

# 7. Alternatives to the Proposed Project

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## 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 Section 15126.6). This chapter identifies potential alternatives to the proposed project and evaluates them, as required by CEQA.

Key provisions of the CEQA Guidelines on alternatives (Section 15126.6[a] through [f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in the EIR.

- “The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly” (15126.6[b]).
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact” (15126.6[e][1]).
- “The no project analysis shall discuss the existing conditions at the time the Notice of Preparation (NOP) is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives” (15126.6[e][2]).
- “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that 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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- “For alternative locations, “only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR” (15126.6[f][2][A]).
- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative” (15126.6[f][3]).

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, and
- Evaluates the comparative merits of the alternative and the project.

Per the CEQA Guidelines Section 15126.6(d), additional significant effects of the alternatives are discussed in less detail than the significant effects of the project as proposed.

### 7.1.2 Project Objectives

As described in Section 3.2, *Statement of Objectives*, the following objectives have been established for the proposed project and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts:

1. **Master Planned Community:** Design and implement the development of a creatively-designed master planned community that expresses and embodies the City’s vision of its future as articulated in the fundamental land use principles, policies, and objectives of the City’s General Plan.
2. **Update the City of Banning’s General Plan:** as it relates to the project site based on current and projected market conditions while maintaining the underlying concept of comprehensive and cohesive development planning that allows for the appropriate physical and economic development of the property.
3. **Provide a Quality, Livable Community:** Provide a quality, livable community through the implementation of a Specific Plan that will ensure a consistent quality of design, allow for the provision and maintenance of community amenities, and create a collection of cohesive, well-defined neighborhoods that provide residents with a clear sense of place and identity within the diverse fabric of the larger community.
4. **Provide a Wide Range of Housing Opportunities:** Provide a range of high quality housing opportunities by developing a diverse range of housing types available at a variety of price points, responsive to market demand, and varying lifestyles.

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5. **Promote Sustainability:** Promote the concept of sustainable community development by implementing green building practices in the selection of construction materials, the recycling of construction waste, and the use of energy and water efficient building practices.
6. **Incorporate Water and Energy Efficiency:** Incorporate energy and water efficient design and technology into the homes, commercial buildings, and landscape of the Specific Plan development.
7. **Ease of Navigation:** Create a community that it easy to navigate through careful use of landscape, signage, and entry design based on the Specific Plan's design objectives.
8. **Recreational Amenities:** Provide recreational amenities which will serve the needs of neighborhood residents and others in the City of Banning as well as nearby communities.
9. **Safe and Efficient Circulation:** Provide a safe and efficient roadway network, linking all internal elements of the planned community with the rest of the City of Banning to the north, west and east.
10. **Address Drainage and Water Quality Issues:** Provide adequate drainage, flood control and water quality improvements, which satisfy applicable local, state and federal criteria while respecting and enhancing/preserving natural drainage functions and features.
11. **Ensure Provision of Public Services:** Ensure provision of adequate public services, utilities and infrastructure in a timely manner as development occurs.
12. **Encourage Alternative Transportation:** Encourage alternative transportation through the creation of a walkable community with well-defined pedestrian linkages between neighborhoods, amenities, schools, and commercial uses, the provision of bike paths, the creation of Low Speed Vehicle or Neighborhood Electric Vehicle (electric carts) linkages, electric vehicle charging stations, transportation coordination with local transit services, and the development of multi-purpose trails.
13. **Promote Community Security:** Promote community security and safety through appropriate outdoor design, the incorporation of "defensible space" concepts in the design of residential developments, and by encouraging community involvement through the area's proposed homeowners associations.

### 7.2 ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING/PROJECT PLANNING PROCESS

The following is a discussion of the land use alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in this Draft EIR (EIR).

#### 7.2.1 Alternative Development Areas

If a similar site was located, the proposed Rancho San Gorgonio Specific Plan could theoretically be developed at an alternative location within the City of Banning. The California Supreme Court determined that examination of infeasible alternatives need not be given exhaustive evaluation. Specifically, in the court case, *Citizens of Goleta Valley v. Board of Supervisors*, 1988, the court stated:

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A feasible alternative is one which can be “accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.” (Public Resources Code Section 21061.1; CEQA Guidelines Section 15364). Surely whether a property is owned or can reasonably be acquired by the project proponent has a strong bearing on the likelihood of a project's ultimate cost and the chances for an expeditious and “successful accomplishment.”<sup>1</sup>

The State CEQA Guidelines, Section 15126.6(f)(1) states:

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 (projects with a regionally significant impact should consider the regional context), 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). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines Section 15126[5][B][1]). In general, any development of the size and type proposed would have substantially the same impacts on air quality, cultural resources, greenhouse gas emissions, noise, and transportation and traffic.

The project applicant, Diversified Pacific, owns the 831 acres of land proposed for development under the Rancho San Gorgonio Specific Plan. Therefore, it would be difficult and economically infeasible to purchase land elsewhere in the City of Banning that would be able to accommodate the buildout potential of the proposed Specific Plan. Most of the large areas of undeveloped land in Banning have already been entitled or have future planned uses. For example, the planned Butterfield Specific Plan project encompasses a 1,543-acre site in northeast Banning for development of up to 4,862 units, open space and parks, two school sites and commercial uses. The Banning Bench Specific Plan and Loma Linda Specific Plan area also occupy two larger portions of land in northern Banning. Other large vacant areas are in Banning's sphere of influence. Therefore, there are no available alternative sites that could accommodate the proposed project.

### 7.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Based on the criteria listed above, the following three alternatives have been determined to represent a reasonable range of alternatives which have the potential to feasibly attain most of the basic objectives of the project but which may avoid or substantially lessen any of the significant effects of the project. These alternatives are analyzed in detail in the following sections.

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<sup>1</sup> 197 Cal.App.3d 1167, 243 Cal.Rptr. 339 (Goleta I). [http://resources.ca.gov/ceqa/cases/1990/goleta\\_valley\\_123190.html](http://resources.ca.gov/ceqa/cases/1990/goleta_valley_123190.html).

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- No Project/No Development Alternative
- No Project/Existing General Plan Alternative
- Reduced Density Alternative

An EIR must identify an “environmentally superior” alternative and where the No Project Alternative is identified as environmentally superior, the EIR is then required to identify as environmentally superior an alternative from among the others evaluated. Each alternative’s environmental impacts are compared to the proposed project and determined to be environmentally superior, neutral, or inferior. Only the impacts involving air quality, greenhouse gas emissions, noise, and traffic were found to be significant and unavoidable. Section 7.4 identifies the environmentally superior alternative.

The preferred land use alternative (see Figure 3-5, *Proposed Land Use Plan*) is analyzed in detail in Chapter 5 of this DEIR.

### 7.3.1 Alternatives Comparison

The following statistical analysis provides a summary of general socioeconomic buildout projections determined by the three land use alternatives compared to the proposed project. It is important to note that these are not growth projections. That is, they do not anticipate what is likely to occur by a certain time horizon, but provide a buildout scenario that would only occur if all the areas of the City were to develop to the probable capacities yielded by the land use alternatives. The following statistics were developed as a tool to understand better the difference between the alternatives analyzed in the DEIR. Table 7-1 identifies City-wide information regarding dwelling unit, population, and employment projections, and also provides the jobs-housing ratio for each of the alternatives.

**Table 7-1 Build-out Statistical Summary**

	Proposed Project <sup>1</sup>	No Project/ No Development Alternative	No Project/ Existing General Plan Alternative	Reduced Density Alternative
Dwelling Units	3,133 (3,385)	0	1,865	2,708
Population <sup>2</sup>	8,365 (9,038)	0	4,980	7,230
Employment	96 (0)	0	0	0
Jobs-to-Housing Ratio	0.03 (0)	0	0	0

<sup>1</sup> Project buildout would consist of 3,385 units and 9,038 residents if Planning Area (PA) 9 and PA-16C are not developed as commercial or school uses, respectively, and instead are developed in accordance with their Residential Overlay Alternatives. In this case, the commercial use would not be developed and no jobs would be generated.

<sup>2</sup> Population is calculated by using the California Department of Finance’s average household size of 2.67 for the City of Banning (DOF 2015).

#### 7.3.1.1 NO PROJECT/NO DEVELOPMENT ALTERNATIVE

Under the No Project/No Development Alternative, the proposed Rancho San Gorgonio Specific Plan would not be adopted and no development would occur onsite. The project site would remain in its existing condition—that is, vacant and used for cattle grazing. The four onsite creeks, Pershing Creek, Montgomery

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Creek, Smith Creek and Gilman Home Channel, would remain in their current natural states (see Figure 3-3, *Aerial Photograph*).

As shown in Table 7-1, buildout of the No Project/No Development Alternative would maintain existing conditions onsite. There would be no residential or nonresidential development nor any associated residents or employees. The site would remain vacant and undeveloped.

### Aesthetics

Since no development would occur and the site would remain undeveloped under this alternative, there would be no impacts to the visual character or quality of the project area. Existing scenic vistas toward the San Jacinto Mountains, San Bernardino Mountains, and nearby rolling hills and valleys would be preserved. No sources of light or glare would be produced either. Therefore, aesthetic impacts under this alternative would be reduced compared to the proposed project.

### Agriculture and Forestry Resources

Under the No Project/No Development Alternative, the project site would continue to be used for cattle grazing. No adverse impact related to the loss of important farmland or conversion of land zoned as agriculture to non-agriculture would occur. Thus, impacts would be reduced and remain less than significant.

### Air Quality

Air quality impacts would be reduced under this alternative because no development would occur onsite. Without development, the site would not generate any vehicle trips and associated emissions nor any construction or operational emissions. Thus, the No Project/No Development Alternative would reduce overall air quality impacts and eliminate significant and unavoidable impacts related to operational emissions.

### Biological Resources

Under this alternative, the project site would remain vacant and undeveloped, eliminating adverse impacts on the site's existing biological resources. The sensitive plant and animal species, wildlife corridors, jurisdictional waters and riparian habitats along the creek beds and throughout the site would not be disturbed. Thus, impacts would be reduced compared to the proposed project.

### Cultural Resources

The project site would remain in its existing conditions under the No Project/No Development alternative. Thus, no grading or construction activities would occur that may potentially unearth previously undiscovered cultural resources. Additionally, any areas within the project site considered sensitive to local tribal groups would also not be impacted. Overall, impacts would be reduced in comparison to the proposed project.

### Geology and Soils

The site would remain undeveloped and vacant. Therefore, no people or structures would be exposed to potential adverse effects of seismic activity, landslides, or ground failure. In addition, no grading or

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construction activities would occur. Therefore, although soil erosion and instability may continue to occur along the creek beds from rains and flooding, erosion and instability associated with development would not occur. Thus, geology and soils impacts would be reduced.

### Greenhouse Gas Emissions

As previously stated, no construction or operational activities would occur onsite, and no mobile or stationary sources of greenhouse gas emissions would be present. The undeveloped site also would not generate any vehicle trips that may contribute emissions into the air basin. Overall, no emissions would be emitted under this alternative, and significant and unavoidable impacts related to exceeding South Coast Air Quality Management District's (SCAQMD) performance targets would be eliminated.

### Hazards and Hazardous Materials

Under this alternative, no construction or operational activities would occur. Therefore, no hazards or hazardous materials would be introduced to the project site. The site would remain undeveloped and vacant, and no hazardous impacts would result. Impacts would be reduced under this alternative.

### Hydrology and Water Quality

Under this alternative, no development would occur and the entire site would stay vacant. Without any development, the existing drainage patterns that follow the creeks onsite would be retained and would not be altered by the proposed development. The site would also maintain its permeability and would not adversely impact groundwater recharge or increase stormwater flows. Also, no homes or structures would be placed within the site's 100-year flood hazard zone areas (see Figure 5.9-5, *Existing Flood Zones*); therefore, no flooding hazards would occur. However, this alternative would not install infrastructure that would reduce the limits of the 100-year flood plain or other improvements, such as infiltration basins, that would increase groundwater recharge. Overall, impacts to hydrology and water quality onsite would be reduced under this alternative.

### Land Use and Planning

Land use and planning impacts would be reduced under this alternative. Current land use designations of the 670 acres of land in the City of Banning would remain Very Low Density Residential, Medium Density Residential, High Density Residential, Rural Residential, and Open Space-Resources, and the 161 acres in unincorporated Riverside County would be designated Ranch/Agriculture. No zone change or General Plan amendment would be required, and no annexation of county land would be required. Thus, impacts would be reduced and less than significant.

### Noise

Under this alternative, no noise impacts would occur because no development would be permitted onsite. There would be no construction or operational noises and no vehicular trips to and from the project site since it would remain undeveloped and vacant. Thus, impacts would be reduced, and significant and unavoidable impacts would be eliminated.

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### Population and Housing

Population and housing impacts would be reduced under this alternative because no homes would be developed onsite and no additional residents would be introduced into the City. Therefore, this alternative would not increase the City's population or housing availability, and the City's jobs-housing ratio would remain the same. Significant and unavoidable impacts to population growth would be eliminated, and all other impacts related to housing and jobs-housing ratio would be less than significant.

### Public Services

Impacts on public services would be reduced under this alternative because no development would occur onsite, and no demand for fire, police, school, or library services would occur.

### Recreation

This alternative would have no impact on recreation compared to the proposed project. No development would occur, and no permanent residents would be introduced to the project area. Therefore, no increase in park demand would develop and impacts would be reduced.

### Transportation and Traffic

This alternative would not generate any vehicle trips because no development would occur onsite. In comparison, the proposed project would introduce 31,698 daily trips, of which 2,245 would occur in the AM peak hour, and 2,861 would occur in the PM peak hour at project buildout in 2035.

Without the proposed project, two intersections would operate at a level of service (LOS) "E" or worse at opening year 2017, interim years 2019 and 2022. Three intersections would operate at a LOS E or worse at interim year 2025; and five intersections would operate at LOS E or worse at interim year 2029 and buildout year 2035. Two traffic signals are projected to be warranted at interim year 2029 and buildout year 2035. No mitigation measures would be implemented to reduce LOS impacts to less than significant levels under the No Project/No Development Alternative. Therefore, transportation and traffic impacts would be greater than the proposed project.

### Utilities and Service Systems

No development would occur on the project site under this alternative. Therefore, there would be no demand for water supply or dry utilities (i.e., natural gas and electricity) services. In addition, no wastewater or solid waste would be generated onsite. Thus, impacts would be greatly reduced in comparison to the proposed project.

### Conclusion

#### *Ability to Reduce Environmental Impacts*

Under the No Project/No Development Alternative, impacts on aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions,



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hazards and hazardous materials, hydrology and water quality, land use and planning, noise, housing, public services, recreation, and utilities and service systems would be reduced in comparison to the proposed project. The alternative would also eliminate significant and unavoidable impacts to air quality (operational), greenhouse gas emissions, noise, and population growth. Only transportation and traffic impacts would be greater under this alternative.

### *Ability to Achieve Project Objectives*

While this alternative would reduce impacts in nearly all topical areas and also eliminate significant and unavoidable impacts, the No Project/No Development Alternative would not meet any of the project objectives. Since the project site would remain undeveloped and vacant, this alternative would not create a master planned community that articulates the City's market conditions and comprehensive development planning approach (Nos. 1 and 2); provide a high quality, livable community with a wide range of housing opportunities (Nos. 3 and 4); promote sustainability through green building practices and water and energy efficiency (Nos. 5 and 6); provide recreational amenities and ease of navigation (Nos. 7 and 8); provide safe and efficient roadway networks, alternative transportation, and public services (Nos. 9, 11 and 12); address drainage and water quality issues onsite (No. 10); or promote community security with "defensible spaces" and engagement with the area's homeowners associations (No. 13).

### **7.3.1.2 NO PROJECT/EXISTING GENERAL PLAN ALTERNATIVE**

The No Project/Existing General Plan Alternative would develop the site based on the current General Plan land use designations. According to the City's General Plan, the 670-acre portion of the site within Banning is designated Very Low Density Residential, with limited Medium Density Residential, High Density Residential, Rural Residential, and Open Space-Parks and Open Space-Resources (see Figure 3-4, *Current Land Use Designations*). The remaining 161 acres of the project site is in the City's SOI in unincorporated Riverside County. This area is designated Ranch/Agriculture by the City of Banning and Light Agriculture (A-1) by the County of Riverside.

Buildout of this alternative would allow up to 1,865 dwelling units and introduce approximately 4,980 residents using the City's average household size of 2.67. Nonresidential development would not be developed onsite; therefore, no jobs would be generated.

### **Aesthetics**

This alternative would allow development of 1,520 fewer dwelling units than the proposed project and would not develop any commercial or school uses onsite. This would reduce the development density onsite and maintain a similar character to other residential development in the surrounding areas, which is primarily very low density and rural residential uses. Additionally, fewer dwelling units and residents would reduce light and glare in the project area. Therefore, aesthetic impacts would be reduced under this alternative and remain less than significant.

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### Agriculture and Forestry Resources

Under this alternative, the project site would be developed based on the City's General Plan designations, which includes 161 acres of land designated as Light Agriculture. Therefore, no adverse impact related to the loss of important farmland or conversion of land zoned as agriculture to nonagriculture would occur. Impacts would be reduced and remain less than significant.

### Air Quality

Development in accordance with the existing General Plan designations would result in 1,520 fewer dwelling units. A reduction in dwelling units would also reduce vehicle trips and associated construction and operational emissions. However, operational air quality impacts would remain significant and unavoidable.

Given that the site would be developed based on General Plan projections, this alternative would be consistent with assumptions in the regional air quality management plan (AQMP). Thus, air quality impacts would be reduced and significant and unavoidable impacts related to consistency with the regional AQMP would be eliminated.

### Biological Resources

Under this alternative, biological resource impacts would be similar to the proposed project. A number of sensitive natural communities—southern riparian scrub and Riversidean alluvial fan sage scrub—and sensitive wildlife species—American badger, burrowing owl, Los Angeles pocket mouse—were found to be present onsite. In addition, wildlife corridors, sensitive riparian communities, and jurisdictional wetlands were also found onsite. Development in accordance with the No Project/Existing General Plan Alternative would reduce development by 1,520 homes, but would be within the same footprint as the proposed Rancho San Gorgonio Specific Plan. Therefore, impacts on biological resources would be similar to the proposed project and would be less than significant upon implementation of applicable mitigation measures.

### Cultural Resources

Cultural resource impacts would primarily be associated with potential ground disturbance and development of previously undisturbed areas. Although this alternative would allow development of 1,520 fewer dwelling units than the proposed project, grading and construction in accordance with existing General Plan designations would still alter the currently undeveloped and vacant site. Therefore, grading activities associated with both the proposed project and alternative would have similar potential to uncover previously undiscovered cultural resources. However, impacts would remain less than significant with implementation of mitigation measures.

### Geology and Soils

Since the proposed project and alternative would be developed on the same site, the potential to be located on a geologic unit or soil that is unstable (i.e., prone to landslide, lateral spreading, subsidence, expansion, liquefaction, and collapse) would be similar. However, fewer homes and structures would be developed on the site under this alternative and would expose fewer people to potential adverse effects of strong seismic

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groundshaking in the project area. Additionally, the development of primarily very low residential and rural residential development under this alternative would reduce the required construction activities, including grading and may reduce impacts to soil erosion or the loss of topsoil onsite. Overall, geology and soil impacts would be reduced under this alternative and impacts would be less than significant.

### Greenhouse Gas Emissions

The No Project/Existing General Plan Alternative would develop 1,520 fewer dwelling units than the proposed project. Therefore, vehicle trips and associated emissions would reduce proportionally. However, the current General Plan does not include a GHG reduction plan and may still exceed SCAQMD's performance targets. Thus, GHG impacts would be reduced under this alternative, but impacts would remain significant and unavoidable.

### Hazards and Hazardous Materials

In both this alternative and the proposed project, all land uses would be required to comply with existing state, federal, and county regulations governing use, storage, transport, and disposal of hazardous materials and hazardous wastes. The portion of the project site designated as a very high fire hazard severity zone is designated as natural open space under the proposed Specific Plan and Open Space-Resources under the Banning General Plan. Therefore, both scenarios would not introduce any fire hazards to residential or nonresidential development. Overall, potential hazards and hazardous materials impacts would be similar under both scenarios and would remain less than significant.

### Hydrology and Water Quality

This alternative would reduce buildout by 1,520 homes compared to the proposed project. Substantially reducing intensity would reduce development of impervious surfaces in the project area compared to the proposed Specific Plan. Additionally, the reduction in development would reduce potential stormwater runoff volumes, erosion and sedimentation in existing drainage channels onsite. Therefore, impacts would be less under this alternative and remain less than significant.

### Land Use and Planning

Neither the proposed project nor No Project/Existing General Plan Alternative would physically divide an existing neighborhood. Development under both scenarios would also require compliance with the Western Riverside County Multiple-Species Habitat Conservation Plan. However, impacts would still be reduced under this alternative. No General Plan amendment or zone change would be required to develop the site under existing General Plan designations. Therefore, this alternative would be consistent with Banning's local land use plan and zoning code. Impacts would be less than significant.

### Noise

Given that fewer homes would be built under this alternative, construction and operational noise impacts would decrease compared to the proposed project. Less development would also reduce the number of residents in the City, which would decrease vehicular noise on local roadways. However, construction and

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operational noise impacts would remain significant and unavoidable because no mitigation would be implemented to minimize future noise impacts.

### Population and Housing

Buildout of this alternative would consist of 1,520 fewer homes and 4,058 fewer residents compared to the proposed project, thereby reducing population and housing impacts. Specifically, significant and unavoidable impacts to population growth under the proposed project would be eliminated.

This alternative would not include development of the 9.3-acre neighborhood commercial use under the proposed Specific Plan; therefore, no jobs would be generated. However, this would nominally affect the project's jobs-housing ratio.

### Public Services

Public service impacts related to fire, police, school, and library services would be reduced under this alternative. Because 4,058 fewer residents would be present in the project area, calls for fire and police service would be reduced. Additionally, fewer residents also correlate with fewer students that would attend schools in the Banning Unified School District service area. Demands for library services would also decrease with a reduction in residents. Overall, impacts would be reduced and less than significant.

### Recreation

This alternative would develop 1,520 fewer homes and introduce 4,058 fewer residents into the project area. This would reduce demands for park and recreational facilities compared to the proposed project. However, this alternative would not include development of parks, paseos, and open space areas proposed under the Specific Plan land use plan, which total to 210.3 acres (25.2 percent of the site). Therefore, this alternative would have slightly greater impacts in this regard. Therefore, by balancing the reduction in park demand with the loss of developed park space, impacts would be similar to the proposed project.

### Transportation and Traffic

Buildout of the existing General Plan would have substantially fewer homes and residents, which would also reduce vehicle trips traveling within and in and out of Banning. This would reduce impacts on level of service at various intersections and roadway capacities. Therefore, impacts would be reduced but not eliminated.

### Utilities and Service Systems

This alternative would reduce impacts on utilities and service systems compared to the proposed Rancho San Gorgonio Specific Plan due to the reduced population at buildout of this scenario. The 4,058 fewer residents would reduce associated water, natural gas, and electricity demands, and wastewater and solid waste generation. For example, buildout of the current General Plan would generate 361,810 gallons of wastewater per day (gpd) compared to 839,138 gpd under the proposed project. Also, buildout of this alternative would generate approximately 22,809 pounds of solid waste per day (ppd) compared to 41,399 ppd under the

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proposed project. Overall, impacts would be reduced under this alternative and impacts would be less than significant.

### Conclusion

#### *Ability to Reduce Environmental Impacts*

Impacts of the No Project/Existing General Plan Alternative would be reduced for aesthetics, agriculture and forestry resources, air quality (construction and operations), geology and soils, greenhouse gas emissions, hydrology and water quality, land use and planning, noise, housing, public services, transportation and traffic, and utilities and service systems. Impacts would be similar for biological resources, cultural resources, hazards and hazardous materials, and recreation. Additionally, significant and unavoidable impacts related to air quality (AQMP consistency) and population growth would be eliminated.

#### *Ability to Achieve Project Objectives*

While this alternative would reduce several impacts, the No Project/Existing General Plan Alternative would not achieve several of the project objectives. For example, development of this alternative would not be designed as a master planned community (No. 1); would not update the City's General Plan based on current and projected market conditions (No. 2); promote the concept of sustainable community development through green building practices (No. 5); create a community easy to navigate with landscaping, signage, and entry design (No. 7); provide recreational amenities (No. 8); provide safe and efficient circulation linking a planned community to the rest of the City (No. 9); address drainage and water quality issues by providing drainage, water quality, and flood control improvements (No. 10); encourage alternative transportation by creating a walkable community with well-defined linkages (No. 12); or promote community security through appropriate outdoor design and defensible spaces (No. 13). Most of these project objectives would be best achieved by implementing a cohesive master plan that is designed all at one time to create a unified community.

Development of this alternative would be able to provide a quality, livable community (No. 3) although not through implementation of a specific plan, and provide a range of housing opportunities (No. 4), although not to the same degree as the proposed Specific Plan, which has various ranges of housing types at different price points. This alternative would be able to incorporate water and energy efficiency (No. 6) by complying with applicable local water and energy conservation regulations and ensure provision of public services (No. 11).

### 7.3.1.3 REDUCED DENSITY ALTERNATIVE

The Reduced Density Alternative would generally reduce residential development within the Specific Plan area by 20 percent while maintaining the development footprint of the project. The reduction in residential density would occur equally across the project site and would result in a buildout of 2,708 dwelling units and 7,230 residents based on an average household size of 2.67. The neighborhood commercial site would be developed with residential use; therefore, no jobs would be generated onsite.

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Similar to the proposed project, the other proposed land uses—park and open space areas, public facility, school, roadway right-of-ways, and storm drain easement would still be developed. Only the residential development would decrease by 20 percent.

### Aesthetics

The Reduced Density Alternative would allow development of 677 fewer homes onsite. Generally, the Specific Plan area would be developed at a less intense scale and would achieve a more rural character, similar to the City's existing conditions. Fewer homes and residents would also reduce light and glare related to vehicular traffic, security and building lighting, and indoor lighting. Therefore, aesthetic impacts would be reduced under this alternative and remain less than significant.

### Agriculture and Forestry Resources

This alternative would have the same development footprint as the proposed project and would redesignate 161 acres of agricultural use to residential use. Therefore, similar impacts to agriculture would occur under both scenarios.

### Air Quality

A 20 percent reduction in development would generally reduce air quality impacts by 20 percent. Construction of 677 fewer homes would require a shorter construction period and minimize short-term emissions in all six phases. The Reduced Density Alternative would also decrease vehicle trips generated, which would also decrease operational emissions that have the potential to exceed SCAQMD's threshold criteria. The 20 percent decrease in development would also reduce the exposure of sensitive receptors to substantial pollutant concentrations during construction and operation. Overall, impacts would be reduced, but significant and unavoidable impacts to operation and AQMP consistency would remain.

### Biological Resources

Although development would be reduced by 677 homes and 1,808 residents, biological resources impacts would be similar under this alternative because the development footprint would be the same as the proposed project. Sensitive natural communities, wildlife species, and riparian corridors would be similarly impacted. However, impacts would be less than significant upon implementation of applicable mitigation measures.

### Cultural Resources

Although intensity would decrease by 20 percent, development under this alternative would still require grading and construction in the same development footprint as the proposed project. Therefore, grading activities associated with both the proposed project and alternative would have similar potential to uncover previously undiscovered cultural resources. Nevertheless, impacts would remain less than significant with implementation of mitigation measures.

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### Geology and Soils

The development footprint of this alternative would be the same as the proposed project. Therefore, impacts related to the stability of the site's geologic units and soils would be similar. However, by reducing development intensity and associated population in the project area, this alternative would reduce the potential to expose people or structures to adverse effects from seismic groundshaking, landsliding, and ground failure.

### Greenhouse Gas Emissions

This alternative would develop 677 fewer homes than the proposed project. The reduction in residential homes would also decrease vehicle trips generated and associated operational GHG emissions in the project area. Construction of 677 fewer homes would also reduce construction GHG emissions. Overall, this alternative would reduce impacts related to GHG emissions but would remain significant and unavoidable.

### Hazards and Hazardous Materials

This alternative would reduce buildout capacity by 20 percent, which equates to 677 fewer residential homes. While this would reduce the use, storage, transport, and disposal of hazardous materials and hazardous wastes during construction and operation, the reduction would be nominal and impacts from hazardous materials would be similar. Additionally, since the project footprint would remain the same under this alternative, potential wildfire hazard impacts would be similar. Overall, impacts would be similar and less than significant.

### Hydrology and Water Quality

Development in accordance with this alternative would result in 677 fewer homes. The development footprint would be the same as the proposed project, but development of fewer homes would reduce potential stormwater runoff volumes, erosion, and sedimentation in existing drainage channels onsite (i.e., Pershing Creek, Smith Creek, Montgomery Creek, and Gilman Home Channel). Compliance with regulatory policies would reduce impacts to less than significant under both alternatives.

### Land Use and Planning

Similar to the proposed project, the Reduced Density Alternative would require a General Plan Amendment to redesignate the current land use designations to Specific Plan use. Impacts related to land use compatibility and building height per the Banning Municipal Airport Comprehensive Land Use Plan and Federal Aviation Administration would also be similar. However, a reduced density scenario would help make the project more compatible with its surrounding uses, which primarily consist of rural residential and low density developments. Therefore, impacts would be slightly reduced under this alternative.

### Noise

Construction and operational noise impacts under this alternative would be reduced under this alternative. Since 677 fewer homes would be developed, construction activities would decrease and reduce noise exposure

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and groundborne vibration to existing and future residents. Operational noise impacts would also be decreased since fewer residents and vehicle trips would be generated. Overall, noise impacts would be reduced, but would remain significant and unavoidable.

### Population and Housing

This alternative would introduce 677 fewer homes and 1,808 fewer residents to the Specific Plan area. This is a significant reduction in homes and residents, which would minimize population and housing impacts. More specifically, population growth under this alternative (7,230 people) would be within SCAG's population projection for the City by 2040 (7,997 people) and would reduce significant and unavoidable impacts to population under the proposed project.

Jobs-housing balance would be similar as both scenarios would develop either a predominantly or completely residential master planned community. Overall, impacts would be reduced.

### Public Services

The reduction in homes and residents in the Specific Plan area would lead to a reduction in calls for service for the Banning Fire Department/Riverside County Fire Department and Banning Police Department. The reduction in residents would also correlate with fewer students attending Banning Unified School District schools and less demand on library services from Banning Library District. Thus, impacts on public services would be reduced under this alternative.

### Recreation

This alternative would introduce 1,808 fewer residents to the project area compared to the proposed project. To meet the City's parkland standard of 5 acres per 1,000 residents, development of this alternative would require approximately 36.2 acres of parkland compared to 45.2 acres under the proposed project.

The 210 acres of proposed park and open space areas would still be developed. Therefore, more parkland would be provided per capita compared to the proposed project. Overall, impacts to recreation would be reduced and less than significant.

### Transportation and Traffic

The Reduced Density Alternative would decrease vehicle trips generated by 20 percent from 31,698 to 25,358 daily vehicle trips by 2035. This would decrease traffic impacts on study area intersections and roadways; however, impacts would remain significant and unavoidable.

### Utilities and Service Systems

Utilities and service system impacts would be reduced under this alternative. The 677 fewer homes and 1,808 fewer residents introduced would generate less wastewater and solid waste and require less water, natural gas, and electricity. For example, buildout of this alternative would generate 707,800 gpd of wastewater while the proposed project would generate 839,138 gpd. Solid waste generation would also decrease from 41,399 ppd



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to 33,119 ppd under this alternative. Overall, impacts would be reduced under this alternative and impacts would be less than significant.

### Conclusion

#### *Ability to Reduce Environmental Impacts*

Under the Reduced Density Alternative, impacts on aesthetics, air quality, geology and soils, greenhouse gas emissions, hydrology and water quality, land use and planning, noise, housing, public services, recreation, transportation and traffic, and utilities and service systems would be reduced in comparison to the proposed project. Impacts to agriculture and forestry resources, biological resources, cultural resources, and hazards and hazardous materials would be similar. Lastly, significant and unavoidable impacts to population growth would be eliminated.

#### *Ability to Achieve Project Objectives*

Although the Reduced Density Alternative would reduce the proposed residential development by 20 percent, it would be able to achieve most project objectives listed above in Section 7.1.2. The alternative would be able to develop a creatively designed master planned community (No. 1); provide a quality livable community (No. 3); promote sustainability and water and energy efficiency (Nos. 5 and 6); create a community with easy navigation and security (Nos. 7 and 13); provide recreational amenities and provisions of public services (Nos. 8 and 11); develop safe and efficient circulation while encouraging alternative transportation (Nos. 9 and 12); and address drainage and water quality issues (No. 10).

However, the City of Banning is in need of housing for future generations. Therefore, this alternative would not provide as much housing opportunity or meet the City's projected housing market conditions (Nos. 2 and 4) as well as the proposed project. More specifically, Objective No. 2 also pursues a goal that allows for the appropriate physical and economic development of the property. Reducing residential development by 20 percent but maintaining all other improvements (i.e., parks, open space, roadways, and infrastructure) would not be an economically viable method to develop the site, nor would it meet the City's projected housing market conditions to the same degree as the proposed project.

## 7.4 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. Table 7-2 provides an impacts summary of the proposed project and three alternatives.

In this case, the environmentally superior alternative is the No Project/No Development Alternative. Therefore, the next environmentally superior alternative is the Reduced Density Alternative. This alternative would lessen impacts to nearly all topical sections and also eliminate significant impacts to population growth. Other significant and unavoidable impacts to air quality, greenhouse gas emissions, noise, and traffic would remain. However, not all the open space amenities would be supported under the Reduced Density

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Alternative. Nevertheless, the Reduced Density Alternative would be able to achieve all the project objectives listed in Section 7.1.2.

**Table 7-2 Summary of Impacts of Alternatives Compared to the Proposed Project**

Topic	Proposed Project	No Project/No Development Alternative	No Project/Existing General Plan Alternative	Reduced Density Alternative
Aesthetics	LTS	<	<	<
Agriculture and Forestry Resources	LTS	<	<	=
Air Quality				
<i>Construction</i>	LTS/M	<	<	<
<i>Operation</i>	S/U	<*	<	<
Biological Resources	LTS/M	<	=	=
Cultural Resources	LTS/M	<	=	=
Geology and Soils	LTS	<	<	<
Greenhouse Gas Emissions	S/U	<*	<	<
Hazards and Hazardous Materials	LTS	<	=	=
Hydrology and Water Quality	LTS	<	<	<
Land Use and Planning	LTS	<	<	<
Noise				
<i>Construction</i>	S/U	<*	<	<
<i>Operation</i>	S/U	<*	<	<
Population and Housing	S/U	<*	<*	<*
Public Services	LTS	<	<	<
Recreation	LTS	<	=	<
Transportation and Traffic	S/U	>	<	<
Utilities and Service Systems	<	<	<	<
Notes: LTS: Less than Significant; LTS/M: Less than Significant with Mitigation Incorporated; S/U: Significant and Unavoidable (-) The alternative would result in less of an impact than the proposed project. (+) The alternative would result in greater impacts than the proposed project. (=) The alternative would result in the same/similar impacts as the proposed project. * The alternative would reduce a significant and unavoidable impact.				

## 7.5 REFERENCES

California Department of Finance (DOF). 2015, May. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011–2015 with 2010 Census Benchmark.  
<http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php>.