SECTION 6: ALTERNATIVES TO THE PROPOSED PROJECT

6.1 - Introduction

In accordance with State CEQA Guidelines Section 15126.6, this Recirculated Draft EIR (RDEIR) contains a comparative impact assessment of alternatives to the project. The primary purpose of this section is to provide decision makers and the public with a reasonable range of feasible project alternatives that could attain most of the basic project objectives, but would avoid or substantially lessen any of the significant effects of the project. Important considerations for analysis of these alternatives are noted below (as stated in State CEQA Guidelines Section 15126.6):

- An EIR need not consider every conceivable alternative to a project;
- An EIR should identify alternatives that were considered by the lead agency, but rejected as infeasible during the scoping process;
- Reasons for rejecting an alternative include:
  - Failure to meet most of the basic project objectives;
  - Infeasibility; or
  - Inability to avoid significant environmental effects.

Alternatives to a project must be considered even if they would impede, to some degree, the attainment of project objectives or be more costly (State CEQA Guidelines Section 15126.6(b)). However, the range of alternatives addressed in an EIR need not be exhaustive, and is governed by a “rule of reason,” which requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. Of the alternatives considered, the EIR need examine in detail only those that the lead agency determines could feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project. An EIR need not consider an alternative whose effects cannot be reasonably ascertained, whose implementation is remote and speculative, or an alternative that would not substantially lessen or avoid the significant effects of the project. State CEQA Guidelines Section 15126.6(d) states that if an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternatives shall be discussed, but “in less detail than the significant effects of the project as proposed.”

State CEQA Guidelines Section 15364 defines “feasibility” as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.” The determination of the feasibility of project alternatives may include, but is not limited to, factors such as: site suitability, economic viability, infrastructure availability, general plan consistency, regulatory and jurisdictional limitations, and whether the project proponent can reasonably acquire, control or otherwise have access to an alternative project site (State CEQA Guidelines Section 15126.6(f)(1)).
A comparison of impacts associated with the project and alternatives is provided within this Section. In several cases, the description and severity of the impact may be the same under each scenario when compared with the CEQA Thresholds of Significance (i.e., both scenarios would result in a “less than significant” impact). However, the actual degree of impact may be slightly different under each scenario, and this relative difference is the basis for a conclusion of greater or lesser impacts. In addition, the alternatives analysis includes the assumption that all applicable mitigation measures associated with the project would be implemented with a given project alternative (e.g. Reduced Intensity Alternative).

An evaluation of a No Project Alternative is required by State CEQA Guidelines Section 15126.6(e), and is included in this section. Both a No Project—No Build Alternative, and a No Project Cherry Valley Gateway Specific Plan (CVGPA SP) Build Alternative, consistent with the General Plan, are evaluated. In addition to the No Project Alternative, a reasonable range of alternatives are analyzed and compared with the project. Alternatives evaluated in detail include:

1. No Project—No Build Alternative
2. No Project—Cherry Valley Gateway Specific Plan (CVGPA SP)
3. Residential Alternative
4. Reduced Intensity Alternative
5. Mixed Use/Business Park Alternative

An alternative would be considered environmentally superior to the project if it would result in fewer or less significant environmental impacts. As required by the State CEQA Guidelines, an environmentally superior alternative has been identified among the alternatives evaluated in this RDEIR, and is discussed in Section 6.6, Environmentally Superior Alternative.

6.1.1 - Alternatives Considered but Rejected

Alternative Site Location

The project applicant attempted to identify other suitable sites for the project along the I-10 Freeway, within the general vicinity of the project site and within the control of the County. Key considerations for site selection include adequate acreage, the extent to which the site can be served by existing infrastructure, the site’s proximity to the freeway, and other considerations such as access, truck routes and proximity to sensitive uses. The use of an alternative project site was not considered feasible, because no other sites are owned or controlled by the project applicant, and no other site was deemed sufficient to support the project, based on the above considerations, including size, configuration, and accessibility to the I-10 Freeway.

In addition, even if it were feasible to use an alternative site, doing so would not reduce the project’s significant adverse and unavoidable impacts identified below in Section 6.1.2, Significant, Adverse and Unavoidable Impacts. Specifically, air quality impacts under an alternative site scenario would be similar to the project, since both scenarios would involve grading and new construction of over two million square feet of building area. Likewise, cumulative traffic impacts to the I-10 Freeway would be similar to the project, due to the increase in truck trips that would occur. Accordingly, an Alternative Site Location was rejected from further consideration.
Original 2.5 Million Square-feet Warehouse Alternative

The project applicant originally proposed a two building warehouse project totaling 2.5 million square feet, consistent with the Notice of Preparation published April 24, 2013. During preparation of the RDEIR, the project applicant received feedback from the County of Riverside on preliminary plans, application documents, technical reports, and administrative drafts of the RDEIR. Two scoping meetings were held to obtain comments on the scope of the evaluation for the RDEIR. In addition, several community meetings regarding the project were held. Collectively, this information provided constructive feedback regarding initial County comments, preliminary understanding of the project environmental impacts, and both local and generalized sentiment regarding the project by the public. Based on consideration of these collective inputs, the applicant elected to redesign the project to reduce environmental impacts, improve project compatibility, and increase amenities, while still providing a feasible project that meets project objectives and is economically feasible.

Compared with the original project, the current project would provide a little over 1.8 million square feet of warehouse and office space, a reduction of approximately 700,000 square feet or 28 percent. Reduction of the warehouse sizing in the current project would have proportionate reduction in truck trips, reducing both truck traffic related impacts and truck related diesel emissions, compared with the Original 2.5 Million Square-feet Warehouse Alternative. Similarly, less warehouse space would require less energy use for lighting, cooling/heating, and equipment use internal and external to the warehouse. Thus, energy consumption related would be reduced in the current project, compared with the Original 2.5 Million Square-feet Warehouse Alternative. The smaller building size has allowed for an increase in the project setback, facilitated the inclusion of on-site riparian mitigation that was not previously feasible, facilitated the inclusion of a trail along the project frontage, and allowed for the incorporation of additional aesthetic amenities to improve the compatibility of the project with the existing land use setting. Economic benefits (employment, rents, and tax revenues) of the new project are expected to be reduced proportionate to the reduction in square footage, but the project will still provide economic benefits, and be economically feasible.

Based on the benefits of the new project, the Original 2.5 Million Square-feet Warehouse Alternative has been withdrawn from further consideration by the project applicant, as it would not provide for any meaningful reduction in environmental impacts compared with the proposed project.

6.1.2 - Significant, Adverse and Unavoidable Impacts

The project would result in the following significant unavoidable impacts, even after the imposition of all feasible mitigation measures, for the potential impacts listed below.

Air Quality—With mitigation, the project emissions would exceed SCAQMD regional thresholds for NOx and ROG during operations. The project would also obstruct implementation of the AQMP, because its emissions would exceed the SCAQMD regional significance thresholds, and would thus impede the timely attainment of ambient air quality standards. The project would also result in a cumulatively considerable net increase in ozone, a criteria pollutant, because regional significance thresholds for ROG and NOx (both ozone precursors), are exceeded.
Traffic—The following scenarios and intersections/ramps are considered to be significantly impacted under cumulative conditions:

Local Intersections
The project would contribute to unacceptable LOS at the following intersections under Existing Plus Ambient Plus Project Plus Cumulative (2018) conditions:

1A. Roberts Road/Cherry Valley Boulevard (AM and PM Peak Hours) LOS F 
3. Calimesa Boulevard/Cherry Valley Boulevard (AM and PM Peak Hours) LOS F 
8. Nancy Avenue/Cherry Valley Boulevard (AM Peak Hour only) LOS E

Additionally, the project would result in a cumulatively considerable contribution to the cumulatively significant impacts at the following intersections, which are anticipated to operate at an unacceptable LOS under Horizon Year (2040) without and with Project conditions:

1A. Roberts Road/Cherry Valley Boulevard—(AM and PM Peak Hours) LOS F 
3. Calimesa Boulevard/Cherry Valley Boulevard—(AM and PM Peak Hours) LOS F 
7. Union Street/Cherry Valley Boulevard—(AM and PM Peak Hours) LOS F 
8. Nancy Avenue/Cherry Valley Boulevard—(AM and PM Peak Hours) LOS F 
9. Beaumont Avenue/Cherry Valley Boulevard—(AM and PM Peak Hours) LOS F 
10. Future Beckwith Avenue/Cherry Valley Boulevard—(AM and PM Peak Hours) LOS F

Freeway Ramps
The project would result in a cumulatively significant impact to the following freeway ramps under the Existing Plus Ambient Plus Project (2018), Existing Plus Project Plus Ambient Plus Cumulative (2018) and the Horizon Year (2040) scenarios:

Existing Plus Ambient Plus Project (2018)
1. I-10 EB Ramps/Cherry Valley Boulevard (AM Peak Hours) LOS F 
2. I-10 WB Ramps/Cherry Valley Boulevard (PM Peak Hours) LOS F

1. I-10 EB Ramps/Cherry Valley Boulevard (AM, PM Peak hours) LOS F 
2. I-10 WB Ramps/Cherry Valley Boulevard (AM, PM Peak hours) LOS F

Horizon Year (2040)
These ramp locations are anticipated to operate at an unacceptable LOS under Horizon Year (2040) Without Project conditions; therefore, the project would contribute to this cumulatively significant impact that would exist even without the project under Horizon Year 2040 conditions:

1. I-10 Eastbound Ramps/Cherry Valley Boulevard—(AM, PM Peak hours) LOS F 
2. I-10 Westbound Ramps/Cherry Valley Boulevard—(AM, PM Peak hours) LOS F
Freeway Mainline Segments

There are 19 freeway mainline segments that are currently operating at an unacceptable LOS under existing traffic conditions and are anticipated to continue to operate at unacceptable LOS through Horizon Year (2040) traffic conditions, even without the project. In addition, under Opening Year Cumulative (2018) conditions, the project would result in a worsening of the LOS for an additional six segments, in addition to the 19 segments that currently operate at an unacceptable LOS. As the project is expected to contribute peak-hour trips to the existing deficiencies on the regional state highway system, the project’s incremental contribution to this impact is considered cumulatively significant and unavoidable.

The project would install new traffic signals and other improvements that would significantly increase the capacity of the I-10 at Cherry Valley interchange ramp intersections, such that even with the addition of project traffic, delay and level service will be improved to better than current conditions. However, mitigation may not fully mitigate these impacts, because the County of Riverside and the project applicant have no control over Caltrans right-of-way or City of Calimesa intersection upgrades, and the County has no control over the provision or timing of the improvements specified in the necessary mitigation measures. Other necessary improvements are not fully included within TUMF or DIF fee programs at this time. Therefore, although the project will pay all applicable fair share fees, because the timing is uncertain as to when the necessary improvements would be complete, the project’s incremental contribution is considered cumulatively significant and unavoidable.

6.1.3 - Project Objectives

The project objectives are listed below.

- **OBJ-1**: Provide an industrial park that supports regional warehouse distribution and logistics tenants which benefit from the strategic location located in close proximity to the I-10 Freeway.

- **OBJ-2**: Provide local employment and economic opportunities for residents of Cherry Valley and neighboring cities that would help reduce commute times and associated air pollution, in accordance with Riverside County General Plan Policies LU 8.12, LU 11.1 and AQ 8.2.

- **OBJ-3**: Provide new development that will assist the County in obtaining fiscal balance in the years and decades ahead through increased tax revenues.

- **OBJ-4**: Provide convenient freeway access to trucks that will use warehouse distribution facilities in a manner that limits truck traffic disruption to residential areas within Cherry Valley and neighboring cities.

- **OBJ-5**: Locate industrial uses near existing roadways and freeways to reduce traffic congestion and air pollutant emissions.

- **OBJ-6**: Facilitate goods movement for the benefit of local, regional, statewide and nationwide economic growth.

- **OBJ-7**: Provide for a reasonable return on investment needed to develop the project.
• **OBJ-8**: Create a high-quality design warehouse complex that maximizes the use of a site and promotes the efficient use of land while still providing natural open space consistent with the rural identity of the community.

• **OBJ-9**: Develop and operate a facility supporting regional warehouse distribution and logistics tenants that meets industry standards for operational design criteria.

**6.2 - No Project Alternative—No Build Alternative**

State CEQA Guidelines Section 15126.6(e) requires the discussion and evaluation of a No Project Alternative. The No Project Alternative provides a comparison between the environmental impacts of the project in contrast to the environmental impacts that could result from not approving, or denying, the project. Under the No Project Alternative, the site would remain in its existing condition and no development would occur.

Impacts from the project are compared with the No Project Alternative for each of the 17 topical issue areas discussed in the RDEIR in the sections that follow.

**6.2.1 - Aesthetics**

The RDEIR concluded that with mitigation, aesthetics and light and glare impacts from the project would be reduced to a less than significant level. The No Project Alternative would allow the site to remain in its current underutilized and undeveloped condition. Therefore, the No Project Alternative would have reduced impacts on aesthetics, light, and glare compared with the project, although impacts under the project would be less than significant.

**6.2.2 - Agriculture and Forestry Resources**

Under the No Project Alternative, the site would remain vacant and undeveloped, and there would be no impacts related to agricultural or forestry resources. The RDEIR determined that the project would have less than significant impacts on agricultural resources, and no impacts to forestry resources. Therefore, impacts in these areas under the No Project Alternative would be slightly less than would occur under the project, although impacts under the project would be less than significant.

**6.2.3 - Air Quality**

The No Project Alternative would result in no development on the site, so there would be no air quality impacts from construction or operational emissions. The project would result in a significant, adverse, and unavoidable operational air quality impact, as discussed in Section 6.1.2, Significant, Adverse, and Unavoidable Impacts, which would be avoided under the No Project Alternative.

**6.2.4 - Biological Resources**

The No Project Alternative would leave the site in its largely undeveloped condition, which would allow plant and animal species to continue utilizing the site. Impacts under this alternative to jurisdictional waters of the U.S. and the state would also be avoided entirely. However, impacts from
the project to biological resources were found to be less than significant with mitigation, and the RDEIR concluded that the project would not have significant impacts on biological resources. Therefore, the No Project Alternative would have reduced impacts on biological resources compared with the project, although impacts under the project would be also be less than significant with mitigation.

6.2.5 - Cultural Resources
The No Project Alternative would leave the site in its present condition without disturbing the ground, and there would be no impacts on cultural resources. The RDEIR concluded that the project would not have significant impacts to cultural resources, with mitigation. Therefore, the No Project Alternative would have reduced impacts on cultural resources compared with the project, although impacts under the project would also be less than significant with mitigation.

6.2.6 - Geology and Soils
Under the No Project Alternative, the site would remain in its present state, and there would be no potential impacts to future structures from geotechnical hazards. While the RDEIR determined that implementation of the project would have various geotechnical impacts, they would be reduced to less than significant levels through the implementation of recommended mitigation measures. The No Project Alternative would have reduced impacts on geology and soils compared with the project, although impacts under the project would also be less than significant with mitigation.

6.2.7 - Greenhouse Gas Emissions
Under the No Project Alternative, no new development on the site would occur, and there would be no greenhouse gas impacts from construction or operations on the site. Therefore, the No Project Alternative would result in fewer greenhouse gas emissions than would occur under the project, which were found to be less than significant with mitigation.

6.2.8 - Hazards and Hazardous Materials
Under the No Project Alternative, the site would remain in its present condition, and there would be no increased impacts from hazards or hazardous materials associated with new uses. Implementation of the project would have impacts related to hazardous materials that could potentially be used by various warehouse uses on the site, as well as the potential for accidental spills during construction. However, these potential impacts will be reduced to less than significant levels through compliance with existing laws and regulations regarding hazardous materials, and through implementation of the recommended mitigation measure. Therefore, the No Project Alternative would have reduced impacts related to hazards and hazardous materials compared with the project, although impacts under the project would also be less than significant with mitigation.

6.2.9 - Hydrology and Water Quality
Under the No Project Alternative, the site would remain in its present condition, and there would be no potential impacts to existing drainages or water quality. However, this alternative would not result in improvements to drainage channels and related drainage structures, which would leave the
project site still vulnerable to flooding. The project is not expected to result in any significant impacts to hydrology or water quality with implementation of the planned flood control improvements and recommended mitigation measures, and would actually reduce the site’s vulnerability to flooding hazards. Thus, the project would result in fewer impacts to hydrology and water quality than under the No Project Alternative.

6.2.10 - Land Use and Planning

The site would remain in its present condition under the No Project Alternative, and there would be no impacts with respect to land use or consistency with Southern California Association of Governments (SCAG) Policies. No improvements would be constructed on the parcels located within the City of Calimesa. The RDEIR concluded that the project would not have significant impacts regarding land use or SCAG regional growth policies. Thus, neither the project nor the No Project Alternative would result in impacts to Land Use and Planning.

6.2.11 - Mineral Resources

Mineral resources impacts relate to loss of mineral resources, incompatible land uses and hazards related to quarries/mines. The site would remain undisturbed and in its present condition under the No Project Alternative, so no impacts to mineral resources would occur. The RDEIR found that the project would have a less than significant impact regarding mineral resources. Therefore, the No Project Alternative would have reduced impacts on mineral resources compared with the project, although impacts under the project would also be less than significant.

6.2.12 - Noise

The site would remain in its present undeveloped condition under the No Project Alternative, and no construction noise or operational noise would occur. The RDEIR concluded that with implementation of mitigation measures, the project would have less than significant impacts regarding noise. Although the project would result in an increase in the ambient noise level in the area compared with the No Project Alternative, this impact would be less than significant with mitigation. Therefore, the No Project Alternative would have reduced noise impacts compared with the project, although impacts under the project would also be less than significant with mitigation.

6.2.13 - Population and Housing

The No Project Alternative would leave the site in its present condition, and therefore would not result in increased population, housing, or employment. The RDEIR concluded that the project would also have a less than significant impact regarding population and housing, and would therefore be similar to the No Project Alternative with regard to this impact area.

6.2.14 - Public Services

The No Project Alternative would not involve any new development, and would therefore not result in an increased need for police, fire, schools, or public services. Therefore, this alternative would have fewer impacts compared with the project, which will necessarily result in the need for certain public services. However, the RDEIR determined that with the required payment of development
impact fees for public services, the project would not result in significant impacts to public services or recreation. Therefore, the No Project Alternative would have reduced impacts on public services compared with the project, although impacts under the project would also be less than significant.

6.2.15 - Recreation
The No Project Alternative would not involve any new residential development, and would therefore not result in an increased need for recreation/park services. Therefore, this alternative would have fewer impacts compared with the project. However, the RDEIR determined that with the required payment of development impact fees for recreation/park services, the project would not produce significant impacts to recreation facilities. Therefore, the No Project Alternative would have reduced impacts on recreation facilities compared with the project, although impacts under the project would also be less than significant.

6.2.16 - Transportation and Traffic
The No Project Alternative would allow the site to remain in its present condition, resulting in fewer traffic impacts on local roads and the I-10 Freeway. With the exception of the I-10 Freeway/Cherry Valley Boulevard Ramps, I-10 Mainline Facilities, and five local intersections, the RDEIR determined that the transportation impacts of the project could be reduced to less than significant levels with implementation of the recommended mitigation measures, including on-site road and intersection improvements, a traffic signal, and fair share contributions to off-site intersection and road improvements. Because there are several intersections/facilities that currently operate at unacceptable levels even without the addition of project traffic, the associated improvement programs would not receive funding from the project under the No Project Alternative, thereby reducing the overall funding for such improvements. The No Project Alternative would avoid the significant, adverse, and unavoidable traffic impacts that would occur under the project with respect to the project’s cumulative contributions to the I-10 Freeway segments, I-10 Ramps, and local intersections under 2018 Existing Plus Ambient Plus Project, 2018 Existing Plus Ambient Plus Project Plus Cumulative, and 2040 Horizon Year conditions, which would occur even if the proposed project was not constructed.

6.2.17 - Utilities and Service Systems
Under the No Project Alternative, the site would remain in its present condition and there would be no potential impacts to existing or planned utility systems (i.e., no increase in the consumption of water or energy resources, or the additional production of wastewater or solid waste). With construction of planned improvements and payment of established development impact fees, the project is also not expected to produce any significant impacts on these systems. Therefore, the No Project Alternative would have reduced impacts on utilities and service systems compared with the project, although impacts under the project would also be less than significant.

6.2.18 - Conclusion for No Project Alternative
The No Project Alternative would eliminate all of the significant and unavoidable impacts that would occur under construction and operation of the project, including impacts to air quality, greenhouse gas emissions, and traffic. However, this alternative does not achieve any of the objectives of the
project, and would not generate substantial benefits to the County and local economy, by providing new jobs and additional tax revenues. Table 6-5 provides a summary comparison, by individual issue area, for each alternative to the project.

6.3 - No Project—Cherry Valley Gateway Policy Area Specific Plan Alternative

Implementation of the Cherry Valley Gateway Policy Area Specific Plan (CVGPA SP) alternative would involve development of the project site with 216 single-family homes on 110 acres, in the following configurations and under the following, existing General Plan land use designations:

- Rural Mountainous: 1 custom lot/unit
- Very Low Density Residential (VLDR): 39 custom lots/units
- Low Density Residential (LDR): 176 units (7,000 sf lot minimum)

Internal street, sidewalk, and utility improvements would also be installed under the CVGPA SP Alternative (see Exhibit 6-1).

The majority of the site is currently designated as Very Low Density Residential (VLDR), while a small portion of the site (approximately 20 percent) is designated as Rural Mountainous (RM). Single-family residential uses with a minimum 10-acre lot size are allowed under the RM land use designation, and single-family residential uses with minimum 1 to 2 acre lot sizes are allowed under the VLDR land use designation.

The site is zoned Controlled Development Area (W-2), which allows for single-family residential uses consisting of lot sizes no less than 20,000 square feet, with a minimum average lot width of 100 feet and a minimum average lot depth of 150 feet, unless larger minimum lot area and dimensions are specified for a particular area or use.

Therefore, the 176 proposed 7,000 square foot LDR lots under this alternative would not strictly comply with the current General Plan or zoning designations of the site, and a General Plan Amendment and Zone Change would be required in order to achieve compliance. However, this alternative also considers the requirements of the Pass Area Plan Cherry Valley Gateway Policy Area, which states that “Higher densities may be allowed through a general plan amendment provided such development meets the goals of the policy area.” Policy PAP 4.1 states: “Clustering of dwelling units and lots is encouraged in order to preserve open space areas.”

The CVGPA SP has been evaluated as the no project alternative that likely would be developed in the absence of the proposed project, because the technical and physical site restraints of the property lend itself to a residential development that is clustered within the south of the site to preserve open space, consistent with Policy PAP 4.1. This allows for the preservation of open space areas to the north. Furthermore, this alternative would be clustered in very low and low densities in the south of the site in order to avoid development within the slopes to the north while also maintaining an appropriate distance from the fault line that runs east/west across the property. The highest density on-site would be under the Low (Residential) designation at 3.3 dwelling units an acre. Please refer to Exhibit 6-1 for additional detail.
This alternative is also consistent with the pattern of residential development within the area, such as the proposed community directly adjacent to the west as well as the approved Sunny Cal Development to the south. The proposed site is further restricted by the drainages and drainage pattern of the site, with jurisdictional features running from east to west. Potential impacts to other biological resources also need to be considered for the selection of alternatives, thus the siting of this alternative within the southern portion of the site would avoid some of the potential impacts to sensitive plant communities in the northern area of the site. Because of site constraints and layout, strict compliance with the minimum one-acre lots over the entirety of the project site would not allow for clustered development, and would not allow for the maximization of open space and preservation of rural character. Therefore, this alternative provides a site layout that would achieve consistency with the applicable Cherry Valley Gateway Policy Area, which would allow for a higher density with approval of a general plan amendment.

According to SCAG, unincorporated areas within the County of Riverside have an average of 3.19 persons per household. Therefore, the 216 housing units under the CVGPA SP Alternative could add an estimated 689 persons within the project area. The following discussion evaluates the potential environmental impacts associated with the CVGPA SP Alternative compared with impacts from the project.

6.3.1 - Aesthetics

Aesthetics impacts relate to scenic resources within a State scenic highway, visual character, and new sources of light and glare. Short-term aesthetics impacts would occur during construction for the project, and mitigation in the form of a photometric plan is anticipated to reduce potential operational impacts from light and glare to a less than significant impact. The RDEIR concluded that with mitigation, the proposed project’s aesthetics and light and glare impacts would be reduced to a less than significant level.

The No Project—CVGPA SP Alternative would have construction grading and earthwork requirements similar to the project, due to the currently undeveloped nature of the site. The single-family residences proposed under this alternative would comply with the County’s restriction of 40 feet in height for residential development within the VLDR land use designation. Likewise, the proposed project would also not introduce any building in excess of 39 feet. Both the project and the No Project—CVGPA SP Alternative would be required to comply with the County’s Municipal Code requirements pertaining to limiting light and glare from structures on-site. Both the project and the No Project—CVGPA SP Alternative would create new sources of light and glare that currently do not exist. The No Project—CVGPA SP Alternative would also have no impact on scenic resources within a State scenic highway.

The proposed project would be located significantly below grade, and screened by landscaping, and would therefore not be visible to motorists on Cherry Valley Boulevard. However, due to the fact that 216 single-family buildings would be constructed at higher elevations under the No Project—CVGPA SP Alternative, many of the residences would likely be visible to passing motorists, and would therefore have a greater impact on the visual character of the site and hillsides than the proposed project.
6.3.2 - Agriculture and Forestry Resources

Development of the No Project—CVGPA SP Alternative would involve construction grading and earthwork requirements similar to the project due to the currently undeveloped nature of the site, for the construction of 216 dwelling units and associated street and sidewalk improvements. The RDEIR determined that the project would have less than significant impacts on agricultural resources, and no impacts to forestry resources.

Agriculture and forestry impacts relate to potential impacts to forestry resources, Williamson Act land and Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland). The project site is categorized as Farmland of Local Importance (approximately 147.64 acres) and Other Land (approximately 97.67 acres) under the Farmland Mapping and Monitoring Program (FMMP). Loss of farmland under these categorizations is not considered a significant impact. Furthermore, the project site is not used for agriculture, is not subject to a Williamson Act contract, and does not contain any designated forestland. Therefore, development of the No Project—CVGPA SP would result in less than significant impacts on agriculture and forestry resources, similar to the project.

6.3.3 - Air Quality

The RDEIR found that the project would have a cumulatively significant and unavoidable impact with respect to ROG and NOx emissions during operation. All project impacts during construction were found to be less than significant with the implementation of mitigation. SCAQMD regional emission thresholds would be exceeded even after all feasible mitigation is incorporated for NOx and ROG during operations. In addition, although the project would comply with all applicable SCAQMD rules and regulations, the project would impede timely attainment of ambient air quality standards and impede implementation of the AQMP, because its emissions exceed the SCAQMD regional significance thresholds for NOx and ROG. Thus, the project will have a cumulatively considerable impact regarding attainment of air quality standards.

The No Project—CVGPA SP Alternative and the project would disturb roughly the same amount of ground surface and involve roughly the same amount of grading and building construction activity, when accounting for the necessary hardscape improvements for a residential development, such as internal roadways and sidewalks, and grading for common open space areas and private yards; therefore, construction emissions would be similar to the project. Refer to Table 6-1 below. The No Project—CVGPA SP Alternative would not exceed the SCAQMD mitigated regional construction emissions threshold for NOx of 100 pounds per day or the ROG threshold of 75 pounds per day, because the project construction is estimated to produce 50.72 pounds of NOx per day and 23.41 pounds per day of ROG, and the grading and construction activities under both scenarios would be similar.

Based on the Trip Generation Evaluation prepared by Urban Crossroads, the No Project—CVGPA SP Alternative would generate 2,056 daily PCE trips, thereby decreasing total operational vehicle trips by approximately 58 percent (from a total of 4,905 daily PCE trips that would occur under the project) and reducing estimated total long-term air quality emissions compared with the project. CalEEMod version 2016.3.1 was used to estimate operational emissions for the No Project—CVGPA SP Alternative.
In addition, the No Project—CVGPA SP Alternative would avoid the significant and unavoidable impact from operational ROG and NO\textsubscript{x} emissions that would occur under the project.

### Table 6-1: No Project—CVGPA SP Alternative Air Pollutant Operational Emissions

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<td>7.2</td>
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</table>

| Would Project Result in Significant Impact? | Yes | Yes | No | No | No | No |
| Would the Alternative Result in Significant Impact? | No | No | No | No | No | No |
| Significance Threshold         | 55  | 55  | 550| 150| 150| 55 |

Notes:
- ROG = reactive organic gases
- NO\textsubscript{x} = nitrogen oxides
- CO = carbon monoxide
- SO\textsubscript{x} = sulfur oxides
- PM\textsubscript{10} and PM\textsubscript{2.5} = particulate matter

6.3.4 - Biological Resources

Potential impacts to biological resources relate to effects on candidate, sensitive or special status species, and conflicts with local policies or ordinances protecting biological resources and effects on U.S. and State jurisdictional waters. The RDEIR found that mitigation is required under the project for potential impacts to US Army Corps of Engineers (USACE) and California Department of Fish and Wildlife (CDFW) jurisdictional habitats and Multiple Species Habitat Conservation Plan (MSHCP) Riverine areas. Additionally, with implementation of mitigation measures for potential impacts to burrowing owls, raptors, and water resources, the project would have a less than significant impact.

Given the scope of the development under the No Project—CVGPA SP Alternative, which would involve the construction of 216 dwelling units and associated street and sidewalk improvements, impacts would be roughly similar to the project, and would be less than significant with mitigation for both the project and the No Project—CVGPA SP Alternative.

6.3.5 - Cultural Resources

Cultural resources impacts relate to potential impacts to historical, cultural, and paleontological resources, as well as potential impact to human remains. The RDEIR found that the project would have less than significant impacts to cultural resources with mitigation, to address the potential that...
buried cultural resources are discovered during project construction. Mitigation is also required to reduce the project’s potential impacts to paleontological resources to a less than significant level.

The No Project—CVGPA SP Alternative scenario and the project would both disturb roughly the same amount of ground surface, due to the currently undeveloped nature of the site and the need to substantially clear and grade the site to accommodate residential dwellings and associates street and sidewalk improvements. Similar mitigation measures would likely be required under the No Project—CVGPA SP Alternative, and impacts to cultural resources would be similar to those under the project and less than significant with mitigation.

6.3.6 - Geology and Soils

Geology and Soils impacts relate to potential hazards associated with liquefaction, unstable soil, and seismic settlement. The RDEIR found that the site is considered developable from a geotechnical perspective; however, mitigation would be required to reduce impacts regarding structural setback zones, hydroconsolidation, soil stability, and landslides. Implementation of mitigation and compliance with County and the Uniform Building Code construction standards would reduce geology and soils impacts under the project to less than significant levels.

The No Project—CVGPA SP Alternative would also require mitigation for structural setback zones, hydroconsolidation, soil stability, and landslides. Therefore, the No Project—CVGPA SP Alternative and the project would require similar mitigation measures to reduce impacts related to geology and soils to a less than significant level. The No Project—CVGPA SP Alternative would allow up to 216 housing units, which could add an estimated 689 persons within the project area. Therefore the No Project—CVGPA SP Alternative would likely result in a greater number of persons exposed to hazards associated with the earthquake fault on the project site compared with the project. However, similar to the project, these impacts would be less than significant with appropriate mitigation.

6.3.7 - Greenhouse Gas Emissions

The County of Riverside’s Climate Action Plan (CAP) is a geographically specific plan that was adopted by the County of Riverside for the purpose of reducing GHG emissions under the control or influence of the County consistent with AB 32 and subsequent state legislation and state agency action to address climate change. The CAP has adopted a target of reducing GHG emissions down to 15 percent below 2008 levels within the County of Riverside by 2020.

Pursuant to the CAP, and discussed in further detail in Section 3.7, projects that achieve at least 100 points based on the County’s screening tables are determined to be consistent with the reduction quantities anticipated in the County’s GHG Technical Report. As such, further project-specific GHG quantification is not required. Consistent with State CEQA guidelines, such projects are determined to have a less than significant individual and cumulative impact for GHG emissions. The RDEIR determined that the project would be less than significant after incorporating at least 100 points from the Riverside County Greenhouse Gas Emissions Screening Tables.

The No Project—CVGPA SP Alternative would produce 3,467 MTCO₂e, substantially less than the project. Additionally, it is logical to conclude that the No Project—CVGPA Alternative would be able
to achieve the necessary 100 points from the screening tables, because this alternative would be single-family residential units compared with the project. Single-family uses would not generate the substantial truck trips proposed under the project or require as many resources in general to operate, thereby reducing overall GHG emissions. Therefore, the impacts of the No Project—CVGPA SP Alternative with respect to greenhouse gas emissions would also be considered less than significant, similar to the proposed project. Although both the project and the No Build—CVGPA SP alternative would result in less than significant impacts, this alternative would result in lesser overall impacts, as the alternative would produce substantially fewer overall GHG emissions.

6.3.8 - Hazards and Hazardous Materials

Hazards and hazardous material impacts relate to posing a hazard to the public or environment, handling hazardous materials, interfering with emergency response plans, airport hazards, potential location on a hazardous site, location in relation to existing or proposed schools, and location in relation to fire hazard areas. Potential impacts of the project would be less than significant regarding hazards and hazardous materials, with the inclusion of mitigation to address potential soils contamination due to previous agricultural uses on-site.

The No Project—CVGPA SP Alternative and the project would disturb similar amounts of ground surface during construction, resulting in similar potential for exposure and disposal of potentially contaminated soils, due to prior agricultural uses on-site. In addition, the No Project—CVGPA SP Alternative would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions related to the release of hazardous materials into the environment. Both the project and the No Project—CVGPA SP Alternative would comply with all applicable federal, state, and local laws with respect to use, handling and disposal of hazard materials, and neither the project nor the No Project—CVGPA SP Alternative would involve uses that would involve the use of hazardous materials. Therefore, assuming that similar mitigation measures would be implemented for the No Project—CVGPA SP Alternative, impacts would be less than significant, similar to the project.

6.3.9 - Hydrology and Water Quality

Hydrology and Water quality impacts relate to drainage, water quality, groundwater, runoff, and flood hazards. The project is not expected to result in any significant impacts to hydrology or water quality with implementation of the planned flood control improvements and recommended mitigation measures, and would actually reduce the site’s vulnerability to flooding hazards. The No Project—CVGPA SP Alternative would be expected to construct similar improvements to drainage channels and related drainage structures as would occur under the proposed project, to ensure that the residential uses are not subject to flooding. These improvements would likely be constructed in the same location as proposed by the project, on the parcels located within the City of Calimesa. Development of the No Project—CVGPA SP Alternative would result in a similar amount of land disturbed by grading and construction, but would likely result in the creation of less impervious area, which would likely include street and sidewalk improvements, driveways, patios, and other hardscapes that are typical of residential development, but with less building square footage than under the project. Therefore, the No Project—CVGPA SP Alternative would have slightly reduced impacts on hydrology and water quality compared with the project due to a smaller amount of
impervious surfaces, although hydrology and water quality impacts under the project would also be less than significant.

6.3.10 - Land Use and Planning

As discussed above, due to site constraints and layout, strict compliance with the minimum one-acre lots over the entirety of the project site would not allow for clustered development, and would not allow for the maximization of open space and preservation of rural character. Therefore, the No Project—CVGPA SP Alternative provides a site layout that would achieve consistency with the applicable Cherry Valley Gateway Policy, which would allow for a higher density with approval of a general plan amendment. Likewise, the project would require a general plan amendment and zone change to allow for high-cube warehouse use, along with other County land use approvals, the impacts of which were determined to be less than significant.

A General Plan Foundation Component Amendment would not be required under the proposed project or for the No Project—CVGPA SP Alternative. The RDEIR found that the project would not divide an existing community, and would not result in a 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, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. In addition, as discussed in Section 3.10, Land Use and Planning, the project would be consistent with the policies of the Cherry Valley Gateway Policy Area. The No Project—CVGPA SP Alternative would be subject to the same County review and approval processes as the project, and would be subject to standard County conditions of approval to ensure consistency with Land Use and Planning policies. In this regard, the County approval process and general plan amendment process would serve as self-executing mitigation for any potential Land Use and Planning impacts.

In summary, the No Project—CVGPA SP Alternative would have Land Use and Planning impacts similar to the project, since both development scenarios would require a General Plan Amendment. Nonetheless, the No Project—CVGPA SP Alternative would generally be more in-keeping with the General Plan’s intention for residential uses on the site. However, ultimately both the proposed project and the No Project—CVGPA SP would require a discretionary approval for a General Plan Amendment and would comply with the policies and further the goals of the CVGPA. Thus, these potential land use impacts would be similar.

6.3.11 - Mineral Resources

Mineral resources impacts relate to loss of mineral resources, incompatible land uses, and hazards related to quarries/mines. The RDEIR found that the project would have a less than significant impact regarding mineral resources. The No Project—CVGPA SP Alternative and the project would be expected to affect roughly the same amount of ground surface during construction, and would therefore result in less than significant impact to mineral resources, similar to the project.
6.3.12 - Noise

The RDEIR found that the project would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. However, the RDEIR found that project construction would result in the following noise impacts:

- Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

As a result, mitigation measures to reduce project construction noise loading/unloading operational noise to less than significant levels were required.

The No Project—CVGPA SP Alternative would generate less long-term traffic noise since it would generate fewer vehicle trips than the project. The No Project—CVGPA SP Alternative would also likely not exceed the 5dB (decibel) threshold over ambient levels, and isolated noise levels at project ingress/egress points would not increase noise levels during peak hours for sensitive receptors. Therefore, similar to the project, the No Project—CVGPA SP Alternative would not create a substantial permanent increase in ambient noise levels. In addition, short-term noise levels during construction would be less than significant with the implementation of mitigation measures. Project impacts from loading/unloading activities would not occur with the No-Project—CVGPA SP Alternative. Therefore, potential short and long-term noise impacts from the No Project—CVGPA SP Alternative would be less than significant, similar to the project. The No Project—CVGPA SP Alternative would generate approximately 58 percent fewer vehicle trips than the project (refer to Section 6.3-16, Transportation and Traffic) and would therefore reduce traffic noise compared with the project. In summary, the No Project—CVGPA SP Alternative would have slightly reduced noise impacts compared with the project, due to the reduction in vehicle trips; however, noise impacts under the project would also be less than significant.

6.3.13 - Population and Housing

Population and housing impacts relate to housing, affordable housing, displacement of persons or housing, and population. The jobs attributed to the project are not anticipated to require specific skills that necessitate substantial hiring outside of the project region. Given the high rate of unemployment in the County and surrounding cities, most of the anticipated new positions in employment would likely be filled from individuals already living in the project region. Therefore, the RDEIR found that the project neither would directly nor indirectly induce substantial new population growth in the area.

The No Project—CVGPA SP Alternative would generate approximately 689 new full-time residents, compared with the project’s estimated 748 employees (including 507 permanent on-site full time jobs and 241 off-site indirect and induced jobs). The No Project—CVGPA SP Alternative would therefore exacerbate the current jobs-to-housing imbalance in Cherry Valley and surrounding areas. Therefore, the No Project—CVGPA SP Alternative would create greater impacts relative to
population and housing growth than the project. However, such impacts would still be considered less than significant, because the No Project—CVGPA SP Alternative is based on residential buildout consistent with the site’s existing General Plan and zoning designations.

6.3.14 - Public Services

Project impacts with respect to public services were found to be less than significant, because the project will comply with the County’s Local Park Code requirements by compensating for impacts to public service and park facilities through the payment of development impact fees.

The No Project—CVGPA SP Alternative would generate approximately 689 new, full-time residents, compared with the project’s 748 full time employees. Therefore, this alternative would result in greater demands on public services for fire and police services, schools, libraries, government facilities, because residents are most likely to utilize these services in the communities in which they reside. New housing developments are more likely to induce new residents to move to the community from other locations, while most of the project’s new employees are expected to already reside within the surrounding area, rather than relocate from another area. However, the greater public services impacts under this alternative would also likely be less than significant, as the No Project—CVGPA SP Alternative would also likely be required to pay development impact fees and user fees to offset the demand for such. Therefore, while the No Project—CVGPA SP Alternative may create greater impacts relative to public services, overall impacts would be less than significant, similar to the project.

6.3.15 - Recreation

Recreation impacts relate to potential impacts to recreational facilities, usage of existing neighborhood/regional parks, and recreational trails. The RDEIR found that the project would have a less than significant impact regarding recreational resources.

The No Project—CVGPA SP Alternative would generate approximately 689 new, full-time residents in the immediate area, compared with the project’s 748 full time employees. Given the skill set required for the new jobs and current unemployment in the area, it is assumed that most of these new jobs would be filled from individuals that already live in the region. Housing tends to place greater demands on local recreational areas as opposed to places of employment, since employees are not expected to access recreational facilities during the workday; therefore, the new residents under the No Project—CVGPA SP Alternative would place a higher demand on recreational facilities compared with the project. However, it is anticipated that the No Project—CVGPA SP Alternative would be required to pay park fees (Quimby Act fees) or in-lieu land dedications that would offset such demand. Therefore, while the No Project—CVGPA SP Alternative may create greater impacts relative to recreation facilities, overall impacts would be less than significant, similar to the project.

6.3.16 - Transportation and Traffic

The project is expected to generate approximately 4,905 PCE trips per day. As indicated within Section 3.16, Traffic and Transportation, implementation of Mitigation Measures TRAN-1a to TRAN-1c, TRAN-4a to TRAN-4e, and TRAN-5 would be required for the project.
Despite incorporation of these mitigation measures, however, cumulative impacts to mainline segments of the I-10 Freeway, I-10 ramps, and several other local intersections would remain adverse and unavoidable under Opening Year 2018 Existing Plus Ambient Plus Project, 2018 Existing Plus Ambient Plus Project Plus Cumulative, and 2040 Horizon Conditions, as discussed under Section 6.1.2, above. Although the project mitigates impacts to the extent feasible, the timing of certain necessary improvements are uncertain and cannot be controlled, and therefore impacts, despite identification of all feasible mitigation, would remain significant and unavoidable.

Using the ITE trip generation factor of 9.52 \(^1\) trips per dwelling for Single-Family Detached Housing, the estimated number of average daily trips (ADT) for the No Project—CVGPA SP Alternative is estimated at 2,056 trips, or approximately 58 percent fewer trips than the 4,905 PCE trips that would be generated by the project (Urban Crossroads 2015b).

Regardless, while the No Project—CVGPA SP Alternative would create fewer trips, it would also be required to provide mitigation measures similar to the project. However, despite the 58 percent fewer trips,\(^2\) the No Project—CVGPA SP Alternative would ultimately have cumulatively significant and unavoidable impacts (albeit lesser than under the project) for the I-10 Freeway mainline segments, local intersections, and on-and off-ramps at Cherry Valley Boulevard. This is due to the fact that these impacts would occur under 2018 Existing Plus Ambient Plus Project, 2018 Existing Plus Ambient Plus Project Plus Cumulative and Horizon Year 2040 conditions, even without the project. Therefore, the No Project—CVGPA SP Alternative would also result in cumulatively significant and unavoidable traffic impacts similar to the project, although these impacts would be somewhat reduced under the No Project—CVGPA SP Alternative.

6.3.17 - Utilities and Service Systems

Utilities and service system impacts relate to water supply, wastewater, solid waste/landfill capacity, electricity, natural gas, and storm water drainage. With mitigation, the project would have a less than significant impact on utilities and service systems.

Typically, residential uses have a higher demand for utilities and service systems compared with warehouse uses or other or other employment generating uses. In particular, warehouse areas are generally not heated or cooled, thus reducing energy consumption. Water demand (and consequently sewer demand) of warehouse uses are also usually much less than residential uses, since employees in such facilities do not use water for household applications such as cooking, bathing, laundry, dishes, etc. Specifically, the proposed project is anticipated to use 8.99 million gallons per year for outdoor uses, and 11.36 million gallons a year for indoor uses, for a total of 20.35 million gallons per year (62.45 acre-feet of water per year). In comparison, 216 residential dwelling units would be expected to use 151,200 gallons per day or 169.48 acre-feet per year of water, or nearly three times as much as the proposed project. Therefore, development and operation of the No Project—CVGPA SP Alternative would substantially increase the demand on utilities and service systems, specifically pertaining to water supply, wastewater, landfill capacity, electricity, and energy. Therefore, the No Project—CVGPA SP Alternative would result in higher demand and consumption of utilities and service systems than

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\(^1\) Trip Generation (8th edition), ITE.

\(^2\) Based on average trip rate per 1,000 square feet of floor area (42.94) from Trip Generation 8th Edition, ITE.
the project, although this could be offset by proper design and conservation features, likely resulting in a less than significant impact similar to the project.

6.3.18 - Conclusion for No Project—CVGPA SP Alternative

The No Project—CVGPA Alternative would result in similar impacts related to Agriculture and Forestry Resources, Biological Resources, Cultural Resources, Hazards and Hazardous Materials, Land Use and Planning, and Mineral Resources as the proposed project. The No Project—CVGPA SP Alternative would result in greater impacts to Aesthetics, Geology and Soils, Population and Housing, Public Services, Recreation, and Utilities and Service Systems than the proposed project, although impacts would likely remain less than significant with mitigation, similar to the project. The No Project—CVGPA SP Alternative would result in fewer impacts related to Air Quality, Greenhouse Gas Emissions, Hydrology and Water Quality, Noise, and Traffic. However, the No Project—CVGPA SP Alternative would not eliminate the significant and unavoidable traffic impacts that would occur under the proposed project. Furthermore, this alternative does not achieve any of the objectives of the project, and would not generate substantial benefits to the County and local economy, by providing new jobs and additional tax revenues. Table 6-5 provides a summary comparison, by individual issue area, for each alternative to the project.

6.4 - Residential Alternative

Implementation of the Residential Alternative would involve the construction of 792 dwelling units on 140 acres, in the following configurations:

- VLDR: 30 custom lots/units
- LDR: 110 lots/units (minimum 7,000 sf lots)
- Medium Density Residential (MDR): 191 (minimum 4,500 sf lots)
- High Density Residential (HDR): 221 townhomes
- Very High Density Residential (VHDR): 240 apartments

Internal street and sidewalk improvements would also be installed under the Residential Alternative. Two park/open space areas would be provided under the Residential Alternative, consisting of 3 acres towards the west of the site near the proposed townhomes, and 2.2 acres near the southeastern portion of the site. A private recreation area would also be provided for the proposed apartments. Refer to Exhibit 6-2 for a conceptual site plan.

The majority of the site is designated as Very Low Density Residential (VLDR), while a small portion of the site (approximately 20 percent) is designated as Rural Mountainous (RM). Single-family residential uses with a minimum 10-acre lot size are allowed under the RM land use designation, and single-family residential uses with a minimum 1 to 2 acre lot sizes are allowed under the VLDR land use designation.

The site is zoned Controlled Development Area (W-2), which allows for single-family residential uses consisting of lot sizes no less than 20,000 square feet, with a minimum average lot width of 100 feet and a minimum average lot depth of 150 feet, unless larger minimum lot area and dimensions are specified for a particular area or use.
Exhibit 6-2
Residential Alternative

PROJECT SUMMARY

<table>
<thead>
<tr>
<th>RESIDENTIAL PRODUCT SUMMARY</th>
<th>ACRE</th>
<th>UNITS</th>
<th>%阀</th>
<th>%MK</th>
</tr>
</thead>
<tbody>
<tr>
<td>VLDR - Very Low Density Residential (0.5 DUAC)</td>
<td>7.8</td>
<td>303</td>
<td>9.3</td>
<td>14%</td>
</tr>
<tr>
<td>LDR - Low Density Residential (1.8 DUAC)</td>
<td>10.3</td>
<td>100</td>
<td>9.7</td>
<td>14%</td>
</tr>
<tr>
<td>HDR - High Density Residential (3 - 14 DUAC)</td>
<td>16.6</td>
<td>243</td>
<td>20.4</td>
<td>30%</td>
</tr>
<tr>
<td>VHDR - Very High Density Residential (14+ DUAC)</td>
<td>30.1</td>
<td>300</td>
<td>19.5</td>
<td>30%</td>
</tr>
<tr>
<td>TOTAL</td>
<td>54.6</td>
<td>746</td>
<td>16%</td>
<td></td>
</tr>
</tbody>
</table>

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Therefore, the Residential Alternative would involve development of the project site at a unit yield that would exceed what is permitted under the existing zoning and General Plan Land Use Designations of VLDR and RM, and a General Plan Amendment and Zone Change would be required in order to achieve consistency. This alternative was analyzed based on the surrounding development patterns of the area and the feasibility restraints discussed under the No Project—CVGPA SP Alternative, above. As depicted in Table 4-1: Cumulative Projects, several other larger scale residential projects have been approved for implementation. Examples include the Sunny-Cal Egg Ranch project to the south (497 dwelling units) and the residential projects planned adjacent to the project site to the east and southeast. More specifically, and discussed in greater detail in Table 4-1 and Exhibit 4-1, additional projects in the vicinity include the Heartland project consisting of 988 dwelling units and 126,000 square feet of commercial uses; Noble Creek Vistas consisting of 648 dwelling units; the Sundance project consisting of 4,716 dwelling units; Jack Rabbit Trails consisting of 2,000 dwelling units; and Potrero Creek Estates consisting of 700 dwelling units, among many others. If the site is not ultimately developed as a warehouse or commercial use, it is likely that the project site would be developed for residential uses of various densities.

According to SCAG, unincorporated areas within the County of Riverside have an average of 3.19 persons per household. Therefore, the 792 housing units under the Residential Alternative could add an estimated 2,526 persons within the project area. The following discussion evaluates the potential environmental impacts associated with the Residential Alternative compared with impacts from the project.

6.4.1 - Aesthetics

Aesthetics impacts relate to scenic resources within a State scenic highway, visual character, and new sources of light and glare. Short-term aesthetics impacts would occur during construction for the project, and mitigation in the form of a photometric plan is anticipated to reduce potential operational impacts from light and glare to a less than significant impact. The Residential Alternative would have construction grading and earthwork requirements similar to the project, due to the currently undeveloped nature of the site.

This alternative would introduce varying building heights due to the townhome and apartment component, as well as the single-family residences. The Residential Alternative would comply with the County of Riverside’s maximum height requirement of 40 feet for single-family and multi-family zones. Both the project and the Residential Alternative would be required to comply with the County’s Municipal Code requirements pertaining to limiting light and glare from structures on-site. Both the project and the Residential Alternative would create new sources of light and glare that currently do not exist. The Residential Alternative would also have no impact on scenic resources within a State scenic highway, and changes to the scenic character of the site would be similar to the project. However, because of greater building heights of the townhomes and apartments that would be developed under this alternative, the Residential Alternative would result in overall greater impacts than the project.
6.4.2 - Agriculture and Forestry Resources

Development of the Residential Alternative would involve construction grading and earthwork requirements similar to the project, for the construction of 792 dwelling units and associated street and sidewalk improvements. Agriculture and forestry impacts relate to potential impacts to forestry resources, Williamson Act land and Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland). The project site is categorized as Farmland of Local Importance (147.64 acres) and Other Land (97.67 acres) under the Farmland Mapping and Monitoring Program (FMMP). Loss of farmland under these categorizations is not considered a significant impact. Furthermore, the project site is not used for agriculture, is not subject to a Williamson Act contract, and does not contain any designated forestland. Therefore, development of the Residential Alternative would result in less than significant impacts on agriculture and forestry resources, similar to the project.

6.4.3 - Air Quality

The RDEIR found that the project would have a cumulatively significant and unavoidable impact with respect to ROG and NOx emissions. All potential project construction impacts would be mitigated to less than significant levels. SCAQMD regional emission thresholds would be exceeded even after all feasible mitigation is incorporated for NOx and ROG during operations. In addition, although the project would comply with all applicable SCAQMD rules and regulations, the project would impede timely attainment of ambient air quality standards and impede implementation of the AQMP, because its emissions exceed the SCAQMD regional significance thresholds for NOx and ROG. Thus, the project will have a cumulatively considerable impact regarding attainment of air quality standards.

The Residential Alternative and the project would disturb roughly the same amount of ground surface and involve roughly the same amount of grading and building construction activity; therefore, construction emissions would be similar to the project.

The Residential Alternative would generate a total of 7,540 daily trips, thereby increasing total operational vehicle trips by approximately 53 percent (from a total of 4,905 daily PCE trips that would occur under the project) and increasing estimated total long-term air quality emissions compared with the project. CalEEMod version 2016.3.1 was used to estimate operational emissions for the Residential Alternative. The operational air pollutant emissions for the Residential Alternative are shown in Table 6-2. As shown in the table, the project would have ROG and SOx emissions comparable to the Residential Alternative. Both scenarios would result in significant ROG emissions. The project would have greater NOx emissions than the Residential Alternative; however, both scenarios would result in significant NOx emissions. The project would result in fewer CO, PM10, and PM2.5 emissions than the Residential Alternative. A comparison of the project and the Residential Alternative indicate that impacts would be similar.
Table 6-2: Residential Alternative Air Pollutant Operational Emissions

<table>
<thead>
<tr>
<th>Source</th>
<th>ROG</th>
<th>NO\textsubscript{x}</th>
<th>CO</th>
<th>SO\textsubscript{x}</th>
<th>PM\textsubscript{10}</th>
<th>PM\textsubscript{2.5}</th>
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</thead>
<tbody>
<tr>
<td>Mobile</td>
<td>20.2</td>
<td>108.1</td>
<td>314.2</td>
<td>1.0</td>
<td>81.5</td>
<td>22.7</td>
</tr>
<tr>
<td>Area</td>
<td>34.7</td>
<td>13.9</td>
<td>71.3</td>
<td>0.1</td>
<td>1.4</td>
<td>1.4</td>
</tr>
<tr>
<td>Energy</td>
<td>0.9</td>
<td>7.4</td>
<td>3.2</td>
<td>0.0</td>
<td>0.6</td>
<td>0.6</td>
</tr>
<tr>
<td>Total Alternative Emissions</td>
<td>55.8</td>
<td>129.4</td>
<td>388.7</td>
<td>1.1</td>
<td>83.5</td>
<td>24.7</td>
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<tr>
<td>Project Emissions—Mitigated</td>
<td>65.4</td>
<td>299.2</td>
<td>183.2</td>
<td>1.6</td>
<td>14.9</td>
<td>7.2</td>
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<tr>
<td>Significance Threshold</td>
<td>55</td>
<td>55</td>
<td>550</td>
<td>150</td>
<td>150</td>
<td>55</td>
</tr>
<tr>
<td>Would Project Result in Significant Impact?</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Would Alternative Result in Significant Impact?</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
</tbody>
</table>

Notes:  
ROG = reactive organic gases \quad NO\textsubscript{x} = nitrogen oxides \quad CO = carbon monoxide \quad PM\textsubscript{10} and PM\textsubscript{2.5} = particulate matter \quad Area = painting and consumer products
Source of emissions: Appendix A: CalEEMod Output.
Source of project emissions: Table 33 (mitigated summer)
Source of thresholds: South Coast Air Quality Management District 2011a.

6.4.4 - Biological Resources

Potential impacts to biological resources relate to effects on candidate, sensitive or special status species, and conflicts with local policies or ordinances protecting biological resources and effects on U.S. and State jurisdictional waters. The RDEIR found that mitigation is required under the project for potential impacts to US Army Corps of Engineers (USACE) and California Department of Fish and Wildlife (CDFW) jurisdictional habitats and Multiple Species Habitat Conservation Plan (MSHCP) Riverine areas. Additionally, with implementation of mitigation measures for potential impacts to burrowing owls, raptors, and water resources, the project would have a less than significant impact. Given the scope of the development under the Residential Alternative, which would involve the construction of 792 dwelling units and associated street and sidewalk improvements, impacts would be roughly similar to the project, and would be less than significant with mitigation for both the project and the Residential Alternative.

6.4.5 - Cultural Resources

Cultural resources impacts relate to potential impacts to historical, cultural, and paleontological resources, as well as potential impact to human remains. The RDEIR found that the project would have less than significant impacts to cultural resources with mitigation, to address the potential that buried cultural resources are discovered during project construction. Mitigation is also required to reduce the project’s potential impacts to paleontological resources to a less than significant level.
The Residential Alternative scenario and the project would both disturb roughly the same amount of ground surface. Similar mitigation measures would likely be required under the Residential Alternative, and impacts to cultural resources would be similar to those under the project.

6.4.6 - Geology and Soils

Geology and Soils impacts relate to potential hazards associated with liquefaction, unstable soil, and seismic settlement. The RDEIR found that the site is considered developable from a geotechnical perspective; however, mitigation would be required to reduce impacts regarding structural setback zones, hydroconsolidation, soil stability, and landslides. Implementation of mitigation and compliance with County and the Uniform Building Code construction standards would reduce geology and soils impacts under the project to less than significant levels.

The Residential Alternative would also require mitigation for structural setback zones, hydroconsolidation, soil stability, and landslides. Therefore, the Residential Alternative and the project would require similar mitigation measures to reduce impacts related to geology and soils to a less than significant level. The Residential Alternative would allow up to 792 housing units, which could add an estimated 2,526 persons within the project area. Therefore the Residential Alternative would likely result in a greater number of persons exposed to hazards associated with the earthquake fault on the project site compared with the project. However, similar to the project, these impacts would be less than significant with appropriate mitigation.

6.4.7 - Greenhouse Gas Emissions

In order to evaluate differences between the project and the Residential Alternative with respect to greenhouse gas emissions, CalEEMod was used to estimate greenhouse gas emissions. The County of Riverside’s Climate Action Plan (CAP) is a geographically specific plan that was adopted by the County of Riverside for the purpose of reducing GHG emissions under the control or influence of the County consistent with AB 32 and subsequent state legislation and state agency action to address climate change.

Pursuant to the CAP, and discussed in further detail in Section 3.7, projects that achieve at least 100 points based on the County’s screening tables are determined to be consistent with the reduction quantities anticipated in the County’s GHG Technical Report. As such, further project-specific GHG quantification is not required. Consistent with State CEQA guidelines, such projects are determined to have a less than significant individual and cumulative impact for GHG emissions. The RDEIR determined that the project would be less than significant after incorporating at least 100 points from the Riverside County Greenhouse Gas Emissions Screening Tables.

The project would have approximately 16 percent greater greenhouse gas emissions compared with the Residential Alternative. The project’s greenhouse gas emissions are less than significant because pursuant to Mitigation Measure GHG-1, the project would be implementing at least 100 points from the Riverside County Greenhouse Gas Emissions Screening Tables to reduce greenhouse gas emissions. The project would also implement on-site solar photovoltaic panels and other sustainability features discussed in greater depth within Section 3.7, Greenhouse Gas. It is possible that the Residential Alternative would also be able to implement 100 points, thereby reducing its
level of significance. Therefore, the Residential Alternative’s greenhouse gas impact would likely be similar to the project, despite a 16 percent decrease in GHG emissions.

6.4.8 - Hazards and Hazardous Materials

Hazards and hazardous material impacts relate to posing a hazard to the public or environment, handling hazardous materials, interfering with emergency response plans, airport hazards, potential location on a hazardous site, location in relation to existing or proposed schools, and location in relation to fire hazard areas. Potential impacts of the project would be less than significant regarding hazards and hazardous materials, with the inclusion of mitigation to address potential soils contamination due to previous agricultural uses on-site.

The Residential Alternative and the project would disturb similar amounts of ground surface during construction, resulting in similar potential for exposure and disposal of potentially contaminated soils, due to prior agricultural uses on-site. In addition, the Residential Alternative would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions related to the release of hazardous materials into the environment. Both the project and the Residential Alternative would comply with all applicable federal, state, and local laws with respect to use, handling and disposal of hazard materials, and neither the project nor the Residential Alternative would involve uses that would involve the use of hazardous materials. Therefore, assuming that similar mitigation measures would be implemented for the Residential Alternative, impacts would be less than significant, similar to the project.

6.4.9 - Hydrology and Water Quality

Hydrology and Water quality impacts relate to drainage, water quality, groundwater, runoff, and flood hazards. The project would have a less than significant impact regarding hydrology and water quality, with mitigation. Similar drainage and flood control improvements would likely be required for development of the Residential Alternative, which would likely be constructed in the same location as proposed by the project, on the parcels located within the City of Calimesa. Development of the Residential Alternative would result in a similar amount of land disturbed by grading and construction, but would likely result in the creation of less impervious area, which would likely include street and sidewalk improvements, driveways, patios, and other hardscapes that are typical of residential development, but with less building square footage than under the project. Therefore, the Residential Alternative would have slightly reduced impacts on hydrology and water quality compared with the project due to a smaller amount of impervious surfaces, although hydrology and water quality impacts under the project would also be less than significant.

6.4.10 - Land Use and Planning

The Residential Alternative would require a General Plan Amendment and Zone change to allow for development at densities in excess of the current RM and VLDR designations and to allow for multi-family residential. Likewise, the project would require a general plan amendment and zone change to allow for high-cube warehouse use, along with other County land use approvals, the impacts of which were determined to be less than significant.
A General Plan Foundation Component Amendment would not be required under the proposed project or for the Residential Alternative. The RDEIR found that the project would not divide an existing community, and would not result in a 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, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. In addition, as discussed in Section 3.10, Land Use and Planning, the project would be consistent with the policies of the Cherry Valley Gateway Policy Area. The Residential Alternative would be subject to the same County review and approval processes as the project, and would be subject to standard County conditions of approval to ensure consistency with Land Use and Planning policies. In this regard, the County approval process and general plan amendment process would serve as self-executing mitigation for any potential Land Use and Planning impacts.

In summary, the Residential Alternative would have Land Use and Planning impacts similar to the project, since both development scenarios would require a General Plan Amendment and Zone Change. Land Use and Planning impacts under both the project and the Residential Alternative would likely be less than significant.

6.4.11 - Mineral Resources

Mineral resources impacts relate to loss of mineral resources, incompatible land uses, and hazards related to quarries/mines. The RDEIR found that the project would have a less than significant impact regarding mineral resources. The Residential Alternative and the project would be expected to affect roughly the same amount of ground surface during construction, and would therefore result in less than significant impact to mineral resources, similar to the project.

6.4.12 - Noise

A more detailed noise analysis was prepared for the Residential Alternative than for the other three alternatives that would involve development on the project site, due to the fact that the type of construction, number of structures and site layout would be drastically different under the Residential Alternative, while the other development scenarios envisioned under the various alternatives are either similar to the proposed project layout and footprint, or involve less intense residential development.

Construction Noise Impacts

Project-related construction noise levels were calculated for the Residential Alternative using the RCNM provided by the FHWA. Table 6-3 summarizes the construction noise modeling results for the Residential Alternative at the closest sensitive receptors to the project site. Modeling output and modeling parameters are provided in Appendix H of this RDEIR.
### Table 6-3: Comparison of Existing Ambient and Construction Noise Levels

<table>
<thead>
<tr>
<th>Sensitive Receptor¹</th>
<th>Location—Distance/Direction from Site</th>
<th>Ambient Noise Level dBA ( L_{\text{max}}/L_{\text{eq}} )</th>
<th>Construction Noise Level dBA ( L_{\text{max}}/L_{\text{eq}} )</th>
<th>Temporary Increase Due to Construction Noise dBA ( L_{\text{max}}/L_{\text{eq}} )</th>
</tr>
</thead>
<tbody>
<tr>
<td>East end of Mobile Home Ranch</td>
<td>City of Calimesa—1,500 feet northwest of nearest construction footprint</td>
<td>56/52(^{(NM1)})</td>
<td>50(^2)/50</td>
<td>0/0</td>
</tr>
<tr>
<td>Single-family home</td>
<td>City of Calimesa—850 feet west of nearest construction footprint</td>
<td>84/68(^{(NM2)})</td>
<td>63/63</td>
<td>0/0</td>
</tr>
<tr>
<td>Single-family home</td>
<td>County of Riverside—1,200 feet north of nearest construction footprint</td>
<td>52/46(^{(NM3)})</td>
<td>74/73</td>
<td>22/27</td>
</tr>
<tr>
<td>Single-family home</td>
<td>County of Riverside—1,600 feet north of nearest construction footprint</td>
<td>52/46(^{(NM3)})</td>
<td>68/67</td>
<td>16/21</td>
</tr>
<tr>
<td>Single-family home</td>
<td>City of Calimesa—670 feet west of nearest construction footprint</td>
<td>55/51(^{(NM4)})</td>
<td>80/79</td>
<td>25/28</td>
</tr>
<tr>
<td>Single-family homes</td>
<td>County of Riverside—110 feet to southeast of nearest project driveway construction area</td>
<td>85/69(^{(NM5)})</td>
<td>78/77</td>
<td>0/8</td>
</tr>
</tbody>
</table>

Notes:
1. Sensitive Receptor locations are shown in Exhibit 2.
2. An extra 10 dB was deducted due to intervening topography.

As noted previously, the City of Calimesa has established noise level limits for construction activities at receiving land uses of 75 dBA \( L_{\text{eq}} \) (8-hour). As shown in Table 6-3, construction noise levels at off-site sensitive receptors could range up to levels above those that would be experienced under implementation of the project. This is primarily due to the fact that construction of proposed residential structures could occur closer to off-site sensitive receptors than the proposed construction footprint of the warehouse structures. Such noise levels would be expected to be shorter in duration as the time required to do site preparation for a single family home is substantially less than that required for construction of the proposed warehouse buildings. Therefore, overall construction impacts would be similar to those experienced under implementation of the project. However, construction noise levels at the nearest off-site residence in Calimesa, west of the project site, would experience noise levels in excess of the City’s standard. Therefore, additional mitigation would likely be required for the Residential Alternative, such as the use of temporary sound barriers.

### Operational Noise Impacts

Operational noise impacts associated with the Residential Alternative were also analyzed in the noise report prepared for the project (included in Appendix H of this RDEIR). As shown in this
analysis, implementation of the Residential Alternative would result in traffic noise impacts to proposed noise sensitive land uses that would not otherwise occur with implementation of the proposed project.

The FHWA highway traffic noise prediction model (FHWA RD-77-108) was again used to evaluate traffic-related noise conditions in the vicinity of the project site that would result with implementation of the Residential Alternative. Traffic data used in the model was obtained from the Traffic Impact Analysis prepared by Urban Crossroads (2014). As a worst case analysis, future roadway widening that would occur with implementation of the project was assumed for both without project and with project future conditions. The traffic noise modeling input and output files are included in Appendix H of this RDEIR.

The highest traffic noise levels on segments of Cherry Valley Boulevard adjacent to the project site would occur under horizon (year 2040) traffic conditions with implementation of the Residential Alternative. Based on the traffic noise modeling results, the project site would be exposed to traffic noise levels ranging up to approximately 73.9 dBA CNEL at 50 feet from the centerline of the nearest travel lane of Cherry Valley Boulevard, under horizon (year 2040) plus Residential Alternative traffic conditions. At the nearest proposed residential property line, located approximately 200 feet from the centerline of Cherry Valley Boulevard (due to the proposed landscape buffer and riparian landscape setback), these traffic noise levels would attenuate to approximately 64 dBA CNEL.

According to the County’s land use compatibility guidelines, environments with noise levels from 55 dBA up to 70 dBA CNEL are considered “conditionally acceptable” for new residential land use development. In such cases, new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features are included in the design. Conventional construction, with closed windows and fresh air supply systems or air conditioning will normally suffice. Therefore, all proposed residences located within 350 feet of the centerline of Cherry Valley Boulevard would be required to include a fresh air supply system or air conditioning that will permit windows to remain closed for prolonged periods of time.

Implementation of the Residential Alternative would result in similar traffic noise levels as those that would be experienced under the proposed project. Traffic noise levels under existing plus Residential Alternative conditions would range up to 55.3 dBA CNEL, an increase of up to 0.6 dBA along Union Street south of Cherry Valley. Likewise, under the proposed project, traffic noise levels along this segment under Existing plus Project conditions would also range up to 55.3 dBA CNEL, as shown in Table 3.12-10. Therefore, traffic noise impacts associated with implementation of the Residential Alternative would be similar to those that would be experienced with implementation of the proposed project.

Calculated noise levels from mechanical ventilation equipment would be slightly higher at off-site receptors under the Residential Alternative conditions compared with those under the proposed Project. This is primarily due to the assumption that mechanical equipment associated with the Residential Alternative would be located closer to the project borders than the rooftop mechanical equipment of the proposed project. However, overall stationary noise levels of the proposed project, including noise levels from parking lot noise and truck loading and unloading operations
(ranging up to 54 dBA $L_{eq}$ at the closest off-site receptor) would be higher than the overall stationary noise levels of the Residential Alternative (ranging up to 47 dBA $L_{eq}$).

Therefore, overall the Residential Alternative would result in greater noise impacts than would occur under the proposed project. However, similar to the proposed project, with mitigation, those impacts would likely be reduced to less than significant.

### 6.4.13 - Population and Housing

Population and housing impacts relate to housing, affordable housing, displacement of persons or housing, and population. The jobs attributed to the project are not anticipated to require specific skills that necessitate substantial hiring outside of the project region. Given the high rate of unemployment in the County and surrounding cities, most of the anticipated new positions in employment would likely be filled from individuals already living in the project region. Therefore, the RDEIR found that the project neither would directly nor indirectly induce substantial new population growth in the area.

The Residential Alternative would generate approximately 2,526 new full-time residents, compared with the project’s estimated 748 full time employees. The Residential Alternative would therefore exacerbate the current jobs-to-housing imbalance in Cherry Valley and surrounding areas. Therefore, the Residential Alternative would create greater impacts relative to population and housing growth than the project. However, this alternative would likely be required to provide mitigation to reduce any such impacts to less than significant.

### 6.4.14 - Public Services

Project impacts to with respect to public services were found to be less than significant, because the project will comply with the County’s Local Park Code requirements by compensating for impacts to public service and park facilities through the payment of development impact fees.

The Residential Alternative would generate approximately 2,526 new, full-time residents, compared with the project’s 748 employees (including 507 permanent on-site full time jobs and 241 off-site indirect and induced jobs). Therefore, this alternative would result in greater demands on public services for fire and police services, schools, libraries, and government facilities. However, these greater impacts would also likely be less than significant, as the Residential Alternative would also be required to pay development impact fees and user fees to offset the demand. Therefore, while the Residential Alternative may create greater impacts relative to public services, overall impacts would be less than significant, similar to the project.

### 6.4.15 - Recreation

Recreation impacts relate to potential impacts to recreational facilities, usage of existing neighborhood/regional parks, and recreational trails. The RDEIR found that the project would have a less than significant impact regarding recreational resources.

The Residential Alternative would generate approximately 2,526 new, full-time residents in the immediate area, compared with the project’s 748 full time employees. Given the skill set required
for the new jobs and current unemployment in the area, it is assumed that most of these new jobs would be filled from individuals that already live in the region. Housing tends to place greater demands on local recreational areas as opposed to places of employment, since employees are not expected to access recreational facilities during the workday; therefore, the new residents under the Residential Alternative would place a higher demand on recreational facilities compared with the project. However, it is anticipated that the Residential Alternative would be required to pay park fees (Quimby Act fees) or in-lieu land dedications that would offset such demand. In addition, the Residential Alternative would provide 5.2 acres of park area and a private recreational area adjacent to the apartment buildings. Therefore, while the Residential Alternative may create greater impacts relative to recreation facilities, overall impacts would be less than significant, similar to the project. This would represent an impact similar to the proposed project.

6.4.16 - Transportation and Traffic

The project is expected to generate approximately 4,905 PCE trips per day (according to Appendix I, Traffic Study’s Table 4-2, Project Trip Generation Summary prepared for the project). As indicated within Section 3.16, Traffic and Transportation, implementation of Mitigation Measures TRAN-1a to TRAN-1c, TRAN-4a to TRAN-4e, and TRAN-5 would be required for the project.

Despite incorporation of these mitigation measures, however, cumulative impacts to mainline segments of the I-10 Freeway, I-10 ramps, and several other intersections would remain adverse and unavoidable under Opening Year 2018 Existing Plus Ambient Plus Project, 2018 Existing Plus Ambient Plus Project Plus Cumulative and 2040 Horizon Conditions, as discussed under Section 6.1.2, above. Although the project would implement mitigation to reduce these impacts to acceptable levels, the County of Riverside cannot control the timing of certain improvements, and impacts would remain significant and unavoidable.

Using the ITE trip generation factor of 9.52\(^3\) trips per dwelling for Single-Family Detached Housing, the estimated number of average daily trips (ADT) for the Residential Alternative is estimated at 7,540 trips, or approximately 53 percent more trips than the 4,905 daily PCE trips that would occur under the project (Urban Crossroads 2015b). The Residential Alternative would be required to provide mitigation measures similar to the project, but would ultimately have greater cumulatively significant and unavoidable impacts than the project for the I-10 Freeway mainline and on-and off-ramps at Cherry Valley Boulevard, as well as the intersection of Cherry Valley Boulevard/Calimesa Boulevard.

6.4.17 - Utilities and Service Systems

Utilities and service system impacts relate to water supply, wastewater, solid waste/landfill capacity, electricity, natural gas, and storm water drainage. With mitigation, the project would have a less than significant impact on utilities and service systems.

Typically, residential uses have a higher demand for utilities and service systems compared with warehouse uses or other or other employment generating uses. In particular, warehouse areas are generally not heated or cooled, thus reducing energy consumption. Water demand (and consequently

\(^3\) Trip Generation (8th edition), ITE.
sewer demand) of warehouse uses are also usually much less than residential uses, since employees in such facilities are not typically using water for household applications such as cooking, bathing, laundry, dishes, etc. Specifically, the Residential Development is estimated to use up to 12 times more water than the proposed project. Therefore, development and operation of the Residential Alternative would substantially increase the demand on utilities and service systems, specifically pertaining to water supply, wastewater, landfill capacity, electricity, and energy. Therefore, the Residential Alternative would result in higher demand and consumption of utilities and service systems than the project, although this could be offset by proper design and conservation features, likely resulting in a less than significant impact similar to the project.

6.4.18 - Conclusion for Residential Alternative

Table 6-5, Alternatives Comparison, provides a summary comparison, by individual issue area, for each alternative against the project. The Residential Alternative would result in similar significant adverse and unavoidable impacts to Air Quality and Traffic compared with the project, due to increased vehicle trips.

The remaining 14 issue areas under the Residential Alternative would be less than significant, similar to the project. When compared with the project, five areas would have greater (but still less than significant) impacts under the Residential Alternative (in the areas of Geology and Soils, Population and Housing, Public Services, Recreation, and Utilities and Service Systems); one areas would have fewer/reduced impacts compared with the project (Hydrology and Water Quality), and the remaining seven issue areas would have similar or equal impacts to the project (Table 6-5).

The Residential Alternative would not fully meet any of the project objectives, because it would not involve the development of an industrial park in support of regional warehouse distribution and logistics, and would not take advantage of the proximity to the I-10 Freeway to facilitate efficient goods movement. The Residential Alternative would also not improve the jobs-housing balance in the Cherry Valley/Calimesa area because it would not create any new jobs, and would not reduce commute times for residents. The Residential Alternative would partially meet Objective 2, in that it would create temporary construction jobs for the development of the single-family residences.

The Residential Alternative may also meet Objective 7 by providing for a reasonable return on investment, although this is less certain given the current housing market, because the region is still recovering from the relatively recent economic downturn that caused local housing prices to drop sharply. The creation of new housing units is also less desirable than warehousing uses, because of the current jobs-to-housing ratio. This ratio identifies the number of jobs available in a given region compared with the number of housing units in the same region. For example, a region with a jobs-to-housing factor of 1.5 would indicate that 1.5 jobs exist for every housing unit within that region. The 2010 estimated jobs-to-housing ratios for Riverside County was only 0.73, which is expected to increase to 1.14 by 2035. This is below the current SCAG standard of 1.24 jobs for every household, which means the creation of new housing units will only further contribute to this imbalance.4

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4 Adopted 2012 RTP Growth Forecast, Southern California Association of Governments.
**6.5 - Reduced Intensity Alternative**

Under the Reduced Intensity Alternative, the proposed development of the site would be scaled down by reducing the building square footage development footprint. For purposes of comparison, the project site plan consists of two buildings: Building 1 will comprise approximately 811,000 square feet, and Building 2 will comprise approximately 1,012,760 square feet, for a total of approximately 1,823,760 square feet of floor area. The project would occupy approximately 230 acres, of which approximately 154.9 acres would be included within the developed portion of the project and would include on-site parking and truck loading areas. The remaining 75.1 acres would remain as natural open space (approximately 32 percent of the project site).

The Reduced Intensity Alternative would develop two equally sized buildings of approximately 651,266 square feet, for a total floor area of 1,302,532 square feet, or a 30 percent reduction in building floor area. In addition, on-site parking and truck loading areas would be proportionally reduced as part of the Reduced Intensity Alternative. This alternative assumes that access to the site would be identical to the project, with access points provided off Cherry Valley Boulevard.

Impacts upon development and operation of Reduced Intensity Alternative compared with the project are discussed below. Refer to Exhibit 6-3 for a conceptual site plan.

**6.5.1 - Aesthetics**

Aesthetic impacts under the project were all determined to be less than significant, without the need for mitigation. The Reduced Intensity Alternative would have similar construction grading and earthwork requirements, and would have an overall design similar to the project consisting of two large buildings, but with a smaller development footprint, which would result in a commensurate reduction in any potential impacts related to aesthetics, light and glare. This alternative would also be of similar height to the project. Similar to the project, the Reduced Intensity Alternative would have no impact on scenic resources within a State scenic highway, and impacts of changes to the scenic character of the site would generally be similar to the project. Therefore, the Reduced Intensity Alternative would have reduced impacts on aesthetics, light, and glare compared with the project due to the smaller development footprint, but impacts under the project would also be less than significant.

**6.5.2 - Agricultural and Forest Resources**

Agricultural impacts for the project were determined to be less than significant. The Reduced Intensity Alternative would have agricultural and forest resources impacts equivalent to the project because, as detailed in Section 3.2, Agricultural Resources and Forest Resources, there is no Prime Farmland or Farmland of Statewide Importance or Forest Resources located within the project site. Thus, the Reduced Intensity Alternative will have less than significant impacts to agricultural and forest resources, similar to the project.
Exhibit 6-3
Reduced Intensity Alternative

Note: This is a conceptual plan. It is based on preliminary information which is not fully verified and may be incorrect. It is meant as a comparative aid in examining alternate development strategies and assumptions indicated are subject to revision as more reliable information becomes available.

6.5.3 - Air Quality

The RDEIR found that the project would have a cumulatively significant and unavoidable impact with respect to ROG and NOx emissions. SCAQMD regional emission thresholds would be exceeded even after all feasible mitigation is incorporated for NOx and ROG during operations. In addition, although the project would comply with all applicable SCAQMD rules and regulations, the project would impede timely attainment of ambient air quality standards and impede implementation of the AQMP, because its emissions exceed the SCAQMD regional significance thresholds for NOx and ROG. Thus, the project will have a cumulatively considerable impact regarding attainment of air quality standards.

For purposes of modeling construction emissions, the Reduced Intensity Alternative and the project would disturb roughly the same amount of ground surface and involve roughly the same amount of grading and building construction activity. Although the building floor area would be reduced by 30 percent, the emissions would be roughly similar, due to the use of similar construction equipment for a similar duration, and because roughly the same acreage would be disturbed even if the vertical improvements on the site were scaled back.

Any differences in emissions would likely be negligible and would not result in a change to the impact determination. Therefore, construction emissions would be similar to the project.

The Reduced Intensity Alternative would exceed the SCAQMD mitigated regional construction emissions threshold for NOx of 100 pounds per day, but would not exceed the threshold of 75 pounds per day for ROG emissions. The project construction is estimated to produce 217.97 pounds of NOx per day and 47.09 pounds per day of ROG, and the grading and construction activities under both scenarios would be similar.

The Reduced Intensity Alternative would generate 3,433 daily PCE trips, thereby reducing total operational vehicle trips by approximately 30 percent (from a total of 4,905 daily PCE trips that would occur under the project) and reducing estimated total long-term air quality emissions compared with the project. CalEEMod version 2016.3.1 was used to estimate operational emissions for the Reduced Intensity Alternative. Based on modeling, the project would result in comparable SOx emissions compared with the Reduced Intensity Alternative. The project would result in greater ROG emissions than the Reduced Intensity Alternative, and both scenarios would result in significant NOx emissions. The project would result in proportionally greater CO, PM_{10}, and PM_{2.5} emissions; however, both the Reduced Intensity Alternative and the Project would result in less than significant impacts to CO, SOx, PM_{10} and PM_{2.5}. The calculated emissions are approximate based on a 30 percent reduction. It is unlikely that the Reduced Intensity Alternative would meet the full 30 percent reduction; therefore, these calculations are approximate. Nonetheless, because of the type of use (logistics warehousing), a 30 percent reduction would not fully reduce NOx and ROG emissions to less than significant levels.

Regional air quality impacts under the Reduced Intensity Alternative would be significant and similar to the project for construction NOx and ROG emissions. In addition, the Reduced Intensity Alternative would not avoid the significant and unavoidable impact due to operational NOx.
emissions. Similar to the project, the Reduced Intensity Alternative would have a cumulatively considerable impact regarding attainment of air quality standards.

### 6.5.4 - Biological Resources

The area of the site that would be occupied by the Reduced Intensity Alternative would be approximately 30 percent smaller than the project, resulting in a smaller development footprint and a corresponding reduction in potential impacts to biological resources.

However, the Reduced Intensity Alternative would likely need to incorporate mitigation for biological resources similar to the project, since it would also involve the disturbance of land and new construction on a site that is currently undeveloped. Impacts would be roughly similar to the project, and would be less than significant with mitigation for both the project and the Reduced Intensity Alternative.

### 6.5.5 - Cultural Resources

The only potential impacts to cultural resources would occur from the unexpected discovery of new resources, likely during grading activities. The Reduced Intensity Alternative and the project would necessarily disturb similar areas with respect to grading and surface area disturbance. Impacts to cultural resources for both the project and the Reduced Intensity Alternative would be less than significant with mitigation.

### 6.5.6 - Geology and Soils

The RDEIR found that the site is considered developable from a geotechnical perspective; however, mitigation would be required to reduce impacts regarding structural setback zones, hydroconsolidation, soil stability, and landslides. Implementation of mitigation measures and compliance with County and Uniform Building Code construction standards would reduce geology and soils impacts to less than significant levels. The smaller size of the Reduced Intensity Alternative would minimally reduce potential exposure of building occupants to strong seismic groundshaking. However, impacts related to geology and soils would remain similar to the project. Through consistency with recommendations outlined within the project’s Geotechnical Investigation Report, as well as standard Uniform Building Code requirements, impacts would remain roughly equivalent to the project.

### 6.5.7 - Greenhouse Gas Emissions

The County of Riverside’s Climate Action Plan (CAP) is a geographically specific plan that was adopted by the County of Riverside for the purpose of reducing GHG emissions under the control or influence of the County consistent with AB 32 and subsequent state legislation and state agency action to address climate change. The CAP has adopted a target of reducing GHG emissions down to 15 percent below 2008 levels within the County of Riverside by 2020.

Pursuant to the CAP, and discussed in further detail in Section 3.7, projects that achieve at least 100 points based on the County’s screening tables are determined to be consistent with the reduction quantities anticipated in the County’s GHG Technical Report. As such, further project-specific GHG
quantification is not required. Consistent with State CEQA guidelines, such projects are determined to have a less than significant individual and cumulative impact for GHG emissions. The RDEIR determined that the project would be less than significant after incorporating at least 100 points from the Riverside County Greenhouse Gas Emissions Screening Tables.

Likewise, it is logical to conclude that the Reduced Intensity Alternative would be able to achieve the necessary 100 points from the screening tables, because this alternative would be a smaller version of the project. Greenhouse gas emissions would be further reduced in proportion to the 30 percent reduction in building square footage and corresponding vehicle trips. Therefore, the impacts of the Reduced Intensity Alternative with respect to greenhouse gas emissions would also be considered less than significant, similar to the proposed project.

6.5.8 - Hazards and Hazardous Materials

The Reduced Intensity Alternative would reduce total building area at the site by 30 percent. Although building area at the site would be reduced, safety risk impacts would remain roughly equivalent to the project, due to the similar design and uses at the site. While the Reduced Intensity Alternative would likely disturb a smaller area of ground surface during construction and would result in less potential exposure to, and disposal of potentially contaminated soils due to prior agricultural uses on-site, this impact would still be potentially significant, and similar mitigation would need to be incorporated. Therefore, impacts related to hazards and hazardous materials would be less than significant with mitigation for both the project and the Reduced Intensity Alternative.

6.5.9 - Hydrology and Water Quality

Impacts to Hydrology and Water Quality would be less than significant for both the project and the Reduced Intensity Alternative, as all drainage and water quality issues would be fully addressed under each scenario with the installation of stormwater and drainage improvements, which would likely be installed in the same location as proposed by the project, on the parcels located within the City of Calimesa. Although the 30 percent reduction in the size of the Reduced Intensity Alternative would likely result in less impervious surfaces and less surface runoff, impacts to hydrology and water quality would be less than significant under both the Reduced Intensity Alternative and the project.

6.5.10 - Land Use and Planning

The project would require a General Plan amendment and zone change, among other County approvals. However, the RDEIR found that the project would not divide an existing community nor would it result in a 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, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. Although the project would require a General Plan amendment and zone change, it would not require a Foundation Component amendment to the General Plan. In addition, as discussed in Section 3.3-10, Land Use and Planning, the Gateway area of Cherry Valley is already in the process of transitioning to land uses with higher intensities and residential densities compared with Cherry Valley proper. This
is evidenced by the many development plans, proposed and approved, adjoining the project site or within the Gateway area, including the large-scale residential development approved for the former Sunny Cal Egg Ranch directly to the south of the project, and the commercially zoned areas within the City of Calimesa directly to the west of the project. Therefore, impacts with respect to Land Use and Planning for the project were determined to be less than significant.

The Reduced Intensity Alternative includes development similar to the project, although the building area would be reduced by 30 percent. Regardless, the Reduced Intensity Alternative would still require a General Plan amendment and zone change, as would the project. Further, similar to the project, the Reduced Intensity Alternative would not divide an existing community, nor would it result in a conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, as with the project, impacts with respect to Land Use and Planning would be less than significant.

6.5.11 - Mineral Resources

The RDEIR found that the project would have a less than significant impact regarding impacts to mineral resources. While the Reduced Intensity Alternative would be 30 percent smaller than the project, this reduction would not provide a meaningful decline in the level of significance compared with the project, and impacts to mineral resources would be less than significant, similar to the project.

6.5.12 - Noise

The RDEIR found that the project would not result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. However, the RDEIR found that project construction would result in the following noise impacts:

- Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

As a result, mitigation measures to reduce project construction noise and loading/unloading activity noise to less than significant levels were required.

The Reduced Intensity Alternative would generate less long-term traffic noise, since it would generate fewer vehicle trips than the project. Also, the Reduced Intensity Alternative would likely not exceed the 3dB (decibel) threshold over ambient levels, and isolated noise levels at project ingress/egress points would not increase noise levels during peak hours for sensitive receptors. Therefore, similar to the project, the Reduced Intensity Alternative would not create a substantial permanent increase in ambient noise levels. In addition, short-term noise levels during construction would be less than significant with the implementation of mitigation measures. Similarly, operational noise impacts from loading/unloading activities would be reduced to less than
significant with implementation of the stated mitigation measures. Therefore, potential short and long-term noise impacts from the Reduced Intensity Alternative would be less than significant, similar to the project. The Reduced Intensity Alternative would generate 30 percent fewer vehicle trips than the project (refer to Section 6.3.16, Transportation and Traffic) and would therefore reduce traffic noise compared with the project. In summary, the Reduced Intensity Alternative would have slightly reduced noise impacts compared with the project, due to the reduction in vehicle trips; however, noise impacts under the project would also be less than significant.

### 6.5.13 - Population and Housing

Population and housing impacts relate to housing, affordable housing, displacement of persons or housing, and population. The jobs attributed to the project are not anticipated to require specific skills that necessitate substantial hiring outside of the project region. Given the high rate of unemployment in the County and surrounding cities, most of the anticipated new jobs generated by the project would likely be filled from individuals already living in the project region. Therefore, the RDEIR found that the project neither would directly nor indirectly induce substantial new population growth in the area. Given the reduced building area of the Reduced Intensity Alternative, fewer jobs would be created, and potential population and housing impacts would be less than significant, similar to the project.

### 6.5.14 - Public Services

The Reduced Intensity Alternative would produce 30 percent less square footage compared with the project. With payment of applicable development impact fees that would correlate to the equivalent impact on public services, impacts to fire protection, police protection, schools, parks, public facilities vehicles and equipment would be less than significant under the Reduced Intensity Alternative, similar to the project.

### 6.5.15 - Recreation

Recreation impacts relate to potential impacts to recreational facilities, usage of existing neighborhood/regional parks, and recreational trails. The RDEIR found that the project would have a less than significant impact regarding recreational resources, because the project would not create any new residential dwellings, and employees of warehouse facilities such as the project are unlikely to use recreation facilities during the workday, and generally do not create demand for such resources. The Reduced Intensity Alternative would produce 30 percent less square footage compared with the project, but due to the similar type of development and uses at the site, total demand for recreation facilities would remain roughly similar to the project, and would be less than significant for both the project and the Reduced Intensity Alternative.

### 6.5.16 - Transportation and Traffic

The project is expected to generate approximately 4,905 passenger car PCE trips per day (Appendix I, Traffic Study’s Table 4-2, Project Trip Generation Summary). As indicated within Section 3.16, Traffic and Transportation, implementation of Mitigation Measures TRAN-1a to TRAN-1c, TRAN-4a to TRAN-4e, and TRAN-5 would be required for the project.
Despite incorporation of these measures, however, cumulative impacts (under 2018 Existing Plus Ambient Plus Project, 2018 Existing Plus Ambient Plus Project Plus Cumulative and Horizon Year 2040 conditions) to several local intersections, I-10 Freeway/Cherry Valley ramps and mainline segments of the I-10 Freeway would remain adverse and unavoidable on a cumulative basis, as discussed under Section 6.1.2, above. Although the project mitigates impacts to the extent feasible, the timing of certain necessary improvements cannot be controlled, and therefore impacts are significant and unavoidable.

Impacts on transportation and traffic would be reduced under the Reduced Intensity Alternative. The buildable area of the site that would be occupied by the proposed project would be reduced by approximately 30 percent, and would result in a commensurate reduction in vehicle trips, for 3,433 net PCE trips per day compared with the 4,905 daily PCE trips that would be generated by the project. Regardless, while the Reduced Intensity Alternative would create fewer trips, it would also be required to provide mitigation measures similar to the project. Based on input from the County of Riverside Transportation Department, the Reduced Intensity Alternative could accommodate a loop road, thereby providing improved internal circulation and additional left-turn access from Cherry Valley Boulevard.

Despite generating fewer trips, the Reduced Intensity Alternative would ultimately have cumulatively significant and unavoidable impacts (albeit somewhat lesser than under the project) for the I-10 Freeway mainline, on- and off-ramps at Cherry Valley Boulevard, and other impacted intersections. This is due to the fact that these impacts would occur under 2018 Existing Plus Ambient Plus Project and 2018 Existing Plus Ambient Plus Project Plus Cumulative and Horizon Year 2040 conditions, even without the project. Therefore, the Reduced Intensity Alternative would also result in cumulatively significant and unavoidable traffic impacts similar to the project, although these impacts would be somewhat reduced under the Reduced Intensity Alternative.

**6.5.17 - Utilities and Service Systems**

Impacts to Utilities and Services Systems under the Reduced Intensity Alternative would be less than under the project, mainly reflecting the 30 percent reduction in the building square footage and development footprint. Consequently, demand for utilities and services would be proportionately reduced under the Reduced Intensity Alternative. However, all impacts would remain less than significant or less than significant with mitigation, similar to the project.

**6.5.18 - Conclusion for Reduced Intensity Alternative**

Because of the 30 percent reduction in building area, the impacts under the Reduced Intensity Alternative would be less than the project for many issue areas. However, potential impacts with respect to transportation and traffic and air quality would remain significant and unavoidable under this alternative, similar to the project. Although the Reduced Intensity Alternative’s operational emissions would not exceed the SCAQMD significance threshold for ROG, it would still exceed SCAQMD significance threshold for operational NOx emissions. Therefore, implementation of the Reduced Intensity Alternative will still result in an exceedance of operational emission thresholds for NOx.
This alternative does not meet all of the project objectives to the same degree as the project. For example, Objective 2 calls for providing additional employment opportunities to local residents of Cherry Valley and neighboring cities to provide local economic opportunities and reduced commute times. The Reduced Intensity Alternative would result in approximately 30 percent fewer jobs compared with the project, due to the corresponding reduction in size. In addition, Objective 3 calls for providing new development that will assist the County in obtaining fiscal balance in the years and decades ahead. The reduction in the size of the project will limit the attainment of this objective by generating less tax revenues. Ultimately, implementation of the Reduced Intensity Alternative would reduce building sizes compared with the project, which narrows the range of warehouse tenants who could potentially occupy the site. This reduction would limit the range of users to those needing smaller square footage, because the Reduced Intensity Alternative would be less attractive to tenants/end users who required larger spaces. Similarly, this alternative would meet Objective 4 and Objective 5, which relate to the location of the project near the freeway and how proper siting could reduce the potential for truck traffic within residential areas and neighboring cities. It is unlikely, however, that this alternative would be required or able to (based on the return on investment) to implement all of the same traffic and air quality reduction strategies in place under the proposed project. Furthermore, the Reduced Intensity Alternative would meet Objective 6, in that it would facilitate goods movement for local, regional, and nationwide economic growth. However, the Reduced Intensity Alternative would not meet it to the same extent as the project, due to its smaller operational size. This may also limit the ability of the Reduced Intensity Alternative to fully meet Objective 7, which is to generate a reasonable return on the investment needed to develop the project. Objective 8 also calls for maximizing use of the site, a goal that would not be fully realized under the Reduced Intensity Alternative due to the 30 percent reduction in building area. The Reduced Intensity Alternative would meet Objective 9 as well, but to a lesser extent because fewer design features may be feasible based on the return on the investment for a smaller use. Lastly, the Reduced Intensity Alternative would not meaningfully reduce any of the significant environmental impacts that would occur under the project despite the smaller building footprint, since grading and new construction would be required under both scenarios.

6.6 - Mixed Use/Business Park Alternative

This alternative would replace Building 1 under the proposed project with 14 smaller business park buildings, totaling 581,470 square feet. These buildings would consist of flex-type or incubator one- or two-story buildings served by a common roadway system. The tenant spaces would be flexible and would be designed to lend themselves to a variety of uses. The spaces may include offices, retail and wholesale stores, restaurants, recreational areas and warehousing, manufacturing, light industrial, or scientific research functions. Based on the average mix of tenants in business park settings, it is estimated that 20 to 30 percent would consist of office/commercial uses, and the remaining 70 to 80 percent would consist of a mix of industrial warehousing, general office building, corporate headquarters, single-tenant office building and research and development uses.

The 1,012,760 square foot Building 2 proposed under the project would still be constructed, for a total of 1,594,230 square feet, or an approximately 13 percent reduction in building floor area compared with the proposed project. This alternative would occupy 152.76 gross acres. This
alternative assumes that access to the site would be similar to the proposed project, with access points provided off Cherry Valley Boulevard. Refer to Exhibit 6-4 for a conceptual site plan.

Impacts upon development and operation of the Mixed Use/Business Park Alternative are discussed below.

6.6.1 - Aesthetics

Aesthetics impacts relate to changes to scenic resources within a State scenic highway, visual character, and new sources of light and glare. While this alternative would have similar structure heights (due to Riverside County’s 40 foot height limitation) and would require building and parking lot lighting, the two projects would have differing looks and styles related to building design, signage, entry points, internal circulation and landscaping. The square footage under the Mixed Use/Business Park Alternative would be divided among multiple smaller buildings and one large building, instead of the two, larger buildings that would be developed under the project, resulting in different massing and scale of the buildings. However, under both the project and the Mixed Use/Business Park Alternative, the site would be developed with a similar intensity on land that is currently vacant.

The Mixed Use/Business Park Alternative would also need to be consistent with the County’s Municipal Code, which regulates light and glare from structures on-site. The Mixed Use/Business Park Alternative would have no impact on scenic resources within a State scenic highway, and impacts from changes to the scenic character of the site would be similar to the project. Therefore, the Mixed Use/Business Park Alternative would have less than significant impacts to aesthetics, light, and glare, similar to the project.

6.6.2 - Agriculture and Forestry Resources

Agriculture and forestry impacts relate to potential impacts to forestry resources, Williamson Act land and Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland). The project site is categorized as Farmland of Local Importance (147.64 acres) and Other Land (97.67 acres) under the Farmland Mapping and Monitoring Program (FMMP). Furthermore, the project site is not currently used for agriculture. It is not subject to a Williamson Act contract, and does not contain any designated forestland. Since the Mixed Use/Business Park Alternative would develop the project in a manner similar to the project, coupled with the lack of prime farmland on-site or operational impacts to surrounding agricultural operations, it is anticipated that development of the Mixed Use/Business Park Alternative will have less than significant impacts to agriculture and forestry resources, similar to the project.

6.6.3 - Air Quality

The RDEIR found that the project would have a cumulatively significant and unavoidable impact with respect to ROG and NOx emissions. SCAQMD regional emission thresholds would be exceeded even after all feasible mitigation is incorporated for NOx and ROG during operations. In addition, although the project would comply with all applicable SCAQMD rules and regulations, the project would impede timely attainment of ambient air quality standards and impede implementation of the
AQMP, because its emissions exceed the SCAQMD regional significance thresholds for NO\textsubscript{x} and ROG. Thus, the project will have a cumulatively considerable impact regarding attainment of air quality standards.

The Mixed Use/Business Park Alternative and the project would disturb roughly the same amount of ground surface and involve roughly the same amount of grading and building construction activity; therefore, construction emissions would be similar to the project.

The Mixed Use/Business Park Alternative would generate 7,645 daily PCE trips, thereby increasing total operational vehicle trips by approximately 64 percent (from a total of 4,905 daily PCE trips) and increasing estimated total long-term air quality emissions compared with the project. CalEEMod version 2016.3.1 was used to estimate operational emissions for the Mixed Use/Business Park Alternative. The operational air pollutant emissions for the Mixed Use/Business Park Alternative are shown in Table 6-4. As shown in the table, the project would have comparable SO\textsubscript{x}, PM\textsubscript{10}, and PM\textsubscript{2.5} emissions, to the Mixed Use/Business Park Alternative. The project would have greater ROG emissions than the Mixed Use/Business Park Alternative, and both scenarios would have significant NO\textsubscript{x} emissions. The project would have fewer CO emissions than the Mixed Use/Business Park Alternative.

<table>
<thead>
<tr>
<th>Source</th>
<th>Emissions (pounds per day)</th>
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</thead>
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<tr>
<td></td>
<td>ROG</td>
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<tr>
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<td>11.2</td>
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<tr>
<td>Mobile—Heavy Duty Diesel Trucks</td>
<td>8.9</td>
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<td>Yes</td>
</tr>
<tr>
<td>Would Alternative Result in Significant Impact?</td>
<td>No</td>
</tr>
</tbody>
</table>

Notes:

ROG = reactive organic gases NO\textsubscript{x} = nitrogen oxides
SO\textsubscript{x} = sulfur oxides PM\textsubscript{10} and PM\textsubscript{2.5} = particulate matter CO = carbon monoxide
Area = painting and consumer products

Source of emissions: Appendix A: CalEEMod Output.
Source of project emissions: Table 33 (mitigated summer)
Source of thresholds: South Coast Air Quality Management District 2011a.

The Mixed Use/Business Park Alternative would not avoid the significant and unavoidable impact that would occur under the project due to operational NO\textsubscript{x} emissions, but would avoid the
significant and unavoidable impact that would occur due to ROG emissions. Regardless, similar to the project, the Mixed Use/Business Park Alternative would have a cumulatively considerable impact regarding attainment of air quality standards.

6.6.4 - Biological Resources

Biological resources impacts relate to effects on candidate, sensitive or special status species, and conflicts with local policies or ordinances protecting biological resources. The RDEIR found that mitigation is required under the project for potential impacts to USACE and CDFW jurisdictional habitats and MSHCP Riverine areas. Additionally, with implementation of mitigation measures for potential impacts to burrowing owls, raptors, and water resources, the project would have a less than significant impact. Development of the Mixed Use/Business Park Alternative would involve a similar amount of ground disturbance on a site that is currently vacant. Therefore, impacts would be roughly similar under the Mixed Use/Business Park Alternative, and would be less than significant with mitigation, similar to the project.

6.6.5 - Cultural Resources

Cultural resources impacts relate to potential impacts to historical, cultural, and paleontological resources, as well as potential impact to human remains. The RDEIR found that the project would have less than significant impacts regarding cultural resources with mitigation, to account for the potential that buried cultural resources are discovered during project construction. Mitigation is also required to reduce potential impacts to paleontological resources to a less than significant level.

The Mixed Use/Business Park Alternative scenario and the project would be roughly equivalent with respect to ground surface disturbance, and similar mitigation measures would likely be required under both scenarios. Therefore, impacts related to historical, cultural, and paleontological resources, as well as potential impact to human remains, would be less than significant under the Mixed Use/Business Park Alternative, similar to the project.

6.6.6 - Geology and Soils

Geology and Soil impacts relate to potential hazards associated with liquefaction, unstable soil, and seismic settlement. The RDEIR found that the site is considered developable from a geotechnical perspective; however, mitigation would be required to reduce impacts regarding structural setback zones, hydroconsolidation, soil stability, and landslides. Implementation of mitigation and compliance with County and Uniform Building Code construction standards would reduce geology and soils impacts to less than significant levels for the project.

Given the similar size and scale of the Mixed Use/Business Park Alternative, this alternative would face similar hazards related to geological impacts, and would require mitigation for structural setback zones, hydroconsolidation, soil stability, and landslides. Overall, impacts would be less than significant with mitigation, similar to the project.
6.6.7 - Greenhouse Gas Emissions

The County of Riverside’s Climate Action Plan (CAP) is a geographically specific plan that was adopted by the County of Riverside for the purpose of reducing GHG emissions under the control or influence of the County consistent with AB 32 and subsequent state legislation and state agency action to address climate change. The CAP has adopted a target of reducing GHG emissions down to 15 percent below 2008 levels within the County of Riverside by 2020.

Pursuant to the CAP, and discussed in further detail in Section 3.7, projects that achieve at least 100 points based on the County’s screening tables are determined to be consistent with the reduction quantities anticipated in the County’s GHG Technical Report. As such, further project-specific GHG quantification is not required. Consistent with State CEQA guidelines, such projects are determined to have a less than significant individual and cumulative impact for GHG emissions. The RDEIR determined that the project would be less than significant after incorporating at least 100 points from the Riverside County Greenhouse Gas Emissions Screening Tables.

Likewise, it is logical to conclude that the Mixed Use/Business Park Alternative would be able to achieve the necessary 100 points from the screening tables, because this alternative would be a type of use relatively similar to the project; therefore, similar mitigation or project design features could potentially be implemented. However, because emissions are greater for the ozone precursor NOx (ozone is a greenhouse gas) under this alternative, GHG impacts would be greater under the Mixed Use/Business Park Alternative than the proposed project. Therefore, the impacts of the Mixed Use/Business Park Alternative with respect to greenhouse gas emissions would be greater than the project, but through compliance with the County’s CAP would also be considered less than significant.

6.6.8 - Hazards and Hazardous Materials

Hazards and Hazardous Material impacts relate to posing a hazard to the public or environment, handling hazardous materials, interfering with emergency response plans, airport hazards, potential location on a hazardous site, location in relation to existing or proposed schools and location in relation to fire hazard areas. With mitigation for potential soils contamination due to previous agricultural uses on-site, the project would have a less than significant impact regarding hazards and hazardous materials.

The Mixed Use/Business Park Alternative scenario and the project would disturb similar amounts of ground surface during construction, resulting in similar potential for exposure and disposal of potentially contaminated soils due to the prior agricultural uses on-site. In addition, the Mixed Use/Business Park Alternative would result in construction (improvements and building) and operational activities that are similar to the project.

The Mixed Use/Business Park Alternative would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions related to the release of hazardous materials into the environment, because the operations on-site would comply with all applicable federal, state, and local laws regarding commercial land uses. Further, similar to the project, the alternative would not handle substantial quantities of hazardous materials, and there
are no uses contemplated that would involve the use of hazardous materials. Therefore, with implementation of similar mitigation measures, impacts would be less than significant for both the Mixed Use/Business Park Alternative and the project.

6.6.9 - Hydrology and Water Quality

Hydrology and Water Quality impacts relate to drainage, water quality, groundwater, runoff, and flood hazards. With mitigation, the project would have a less than significant impact regarding hydrology and water quality.

Development of the Mixed Use/Business Park Alternative would not substantially reduce the amount of land disturbed by construction, nor reduce the amount of impermeable surfaces despite the 22 percent reduction in building square footage, since internal access roadways would need to be provided between the mixed use buildings. Therefore, with mitigation measures to control stormwater run-off and associated pollutants, impacts of the Mixed Use/Business Park would be less than significant and similar to those of the project with respect to hydrology and water quality.

6.6.10 - Land Use and Planning

The project would require a General Plan amendment and zone change, among other County approvals. However, the RDEIR found that the project would not divide an existing community nor would it result in a 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, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. Although the project would require a General Plan amendment and zone change, it would not require a Foundation amendment to the General Plan, since the proposed land uses are consistent with the Community Development Foundation (which the project is located within). In addition, as demonstrated in Section 3.10, Land Use and Planning, the project is in accordance with the Pass Area Plan, the Cherry Valley Policy Area, and the Cherry Valley Gateway Policy Area. Therefore, impacts with respect to Land Use and Planning for the project were determined to be less than significant.

The Mixed Use/Business Park Alternative includes development similar in nature, although it would generate more traffic and pollutant emissions. The Mixed Use/Business Park Alternative would also require a General Plan amendment and zone change, as would the project. Further, similar to the project, this alternative would not divide an existing community, nor would it result in a conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. Impacts with respect to Land Use and Planning would be less than significant under the Mixed Use/Business Park Alternative, similar to the project.

6.6.11 - Mineral Resources

Mineral resources impacts relate to loss of mineral resources, incompatible land uses and hazards related to quarries/mines. The RDEIR found that the project would have a less than significant impact regarding mineral resources. The area that would be disturbed by the Mixed Use/Business
San Gorgonio Crossing
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Park is similar to the project, and no impacts beyond those identified for the project would occur. Therefore, the Mixed Use/Business Park Alternative would result in less than significant impacts to mineral resources, similar to the project.

6.6.12 - Noise
The Mixed Use/Business Park Alternative would increase vehicle trips by 56 percent (refer to 6.5.16, Transportation and Traffic) compared with the project. Therefore, while construction noise impacts would remain similar, the increase in vehicle trips would increase traffic noise, and would likely result in noise levels that would exceed cumulative traffic noise thresholds along segments of Cherry Valley Boulevard. In addition, this alternative would likely result in operational noise impacts from loading/unloading activities similar to the project. Impacts would therefore be substantially greater under the Mixed Use/Business Park Alternative compared with the project, and additional mitigation measures may be needed to offset the increase in traffic noise under the Mixed Use/Business Park Alternative, beyond what would be required for the project.

6.6.13 - Population and Housing
Population and housing impacts relate to housing, affordable housing, displacement of persons or housing, and population. The estimated jobs attributed to the project are not anticipated to require specific skills that necessitate substantial hiring outside of the project region. Given the high rate of unemployment in the County and surrounding cities, most of the anticipated new jobs would likely be filled by individuals already living in the project region. Therefore, the RDEIR found that the project neither would directly nor indirectly induce substantial new population growth in the area.

The Mixed Use/Business Park Alternative would generate an estimated 667 employees from the mixed use/business park uses alone, based on the generation factor of one job per 600 square feet of Business Park square footage used in the 2008 Riverside County General Plan. When combined with the jobs that would be generated by the 1,012,760 square feet of industrial uses which would be retained as “Building 2,” this alternative would exceed the estimated 748 jobs (including 507 permanent on-site full time jobs and 241 off-site indirect and induced jobs), thus improving the jobs-to-housing ratio. However, because these jobs would also be filled by the existing workforce in the project region, impacts to population and housing under the Mixed Use/Business Park Alternative would be less than significant and similar to the project.

6.6.14 - Public Services
The Mixed Use/Business Park Alternative would produce 13 percent less square footage compared with the project. Demand on school facilities and other resident-focused facilities such as libraries, recreational facilities would be similar to the project, and would be less than significant. Police and Fire service demand would likely be higher compared with the project, due to the higher number of employees, and the higher vehicle trips associated with the Mixed Use/Business Park Alternative compared with the project (7,645 versus 4,905; refer to Section 6.6.16, below). However, applicable development impact fees, geared specifically toward service demand levels for commercial uses would offset impacts of the Mixed Use/Business Park Alternative, similar to the project. Therefore,

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1 Riverside County General Plan, Appendix E, Socioeconomic Build-out Projections Assumptions & Methodology.
although demand for some services may be greater for the Mixed Use/Business Park Alternative compared with the project, impacts would remain less than significant for both the project and this alternative.

6.6.15 - Recreation

The Mixed Use/Business Park Alternative would develop 13 percent less square footage compared with the project (for Building 2). However, because of the similar use of the site, total demand for recreation facilities would remain roughly similar to the project, since employees are not likely to use recreation facilities during the workday. Similar to the project, the jobs created for the alternative would likely be filled by employees in the region, as opposed to bringing in new employees to the region who would use existing recreation facilities near their places of residence. Impacts to recreation under the Mixed Use/Business Park Alternative would be less than significant, similar to the project.

6.6.16 - Transportation and Traffic

The Mixed Use/Business Park Alternative would increase the number of daily vehicle trips compared with the project. The project would generate approximately 4,905 PCE trips per day (Appendix I, Traffic Impact Study’s Table 4-2, Project Trip Generation Summary), and the Mixed Use/Business Park Alternative would generate an estimated 7,645 PCE trips, roughly 56 percent more than the number of vehicles generated by the project (Urban Crossroads 2015b). Thus, the project would generate approximately 2,740 fewer PCE trips than the Mixed Use/Business Park Alternative. As indicated within Section 3.16, Traffic and Transportation, implementation of Mitigation Measures TRAN-1a to TRAN-1c, TRAN-4a to TRAN-4e, and TRAN-5 would be required for the project and, likewise, would be assumed for the Mixed Use/Business Park Alternative. Further, additional mitigation measures to offset this level of traffic would likely be required for the Mixed Use/Business Park Alternative. Given the increase in vehicle trips from the Mixed Use/Business Park Alternative compared with the project, additional level of service failures at street intersections and freeway ramps would be anticipated, unless additional mitigation measures were implemented, as feasible. Cumulative impacts to mainline segments of the I-10 Freeway and I-10 ramps would also be exacerbated and would remain significant, adverse, and unavoidable. Impacts would also remain significant and unavoidable for the Cherry Valley Boulevard/Calimesa Boulevard and other impacted intersections under 2040 conditions, as discussed under Section 6.1.2, above.

Consequently, the Mixed Use/Business Park Alternative would also result in a significant and unavoidable traffic impact similar to the project, but to a greater degree than the project.

6.6.17 - Utilities and Service Systems

Impacts to Utilities and Services Systems under the Mixed Use/Business Park Alternative would likely be greater than the project with respect to water, sewer, electricity, natural gas, based on the higher number of employees and visitors to under the Mixed Use/Business Park Alternative (see discussion under 6.5.14, above). However, it is expected that these increases in demand would be offset by applicable development impact fees and user/service fees, which would reflect the higher demand. In addition, if the Mixed Use/Business Park Alternative required new or expanded facilities,
mitigation could be imposed to require that such facilities be provided. Therefore, although demand for services would be greater under the Mixed Use/Business Park Alternative than the project, impacts would still likely be less than significant, similar to the project.

6.6.18 - Conclusion for Mixed Use/Business Park Alternative

Table 6-5 provides a summary comparison, by individual issue area, for each alternative to the project. The Mixed Use/Business Park Alternative would not eliminate any significant adverse and unavoidable impacts compared with the project, due to the need for site grading and new construction on the site, and the increase in vehicle trips for the Mixed Use/Business Park Alternative compared with the project (refer to Section 6.5.16, Transportation and Traffic). In fact, due to the increase in vehicle trips, it would result in a worsening of these impacts with respect to air quality, greenhouse gas emissions and cumulative traffic impacts on the I-10 Freeway with respect to mainline segments and Cherry Valley Boulevard ramps. In addition, the Mixed Use/Business Park Alternative, similar to the project (refer to discussion in Section 6.5.3, Air Quality) would exceed SCAQMD operational significance thresholds for ROG and NOx criteria pollutants. Although less than significant, the Mixed Use Business Park Alternative would also generate greater GHG emissions than the proposed project.

This alternative would not result in significant adverse and unavoidable impacts in any of the 14 remaining issue areas, although it would result in increased impacts related to noise, public services and utilities and service systems. The remaining 11 issue areas would have impacts similar to the project (Table 6-3).

The Mixed Use/Business Park Alternative would likely meet three of the project objectives: Objective 2 (provide additional employment opportunities), Objective 3 (fiscal balance for the County) and Objective 7 (reasonable return on investment). This alternative would also meet Objectives 6 (facilitate goods movement), and 9 (regional logistics warehouse that meets industry standards) but to a much lesser extent than the project. Additionally, although this alternative would locate industrial uses near existing roadways and freeways (Objective 5), traffic and air pollutant emissions would actually increase under the Mixed Use/Business Park Alternative and this objective cannot be met. The Mixed Use/Business Park Alternative may provide more jobs than the project because of its office, research, and development components, although the exact tenant mix is uncertain. In addition, fewer jobs would be available to adults with only a high school education under the Mixed Use/Business Park Alternative than under the project. This is critical for the Pass Area and Riverside County, where it has been estimated that approximately 45 percent of adults have a high school education or less. This alternative would meet Objective 1 to a lesser degree than the proposed project, because the Mixed Use/Business Park Alternative would reduce the size of the regional warehouse distribution and logistics component, and would not facilitate efficient goods movement by taking advantage of the site’s proximity to the I-10 Freeway to the same extent as the proposed project. Objectives 4 and 5 would also not be met to the same extent, which are to provide convenient freeway access in a manner that limits truck traffic disruption to residential areas within Cherry Valley and neighboring cities, and to locate industrial uses near existing roadways and freeways to reduce traffic congestion and pollutant emissions. If the site were partially developed for Mixed Use/Business Park uses, the opportunity to locate industrial uses in this prime location...
near a major freeway would be reduced, and traffic congestion and pollutant emissions would not be reduced.

6.7 - Environmentally Superior Alternative

As required by State CEQA Guidelines Section 15126.6, one of the alternatives must be identified as an Environmentally Superior Alternative. The Environmentally Superior Alternative is the one that would result in the fewest or least significant impacts. If the Environmentally Superior Alternative is the No Project Alternative, as in this case, then an Environmentally Superior Alternative must be selected from the remaining alternatives.

Table 6-5 provides a summary of each alternative related to the environmental issues evaluated in Section 3, Environmental Impact Analysis, of this RDEIR, and includes the level of significance associated with the project in order to facilitate a thorough comparison of the alternatives. Refer to Section 3 of this document for a detailed discussion of each environmental issue. For some impacts, while the alternative may have a reduced level of impact, the impact would still be considered significant and unavoidable. With the exception of the No Project Alternative, none of the other three alternatives completely eliminate the significant, adverse, and unavoidable impacts that would occur under the project regarding traffic and air quality.

The No Project—CVGPA SP Alternative would eliminate the significant and unavoidable ROG operational impact that would occur under the project, and would also eliminate the significant and unavoidable operational NOx impact that would occur under the project. Both the No Project—CVGPA SP Alternative and the Reduced Intensity alternatives would reduce vehicle trips compared with the project, although the Reduced Intensity Alternative would result in a trip reduction of 30 percent, compared with the 58 percent reduction in vehicle trips that would be realized under the No Project—CVGPA SP Build Alternative.

The lower number of vehicle trips generated by the No Project—CVGPA SP Alternative compared with the Reduced Intensity Alternative would also result in a commensurate reduction of traffic-generated impacts with respect to air quality, greenhouse gases and noise. The No Project—CVGPA SP Alternative would result in impacts for six issue areas that were greater than the project, although still less than significant, while the Reduced Intensity Alternative did not have impacts in any issue areas that were greater than the project. Because of the reduction in vehicle trips that would be realized under the No Project—CVGPA SP Alternative, the No Project—CVGPA SP Alternative is considered the Environmentally Superior Alternative. This is due to the fact that this alternative would reduce the significant and unavoidable impacts that would occur under the project to a greater extent than the Reduced Intensity Alternative would. However, as discussed above, this alternative does not achieve any of the objectives of the project, and would not generate substantial benefits to the County and local economy by providing new jobs and additional tax revenues.
### Table 6-5: Alternatives Comparison

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**Notes:**
- **L** = Lesser impact than the proposed project.
- **G** = Greater impact than the proposed project.
- **LTS** = Less than Significant.
- **E** = Equivalent impact to the proposed project.
- **SIG** = Significant, Adverse and Unavoidable.