

7. Alternatives to the Proposed Project

7.1 INTRODUCTION

7.1.1 Purpose and Scope

The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Guidelines § 15126.6[a]). As required by CEQA, this chapter identifies and evaluates potential alternatives to the County of San Bernardino (County) Countywide Plan (CWP or Project).

Section 15126.6 of the CEQA Guidelines explains the foundation and legal requirements for the alternatives analysis in an EIR. Key provisions are:

- “[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” (15126.6[b])
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact.” (15126.6[e][1])
- “The no project analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” (15126.6[e][2])
- “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.” (15126.6[f])
- “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries..., and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)” (15126.6[f][1]).

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- “Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.” (15126.6[f][2][A])
- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.” (15126.6[f][3])

For each development alternative, this analysis:

- Describes the alternative.
- Analyzes the impact of the alternative as compared to the proposed Project.
- Identifies the impacts of the Project that would be avoided or lessened by the alternative.
- Assesses whether the alternative would meet most of the basic Project objectives.
- Evaluates the comparative merits of the alternative and the Project.

According to Section 15126.6(d) of the CEQA Guidelines, “[i]f an alternative would cause...significant effects in addition those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.”

7.1.2 Project Objectives

As described in Section 3.2, the proposed Countywide Plan is guided by the following project goals and will aid decision makers in their review of the Project, the Project alternatives, and associated environmental impacts.

1. **Character and Heritage.** Recognition, preservation, and celebration of the distinct character, history, culture, and heritage of the County and its communities.
2. **Collaboration.** Greater coordination within the County government alongside expanded partnerships with other public and private entities to create a more complete County.
3. **Community Capacity.** A public equipped with tools to create positive changes in their communities, empowered by civic involvement and a network of relationships.
4. **Education.** Residents with the skills and education needed to achieve a rich and satisfying life through a cradle-to-career education system and a culture of lifelong learning.
5. **Fiscally Sustainable Growth.** A pattern of growth and development that facilitates logical, cost-effective, and fiscally sustainable provision of public services and infrastructure.
6. **Health and Wellness.** Active and engaged people and communities with access to infrastructure, programs, and services to support physical, social, and economic health and well-being.
7. **Prosperity.** Diverse opportunities for residents to pursue their desired standard of living and for businesses to work toward their economic success.

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8. **Resiliency.** A County with a system of communities and services that can persevere in the face of emergencies, external forces, or unexpected circumstances, and continue to carry out core missions despite formidable challenges.
9. **Security.** A real and perceived sense of safety that allows and encourages people, businesses, and organizations to thrive, build community, and invest.
10. **Stewardship.** Communities that protect the viability of natural resources and open spaces as valuable environmental, aesthetic, and economic assets.

7.1.3 Significant Impacts of the Project

As discussed above, a primary consideration in defining Project alternatives is their potential to reduce or eliminate significant impacts compared to the proposed Project. The impact analysis in Chapter 5 of this PEIR concludes that implementation of the Countywide Plan would result in significant impacts, as follows.

7.1.3.1 SIGNIFICANT UNAVOIDABLE IMPACTS

Air Quality

Impact 5.3-1. Growth associated with CWP buildout would not exceed Southern California Association of Governments (SCAG) forecasts, but emissions generated by growth have the potential to exceed emission forecasts in the South Coast Air Quality Management District (SCAQMD) and Mojave Desert Air Quality Management District (MDAQMD) Air Quality Management Plans.

Impact 5.3-2. Buildout of the Countywide Plan would generate a net increase of 49,680 people and 12,546 jobs, resulting in an increase in criteria air pollutant emissions from transportation, energy, and area sources that would exceed the SCAQMD and MDAQMD significance thresholds and would contribute to the nonattainment designations of the South Coast Air Basin (SoCAB) and Mojave Desert Air Basin (MDAB).

Impact 5.3-3. Short-term construction activities associated with the Countywide Plan would exceed the SCAQMD and MDAQMD significance thresholds and would contribute to the nonattainment designations of the SoCAB and MDAB.

Impact 5.4-4. The proposed Project could expose sensitive receptors to substantial pollutant concentrations.

Biological Resources

Impact 5.4-1. Implementation of the Countywide Plan would impact several special-status species.

Impact 5.4-2. Implementation of the Countywide Plan would result in the loss of several special-status vegetation communities.

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Greenhouse Gas Emissions

Impact 5.7-1. The County would experience a decrease in greenhouse gas (GHG) emissions from existing conditions but would not achieve the GHG reduction targets established under Senate Bill (SB) 32 or Executive Order B-03-05.

Hazards (Wildfire)

Impact 5.8-6. Due to slope, prevailing winds, and other factors, unincorporated growth in or near state responsibility areas or lands classified as very high fire hazard severity zones could expose occupants to or exacerbate risks from pollutant concentrations from a wildfire or from the uncontrolled spread of a wildfire.

Impact 5.8-8. Unincorporated growth may expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of postfire slope instability.

Mineral Resources

Impact 5.11-1. Because significant mineral resources may potentially be developed under the CWP, particularly within the Mineral Resource Zones (MRZ) 2 and 3 area designations, impacts to mineral resources would remain significant and unavoidable.

Noise

Impact 5.12-1. Construction activities would result in temporary noise increases.

Impact 5.12-2. Buildout of the Countywide Plan would cause a substantial noise increase related to traffic on highways and local roadways and could locate sensitive receptors in areas that exceed established noise standards

Transportation and Traffic

Impact 5.16-3. Trip generation related to land use development under the projected 2040 buildout of the Countywide Plan would exceed the County's vehicle miles traveled (VMT) reduction threshold (4 percent reduction in VMT/person (residential) and 4 percent reduction in VMT/employee in comparison to existing VMT/person (or employee)

7.1.3.2 SIGNIFICANT UNTIL MITIGATED IMPACTS

Air Quality

Impact 5.3.5. Some land uses with CWP buildout would have the potential to create objectional odors. This impact would be mitigated by adherence to an odor control plan and compliance with Rule 401.

Biological Resources

Impact 5.4-4. The proposed Project would affect wildlife movement corridors.

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Impact 5.4-5. Implementation of the Countywide Plan would require compliance with local conservation plans.

Cultural Resources

Impact 5.5-1. Development of the Project could impact an identified historic resource.

Impact 5.5-2. Development of the Project could impact archaeological resources.

Impact 5.5-3. The proposed Project could destroy paleontological resources or a unique geologic feature.

Noise

Impact 5.12-3. Buildout of the individual land uses and projects for implementation of the Countywide Plan may expose sensitive uses to strong levels of groundborne vibration.

7.2 POLICY PLAN BACKGROUND: ALTERNATIVE GROWTH SCENARIOS

The proposed CWP was developed by a comprehensive process based on the defined goals for the plan as well as specific environmental protection criteria. To develop meaningful alternatives, the scenarios were developed with the goal to maintain consistency with regional projections and to allow an apples-to-apples comparison during development of the proposed project. Each alternative, as well as the proposed Project, was designed to identify suitable sites to accommodate the net unincorporated housing growth of approximately 18,000 units projected in SCAG's 2016 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS). The following growth scenarios were evaluated:

No Project Alternative. This alternative assumed that the existing General Plan (adopted in 2007) would remain in effect. Since the development at full capacity of the existing plan is unlikely, growth levels were projected consistent with SCAG's 2016 RTP/SCS and distributed in accordance with the existing General Plan designations/allowed densities.

Master Planned Development. This alternative assumed that residential growth would occur exclusively in the North and East Desert regions and within new master-planned communities. Developers would be responsible for ensuring adequate infrastructure. Employment growth is focused in the Valley region.

Concentrated Suburban Growth. This alternative focuses on intensifying residential development in the already urban areas in the Valley region and preserving the relatively undeveloped Desert and Mountain regions. Higher density housing types are projected. Employment growth would also be limited to the Valley region.

Dispersed Rural Growth. This alternative distributes residential growth throughout the unincorporated County, provided no new or expanded wastewater infrastructure would be required. Some residential growth would be concentrated in the Valley region, but most of the housing growth would be distributed across the North Desert region (≤ 2 units per acre), which is served by septic systems. Limited growth is included in the Mountain region, and no growth is projected in the East Desert region (lack of existing wastewater facilities and septic restrictions).

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7.2.1 Environmental Constraints

The Countywide Plan was designed assuming no new development in areas with the following characteristics:

- Areas within Alquist-Priolo Fault Zones
- Areas with slopes \geq 20 percent
- Areas within a Federal Emergency Management Agency (FEMA) 100-year flood zone or Department of Water Resources (DWR) 100-year flood awareness zone
- Areas with one of the following agricultural areas: Williamson Act designated, current agricultural land use (LUZD) within an AP overlay, or Farmland Mapping and Monitoring Program (FMMP) farmland designation
- Areas in the Mountains, East Desert, or North Desert within MRZ-2 or MRZ-3

The CWP was also developed to avoid impacts (minimize) in areas of:

- Biological resources
 - Habitat linkages
 - Vegetation communities of conservation interest
 - Listed and sensitive species
- High or very high fire hazard severity zones
- Moderate or high constraints on water quality
- Areas within the FEMA 500-year flood zone
- Areas with moderate water supply constraints

In comparison, the alternative growth scenarios were programmed with the following environmental constraints:

Master Planned Development. The same as proposed Project, except properties with the following constraints were avoided, but not strictly prohibited:

- Areas within FEMA 100-year flood zone or DWR 100-year flood awareness zone
- Areas with one of the following agricultural areas: Williamson Act designated, current agricultural land use (LUZD) within an AP overlay, or FMMP farmland designation
- Areas in the Mountains, East Desert, or North Desert within MRZ-2 or MRZ-3

Concentrated Suburban Growth. The same constraints as proposed Project.

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Dispersed Rural Growth. The only environmental constraint was that no new development be included in Alquist-Priolo Fault Zones. This alternative, by definition, excluded areas without existing wastewater treatment that could not be served by allowed septic systems.

7.3 ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING/PROJECT PLANNING PROCESS

7.3.1 No Growth/No Development

The No Growth/No Development Alternative would prohibit all new development, restricting urban growth to its current extent. No alterations to the unincorporated areas would occur (with the exception of previously approved or entitled development). All existing residential, commercial, office, industrial, public facilities, agriculture and open space, along with utilities and roadways, would generally remain in their current condition. Implementation of this alternative would not provide adequate housing to meet the County's fair share of housing and would be inconsistent with SCAG's 2016 RTP/SCS. By limiting development within the County, implementation of this alternative would increase development pressure in surrounding counties, including Los Angeles, Riverside, and Orange counties. It should also be noted that this alternative would not achieve any of the objectives established for the Project. As a result, this alternative has been rejected from further consideration.

7.3.2 Dispersed Rural Growth

Although the Dispersed Rural Growth alternative was evaluated during the planning process for the proposed Project, it does not represent a viable alternative for CEQA purposes. It assumed low density, dispersed rural growth and incorporated very few environmental constraints. As detailed in Section 7.2, compared to the other growth scenarios studied, the only environmental constraint that was programmed was to exclude development within Alquist-Priolo zones. It did, however, restrict new development to areas that were served by wastewater treatment systems, or where septic systems were allowed and viable. This alternative was rejected for further evaluation because it did not have the potential to reduce or eliminate significant impacts of the Project or meet the Project objectives.

7.4 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

7.4.1 Alternative Description and Statistical Comparison

The following alternatives (described in Section 7.2) were selected for further analysis in this PEIR:

- No Project
- Master Planned Development
- Concentrated Suburban Growth

A new alternative, Limited Suburban Growth, was defined as a logical growth scenario to comply with CEQA criteria for alternatives analyses.

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Limited Suburban Growth. This alternative generally mirrors the proposed CWP with respect to growth distribution and environmental constraints. In an effort to minimize environmental impacts in comparison to the proposed Project, however, it reduces the number of residential units and slightly reduces employment projections. Allowable densities (units/acre) were reduced within two key areas: the Apple Valley sphere of influence (SOI) annexation area, and the Bloomington Community. New residential growth in the Apple Valley SOI would be limited to the Hacienda Fairview Specific Plan area, and residential densities in Bloomington would be reduced. Following is a summary of changes by area:

Apple Valley SOI annexation area. This area would revert to the rural living designation (RL), which would result in very little, if any, additional growth. Apple Valley employment would be reduced to account for the loss of residential development that would be driving the jobs in this area under the proposed Project.

Net changes in comparison to proposed Project:

- DU: a reduction of 2,492 units (2,349 units compared to 4,841 for the proposed Project for this area)
- Employment: a reduction of 247 employees (236 employees compared to 483 for the proposed Project)

Bloomington. Residential densities that were intensified under the proposed Project reverted to lower densities. Densities were changed from the proposed LDR (low density residential, 2–5 units/acre) or MDR (medium density residential, 5–20 units/acre) to VLDR (very low density residential, 0–2 units / acre). Growth in these areas was projected at the midrange density of approximately 1 unit/acre. Employment in Bloomington would remain unchanged in comparison to the proposed Project.

Net changes in comparison to the proposed Project:

- DU: a reduction of 2,993 units (3,176 units in comparison to 6,169 for the proposed Project)

Overall, this alternative would reduce new housing development by 5,497 units and would reduce projected employment by 247 in comparison to the proposed Project.

Table 7-1, *Alternatives Description and Statistical Comparison*, summarizes the alternatives selected for evaluation. This table also includes a list by alternative of significant impacts anticipated to be reduced or eliminated in comparison to the proposed Project.

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Table 7-1 Alternatives Description and Statistical Comparison

Alternative Description	Growth Potential			Net Change in Comparison to Proposed CWP			Environmental Reasons Considered
	Pop.	Housing	Emp.	Pop.	Housing	Emp.	
<p>Proposed CWP (Proposed Project) Population growth projections for the unincorporated areas focus on residential development in two areas: the Bloomington community (Rialto sphere of influence [SOI]) and future master planned communities in the Town of Apple Valley SOI. Employment growth is focused in the unincorporated portions of the Valley region, particularly in the Fontana SOI, East Valley Area Plan, and Bloomington community (Rialto SOI). Little to no growth is projected for other unincorporated areas based on the availability of water and infrastructure systems, presence of natural hazards and topographical constraints, and the desires of residents.</p>	49,680	15,368	12,546	-	-		Constraints used to define the CWP are defined in Section 7.2
<p>No Project This scenario assumes that the existing General Plan, last updated in 2007, would remain in effect. Unincorporated residential development under this plan, places nearly 85 percent of new development in city spheres of influence (SOIs) and Community Planning Areas (CPAs), with the balance distributed throughout the unincorporated county. The most substantial employment growth is concentrated in the unincorporated portions of the Valley and North Desert regions, but significant employment gains are also projected in the East Desert.</p>	47,226	17,947	33,547	-5%	+17%	+167%	Required by CEQA
<p>Limited Suburban Growth Generally, this alternative mirrors the proposed CWP, with limited changes to land use designations in the Apple Valley SOI and Bloomington community. The land use changes reduce potential housing growth relative to the proposed project. Retail and public employment growth in the Apple Valley SOI were reduced to reflect lower levels of housing growth, but employment estimates elsewhere in the unincorporated county remain consistent with the proposed Project.</p>	31,867	9,871	12,299	-36%	-36%	-2%	Potential to reduce significant impacts related to: <ul style="list-style-type: none"> • Transportation (VMT) • Noise (traffic-related) • Air quality • Greenhouse gas emissions (GHG) • Biological and cultural resources
<p>Master Planned Development This scenario focuses unincorporated residential growth in new master-planned communities in the North and East Desert regions, where master developers would be responsible for ensuring adequate water supply as well as the development and maintenance of all new infrastructure. No housing growth is projected in the Mountain or Valley regions due to either limited infrastructure or an</p>	59,740	17,890	16,017	+20%	+16%	+28%	Potential to reduce significant impacts in comparison to the proposed project related to: <ul style="list-style-type: none"> • Biological and cultural resources • Wildfire hazards

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Table 7-1 Alternatives Description and Statistical Comparison

Alternative Description	Growth Potential			Net Change in Comparison to Proposed CWP			Environmental Reasons Considered
emphasis on growth occurring only after annexations occur. Like the proposed Project, the majority of employment growth is focused in the unincorporated portions of the Valley region. Some additional jobs (above those of the proposed Project) would be located in the master planned communities.							
Concentrated Suburban Growth This scenario focuses on intensifying residential development in the already urban areas in the Valley region and preserving the relatively undeveloped Desert and Mountain regions. Higher density housing types are projected along transit lines and near existing walkable communities, and small-lot, single-family homes are projected in existing single-family neighborhoods that are less walkable and further from transit. No residential growth is projected in other unincorporated areas. Employment growth is limited to the unincorporated portions of the Valley region.	53,428	17,639	12,817	+8%	+15%	+2%	Potential to reduce significant impacts in comparison to the proposed project related to: <ul style="list-style-type: none"> • Transportation (VMT) • Air quality • GHG emissions • Biological and cultural resources • Wildfire hazards

7.4.2 Environmental Impact Comparison

Table 7-2, *Environmental Impact Comparison of Project Alternatives*, assesses the relative impact for each project alternative in comparison to the proposed Project. All of the environmental categories evaluated for the proposed Project in this PEIR are compared. A determination is provided whether the impact is “less than” (LT), “greater than” (GT), or “similar to” (S) the respective environmental impact for the proposed Project.

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Table 7-2 Environmental Impact Comparison

Impact	No Project	Limited Suburban Growth	Master Planned Development	Concentrated Suburban Growth
<p>Aesthetics</p>	<p>Under this alternative, previously unutilized building intensity would be developed at higher intensities, resulting in more housing and employment growth that is less concentrated in urban areas than the proposed Project.</p> <ul style="list-style-type: none"> Sporadic development of additional housing is projected in Desert and Mountain regions where comparable development already exists. An impact similar to the proposed Project on existing scenic views and the character of existing communities would be likely. Significant increases in housing and employment in the rural Desert areas, and lack of policy protection for dark skies, may have a greater impact on natural aesthetic resources, including impacts to vegetation and existing dark skies. Substantial increases in employment and nonresidential development in the Desert regions may alter existing localized views and the character of existing communities through the introduction of large employment centers that are substantial in size, cover a large area, and operate during nighttime hours. Scenic routes are largely in areas outside of County control. An impact similar to the proposed Project is likely. <p style="text-align: center;">GT</p>	<p>Under this alternative, housing development in the Apple Valley Annexation Area and the Bloomington Community would be substantially reduced compared to the proposed project, and a marginal number of jobs intended to support the Apple Valley Annexation Area community would be eliminated. All other areas of growth remain the same as the proposed Project.</p> <ul style="list-style-type: none"> A reduction in the development footprint in the Apple Valley SOI and Bloomington community would reduce impacts to natural resources, including changes to geological formations/topography and vegetation. A reduction in housing development would reduce impacts to viewsheds and potentially to scenic corridors. All other areas would have similar impacts to the proposed Project. <p style="text-align: center;">LT</p>	<p>Under this alternative, new housing development would be limited to five master-planned communities within two Desert regions. The majority of employment growth would be concentrated in the Valley region, similar to the proposed Project. Employment above that of the proposed Project would be located in the master planned communities.</p> <ul style="list-style-type: none"> Eliminating housing growth in the Valley and Mountain regions would reduce the aesthetic impacts in those regions. Expansion of the existing Helendale Master Planned Community would be similar to the existing community structure, resulting in similar aesthetic impacts as the proposed Project. This area is already heavily developed, so the impact to dark skies would also be similar. While some scenic views of the surrounding desert may be altered by the additional development, the lake at the center of the community remains the primary vista. New homes under this alternative would not alter views of the lake, so the impact to scenic views would be similar to the proposed project. Lucerne Valley: A new master planned community would double the number of existing homes in the CPA, introducing a new type of development that would significantly alter the rural character of the existing community and cause a greater impact on community character. Development would also cause a greater impact on dark skies. Existing scenic views and views from two state-eligible scenic highways would also be more heavily impacted because the physical character of the valley allows for long vistas from higher elevations. Phelan/Pinon Hills and Homestead Valley: This alternative would place new master planned communities in each CPA. The type, intensity, and amount of development would significantly alter the existing community character and cause greater impacts on dark skies and existing scenic views than the proposed project for each area. State eligible scenic routes through these areas generally fall outside of County control, and impacts would be similar to the proposed Project. Hacienda Fairview Specific Plan: Like the proposed Project, this alternative would build out the entitled Hacienda Fairview Specific Plan in the Apple Valley SOI. Because this growth is consistent with the proposed Project, the impacts would be similar. All other areas would have similar impacts to the proposed Project. <p style="text-align: center;">GT</p>	<p>Under this alternative, new housing development is limited to CPAs and SOIs (described below) in the Valley region, while the distribution of employment growth is similar to the proposed Project.</p> <ul style="list-style-type: none"> Eliminating housing growth in the Desert and Mountain regions would reduce the aesthetic impacts in those regions. Bloomington and East Valley Area Plan: This alternative places a similar number of new housing units in Bloomington and the East Valley Area Plan as the proposed Project, so impacts would be similar to the proposed Project. Mentone: This alternative significantly intensifies development in the Mentone CPA, specifically intensifying rural and agricultural land uses in the Crafton area to allow suburban type residential development. The type, intensity, and amount of development that this alternative supports would significantly alter the existing community character and may cause a greater impact on existing scenic views of the surrounding mountain areas than the proposed Project. Chino SOI: This alternative intensifies underdeveloped areas in the Chino SOI to allow small-lot, single-family and attached single-family development. The Chino SOI is already heavily urbanized, and existing scenic views are already obstructed. As such this alternative would likely have a similar impact on aesthetic concerns as the proposed Project. All other areas would have similar impacts to the proposed Project. <p style="text-align: center;">GT</p>

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Table 7-2 Environmental Impact Comparison

Impact	No Project	Limited Suburban Growth	Master Planned Development	Concentrated Suburban Growth
Agriculture	<p>Under the No Project alternative, housing and growth is less concentrated in the Valley region, where 90% of the County's mapped farmland is located. Employment growth in the Valley region is similar to the proposed Project in terms of quantity and location, but significantly more jobs are projected in the Desert regions.</p> <ul style="list-style-type: none"> Reducing the development footprint in the Bloomington Community would preserve the existing Prime Farmland (11 ac) and Farmland of Statewide importance (24 ac) in this area in comparison to the proposed Project. Under the proposed project, this impact may be mitigated by implementation of Policy NR 7.2 requiring a project-specific agricultural resource analysis for projects that involve 20 or more acres of prime and statewide important farmland. Individual projects may be less than 20 acres, however. The areas where employment growth is expected in the Desert regions avoid mapped farming operations, so impacts would be similar to the proposed Project. All other areas would have similar impacts to the proposed Project. <p style="text-align: center;">LT</p>	<p>Under this alternative, housing development in the Apple Valley Annexation Area and the Bloomington Community would be substantially reduced compared to the proposed Project, but other areas of growth would largely remain the same</p> <ul style="list-style-type: none"> Reducing the development footprint in the Bloomington community would preserve the existing Prime Farmland (11 ac) and Farmland of Statewide importance (24 ac), in comparison to buildout under the proposed Project. Potential impacts to other areas with mapped farmlands would be the same as the proposed Project. <p style="text-align: center;">LT</p>	<p>Under this alternative, all housing development and employment growth above the proposed Project would be limited to five master planned communities in the two Desert regions. Employment growth outside of the master planned communities would be similar to the proposed Project.</p> <ul style="list-style-type: none"> Eliminating housing growth in the Bloomington community would preserve the existing Prime Farmland (11 ac) and Farmland of Statewide importance (24 ac). The proposed development of expansion of master planned communities in Lucerne Valley, Phelan/Pinon Hills, and Homestead Valley and Helendale would not impact mapped farmland or preclude the continued operation of any existing agricultural enterprises. All other areas, including the master planned community in the Hacienda Fairview Specific Plan, would have similar impacts to the proposed Project. <p style="text-align: center;">LT</p>	<p>Under this alternative, new housing development is limited to select areas in the Valley region. Distribution of employment growth would be similar to the proposed Project.</p> <ul style="list-style-type: none"> Bloomington and East Valley Area Plan: This alternative would place a similar number of new housing units in Bloomington and the East Valley Area Plan as the proposed Project, so impacts would be similar to the proposed Project. Mentone: This alternative significantly intensifies development in the Mentone CPA, converting approx. 850 acres of Prime Farmland and 8 acres of Farmland of Statewide Importance to suburban-type residential development. Under Policy NR-7.2, this farmland could be replaced at a 1:1 ratio in agricultural areas in the Desert region, such as Newberry Springs. Chino SOI: This alternative would convert approx. 16 acres of Prime Farmland and 32 acres of Farmland of Statewide Importance to small-lot and attached single-family housing. Under Policy NR-7.2, this farmland could be replaced at a 1:1 ratio in agricultural areas in the Desert region, such as Newberry Springs. <p style="text-align: center;">GT</p>
Air Quality	<p>This alternative reflects the SCAG growth model used to produce the 2016 RTP/SCS. The two significant differences between this and the proposed Project are 1) More employment in the Desert region and 2) More dispersed housing development.</p> <ul style="list-style-type: none"> The existing General Plan is the basis for the SCAG growth model and therefore would not exceed the SCAG forecasts; however, as with the proposed Project, the substantial growth projected at buildout would exceed both SCAQMD's and MDAQMD's AQMP emissions forecasts, resulting in a significant, unavoidable impact. Due to the substantial increase in employment as well as more dispersed housing in comparison to the proposed Project, this alternative would increase vehicle miles traveled, and related traffic air quality emissions. Dispersed housing growth and a larger nonresidential building footprint could also result in exposing a greater number of sensitive receptors to pollutants concentrations from construction activity and other sources. The land uses that have the potential to create objectionable odors would remain the same, causing a similar impact as the proposed Project. <p style="text-align: center;">GT</p>	<p>This alternative eliminates housing, population, and employment growth in the Apple Valley Annexation Area and greatly reduces the housing and population growth in Bloomington. All other growth assumptions are consistent with the proposed Project.</p> <ul style="list-style-type: none"> Decreasing the residential development footprint would decrease pollutants produced during construction and would decrease the amount energy used in homes. Fewer people living in the Apple Valley Annexation Area will result in fewer people commuting long distances and will improve emissions generated by growth. Decreased development footprint in Bloomington may reduce exposure of sensitive receptors to pollutant concentrations. The land uses that have the potential to create objectionable odors would remain the same, causing a similar impact as the proposed Project. <p style="text-align: center;">LT</p>	<p>This alternative would limit new housing development to five master planned communities in Desert CPAs. The majority of employment growth would largely mirror the proposed Project, and employment growth above that of the proposed Project would be in the master planned communities.</p> <ul style="list-style-type: none"> Creating large residential communities far away from employment centers would result in longer commuter trips and more vehicle emissions in comparison to the proposed Project. Concentrating residential development on greenfield communities in the Desert region may result in increased pollutants due to short-term construction. Isolating residential development in rural areas that are distant from most sensitive receptors may result in less exposure to pollutant concentrations. The land uses that have the potential to create objectionable odors would remain the same, causing a similar impact as the proposed Project. <p style="text-align: center;">GT</p>	<p>This alternative would limit housing and employment growth to the Valley. Housing densities in Bloomington are consistent with the proposed Project, and there would be a substantial increase in housing density in Mentone and the Chino SOI. Employment distribution would be similar to the proposed Project.</p> <ul style="list-style-type: none"> Prioritizing compact development in already urban areas of the County would place new homes closer to existing and projected jobs, resulting in shorter commute times and reduced vehicle-related emissions. Increasing housing density in the Chino SOI relative to the proposed Project would introduce more residences closer to large employment centers in Los Angeles and Orange Counties, resulting in shorter commute times and reduced vehicle-related emissions. Construction-related emissions would likely be reduced for this impact relative to the proposed Project. Development would occur within existing urban areas with established infrastructure, and likely be more efficient. Moreover, lower density and greenfield development associated with the proposed project is more likely to include more extensive grading, resulting in higher construction emissions. <p style="text-align: center;">LT</p>

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Table 7-2 Environmental Impact Comparison

Impact	No Project	Limited Suburban Growth	Master Planned Development	Concentrated Suburban Growth
Biological Resources	<p>In comparison to the proposed Project, the No Project alternative would be characterized by more dispersed housing on larger lots, resulting in an increased disturbance of land, potentially with biological resources. The No Project would also result in:</p> <ul style="list-style-type: none"> • Less policy protection for conservation, protection, funding, and support of restoration and maintenance of open space, habitat, and wildlife corridors. • Less policy protection requiring mitigation for and improving protection of special status species and habitat conservation areas. • Less policy protection ensuring proper environmental clearance. • Less policy direction requiring minimized and mitigated impacts to special status vegetation. • Less policy protection for jurisdictional waters. • Less policy direction requiring coordinated habitat planning. • More dispersed housing development which would be more likely to encroach on special status species. • Fewer land use protections / less conserved open space. <p style="text-align: center;">GT</p>	<p>In comparison to the proposed Project, this alternative would substantially reduce development in the Apple Valley Annexation Area and the Bloomington community, resulting in:</p> <ul style="list-style-type: none"> • A reduced development footprint that would reduce potential conflicts with the pending HCP/NCCP covering parts of the Apple Valley SOI. • A reduction in the development footprint and potential impact on special status species and vegetation in the Apple Valley area and Valley region. • Similar impacts on wildlife movement corridors. <p style="text-align: center;">LT</p>	<p>In comparison to the proposed Project, this alternative would limit new housing to five master planned communities in the Desert regions. As a result, it would</p> <ul style="list-style-type: none"> • Avoid biological resources impact in the Mountain and Valley regions. • Limit acres of potential biological disturbance by concentrating growth within the master planned communities. • Limit the number of acres that see new development by expanding one existing and creating four new master planned communities, which may reduce potential conflicts with habitat conservation plans, impacts on special status species, and impacts on special status vegetation communities. • Since the employment footprint outside of the master planned communities would be consistent with the proposed Project, associated biological resource impacts would be in the Valley region and similar to the proposed Project. <p style="text-align: center;">LT</p>	<ul style="list-style-type: none"> • Limiting growth to the Valley region will result in greater impacts to special status species and special status vegetation communities in the Valley region. • Eliminating growth in the Mountain and two Desert regions would eliminate impacts to areas with Habitat Conservation Plans (which are currently only approved for areas in the Mountain and two Desert regions). • Eliminating growth in the Mountain and two Desert regions would eliminate impacts to special status species and special status vegetation communities in those regions. <p style="text-align: center;">LT</p>
Cultural Resources	<p>In comparison to the proposed Project, the No Project alternative would be characterized by more dispersed housing on larger lots, resulting in an increased disturbance of land, potentially containing cultural resources. As with the proposed Project, cultural resource impacts, including historical, paleontological, and archaeological impacts, would be mitigated to less than significant per the adopted mitigation in the 2007 General Plan PEIR. Impacts, however, for the No Project alternative are determined to be slightly greater than the proposed Project since land disturbance would be anticipated to be greater.</p> <p style="text-align: center;">GT</p>	<p>This alternative would result in very little additional growth in the Apple Valley annexation area, if any. It would reduce residential densities within the Bloomington community. In comparison to the proposed Project, these changes would:</p> <ul style="list-style-type: none"> • Reduce potential impacts to cultural resources by reducing land disturbance in the north Desert Region, which is relatively rich in cultural resources. • Potentially slightly reduce the level of impact in the Valley region (this subregion is richest in historical resources, and the density reduction might change the number of properties impacted). • Minimally reduce potential impacts to paleontological resources and geologic formations related to reducing growth in north Desert (Apple Valley annexation area). • <p style="text-align: center;">LT</p>	<p>In comparison to the proposed Project, this alternative would limit new housing to five master planned communities in the Desert region. As a result, it would</p> <ul style="list-style-type: none"> • Avoid potential cultural resource impacts in the Mountain and Valley regions. • Limit acres of potential cultural resources disturbance by concentrating growth within the master planned communities. <p>Since the employment footprint outside of the master planned communities would be consistent with the proposed Project, associated cultural resource impacts would be in the Valley region and similar to the proposed Project.</p> <p style="text-align: center;">GTLT</p>	<p>In comparison to the proposed Project, this alternative would limit new growth, both housing and employment, to the Valley region. This would:</p> <ul style="list-style-type: none"> • Eliminate potential cultural resource impacts in the Mountain and Desert regions. • Increase cultural resource impacts in the Valley region, particularly within the Mentone area that would be undisturbed by the proposed Project and would be converted to a suburban development. <p>Overall, cultural impacts would be considered different, but at a similar level of impact as the proposed Project.</p> <p style="text-align: center;">S</p>
Geology and Soils	<p>In comparison to the proposed Project, the No Project alternative would be characterized by more dispersed housing on larger lots, resulting in an increased disturbance of land. Exposure of new development to geological and soils hazards, including seismic shaking, liquefaction, and land subsidence, would be similar to the proposed Project. And as with the proposed Project, geotechnical and soils hazards would be mitigated to less than significant with implementation of existing regulatory measures, including compliance with the California Building Codes and National Pollutant Discharge Elimination System (NPDES) requirements and best management practices.</p> <p style="text-align: center;">S</p>	<p>In comparison to the proposed Project, this alternative would result in very little additional growth in the Apple Valley annexation area, if any. It would reduce residential densities within the Bloomington community. Although the potential geological/soils impacts are less severe in the Apple Valley area than in the Valley and Mountain regions, the primary reason this alternative would reduce geological/soils impacts in comparison to the proposed Project is because it would reduce the number of people potentially exposed to geotechnical/soils related hazards. This alternative would reduce the projected population and number of housing units by 36% in comparison to the proposed Project. As with the proposed Project, these impacts would be reduced to less than significant by implementation of regulatory measures.</p> <p style="text-align: center;">LT</p>	<p>In comparison to the proposed Project, this alternative would limit new housing to five master planned communities in the Desert regions. Since it would not introduce new growth into the more seismically active Valley and Mountain regions, impacts would be less than the proposed Project. As with the proposed Project, geotechnical/soils would be mitigated to less than significant after compliance with existing regulations.</p> <p style="text-align: center;">LT</p>	<p>In comparison to the proposed Project, this alternative would limit new growth, both housing and employment, to the Valley region. Because the Valley region is characterized by more earthquake faults and seismic activity, this would increase geotechnical/soils impacts relative to the proposed Project. As with the proposed Project, however, these impacts would be mitigated to less than significant with existing regulatory requirements.</p> <p style="text-align: center;">GT</p>

7. Alternatives to the Proposed Project

Table 7-2 Environmental Impact Comparison

Impact	No Project	Limited Suburban Growth	Master Planned Development	Concentrated Suburban Growth
Greenhouse Gas Emissions	<p>As with the proposed Project, development within the unincorporated County would comply with existing GHG regulations, CARB's Scoping Plan, and the County's GHG Reduction Plan adopted in September 2011. New growth, however, would be more dispersed, and the projected vehicle miles traveled (VMT) for the No Project (existing General Plan) would be approximately 5% greater than for the proposed Project (141.2 billion VMT/day v. 134.3 billion VMT/day). Since on-road transportation accounts for the approximately 40% of GHG emissions, this would result in an increased GHG impact relative to the proposed Project.</p> <p>As with the proposed Project, although GHG emissions would be reduced in comparison to existing conditions, this impact would be significant and unavoidable.</p> <p style="text-align: center;">GT</p>	<p>In comparison to the proposed Project, this alternative would result in very little additional growth in the Apple Valley annexation area, if any. It would reduce residential densities within the Bloomington community. In comparison to the proposed Project it would reduce residential units and population by 36% and employment by 2%. This overall reduction, including a substantial reduction in units in the remote Apple Valley area (potentially resulting in long employment commuter trips), would reduce VMT in comparison to the proposed Project. It would also reduce GHG emissions generated by building energy use.</p> <p>Overall, this alternative would reduce GHG impacts relative to the proposed Project, but the GHG impact would remaining significant and unavoidable.</p> <p style="text-align: center;">LT</p>	<p>This alternative would situate new housing development exclusively in the Desert region. Because this would likely result in long commutes from the new residences to distant employment centers (e.g., in the Valley region, Los Angeles and Orange counties), this alternative would increase VMT. Since transportation generated emissions comprise the largest source of GHG emissions (approximately 40%), this alternative would result in an increase in GHG emissions.</p> <p style="text-align: center;">GT</p>	<p>In comparison to the proposed Project, this alternative would limit new growth, both housing and employment, to the Valley region. This would reduce the length of commuter trips and would, therefore, be expected to substantially reduce VMT-generated GHG emissions in comparison to the proposed Project. Although reducing emissions, it is not anticipated that it could achieve the GHG reduction targets established under SB 32 and Executive Order B-03-05, and therefore, impacts would remain significant and unavoidable.</p> <p style="text-align: center;">LT</p>
Hazards and Hazardous Materials	<p>In comparison to the proposed Project, the No Project alternative would be characterized by more dispersed housing on larger lots. Also, as with the proposed project, for the most part, the transport, use and storage of hazardous materials would be mitigated by comprehensive regulations. Similarly, airport-related safety hazards would be mitigated by compliance with regulations and the County's Airport Land Use Commission.</p> <p>As with the proposed Project, the 2007 EIR for the existing General Plan concluded that impacts related to wildfire hazards would be significant and unavoidable. The proposed Project, however, has more comprehensive hazard-related policies and more restrictive policies relative to development within high and very high fire hazard severity zones. The overall hazards impact for this alternative, therefore, is greater than for the proposed Project. As with the proposed Project, the wildfire impact would be significant and unavoidable.</p> <p style="text-align: center;">GT</p>	<p>As with the proposed Project, for the most part, the transport, use, and storage of hazardous materials would be mitigated by comprehensive regulations. Similarly, airport-related safety hazards would be mitigated by compliance with regulations and the County's Airport Land Use Commission. The reduction in units in the Apple Valley annexation area and the Bloomington community would not substantially reduce impacts in comparison to the proposed Project relative to wildfire hazards. These areas are not within high or very high fire hazard severity zones.</p> <p>The overall hazards impacts would therefore be similar to the proposed Project, and as with the proposed Project, would result in a significant unavoidable impact for wildfire impacts.</p> <p style="text-align: center;">S</p>	<p>As with the proposed Project, for the most part, the transport, use, and storage of hazardous materials would be mitigated by comprehensive regulations. Similarly, airport-related safety hazards would be mitigated by compliance with regulations and the County's Airport Land Use Commission. By limiting residential growth to master planned communities in the Desert regions; however, this alternative would substantially reduce impacts related to wildfire hazards. These areas are not within high or very high fire hazard severity zones. This alternative, therefore, would reduce wildfire hazards and eliminate the significant unavoidable impact associated the proposed Project.</p> <p style="text-align: center;">LT (eliminates significant unavoidable impact)</p>	<p>As with the proposed Project, for the most part, the transport, use, and storage of hazardous materials would be mitigated by comprehensive regulations. Similarly, airport-related safety hazards would be mitigated by compliance with regulations and the County's Airport Land Use Commission. This alternative, however, would substantially reduce wildfire-related project impacts. Residential and employment growth would both be limited to areas within the Valley region that are not within high or very high fire hazard severity zones. This alternative, therefore, would reduce wildfire hazards and eliminate the significant unavoidable impact associated the proposed Project.</p> <p style="text-align: center;">LT (eliminates significant unavoidable impact)</p>
Hydrology and Water Quality	<p>As with the proposed Project, development under the existing General Plan would be subject to the myriad of regulations that control potential flooding and water quality impacts. These include NPDES, which regulates discharges into waters of the United States and mandates MS4 permits (regulating municipal storm sewer systems) and Storm Water Pollution Prevention Plans (SWPPPs) requiring implementation of best management practices for potential surface water and water quality impacts related to project construction. Additionally, the No Project alternative would be subject to flood hazard development reviews in compliance with County Code of Ordinances (Chapter 85.07). Hydrology impacts, therefore, would be similar to the proposed Project.</p> <p style="text-align: center;">S</p>	<p>The Limited Suburban Growth alternative is a reduced version of the proposed Project. Therefore, it reflects the criteria to avoid development within 100-year floodplain areas. As with the proposed Project, this alternative would comply with the same regulations summarized under the No Project alternative. Impacts would be similar to the proposed Project.</p> <p style="text-align: center;">S</p>	<p>The Master Planned Community alternative would comply with the regulations as summarized under the No Project alternative. These regulations would mitigate the hydrology and water quality impact to less than significant. This alternative, however, was developed without the constraint limiting development to areas outside of the 100-year floodplain. Therefore, although this impact would be mitigated to less than significant, impacts associated with this hydrology and water quality are considered to be slightly greater than for the proposed Project.</p> <p style="text-align: center;">GT</p>	<p>The Concentrated Suburban Growth alternative would comply with the regulations as summarized under the No Project alternative. These regulations would mitigate the hydrology and water quality impact to less than significant. Like the proposed Project, this alternative includes the constraint limiting development to areas outside of the 100-year floodplain. Hydrology and water quality impacts for this alternative, therefore, would be similar to the proposed Project.</p> <p style="text-align: center;">S</p>
Land Use and Planning	<p>The No Project alternative lacks more precise policy protection prohibiting new industrial development in areas around schools or parks without a comprehensive specific planning process. Without this protection, and subject to existing land use restraints, piecemeal development of industrial buildings could create a noticeable divide in existing communities, causing a greater Land Use impact than the proposed Project.</p> <p>The proposed Project includes stronger policy language in support of ongoing coordination with habitat planning efforts than the no project option.</p> <p style="text-align: center;">GT</p>	<p>The minor land use differences between this alternative and the proposed Project would not alter land use and planning impacts.</p> <p style="text-align: center;">S</p>	<p>Three of the five master planned developments could significantly divide the existing communities (Lucerne Valley, Phelan/Pinon Hills, and Homestead Valley).</p> <p>The expansion of the Helendale master planned community and the buildout of the Hacienda Fairview Specific Plan would have similar impacts as the proposed Project.</p> <p>This alternative would conflict with existing plans, including habitat conservation plans.</p> <p style="text-align: center;">GT</p>	<p>Intensifying residential development in the eastern Valley area could significantly divide the existing community. This alternative would substantially intensify development in the Mentone community, specifically intensifying rural and agricultural land uses in the Crafton area to allow suburban-type residential development. The type, intensity, and amount of development that this alternative would support would potentially alter the existing community character and potentially divide existing communities.</p> <p style="text-align: center;">GT</p>

7. Alternatives to the Proposed Project

Table 7-2 Environmental Impact Comparison

Impact	No Project	Limited Suburban Growth	Master Planned Development	Concentrated Suburban Growth
Mineral Resources	<p>Although development under the existing General Plan would be more dispersed than development under the proposed Project, the potential impact to mineral resources would be mitigated with the implementation of numerous General Plan policies and EIR mitigation measures. As with the proposed Project, however, ultimately mineral resource areas designated MRZ-2 or MRZ-3 could be developed, precluding future extraction of minerals in these areas. Overall, the impact to mineral resources would be similar to the proposed Project and significant and unavoidable.</p> <p style="text-align: center;">S</p>	<p>This impact is modeled after the proposed Project but with some development growth potential eliminated (within the Apple Valley annexation area and in the Bloomington community); impacts would be assumed to be less than the proposed Project. There are not designated MRZ-2 or -3 within the Apple Valley annexation area, however, and the Bloomington development footprint is assumed to be the same as the proposed Project, just at reduced densities. Therefore, the mineral resource impact would be similar to the proposed Project.</p> <p style="text-align: center;">S</p>	<p>The scenario modeling for the Master Planned Community alternative did not specifically include mineral zone avoidance as a criterion. Nevertheless, development of five master planned communities in the Desert regions are not characterized by the presence of designated mineral zones. Almost the entire Valley region is within designated mineral zones, and an estimated 52% of the housing is projected to be within this region under the proposed Project. Therefore, mineral resource impacts for the Master Planned Community alternative are determined to be less than the proposed Project.</p> <p style="text-align: center;">LT</p>	<p>This alternative would focus all development growth, housing and employment within the Valley region. Most of this region is within MRZ 2 and MRZ 3 mineral zone designations. The potential mineral resource impact of this alternative, would therefore, be greater than for the proposed Project.</p> <p style="text-align: center;">GT</p>
Noise	<p>The No Project alternative would result in a substantial increase in employment growth relative to the proposed Project (approximately 33k new jobs compared to 12.5k for the proposed Project). These new employment opportunities are projected to occur throughout the unincorporated County and would substantially increase commuter trips and related traffic noise in comparison to the proposed Project. Construction-related noise impacts would also be greater due to the increased job centers. As with the proposed Project, both these impacts would be significant and unavoidable.</p> <p style="text-align: center;">GT</p>	<p>The reduction of both housing units and jobs by approximately 36% in comparison to the proposed Project would reduce both construction noise and traffic-related impacts for the Limited Suburban Growth alternative. Although these impacts would be decreased, it is not anticipated that impacts could be reduced to less than significant.</p> <p style="text-align: center;">LT</p>	<p>By focusing residential growth in more remote Desert regions, the majority of new residents would be expected to drive much longer distances for employment. Although the more remote, new development could be developed to avoid significant traffic-related impacts for the new housing, the increase in traffic would result in noise to existing residences along highways and roadways that would exceed a 3 dB increase. Construction noise impacts, for both housing and employment, could be adjacent to sensitive receptors and prolonged, also resulting in significant impacts. Although the character of noise impacts would be different than for the proposed Project, the overall level of impact would be similar, and significant and unavoidable for construction and traffic-related noise.</p> <p style="text-align: center;">S</p>	<p>Limiting growth potential to within the Valley region would increase construction-related noise impacts because the Valley region is more densely developed than the other regions. New construction is more likely to occur in proximity to existing, sensitive receptors. The distance of vehicle trips would be reduced relative to the proposed Project, because new development would be closer to job opportunities and prioritized to be close to transit. The increase in local traffic trips, however, would be more concentrated along roadways within the more intensely developed Valley region. Overall, noise impacts would be different than the proposed Project, but similar in significance. They would be significant and unavoidable.</p> <p style="text-align: center;">S</p>
Population and Housing	<p>The No Project alternative accommodates a similar number of housing units as the proposed Project, but more than double the growth in the number of employees (approximately 33k employees compared to 12.5k for the proposed Project). The employee growth for this alternative was projected primarily in the Valley and North Desert regions. In comparison, the proposed Project focuses employment growth in the Valley region. The increase in remote employment opportunities under this alternative would induce growth and extension of infrastructure. Although the employment projection is consistent with the 2016 RTP/SCS projections, it was refined and lowered, in consultation with SCAG, to numbers closer to the proposed Project in the 2020 RTP/SCS. The updated numbers for the proposed Project reflect more reasonable market information. In comparison to the proposed Project, more housing is distributed in the Desert regions and a smaller percentage in the Valley region. Focusing more on greenfield development would reduce the potential for existing housing to be redeveloped resulting in displacing current residents. As described in Section 5.12, however, redevelopment of existing housing at higher densities within the Valley region would be voluntary for existing owners under the proposed Project, and the number of rental units that could be redeveloped at higher densities in Bloomington and Muscoy represents a small percentage of parcels (less than 3 percent) under this alternative. Overall, the population and housing impact of the No Project alternative would be substantially greater than the proposed Project and has been determined to be significant and unavoidable in the Valley region.</p> <p style="text-align: center;">GT (and creates a new, significant, unavoidable impact)</p>	<p>The reduction of housing units in the Apple Valley annexation area under this alternative would reduce the potential to induce outlying growth and new infrastructure in comparison to the proposed Project. Similarly, the reduction in housing densities in the Bloomington community would reduce the potential for the project to displace existing residences. Population and housing impacts under this alternative would be reduced in comparison to the proposed Project.</p> <p style="text-align: center;">LT</p>	<p>Changing land uses in Desert region communities to allow for the development of master planned communities may induce a population increase and extension of infrastructure to accommodate the new developments. This alternative, however, would reduce the potential to displace existing residents, which under the proposed Project is possible in the Valley region. Overall, the population and housing impact of this alternative is similar to the proposed Project.</p> <p style="text-align: center;">S</p>	<p>Limiting the growth to the Valley region would reduce impacts related to the potential of inducing growth because it would reduce the extension of infrastructure to serve the new housing and employment. Intensifying residential land uses in the Valley region, however, could result in more existing housing being redeveloped at higher densities, and potentially displacing existing residences. Overall, the population and housing impact of this alternative would be similar to the proposed Project.</p> <p style="text-align: center;">S</p>

7. Alternatives to the Proposed Project

Table 7-2 Environmental Impact Comparison

Impact	No Project	Limited Suburban Growth	Master Planned Development	Concentrated Suburban Growth
Public Services	Relative to the proposed Project, the No Project alternative would include substantially greater employment opportunities. Although employment centers generate fewer calls for emergency services and do not directly generate increased school, library, or park needs, this would increase impacts relative to the proposed Project. Moreover, development would be more dispersed and likely more difficult to serve. GT	This alternative would reduce both population and jobs by approximately 36%. Service requirements and impacts would be reduced by approximately the same percentage relative to the proposed Project. LT	This alternative would limit new housing growth to the Desert region and would require that infrastructure be the responsibility of the developer. Although sheriff and fire services would be funded by property taxes, it is expected that Community Facility Districts or impact fees would be used to fund any new sheriff or fire stations required to serve the communities. As with the proposed Project, this alternative would be subject to developer school fees under SB 50 (1998). Overall, public services impact would be less than for the proposed Project. LT	Concentrating both housing and employment growth in the Valley region would result in the need for additional fire and sheriff stations, equipment, and personnel in this region. Additional facilities in the Valley region are also anticipated under the proposed Project. Since this alternative would eliminate increased service needs in the Mountain and Desert regions, overall impacts would be less than the proposed Project. LT
Recreation	The overall housing projections of this alternative are similar to the proposed Project. The No Project alternative, however, disperses the housing growth more than the proposed Project and places more housing in the Mountain (slight increase), and Desert regions. Based on the 2007 General Plan EIR (No Project), a shortage of local parkland would result in the Valley region. Overall impacts to recreation, however, would be less than significant. The proposed Project includes updated policies that would ensure new communities fund required local improvements. But both the proposed Project and the No Project would rely heavily on property taxes generated by new development for new park improvements and maintenance, and major contributions by cities to fund regional parks that support the entire County. GT	Under this alternative, demand on existing parks and need for new parks and facilities would be reduced by approximately the same percentage as housing and population reduction in comparison to the proposed Project (36%). Since funding for new parks and improvements would be the same and primarily based on property tax revenue and/or developer improvements, impacts would be similar to the proposed Project. S	The Master Planned Development alternative would likely reduce recreation impacts in comparison to the proposed Project. Developers would be responsible for providing all new infrastructure, including improved park acreage and improvements. Maintenance would also be the responsibility of the new development. New development, however, would still contribute to property taxes that would contribute to funding regional parks. LT	Since funding for new parks and improvements would be primarily based on property tax revenue and/or developer improvements, impacts would be similar to the proposed Project. S
Transportation and Traffic	As detailed under the Greenhouse Gas Emissions section, due to the increased employment uses and more dispersed nature of growth under the No Project alternative, this alternative would result in an approximate 5% increase in total VMT in comparison to the proposed Project. This alternative would also be less successful in increasing multimodal use in urban areas. The transportation impact, therefore, would be greater, and as with the proposed Project, would be significant and unavoidable. GT	Because this alternative would reduce both housing and employment uses by about 36% in comparison to the proposed Project, it would be expected to reduce total VMT. In comparison to the proposed Project, it would reduce housing densities in the Apply Valley SOI and Bloomington community. The lower levels of residential growth in the north Desert would improve the average VMT/capita of the proposed Project, while less residential growth in the Bloomington community should affect VMT/capita proportionately. Accordingly, total VMT would be reduced and VMT/capita (efficiency) would likely be improved relative to the proposed Project. Overall, transportation impacts would be lower. LT	New housing growth under this alternative would be limited to the more remote north and east Desert regions. Employment growth would still be focused in the Valley region. This would increase distances residents travel for jobs, and therefore, increase VMT relative to the proposed Project. It would not take advantage of increased multimodal transportation use that would be promoted under the proposed Project for the Valley region. Transportation impacts for this alternative would be greater than for the proposed Project, and significant and unavoidable (as for the proposed Project). GT	Limiting both housing and employment growth to the Valley region under this alternative would substantially reduce commuter distances to employment opportunities (even if traveling to surrounding counties) in comparison to the proposed Project. It would also be able to focus on multimodal transportation opportunities. Since the subregional analysis for the proposed Project demonstrates that VMT within the Valley region would achieve the VMT significance threshold (4% less than the unincorporated County average), this alternative would be expected to reduce transportation impacts in comparison to the proposed Project and eliminate a significant, unavoidable impact in comparison to the proposed Project. LT (eliminates significant, unavoidable impact)
Tribal Cultural Resources	In comparison to the proposed Project, the No Project alternative would be characterized by more dispersed housing on larger lots, resulting in an increased disturbance of land, potentially impacting tribal cultural resources. Impacts, however, for the No Project alternative are determined to be slightly greater than the proposed Project since land disturbance would be anticipated to be greater. Impacts, however, would be mitigated to less than significant. GT	In comparison to the proposed Project, this alternative would result in very little additional growth in the Apple Valley annexation area, if any. It would reduce residential densities within the Bloomington community. In comparison to the proposed Project, it would reduce land disturbance in the north Desert area and potentially reduce impacts to tribal cultural resources in this region. The reduction in density in the Bloomington area would reduce impacts but would not be expected to appreciably alter the potential impact to tribal cultural resources. LT	In comparison to the proposed Project, this alternative would limit new housing to five master planned communities in the Desert region. As a result, it would avoid impacts to cultural tribal resources in the Mountain and Valley regions. Since the employment footprint, outside of the master planned communities, would be consistent with the proposed Project, cultural tribal resource impacts would be in the Valley region and similar to the proposed Project. S	In comparison to the proposed Project, this alternative would limit new growth, both housing and employment, to the Valley region. This would eliminate potential tribal cultural resource impacts in the Mountain and Desert regions. Tribal cultural resource impacts could be increased in the Valley region, particularly within the Mentone area, that would be undisturbed by the proposed Project and would be converted to a suburban development under this alternative. Overall, impacts to tribal cultural resources would be considered different, but at a similar level of impact as the proposed Project. S

7. Alternatives to the Proposed Project

Table 7-2 Environmental Impact Comparison

Impact	No Project	Limited Suburban Growth	Master Planned Development	Concentrated Suburban Growth
<p>Utilities and Service Systems</p>	<ul style="list-style-type: none"> • Much of the development under this alternative would rely on septic tanks and leach fields and would not require connection to a wastewater service provider. The development that would connect to service providers is projected to generate approx. 1.6 million gallons per day (mgd). This development would be distributed between existing wastewater service providers and could be accommodated in each provider's existing capacity, causing a similar impact to the proposed Project. • Buildout of the No Project option includes a similar amount of housing growth, less population growth (due to differences in persons per household assumptions between SCAG and the proposed project, as discussed in section 5.13.1.2), and more than 21,000 more employees than the proposed Project. Because the number of housing units remains consistent with the proposed Project, the residential water demand would be similar. The additional employment proposed under this alternative, however, would increase the water demand. The employment is also distributed throughout a number of the desert region communities, some of which have limited water supply. • The No Project alternative lacks policy encouraging new development focus on areas where there is potable water, wastewater treatment, roadways, and public services. • Additional employment in the Desert region would produce more solid waste than the proposed project. The increase in employment is divided between the North Desert and East Desert regions, so it would likely be accommodated within the existing landfill capacity. <p style="text-align: center;">GT</p>	<ul style="list-style-type: none"> • A total increase in wastewater generation of 4.10 mgd is projected for the unincorporated areas under this alternative, a decrease of 0.22 mgd compared to the proposed Project. The decreased development footprint in the Apple Valley SOI and Bloomington would lessen the strain on existing wastewater infrastructure in comparison to the proposed Project. • A decrease in housing and population growth would also reduce water demand (approximately 36%) in comparison to the proposed Project. • The reduction in population and employment growth would also reduce solid waste generation and lessen the impact on existing landfills. <p style="text-align: center;">LT</p>	<ul style="list-style-type: none"> • A total increase in wastewater generation of 5.82 mgd is projected for the unincorporated areas under this alternative, an increase of 1.5 mgd over the proposed Project. Existing county regulation would require the majority of the wastewater to be treated by a service provider (septic and leach fields could not be utilized). Three of the proposed master planned communities do not have existing sewer service and would require the construction of new treatment facilities and conveyance infrastructure that could cause significant environmental effects. • The increase in population (resulting from larger homes than can accommodate larger household sizes) and increased employment growth would increase the water demand compared to the proposed Project. • The creation and expansion of large master planned communities would require the construction of new stormwater drainage facilities, which could cause environmental impacts. • Concentrating on master planned communities in the two Desert regions would increase the amount of solid waste generated within each region, while it would lessen the impact on landfills in the Mountain and Valley regions. Under this alternative, the housing growth in the North Desert region would double that of the proposed Project. The growth in the east Desert region would increase by more than 5,300 units and 1,600 jobs compared to the proposed Project. The increase in solid waste could be accommodated in the existing landfills. <p style="text-align: center;">GT</p>	<ul style="list-style-type: none"> • A total increase in wastewater generation of 4.17 mgd is projected for the unincorporated areas under this alternative, a decrease of 0.15 mgd compared to the proposed project. Existing county regulation would require the majority of the wastewater to be treated by a service provider (septic and leach fields could not be utilized). Because of the change in the location of growth, two service providers would see increases in wastewater flows: IEUA and the City of Redlands. As stated in section 5.18.1.4, each has enough capacity to accommodate increased flows, so impacts would be similar to the proposed project. • The overall population growth in this alternative is consistent with the proposed project and would result in a similar demand on the County's water supply. The growth, however, is more concentrated than it is under the proposed project, so it could put greater strain on the water supply in the Valley region than the proposed Project, while it would lessen the impact in the Mountain and Desert regions. • The intensification of currently undeveloped land in the east Valley could require the construction of new stormwater drainage facilities. • Concentrating development in the Valley region would significantly increase the amount of solid waste generated within the region, while it would lessen the impact on landfills in the Mountain and Desert regions. Under this alternative, the housing growth in the Valley region would increase by 10,000 units compared to the proposed Project. The increase in solid waste could be accommodated in existing landfills. <p>Overall, this alternative would reduce the impact to utilities and service systems relative to the proposed Project.</p> <p style="text-align: center;">LT</p>

7. Alternatives to the Proposed Project

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7. Alternatives to the Proposed Project

7.5 CONCLUSIONS BY ALTERNATIVE

This section summarizes the impact analysis for each alternative as included in Table 7-2, Environmental Impact Comparison, and also evaluates the potential for each Project alternative to achieve the Project objectives. A summary of relative environmental impacts for each of the alternatives is provided as Table 7-3, Summary of Alternatives' Relative Impacts in Comparison to proposed Project.

7.5.1 No Project – Existing General Plan

7.5.1.1 ABILITY TO REDUCE ENVIRONMENTAL IMPACTS

Based on the review in Table 7-2, *Environmental Impact Comparison*, in comparison to the proposed Project, implementation of the existing General Plan would result in greater environmental impacts to the following (14 impacts): aesthetics, air quality, biological resources, cultural resources, GHG emissions, hazards (wildfire), land use and planning, noise, population and housing, public services, recreation, transportation and traffic, tribal cultural resources, and utilities and service systems. This includes increasing the severity of significant, unavoidable impacts to air quality, biological resources, GHG emissions, hazards (wildfire), noise, and transportation and traffic. These impacts would be increased due to a more dispersed development throughout the County and also a substantial increase in new employment relative to the proposed Project. New housing growth would be similar to the proposed Project. Impacts to agricultural resources would be less than for the proposed Project, and impact levels would be similar for geology and soils, hydrology and water quality, and mineral resources.

Summary

- No. impacts increased: 14
- No. impacts reduced: 1
- No. of similar impacts: 3
- No. of significant, unavoidable impacts *avoided*: 0
- No. of *new* significant, unavoidable impacts: 1

7.5.1.2 ABILITY TO ACHIEVE PROJECT OBJECTIVES

The No Project Alternative could achieve the primary objectives of the proposed Project as listed in Section 7.1.2. It would be less effective than the proposed Project, however, in achieving some of the stated goals. For example, the proposed Project has more comprehensive and detailed policies to ensure:

- **Collaboration** with other public and private entities.
- **Fiscally Sustainable Growth** with requirements to require new, outlying development to bear the responsibility of new infrastructure and services.
- **Resiliency** to ensure services in the face of emergencies, external forces, and unexpected circumstances.

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- **Stewardship** of natural resources.

7.5.2 Limited Suburban Growth

7.5.2.1 ABILITY TO REDUCE ENVIRONMENTAL IMPACTS

Because this alternative would reduce both housing and employment growth by approximately 36 percent, it would impact services that are dependent upon the development footprint and population. It would reduce the following impacts determined to be significant and unavoidable under the proposed Project: air quality, biological resources, GHG emissions, noise, and transportation and traffic. It would not, however, reduce any of these impacts to less than significant. It would also reduce impacts to aesthetics, agricultural resources, cultural resources, geology and soils, population and housing, public services, tribal cultural resources, and utilities and service systems relative to the proposed Project. Overall, it would reduce impacts in 13 environmental categories. It would not increase the severity of any impacts. Similar level impacts would occur for hazards, hydrology and water quality, land use and planning, mineral resources, and recreation.

Summary

- No. impacts increased: 0
- No. impacts reduced: 13
- No. of similar impacts: 5
- No. of significant, unavoidable impacts *avoided*: 0
- No. of *new* significant, unavoidable impacts: 0

7.5.2.2 ABILITY TO ACHIEVE PROJECT OBJECTIVES

The Limited Suburban Growth alternative is a reduced version of the proposed Project, and as such, would achieve the primary objectives of the proposed Project. Lowering residential density in the Bloomington community and avoiding development of the Apple Valley annexation area would reduce housing unit development by approximately 5,500 units. This alternative, therefore, would not be consistent with the project's 2016 RTP/SCS growth assumptions for housing production, or the estimates anticipated in the 2020 RTP/SCS. This is not stated as a specific objective of the proposed Project, but the proposed Project does anticipate ongoing cooperation with cities through SBCTA and SBCOG to comply with regional housing and transportation plans. The upcoming Regional Housing Needs Assessment and 2028 RTP will likely require a more concentrated housing growth, consistent with the proposed Project.

7.5.3 Master Planned Community

7.5.3.1 ABILITY TO REDUCE ENVIRONMENTAL IMPACTS

Housing growth under this alternative would be limited to five master planned communities within the two Desert regions. New communities would range from approximately 2,500 to 5,800 units each. Employment growth would be similar to the proposed Project and include the Valley region. Creating large residential communities far away from employment opportunities would substantially increase VMT for job commuting,

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resulting in greater impacts to air quality (vehicle emissions), GHG emissions (vehicles), and transportation/traffic impacts. Each of these impacts represents a significant, unavoidable impact of the proposed Project. This alternative would also increase aesthetics, hydrology and water quality, land use and planning, and utilities and service systems impacts relative to the proposed Project. Overall, impacts to 7 impact categories would be worse than the proposed Project.

Concentrating growth in master planned communities within the Desert regions would be expected to reduce impacts to agricultural resources, biological resources, cultural resources, geology and soils, hazards (wildfire), mineral resources, public services, and recreation. *It would eliminate the significant, unavoidable impact associated with wildfire hazards compared to the proposed Project.* Noise impacts would be similar to the proposed Project and remain significant and unavoidable. Impacts to population and housing and tribal cultural resources would also be similar to the proposed Project.

Summary

- No. impacts increased: 7
- No. impacts reduced: 8
- No. of similar impacts: 3
- No. of significant, unavoidable impacts *avoided*: 1
- No. of *new* significant, unavoidable impacts: 0

7.5.3.2 ABILITY TO ACHIEVE PROJECT OBJECTIVES

This alternative would provide essentially the same growth opportunities as the proposed Project for housing and employment. It would not, however, provide opportunities within the Valley or Mountain regions. Without the policies requiring master developers to be responsible for ensuring adequate water supply and providing and maintaining all new infrastructure, this alternative would not achieve the objective for fiscally sustainable growth. With these requirements, this alternative could achieve the stated project objectives. However, the success of this alternative relies on currently unknown developers developing new infrastructure that would be essential to support the growth model.

7.5.4 Concentrated Suburban Growth

7.5.4.1 ABILITY TO REDUCE ENVIRONMENTAL IMPACTS

As detailed in Table 7-2, *Environmental Impact Comparison*, since new growth would be concentrated, this alternative would reduce development footprints, reducing impacts to biological and mineral resources. It would reduce VMT, resulting in decreases to air quality, GHG emissions, and transportation and traffic impacts. It would also reduce impacts to hazards (wildfire), public services, and utilities and service systems. Overall, it would reduce impacts to eight environmental categories. *It would eliminate significant, unavoidable impacts of the proposed Project related to wildfire, mineral resources, and transportation and traffic.* However, it would increase impacts to aesthetics, agriculture and forestry resources, geology and soils (due to higher seismic activity in the Valley), and land use and planning impacts due to the introduction of residential development in the primarily agricultural

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community of Mentone. Remaining impacts—cultural resources, hydrology and water quality, noise, population and housing, recreation, and tribal cultural resources, would be similar to the proposed Project.

Summary

- No. impacts increased: 5
- No. impacts reduced: 7
- No. of similar impacts: 6
- No. of significant, unavoidable impacts *avoided*: 2
- No. of *new* significant, unavoidable impacts: 0

7.5.4.2 ABILITY TO ACHIEVE PROJECT OBJECTIVES

The Concentrated Suburban Growth alternative could achieve the Project objectives. Because it would place both new housing and employment in areas with existing infrastructure, it would provide logical, cost-effective fiscally sustainable provision of public services and infrastructure. Extra effort would be required, however, to ensure that higher densities in the Valley region would not jeopardize the existing character and heritage goal for this region. This alternative could be developed providing the collaboration, resiliency, security, and stewardship as provided by the proposed Project.

7.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the “environmentally superior alternative” and, in cases where the “No Project” Alternative is environmentally superior to the proposed Project, the environmentally superior development alternative must be identified. One alternative has been identified as “environmentally superior” to the proposed Project:

- Concentrated Suburban Growth Alternative

The Concentrated Growth Alternative has been identified as the environmentally superior alternative because it would reduce eight of the 18 environmental topics in comparison to the proposed Project and would reduce three of the proposed Project’s significant, unavoidable impacts to less than significant. The potential wildfire (hazards), mineral resources, and transportation/traffic impacts would be reduced to less than significant under this alternative. This alternative, however, would increase four impacts in comparison to the proposed Project— aesthetics, agricultural resources (impact to Mentone existing agricultural uses), geology/soils (related to the more seismically active Valley region), and land use and planning. These impacts, however, would be mitigated to less than significant under this alternative.

As summarized above, this alternative could achieve the majority of the project objectives. Due to the higher densities in the Valley, however, this alternative could jeopardize the existing character and heritage goal for this region.

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Table 7-3 Alternative Impact Summary

Topic	No Project	Limited Suburban Growth	Master Planned Development	Concentrated Suburban Growth
Aesthetics	+	-	+	+
Agriculture and Forestry Resources	-	-	-	+
Air Quality	+	-	+	-
Biological Resources	+	-	-	-
Cultural Resources	+	-	-	=
Geology and Soils	=	-	-	+
Greenhouse Gas Emissions	+	-	+	-
Hazards and Hazardous Materials	+	=	- (-SUI)	- (-SUI)
Hydrology and Water Quality	=	=	+	=
Land Use and Planning	+	=	+	+
Mineral Resources	=	=	-	+
Noise	+	-	=	=
Population and Housing	+ (new SUI)	-	=	=
Public Services	+	-	-	-
Recreation	+	=	-	=
Traffic and Transportation	+	-	+	- (-SUI)
Tribal Cultural Resources	+	-	=	=
Utilities and Service Systems	+	-	+	-

- less than proposed Project
 + greater than proposed Project
 = same as proposed Project
 SUI significant unavoidable impact

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