating more land than was necessary to meet the County RHNA obligation. Fewer units would reduce traffic throughout the County which would reduce but not eliminate the impact on regional roadways. It is anticipated that one or more parcels, and thereby the potential dwelling units, will be removed from the project as part of the public review and approval process.
- *Local Roadway Capacity Improvements.* As each project is submitted for review, the existing development review process requires an assessment of traffic. Project-specific mitigation ranging from roadway widening to intersection modification and even new road construction would be determined in conjunction with review of the individual project. The proposed project is not sufficiently detailed to establish individual project improvement requirements for local roadways.
- *Widening Roadways.* The analysis for expansion of roadway capacity is done at the project level as part of the traffic impact analysis. This EIR assumes and evaluates buildout, but does not recommend widening roadways to address potential traffic.
- *Reducing Vehicle Miles Traveled.* The proposed project includes an ordinance to implement the existing mixed-use provisions of the General Plan. The proposed project expands the mixed-use areas to accommodate both residential and commercial uses.

This was done in an attempt to encourage retail and professional services near the planned residences to help reduce the need to travel. The increase in density in each of the Area Plans is also hoped to result in a larger local market which could further reduce the need to travel. The availability of existing service areas was a factor in selecting sites for the proposed project.

Population & Housing

There is no adopted threshold for population increase. This EIR applied mathematical assumptions for building and occupancy to determine potential population changes resulting from the proposed project. These assumptions resulted in a total 'potential' population increase of 240,805 residents countywide. This figure assumes full buildout of all land to the maximum potential building density which is not likely to occur due to site constraints (e.g., slope, soils, wetlands) or service constraints (e.g., water, wastewater).

The EIR used the same buildout assumptions to calculate the population increase for each Area Plan. Where the increase was 10 percent or more above the existing estimate, the EIR concluded that the impact was significant and unavoidable. In selecting properties for the proposed project, the County assumed that some of the parcels would be eliminated as part of the public review and consideration process and therefore designated more land than was necessary to meet the RHNA numbers. While a reduction in parcels is probable, the number can only be reduced to a point where the RHNA obligation of 12,044 extremely low, very low, and low units is met. Reduction in unit count or density is the only alternative that would address this potential impact.

5.4 ALTERNATIVES DESCRIPTIONS AND ANALYSIS

DESCRIPTION OF PROJECT ALTERNATIVES

Alternative 1: No Project

CEQA Guidelines Section 15126.6(e) requires that a No Project alternative be evaluated in an EIR. The No Project analysis must discuss the circumstance under which the project does not proceed. The comparison is that of the proposed project versus what can reasonably be expected to occur on the properties should the proposed project not be approved. The analysis allows decision-makers to compare the impacts of approving the project with the impacts of not approving the project (CEQA Guidelines Section 15126.6(e)(3)(B)).

Future development allowed under the 2013–2021 Housing Element update would cumulatively result in the capacity for up to 73,254 more dwelling units and 240,805 more people in Riverside County in comparison to the development capacity without the 2013–2021 Housing Element. The No Project Alternative assumes that the 2013–2021 Housing Element update is not adopted. In addition, the proposed changes to the Land Use Element and Ordinance No. 348, and the redesignation and rezoning of specific sites throughout the unincorporated County, would not occur. Accordingly, Alternative 1 can also be said to represent the "status quo." However, the status quo in this case equates to the continual lack of accommodation of the previous 2006–2013 RHNA, as well as not accommodating the most recent, 2014–2021 RHNA. This is in conflict with Government Code Section 65583 requirements that jurisdictions evaluate their housing elements every eight years to determine their effectiveness in achieving county and state housing goals and objectives, and adopt an updated housing element reflecting the results of this evaluation.

5.0 ALTERNATIVES

ANALYSIS OF ALTERNATIVES

The project alternatives are evaluated in less detail than those of the proposed project, and the impacts are described in terms of difference in outcome compared with implementing the proposed project. **Table 5.4** at the end of this section provides an at-a-glance comparison of the environmental benefits and impacts of each alternative.

Comparative Impacts of Alternative 1: No Project

1. Air Quality

The air quality analysis for the proposed project identified that subsequent land use activities associated with the project could conflict with the South Coast Air Quality Management District's (SCAQMD) 2012 Air Quality Management Plan and result in short- and long-term emissions that could substantially contribute to the violation of federal and state standards for ozone and particulate matter at levels that are considered significant and unavoidable and cumulatively considerable. Under Alternative 1, the 4,972 acres of land identified for a change of land use designation and zone classification to Highest Density Residential and Mixed Use Area could be developed in accordance with the existing zoning and land use designations for the sites, which provide for less intense development of these sites (see **Table 3.13-4** in Section 3.0, Countywide Impact Analysis).

Buildout capacity under Alternative 1, which is defined by the currently adopted General Plan, currently exceeds Southern California Association of Governments' (SCAG) growth forecasts, which informs the 2012 Air Quality Management Plan's air pollutant inventory for the South Coast Air Basin. Therefore, Alternative 1 would conflict with the SCAQMD's 2012 Air Quality Management Plan. The increase in development potential allowed under the proposed project would further exceed SCAG growth forecasts and thus the 2012 Air Quality Management Plan. Therefore, Alternative 1 would result in a lesser degree of impact to SCAQMD's air quality planning.

Alternative 1 would likely have less construction activities and development, which would result in less short-term construction emissions and long-term operational and mobile source emissions. Therefore, Alternative 1 would result in a lesser degree of air quality impacts than the proposed project.

2. Hydrology and Water Quality

The proposed project could result in increased water demand leading to groundwater extractions cumulatively exceeding groundwater basins' safe yields or causing a net deficit in aquifer volume. Alternative 1 would result in less housing development and land disturbance potential than the proposed project, which would reduce the demand for water and thus the amount of groundwater extraction. While it is uncertain exactly what portion of the water supply for future development would be provided by groundwater, as the source of the water supply (groundwater, surface water, recycled water, imported water, etc.) would vary depending on the ultimate timing and location of development, the greatly reduced amount of residential development potential under Alternative 1 would most likely result in a lesser degree of impact to groundwater resources than the proposed project.

3. Noise

The noise analysis for the proposed project identified that subsequent land use activities associated with the project could result in short- and long-term noise levels that exceed County noise standards. In most cases it can be assumed that future construction activities will be exempted from County noise standards since most construction occurs within the set of established hours that the County has identified as specifically exempted. However, the timing of all future construction projects cannot be guaranteed and it is possible that construction noise would be generated outside of exempted hours. The same would be true under Alternative 1. Therefore, short-term noise level impacts would be the same under Alternative 1 and the proposed project.

The noise analysis for the proposed project identified that predicted increases in traffic noise levels associated with buildout of the proposed Housing Element update would not be greater than the appropriate noise level thresholds, with the exception of traffic noise levels at the State Route (SR) 111 segment between 65th Avenue and 68th Avenue, which traverses the community of Mecca. As previously described, for new development instigated by the proposed project, it is anticipated that Riverside County standards could be met and substantial noise impacts could be avoided by incorporating appropriate mitigation strategies which would reduce potential impacts to less than significant levels. However, for existing noise-sensitive uses located in areas adjacent to SR 111 between 65th and 68th Avenues, it may not be possible or feasible to include noise reduction strategies to address noise impacts. Alternative 1 would likely have less development, which would result in less traffic-generated noise levels at the SR 111 segment between 65th Avenue and 68th Avenue. Therefore, Alternative 1 would result in a lesser degree of long-term noise impacts than the proposed project.

4. Population and Housing

The proposed project would result in significant and unavoidable impacts to population and housing. The increase in population associated with Alternative 1 would be lower, and the alternative would not result in the displacement of people or housing. Therefore, Alternative 1 would result in lesser population and housing impacts than the proposed project.

5. Utilities and Service Systems

The proposed project would result in an increase in population and housing, which would increase the demand for water. In the absence of definitive identification of future water supplies for buildout associated with the project, potential impacts associated with water supply and demand must be considered cumulatively considerable and significant and unavoidable. Alternative 1 would result in less population and housing, which would decrease the demand for water compared to the proposed project. Therefore, Alternative 1 would result in a lesser degree of impact utilities and service systems.

Alternative 2: Remove All Lands Designated for Agricultural Land Use

The proposed project would rezone approximately 525 acres of land in the Eastern Coachella Valley Area Plan that are currently both designated and zoned for agriculture uses. Of those, approximately 472 acres are Prime Farmland, with the remaining 52 acres being a mixture of Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, Urban and Built-Up Land, and lands designated as 'Other' lands. While other property may be similarly designated, the existing General Plan and the previous General Plan designated the properties for development and made findings of overriding considerations addressing the conversion of

5.0 ALTERNATIVES

agricultural land to nonagricultural purposes. The proposed project would add an additional 131.48 acres of agricultural land that was not previously designated for development. This additional agricultural land conversion is considered a significant and unavoidable impact. Alternative 2 would eliminate the significant impact by removing the 131.48 acres identified for redesignation to nonagricultural purposes.

The reduction of 131.48 acres would result in the potential for 4,154 fewer housing units and 19,418 fewer residents than shown in Table 4.8-8 of this EIR. This is a reduction of approximately 17 percent from the potential units and population estimated.

Comparative Impacts of Alternative 2: Remove All Lands Designated for Agricultural Use

1. Agricultural Resources

The proposed project focused on increasing the density and intensity of lands that were already designated for development in the current and previous General Plans. These lands had previously been considered by the County for conversion from agricultural use to nonagricultural use and findings were made during certification of EIR 521. The proposed project was amended to include 131.48 acres in Eastern Coachella Area Plan that had not been considered for conversion to nonagricultural use in the General Plan. As a result, the EIR concluded that the conversion of the land constituted a significant and unavoidable impact.

Alternative 2 would remove the 131.48 acres from the proposed project which would eliminate the significant and unavoidable impact. In this regard, Alternative 2 would have a less of an impact on agricultural resources than the proposed project.

2. Air Quality

The air quality analysis for the proposed project identified that subsequent land use activities associated with the project could conflict with the SCAQMD's 2012 Air Quality Management Plan and result in short- and long-term emissions that could substantially contribute to the violation of federal and state standards for ozone and particulate matter at levels that are considered significant and unavoidable and cumulatively considerable. Under Alternative 2, the 4,972 acres of land identified for a change of land use designation and zone classification to Highest Density Residential and Mixed Use Area would be reduced by approximately 131.48 acres. The land would continue to be used for agriculture, and would not be anticipated for development.

The reduction of 131.48 acres from the total of 4,972 acres of land intended for rezoning as part of the proposed project represents a decrease of approximately 3 percent. Alternative 2 would therefore have slightly less construction activities and development and result in less short-term construction emissions and long-term operational and mobile source emissions. Overall, Alternative 2 would result in similar air quality impacts to the proposed project.

3. Hydrology and Water Quality

The proposed project could result in increased water demand leading to groundwater extractions cumulatively exceeding groundwater basins' safe yields or causing a net deficit in aquifer volume. Alternative 2 would result in less housing development and land disturbance potential than the proposed project, which would reduce the demand for water and thus the amount of groundwater extraction. While it is uncertain exactly what portion of the water supply for future development would be provided by groundwater, as the source of the water supply (groundwater, surface water, recycled water, imported water, etc.) would vary depending on

the ultimate timing and location of development, the reduced amount of residential development potential under Alternative 2 would most likely result in less of an impact to groundwater resources than the proposed project.

4. Noise

The noise analysis for the proposed project identified that subsequent land use activities associated with the project could result in short- and long-term noise levels that exceed County noise standards. In most cases it can be assumed that future construction activities will be exempted from County noise standards since most construction occurs within the set of established hours that the County has identified as specifically exempted. However, the timing of all future construction projects cannot be guaranteed and it is possible that construction noise would be generated outside of exempted hours. The reduction in the potential housing units would result in less development which would reduce the potential for noise impacts. Noise impacts associated with the remainder of the proposed project would remain unchanged; however, because there would be fewer homes and less traffic, Alternative 2 would result in lower long-term noise impacts than the proposed project.

5. Population and Housing

The proposed project would result in significant and unavoidable impacts to population and housing in the Eastern Coachella Area Plan. The reduction in population associated with Alternative 2 is approximately 19,416. The RHNA as shown in **Table 2.1-2** of Section 2.0 Project Description, requires 23,794 low- and very low-income housing units. As noted in this EIR, this type of housing is assumed when the development density is 30 units per acre consistent with the Highest Density Residential land use designation. Alternative 2 would reduce the potential housing units at this density by 4,155. As shown in **Table 3.13-4**, the proposed project could result in 73,255 housing units. After the reduction associated with this alternative, the potential would be 69,100 housing units which represents a reduction of approximately 6 percent. As the remaining potential housing units at 30 units to the acre remains above the required RHNA target, this alternative would be consistent with the project objective. Therefore, Alternative 2 would result in less impact to population and housing than the proposed project.

5. Utilities and Service Systems

The proposed project would result in an increase in population and housing, which would increase the demand for water. In the absence of definitive identification of future water supplies for buildout associated with the project, potential impacts associated with water supply and demand must be considered cumulatively considerable and significant and unavoidable. Alternative 2 would result in less population and housing, which would decrease the demand for water compared to the proposed project. Therefore, Alternative 2 would result in less of an impact to utilities and service systems.

Alternative 3: Remove HHDR on All Lands Affected by MARB Land Use

On August 17, 2015, the County received a letter from Edward Cooper from the Riverside County Airport Land Use Commission (ALUC). This letter states that the 50 percent Highest Density Residential (HHDR) for both Neighborhoods 1 and 2 are inconsistent with the provisions of the 2014 March Air Reserve Base/Inland Port ALUC Plan. According to the plan, these neighborhoods are located in Airport Compatibility Zone C2, where residential densities are limited to a maximum of six dwelling units per acre. Further, because these neighborhoods are within an airport compatibility zone, they are subject to mandatory ALUC review. The only alternative that would

5.0 ALTERNATIVES

address this potential impact is to reduce density to six dwellings per acre. The two neighborhoods total approximately 88 acres and with a 50 percent proposed HHDR designation represent a potential for 1,320 housing units. Housing could still be permitted in the area subject to the six or fewer units per acre restriction of the Airport Compatibility Zone C-2; however, at this density, the housing would be considered market rate.

Comparative Impacts of Alternative 3: Remove HHDR on All land Affected by MARB Land Use.

1. Air Quality

The air quality analysis for the proposed project identified that subsequent land use activities associated with the project could conflict with the SCAQMD's 2012 Air Quality Management Plan and result in short- and long-term emissions that could substantially contribute to the violation of federal and state standards for ozone and particulate matter at levels that are considered significant and unavoidable and cumulatively considerable. Under Alternative 3, the land within the March Air Reserve Base Airport Compatibility Zone could still be developed, albeit at a lower density. As the land would still be subject to grading, pavement, and construction, the air quality impacts would be similar to those of the proposed project. The reduction in density would result in fewer residents and therefore less traffic, which would result in air quality impacts less than those of the proposed project.

2. Hazards and Hazardous Materials

Alternative 3 would remove the HHDR expectation for the two neighborhoods, which would eliminate any conflict with the Airport Land Use Compatibility Plan. The land is currently designated Business Park which does not anticipate the construction of housing. Alternative 3 would reduce the current significant and unavoidable impact conclusion of the EIR to no impact.

3. Hydrology and Water Quality

The proposed project could result in increased water demand leading to groundwater extractions cumulatively exceeding groundwater basins' safe yields or causing a net deficit in aquifer volume. Alternative 3 would result in fewer homes than the proposed project, which would reduce the demand for water and thus the amount of groundwater extraction. While it is uncertain exactly what portion of the water supply for future development would be provided by groundwater, as the source of the water supply (groundwater, surface water, recycled water, imported water, etc.) would vary depending on the ultimate timing and location of development, the reduced amount of residential development potential under Alternative 3 would most likely result in less of an impact to groundwater resources than the proposed project.

4. Noise

The noise analysis for the proposed project identified that subsequent land use activities associated with the project could result in short- and long-term noise levels that exceed County noise standards. In most cases it can be assumed that future construction activities will be exempted from County noise standards since most construction occurs within the set of established hours that the County has identified as specifically exempted. However, the timing of all future construction projects cannot be guaranteed and it is possible that construction noise would be generated outside of exempted hours. The reduction in the potential housing units would result in less development which would reduce the potential for noise impacts. Noise impacts associated with the remainder of the proposed project would remain unchanged; however, Alternative 3 would result in lower long-term noise impacts than the proposed project.

5. Population and Housing

The proposed project would result in significant and unavoidable impacts to population and housing in the Mead Area Plan. The reduction in population associated with Alternative 3 is approximately 6,170. The RHNA as shown in **Table 2.1-2** requires 23,794 low- and very low-income housing units. As noted in this EIR, this type of housing is assumed when the development density is 30 units per acre consistent with the Highest Density Residential land use designation. Alternative 3 would reduce the potential units at this density by 1,320. As shown in **Table 3.13-4**, the proposed project could result in 73,255 housing units. After the reduction associated with this alternative, the potential would be 71,935 housing units, which represents a reduction of approximately 2 percent. As the remaining potential housing units are in excess of the required RHNA target, this alternative would be consistent with the project objectives. Therefore, Alternative 3 would result in less population and housing impact than the proposed project.

6. Traffic

The addition of housing density in the Mead Area Plan would increase impacts to local roadways and reduce the projected level of service. Alternative 3 would reduce the potential for traffic impacts associated with housing units when compared to the proposed project. Alternative 3 would have less of an impact on local traffic.

7. Utilities and Service Systems

The proposed project would result in an increase in population and housing, which would increase the demand for water. In the absence of definitive identification of future water supplies for buildout associated with the project, potential impacts associated with water supply and demand must be considered cumulatively considerable and significant and unavoidable. Alternative 3 would result in less population and housing, which would decrease the demand for water compared to the proposed project. Therefore, Alternative 3 would result in less of an impact to utilities and service systems.

Combined Alternative 2 and Alternative 3

Both Alternatives 2 and 3 reduce the potential for housing in areas to either avoid new conversion of agricultural land to nonagricultural purposes or to avoid conflicting with an airport land use plan. The proposed project could result in 73,255 housing units. If both Alternatives 2 and 3 were selected, the reduction of potential housing units would total 5,475, resulting in a total of 67,780, which represents a reduction of approximately 8 percent. The reduced potential housing units is more than the 23,794 housing unit obligation, which would allow both alternatives to be selected and still meet the project objectives.

5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Table 5.4 provides a summary of the potential impacts of the alternatives evaluated in this section, as compared with the potential impacts of the proposed project. The No Project Alternative would eliminate all of the environmental impacts associated with the proposed project, but would meet none of the project objectives. Both Alternative 2 and Alternative 3 meet the project objectives, and do not significantly reduce the number of potential housing units. Alternative 2 could provide housing that would benefit farmworkers in the Coachella Valley, and would not significantly reduce the amount of available agricultural land. While Alternative 3 has the potential to reduce vehicle miles traveled by placing housing near employment centers in the Business Park, Light Industrial land uses, and near the Interstate 215 transportation corridor, the housing is in conflict

5.0 ALTERNATIVES

with the March Air Reserve Base Land Use Compatibility Plan and could constitute a hazard. Therefore, Alternative 3 is considered the environmentally superior alternative.

**TABLE 5.4
ALTERNATIVES IMPACTS COMPARISON**

Environmental Issue	Proposed Project Impact Finding (Mitigated)	Alternative 1: No Project	Alternative 2: No Ag Land	Alternative 3: Outside Airport
Agriculture	Significant and Unavoidable	-	-	=
Air Quality	Significant and Unavoidable	-	-	-
Hazards	Significant and Unavoidable	-	=	-
Hydrology and Water Quality	Significant and Unavoidable	-	-	-
Noise	Significant and Unavoidable	-	=	-
Population and Housing	Significant and Unavoidable	-	-	-
Traffic	Significant and Unavoidable	-	-	-
Utilities and Service Systems	Significant and Unavoidable	-	-	-

- Impacts less than those under proposed project

+ Impacts greater than those under proposed project

= Impacts similar to those of the proposed project