6.1 INTRODUCTION

As discussed in Chapter 4.0, the proposed Project would have potentially significant impacts to agricultural resources; biological resources; cultural resources; geology, soils and seismicity; hydrology and water quality; land use and planning; noise; public services and utilities; and water supply; however, mitigation measures can be implemented to reduce these impacts to a level that is less than significant. As described below in Section 6.4, Significant and Unavoidable Impacts of the Proposed Project, significant and unavoidable impacts would occur with regard to aesthetics, light, and glare; air quality; hazards and hazardous materials (fire hazards in PA 60 and 61), noise (cumulative); traffic and transportation; water supply (cumulative); and climate change. The analysis below compares a range of alternatives to the proposed Project to evaluate whether impacts would be greater, lesser, or similar to those resulting with the proposed Project.

6.2 CEQA REQUIREMENTS

Section 15126.6(a) of the *CEQA Guidelines* requires that an EIR describe a range of reasonable alternatives to the Project, or a range of reasonable alternatives to the location of the Project, that could feasibly attain the basic objectives of the Project. An EIR does not need to consider every conceivable alternative project, but it does have to consider a range of potentially feasible alternatives that facilitate informed decision-making and public participation.

The range of feasible alternatives is selected and discussed in a manner to foster meaningful public participation and informed decision-making. Among the factors that may be taken into account when addressing the feasibility of alternatives (as described in CEQA Section 15126.6(f)) are site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the proponent could reasonably acquire, control, or otherwise have access to the alternative site. An EIR need not consider an alternative if its effects cannot be reasonably identified, its implementation is remote or speculative, or if it would not achieve most of the basic project objectives.
In accordance with Section 15126.6(a) of the *CEQA Guidelines*, the discussion must focus on alternatives that would avoid or substantially reduce any significant effects of the Project, even if the alternatives would be more costly or hinder to some degree the attainment of the Project objectives. The "No Project" alternative must be evaluated and must discuss the existing conditions and what would reasonably be expected to occur in the foreseeable future if the Project is not approved.

The range of alternatives required is governed by a "rule of reason." Thus, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives must be limited to only those that would avoid or substantially lessen any of the significant effects of the Project, or to only those locations that would avoid or substantially lessen the significant effects of the Project.

The alternatives identified below, with exception of the mandatory No Project Alternative, were selected due to their potential to at least partially meet most of the basic Project objectives, and to lessen or avoid significant environmental effects resulting from implementation of the proposed Project. A number of the more significant impacts of the proposed Project, such as traffic, air quality and noise, relate to the size of the Project, therefore, reducing the size of the Project within reason was an important criterion in the selection of alternatives.

The *CEQA Guidelines* also require an EIR to state why an alternative is being rejected. If the City of Banning ultimately rejects any or all Project alternatives, the rationale for rejection will be presented in the findings that are required before the City certifies the EIR and takes action on the proposed Project. According to Section 15126.6(f)(1) of the *CEQA Guidelines*, among the factors that may be taken into account when addressing feasibility of alternatives are environmental impacts, site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the applicant could reasonably acquire, control, or otherwise have access to the alternate site.

6.3 PROJECT OBJECTIVES

Section 15124(b) of the CEQA Guidelines indicates that an EIR should include "a statement of objectives sought by the proposed Project." The Specific Plan was prepared to achieve the following Project objectives, which are also described in Section 3.6 of this Draft EIR:

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 principals, policies, and objectives of the City's General Plan;

2. **Update the Deutsch Specific Plan:** Update the prior approved 1993 Deutsch Property Specific Plan based on current and projected market conditions while maintaining the Plan's 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, varying lifestyles, and the developing economic profile of the community;

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 Butterfield development;

7. **Conserve Water Resources:** Conserve water resources and reduce demand for potable water within the Specific Plan area by maximizing the use of recycled water wherever appropriate, including the potential development of on-site recycled water treatment capacity, if needed;

8. **Increase Employment Opportunities:** Increase local job opportunities through the approximate 30 year build out;

9. **Ease of Navigation:** Create a community that is easy to navigate through careful use of landscape, signage, and entry design based on the Specific Plan's design objectives;

10. **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;

11. **Safe and Efficient Circulation:** Provide a safe and efficient roadway network, linking all internal elements of the planned community with the surrounding area;

12. **Encourage Alternative Transportation:** Encourage alternative transportation choices 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 LSV/NEV linkages, and the development of multi-purpose trails;

13. **Promote Community Security:** Promote community security and safety through appropriate outdoor lighting, the incorporation of "defensible space" concepts in the design of multifamily developments, and by encouraging community involvement through the area's master homeowners association;

14. **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;

15. **Ensure Provision of Public Services:** Ensure provision of adequate public services, utilities and infrastructure in a timely manner as development occurs; and

16. **School Facilities:** Ensure provision of adequate education facilities within the planned community, pursuant to applicable school district and state requirements.

6.4 SIGNIFICANT AND UNAVOIDABLE IMPACTS OF THE PROPOSED PROJECT

While the specific mitigation measures summarized in Section 1.0, *Executive Summary*, would reduce the level of many significant impacts to a less than significant level, the Draft EIR identified the following areas where, after the implementation of feasible mitigation measures and consideration of Project Design Features and existing regulations, the Project would result in impacts which cannot be fully mitigated (note that these conclusions, and overall Project impacts, are similar to those found in the previously certified Deutsch Specific Plan EIR and City of Banning General Plan EIR):

Project Impacts

Aesthetics, Light and Glare

Implementation of the Projects mitigation measures as outlined in Section 4.1, *Aesthetics Light and Glare,* would reduce aesthetic impacts. However, due to the size of the proposed Project and the current context of undeveloped conditions onsite and within the project surroundings, it's impact on light and glare (associated with increased lighting sources from the proposed development) is considered significant and unavoidable, which is typical of large-scale residential development.

Air Quality

Implementation of the Projects mitigation measures as outlined in Section 4.3, *Air Quality*, would attenuate construction-related emissions, but as Project-related emissions are anticipated to exceed SCAQMD thresholds, construction-related emissions are considered significant and unavoidable because the basin is in a non-attainment for ozone and particulate matter.

During the operational phase, the Project would result in a net increase in regional emissions of ROG, NO_X, SO_2, CO, PM_{10}, and $PM_{2.5}$ from the operation of both stationary and mobile sources.

Despite the inclusion of numerous project design features that would reduce the potential air quality impacts to the degree feasible, emissions would remain above SCAQMD significance thresholds for all of these criteria pollutants (except SO_x). Therefore, operation of the proposed Project would have a significant and unavoidable impact on regional air quality.

As the Project would exceed SCAQMD thresholds, the Project would potentially result in a long-term impact on the region's ability to meet State and Federal air quality Standards. The Project would conflict with the AQMP as it would not meet the first AQMP consistency criterion (Section 4.3, pages 4.3-36 and 4.3-37). However, the proposed Specific Plan is generally consistent with the previously approved Deutsch Specific Plan, and therefore the City of Banning General Plan's assumptions regarding population and housing growth. On a regional scale, the emissions from the Specific Plan have been considered in the forecasts presented in the 2007 AQMP. The Project would meet the second AQMP consistency criterion of whether the Project exceeds the assumptions utilized in preparing the forecasts presented in the AQMP focusing on 3 criteria (Page 4.3-37).

Traffic and Circulation

As determined in Section 4.13, *Traffic and Circulation*, construction of the recommended improvements, when and where needed, would achieve applicable level-of-service performance at all study area intersections; however, some improvements could also result in significant impacts to existing land uses (due to Project right-of-way requirements). These traffic measures would require varying levels of construction activities, which could result in air quality, noise and traffic impacts. As these improvements are designed and implemented, appropriate construction practices intended to minimize impacts would be required. For example, the implementation of best management practices with regard to erosion, the watering of construction sites, the use of properly operating equipment, and the use of noise reduction devices would minimize environmental impacts. In addition, traffic flow during construction of the improvements would be considered by the appropriate agency.

Also, due to the speculative nature of the timing of implementation and availability of funding to implement the planned improvements listed in Section 4.13, Traffic and Transportation to less than significant levels cannot be guaranteed, and as such, reduction of long-term traffic congestion impacts would remain significant and unavoidable. Further, many of the recommended improvements are located in jurisdictions outside the City of Banning. Most of these improvements have been, can be and should be implemented by those other agencies, but successfully completing the improvements in a timely fashion cannot be guaranteed.

Climate Change

The Project has implemented reasonable and feasible mitigation measures and has incorporated special Project Design Features to reduce greenhouse gas emissions to the extent feasible. In addition, the Project is consistent with the Deutsch Specific Plan represented in the adopted City of Banning General Plan, and therefore is consistent with the SCAG regional growth

projections. Post mitigation levels of greenhouse gases could be significant and unavoidable, due to the large scale of the project and the uncertainties in determining a quantitative basis for assessing the significance of a global impact.

Cumulative Impacts

Aesthetics, Light and Glare

Development of the Project and related projects will introduce significant sources of light (which could increase glare) into an existing rural, undeveloped area and result in a significant and unavoidable adverse impact on nighttime views of the Project site in the interim and long-term build-out condition. Mitigation measures can reduce these impacts but would not reduce them to a level of insignificance due to the nature, size, and scale of the proposed project and its cumulative significance.

Air Quality

The Project would contribute to a significant and unavoidable cumulative construction air quality impact given that the Basin is non-attainment for Ozone (8 hour), Particulate Matter (PM_{10} - 24 hour/ Annual) and Fine Particulate Matter ($PM_{2.5}$ - Annual). Emissions from development and operation of the proposed Project would exceed the SCAQMD thresholds for each of these criteria pollutants (except SO_x), resulting in a significant impact. In accordance with SCAQMD methodology, any project that results in emissions that cannot be mitigated to a level of less than significant is also considered significant on a cumulative basis.. Refer to Section 4.3, Air Quality for this analysis.

Climate Change

Although the Project has incorporated reasonable and feasible mitigation measures, it was conservatively concluded that even with implementation of Project features, GHG reduction measures, and mitigation measures, the Project's incremental contribution to global climate change can be considered "significant" on a cumulatively considerable basis.

Noise

Long-term traffic noise levels, comprised of project-generated and other locally-generated traffic sources would exceed threshold criteria at sensitive receptor locations along the areas adjacent to the site where existing developments are located (south along Wilson Street and in the southwest and southeast corners along Highland Springs Road and Highland Home Road, south of "F" Street. As the Project cannot reasonably or feasibly mitigate for cumulative mobile noise impacts (e.g., constructing sound walls along the entire perimeter of the sensitive uses surrounding the Project site; forcing existing residential uses to change their existing windows; etc.), implementation of the proposed Project would result in a significant and unavoidable impact for cumulative noise impacts.

Traffic and Circulation

As stated above under the Project impacts related to traffic and circulation, construction of the recommended improvements, when and where needed, would achieve applicable level-of-service performance at all study area intersections; however, as some improvements could also result in significant impacts to existing land uses (due to cumulative right-of-way requirements), certain improvements may either be made in part, deferred or not implemented due to overriding considerations and/or limited funding. Further, many of the recommended improvements are located in jurisdictions outside the City of Banning. Most of these improvements have been, can be and should be implemented by those other agencies, but successfully completing the improvements in a timely fashion cannot be guaranteed. Given these constraints, this Project's traffic could result in a cumulatively considerable traffic congestion impact at several locations.

6.5 ALTERNATIVES TO THE PROPOSED BUTTERFIELD SPECIFIC PLAN PROJECT

As noted previously, the *CEQA Guidelines* (Section 15126.6(e)(2)) require that the alternatives discussion analyze the "No Project Alternative." Pursuant to CEQA, the No Project Alternative refers to the analysis of existing conditions (i.e., implementation of current plans and consistency with available infrastructure and community services) and what would reasonably be expected to occur in the foreseeable future if the Project is not approved. When the project is the revision of an existing land use plan, the no project alternative is the continuation of the existing plan into the future and the EIR's discussion compared the projected impacts of the change that would result from approval of the project with the impacts that would occur under the existing plan. CEQA Guidelines Section 15126.6(e)(3)(A).

Potential environmental impacts of three separate alternatives are compared below to impacts from the proposed Project. These alternatives were selected based upon their ability to avoid or substantially lessen the significant effects of the proposed Project, while still achieving the primary Project objectives (to develop the site in a manner generally consistent with the currently approved Deutsch Specific Plan).

Although no specific alternatives were identified during the EIR Notice of Preparation (NOP) comment period and scoping process (see Appendix A), several residents did express concern regarding the Project density along the eastern boundary. In response to this, Pardee modified the Land Use Plan and created additional separation between the existing homes and proposed development.

For the purpose of this analysis, the alternatives are analyzed in comparison to the 5,387 dwelling unit Butterfield Specific Plan. The analysis for each of the Project alternatives identified below includes the following:

- Description of the alternative.
- Analysis of environmental impacts and comparison to the proposed Project. Pursuant to the CEQA Guidelines, if an alternative would cause one or more significant effects in addition to those that would be caused by the Project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the Project as proposed.
- Assessment of the ability of the alternative to meet the Project objectives (previously identified above and in Section 6.3).

The Project alternatives are:

- No Project/Existing Specific Plan Alternative
- Reduced Density – 20% Reduction Alternative
- Active Adult Community Alternative
- No Golf Course Alternative

Alternatives rejected from further consideration:

- No Development Alternative
- Alternative Site Alternative

CEQA states that the specific alternative of "No Project" shall also be evaluated along with its impact (15126.6(e)(1)). 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)). A comparison of the proposed alternatives to the proposed Project is presented in Table 6-1, Comparison of Impacts Resulting from Project Alternatives As Compared to the Proposed Project. An indication of whether the impacts resulting with each alternative would be lesser, greater, or similar to the proposed Project is given.

NO PROJECT / EXISTING SPECIFIC PLAN ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

In accordance with the State CEQA Guidelines, the No Project Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(A) of the Guidelines states that, "when the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the 'no project' alternative will be the continuation of the existing plan…" For purposes of this analysis, the No Project/Existing Specific Plan Alternative assumes this condition. Accordingly, the No Project / Existing Specific Plan Alternative assumes that development as proposed with the Butterfield Specific Plan Project would not occur, and that the Project site would instead remain subject to the provisions contained within the currently approved Deutsch Property Specific Plan. The

Deutsch Property Specific Plan provides for a total of 5,400 dwelling units (with a net density of 3.5 du/ac), three elementary schools, a 193-acre 18-hole championship golf course, a 10-acre community center, a 10-acre commercial site, a 5-acre medical/office site, two community parks and three neighborhood parks (totaling approximately 75 acres of parks). The Deutsch Property Specific Plan includes a higher maximum number of dwelling units than the proposed Project (5,387 dwelling units) and an equivalent gross density (3.5 du/ac). Additionally, this alternative would have a slightly larger impact area (1,552 acres) than the proposed Project (1,543 acres). A detailed comparison of the currently approved Deutsch Specific Plan with the proposed Butterfield Specific Plan is provided in Section 3.6.1 and Table 3.0-3 of this Draft EIR, and in Section 1.4 of the Draft Butterfield Specific Plan. The primary differences between the presently approved and the proposed Specific Plans are:

- Increase in dwelling units (du's) (Butterfield proposes 5,387 du's vs. Deutsch SP approved 5,400 du's)
- Decrease in open space (Butterfield proposes 428.8 acres vs. Deutsch SP approved 268 acres)
- Decrease in commercial use acres (Butterfield proposes 36 acres vs. Deutsch SP approved 25 acres)
- Does not include an optional satellite wastewater treatment plant
- A less efficient internal circulation system, and the elimination of the proposed NEV program
- Does not include open space buffers along the northeastern boundary
- Omission of the 70-acre natural open space area in PA 71 proposed under the Butterfield SP, which is intended to preserve the steeper slopes in open space
- No realignment of the golf course and Planning Areas to respect the identified seismic hazards
- Does not include the optional 21-acre area that could be acquired and/or annexed in the future

IMPACTS COMPARED TO THE PROPOSED PROJECT

Aesthetics, Light, and Glare

Development of 5,400 dwelling units within the Deutsch Property Specific Plan area would significantly alter the existing visual resources and site character of the Project site and would result in new stationary and mobile sources of light and glare. As compared to the proposed Project, the increased dwelling unit count of this alternative could incrementally increase the impacts on site character, particularly since the development footprint would be slightly larger. Short-term construction impacts would be similar to the Project, as mass grading of the site would occur, resulting in temporary exposure of onsite soils and construction equipment and

debris, and views to the site during construction would occur from surrounding public vantage points. In addition, no onsite natural open space in the northern foothills area would occur under the Deutsch Property Specific Plan Land Use Plan, allowing for a greater portion of the property to be visually changed from undeveloped to developed land. In addition, the increase of residential units by approximately 0.24% would result in a (very) slight increase of new sources of light and glare as compared to the proposed Project, thereby increasing the potential for light pollution and light trespass to occur. Therefore, impacts related to aesthetics, light, and glare are considered to be marginally greater under the No Project / Existing Specific Plan Alternative, as compared to the proposed Project, and would not be reduced to a level that is less than significant.

Agricultural Resources

Although development of the site under the proposed Project and this alternative would result in conversion of approximately 1,500 acres of State-designated Farmland of Local Importance, the Deutsch Banning Specific Plan EIR previously determined that the conversion of such farmland would result in a less than significant impact. Therefore, implementation of this alternative, as with the proposed Project, would result in less than significant impacts to agricultural resources concerning the conversion of Farmland of Local Importance to non-agricultural use. Similar to the proposed Project, this alternative would not result in a conversion of forest land to non-forest use, and impacts would be less than significant.

Air Quality

The proposed No Project / Existing Specific Plan Alternative would develop 5,400 dwelling units, as compared to 5,387 dwelling units with the Project. Because the development area and the number of dwelling units proposed under this alternative would be greater than the proposed Project, short-term construction-related impacts would also be greater, as increased construction activities would occur. However, mobile vehicular emissions may be slightly reduced, commensurate with the slightly reduced offsite traffic generation noted below (i.e., an approximately 7% reduction in net total trip generation). Despite this reduction in traffic, it is not anticipated that this alternative would eliminate the significant long-term operational air quality impact identified for the project, since impacts were determined to exceed SCAQMD thresholds by 4 to 14 times. The mitigation program identified for the proposed Project to reduce potential impacts on air quality would apply to this alternative; however, similar to the proposed Project, significant unavoidable air quality impacts for the construction and operational phases, as well as conflicts with the applicable air quality management plan, would still occur.

Biological Resources

Development of the No Project / Existing Specific Plan Alternative would result in a larger development area of 1,552 acres (as the Project retains a 70-acre natural open space area), which

would result in greater impacts to existing biological resources. This alternative includes 75 acres of park space and 193 acres for the golf course, whereas the proposed Project provides 253.9 acres for the golf course, 67 acres of park space, and 108.4 acres of open space, which includes drainage and recreation area open space. Furthermore, the proposed Project would provide area within the golf course that would incorporate native landscaping for biological mitigation and provide natural open space in the far northern and eastern area of the Project site.

The proposed Project would essentially create superior habitat within these areas of the Project site; the Deutsch SP would provide a reduced amount of open space and does not include the same degree of native landscaping proposed in the Butterfield SP. While the proposed Project would plant native plant materials in areas occupied by the Smith Creek alignment, this alternative does not, thus decreasing future biological habitat within the realignment of Smith Creek. Under the proposed Project, the plant palette and re-vegetation associated with Smith Creek is designed to replicate natural conditions and to preserve and enhance biological values. The system of basins will also be vegetated under the proposed Project and the landscaping of active recreational areas will increase the availability of plant cover and trees on the site, providing habitat for birds and forage for birds of prey.

Therefore, implementation of this alternative would result in greater impacts to biological resources as compared to the Project, due to comparatively decreased provisions for on-site open space.

Climate Change

Development of the No Project / Existing Specific Plan Alternative would include construction of 5,400 dwelling units, three schools, a commercial center and a community center, and 75 acres of parks. Construction of the additional residential units as compared to the Project would require increased grading and construction activities, thereby resulting in increased emissions (due to the larger grading area). The net effect of land use changes would be expected as a slight reduction in energy demand due to very slight increase in residential and a potential 25% reduction in commercial land uses. Although design features and mitigation measures would be incorporated to reduce greenhouse gas emissions and pollutant criteria emissions, incremental contributions and cumulative development greenhouse gas impacts may still remain significant and unavoidable, as with the proposed Project. The approved Deutsch Specific Plan does not include the extensive suite of energy conservation and greenhouse gas reduction measures as proposed with the Butterfield Specific Plan, as described in Section 4.5, Climate Change (including a Neighborhood Electric Vehicle program, bus stops within the Specific Plan, Pardee's LivingSmart conservation program, and other factors). However, it should be noted that Pardee may implement the LivingSmart conservation program, and other conservation programs, which would help reduce greenhouse gas emissions if the Project were to be developed under the approved Deutsch Specific Plan. Impacts with regard to climate

change associated with this alternative would be similar or greater as compared to the proposed Project.

Cultural Resources

Development of the No Project / Existing Specific Plan Alternative would result in a larger development area of 1,552 acres (compared to the proposed project), which would potentially result in greater impacts to existing cultural and historical resources, particularly with regard to unknown resources. Similar construction activities would be required to prepare the site for development and may result in impacts to undiscovered resources during grading and excavation. As such, mitigation measures in the form of monitoring, similar to the proposed Project, would be required to reduce potential impacts to less than significant; however, as a greater land area would be affected by this alternative, potential impacts on cultural, historic, and paleontological resources are considered to be slightly greater as compared to the Project.

Geology, Soils, and Seismicity

Development of 5,400 dwelling units with the No Project / Existing Specific Plan Alternative would have slightly increased impacts with regard to geology, soils and seismicity, as a larger development area of 1,552 acres would be affected, resulting in a potential increase in disturbed and/or unstable surfaces when compared to the proposed Project. The Deutsch Specific Plan also did not account for identified faults in the northeastern area, nor did it specify avoidance of development near fault areas. The proposed Project recognizes these faults and would distribute the land uses to avoid development within a specified setback in these fault areas, which would reduce the exposure of structures and people to hazards from landslides, seismic events and unstable soils. Additionally, the increased number of dwelling units resulting with this alternative would increase the number of people that would be exposed to potentially adverse impacts from seismic ground shaking, landslides, seismic events, and unstable soils. Development would be subject to applicable Federal, State, and local codes, permits, and regulations pertaining to design requirements, as with the proposed Project, to reduce impacts to less than significant; however, long-term impacts related to geology, soils, and seismicity would be marginally greater than those with the proposed Project.

Hazards and Hazardous Materials

Short-term impacts resulting with the transport of debris and trash from grubbing and clearing, use of hazardous products, fuel spills, and accidental release and/or handling of hazardous waste would be similar to that of the proposed Project. Development of the No Project / Existing Specific Plan Alternative would result in an incremental increase in the potential exposure of people and structures to wildfire hazards when compared to the proposed Project, as a greater number of residential units would be constructed. The existing Deutsch Specific Plan also proposes development throughout the steeper northeastern section of the Project, where fire response and water system pressure would be more challenging. These challenges

could likely be overcome through measures similar to those proposed for the Project, such as fuel modification, and water pressure zone modifications (including pump stations and storage tanks to serve higher elevations). Overall, impacts would not be substantially different than that which would result with the Project.

Hydrology and Water Quality

Development of the Project site under the No Project / Existing Specific Plan Alternative would result in a slightly greater number of residential dwelling units than the proposed Project. The greater development footprint (less open space) would add to the overall amount of impermeable surfaces, thereby increasing the amount of stormwater runoff from the developed portions of the Project site. In addition, this alternative would require grading and disturbance of a larger surface area, thereby increasing the potential for erosion and siltation to occur as the result of exposed soils during construction. This alternative does not have as dynamic and comprehensive an approach to water supply, drainage, water quality and biological mitigation, whereas the Project integrates these ecosystem functions through the realigned Smith Creek, north basin, recharge/water quality basins, and biological mitigation areas. Therefore, impacts on hydrology and water quality would be slightly greater than those of the proposed Project.

Land Use and Planning

The No Project / Existing Specific Plan Alternative would be consistent with the existing land use designation by implementing the existing Deutsch Property Specific Plan in the Project area, and no conflicts with any applicable land use plan or habitat conservation plan would occur, nor would this alternative physically divide an established community. With implementation of this alternative, the existing agricultural land uses would be permanently converted to urban land uses, including residences, schools, a golf course, parks, and commercial uses, similar to the proposed Project. However, the currently approved Deutsch Specific Plan has more limited open space buffers for existing residential areas along the eastern boundary, which could result in additional impacts associated with air quality, noise, and light and glare. Impacts on land use and planning would therefore be similar or slightly greater to those of the proposed Project.

Noise

Development of the No Project / Existing Specific Plan Alternative would include construction of 5,400 dwelling units, three schools, a commercial center and a community center, and 75 acres of parks. The density of this alternative would be similar to that of the proposed Project; however, due to a larger development footprint, the impacts resulting from construction noise would likely be slightly greater as compared to the Project. The Deutsch Specific Plan also has less buffer area between residences to the east, which would likely result in slightly greater construction and operational noise impacts (to existing residential areas along Highland Home Road). Operational noise impacts from commercial uses (e.g. truck deliveries, loading dock activities, etc.) would be similar to those of the Project. Mobile noise impacts (from Project

traffic) would be slightly reduced, commensurate with the slight reduction in offsite traffic noted below. Overall, impacts related to noise would be similar to those resulting from the proposed Project.

Public Services and Utilities

The No Project / Existing Specific Plan Alternative would generate a slightly greater number of residential units as compared to the proposed Project, although the commercial area is reduced. Therefore, the associated demand for public services (fire, police, schools, libraries, and solid waste) and utilities (water, sewer, electricity, and natural gas) would likely be similar to that of the proposed Project. The Project proposes a more comprehensive approach to public services such as schools, fire (with the fire station site relocated to better serve the Project), wastewater (a proposed optional satellite wastewater treatment plant), and water (comprehensive approach to maximize use of local water supplies included reclaimed water and stormwater runoff). Based on this, impacts regarding public services and utilities would be greater than the proposed Project with implementation of this alternative.

Traffic and Transportation

Total net trip generation for this alternative would be an estimated 58,000 average daily traffic trips (ADT) (net total trip generation) at buildout. This represents a decrease of approximately 4,263 ADT, or 7%, as compared to the proposed Project, due to the reduced commercial center acreage. It should be noted that this trip reduction may also occur with the Project as proposed, as the Project includes a residential overlay for the school and commercial sites, but holds the residential density at the maximum proposed of 5,387 DU. In addition, the total traffic generation associated with the proposed Project would remain constant regardless of the amount of commercial development that occurs within the overlay areas of the Specific Plan (as referenced in mitigation measure TRF-2). This potential reduction in offsite traffic generation would have a lesser impact on the City and surrounding circulation system, and would reduce the Project's contribution toward cumulative impacts. However, Project traffic impact fees would also be reduced as well as reduced commercial services and/or school facilities.

As with the proposed Project, significant and unavoidable impacts would remain after mitigation measures are implemented, as many improvements are required outside of the jurisdiction of the City of Banning, and certain improvements may be infeasible due to existing development and/or constrained right-of-ways. As such, recommended mitigation for cumulative impacts cannot be ensured, particularly over the time span assumed for buildout. Cumulative impacts would remain significant and unavoidable, similar to the proposed Project.

Therefore, the No Project/Existing Specific Plan Alternative would result in slightly reduced traffic impacts as compared to the Project, but would not eliminate the identified significant and unavoidable impacts.

Water Supply

This alternative would generate a slightly greater number of residents compared to the proposed Project, although reduced commercial acreage is designated. The net effect is an anticipated slight reduction in water demand compared to the Project. It is assumed that the beneficial impacts associated with the realignment of Smith Creek and the proposed State Water Project water deliveries for storage and groundwater recharge would still occur under this alternative, thereby allowing for groundwater recharge. In addition, similar to the proposed Project, City infrastructure would require either upgrades or replacement to ensure that adequate recycled water services are provided. However, the approved Deutsch Specific Plan did not include the comprehensive water supply program being proposed by the Project, including maximization of groundwater resources, stormwater runoff capture, reclaimed water, and aggressive water conservation measures. As such, although the water demand may be slightly reduced, the net effect on City and regional water supplies is considered greater under this alternative.

CONCLUSION

A comparative summary of the environmental impacts associated with the No Project/Existing Specific Plan Alternative with the environmental impacts anticipated under the proposed project is provided in Table 6-1 at the end of this Chapter. The No Project / Existing Specific Plan Alternative would meet the Project objectives and would slightly reduce certain impacts in comparison to the proposed Project while slightly increasing others. This Alternative does not reflect more refined land use planning, more sensitive treatment of the eastern boundary with existing residences, improved public safety by respecting identified fault zones, improved internal circulation, and increased natural open space.

Project objectives that would *not* be achieved under this alternative include:

2. **Update the Deutsch Specific Plan:** This alternative would not update the prior approved 1993 Deutsch Property Specific Plan based on current and projected market conditions, but would leave the Plan in its current condition, which was based on market conditions existing at the time it was approved (1993);
3. **Provide a Quality, Livable Community**: The prior approved Deutsch SP would not offer the same level of community amenities. The Deutsch SP would decrease the amount of open space overall compared to the proposed Project and would eliminate the open space buffer along the northeastern boundary of the Project site.
5. **Promote Sustainability:** The prior approved Deutsch SP would allow for a less efficient internal circulation system, and would eliminate the proposed NEV program. In addition, this alternative would not incorporate the proposed green building practices (Mitigation Measures GHG-1 and GHG-2).

6. **Incorporate Water and Energy Efficiency:** As stated above, this alternative would not incorporate the proposed green building practices (Mitigation Measure GHG-1 and GHG-2) which include various energy- and water-conserving features.
7. **Conserve Water Resources:** This alternative would not include the potential onsite satellite wastewater treatment plant or the proposed groundwater recharge system. It would also not include water-conserving features listed in Mitigation Measure GHG-1.
12. **Encourage Alternative Transportation:** As stated above, the prior approved Deutsch SP would eliminate the proposed NEV program.
14. **Address Drainage and Water Quality Issues:** Under this alternative, the proposed drainage improvements within Smith Creek would be eliminated. Under the proposed Project, Smith Creek serve as the primary backbone drainage facility, conveying storm water and nuisance flows through biological habitat mitigation areas, water quality treatment facilities, and groundwater recharge areas located along its alignment

REDUCED DENSITY (20% Reduction) ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The purpose of the Reduced Density Alternative is to reduce impacts from the Project related to the number of units developed and the intensity of commercial development. Under this alternative, the total number of residential dwelling units would be reduced from 5,387 to 4,318, representing a reduction of 1,069 units, or approximately 20%. In addition, it is anticipated that commercial square footage would be reduced by 20% under this alternative. This alternative assumes the development of 4,318 residential units in the same Planning Areas proposed with the Project. Under this alternative, the average residential density would be reduced from 3.5 du/ac to 2.8 du/ac. This reduced density alternative may not have the same design features as the proposed Project, and therefore, the impacts of this alternative could be greater than or less than the impacts of the proposed Project with regard to specific issue areas. As a variation of this alternative, the site could be developed with higher density product in the lower elevations in a "cluster development" fashion, leaving increased natural open space in the northeastern areas and reducing the extent and cost of infrastructure improvements and site grading. The Deutsch Specific Plan presently allows for this flexibility with cluster development and mixed use overlays in the residential Planning Areas. The Reduced Density Alternative may not require the same acreage for the community park based on a reduction in population within the Project site (due to the lower allowable population growth within the Project site). In addition, due to a reduction in residential units, student generation would be reduced by 20%, potentially resulting in the reduction or elimination of proposed school sites under this alternative.

IMPACTS COMPARED TO THE PROPOSED PROJECT

Aesthetics, Light, and Glare

Development of 4,318 dwelling units within the Butterfield Specific Plan area would significantly alter the visual setting and character of the Project site and result in new stationary and mobile sources of light and glare. Short-term construction impacts would be similar to the Project, as mass grading of the site would occur, resulting in temporary exposure of onsite soils and construction equipment and debris, and views to the site during construction would occur from surrounding public vantage points. Compared to the proposed Project, the reduced dwelling unit count of this alternative could reduce visual impacts on site character as density would be reduced, thereby resulting in a smaller percentage of land that would support physical development. Although a reduction in unit density within the landscape would be visually evident, development of the site would still result in a visual change from undeveloped to developed land. The reduction of units by approximately 20% would generate fewer new potential sources of light and glare as compared to the proposed Project, thereby reducing such potential impacts with regard to light pollution and spillover onto adjacent lands; however, in relation to the current conditions, this alternative still introduces a significant new light source. Therefore, impacts related to aesthetics, light, and glare would be slightly reduced under this alternative as compared to the proposed Project, but not to a level of less than significant. If a higher density cluster development approach were pursued, creating additional open space in the northeast, this alternative would result in still further reduced impacts, but impacts would remain significant.

Agricultural Resources

While the overall number of residents and dwelling units would be reduced under this alternative, the land would still be developed in the same Planning Areas as proposed in the Butterfield Specific Plan. As such, implementation of this alternative would result in similar less than significant impacts to agricultural resources as compared to the proposed Project, specifically related to conversion of Farmland of Local Importance to non-agricultural use.

Air Quality

The proposed alternative would result in development of 4,318 dwelling units, as compared to 5,387 dwelling units with the Project, thereby reducing the overall number of resulting daily vehicle trips generated. As such, this alternative would result in reduced vehicle-generated air emissions as compared to the Project. The development area under this alternative would be the same as for the proposed Project. Short-term construction-related and long-term operational impacts would be reduced. However, short-term impacts would remain significant for PM_{10}, $PM_{2.5}$, NOx, and ROG and long-term operational impacts for ROG, NO_x, CO, PM_{10}, and $PM_{2.5}$ would remain significant albeit reduced by 20% in comparison to the proposed project. However since the impacts associated with the proposed project are 4-14 times greater than the

thresholds, this reduction would not reduce impacts to less than significant levels. The mitigation program identified for the proposed Project would apply to this alternative; however, while impacts would be reduced with this alternative due to a reduction in the number of dwelling units proposed and possible reduction in development footprint, significant unavoidable air quality impacts would still occur.

Biological Resources

The alternative design utilizes the same type of development footprint as the proposed Project, with fewer overall units; therefore, impacts to biological resources would be similar in nature to the proposed Project. However, because the development footprint could be reduced through a cluster development approach, impacts on biological resources would be slightly reduced as compared to the Project (although the biological resource value of the northeastern slopes is relatively limited). Impacts are considered to be similar to that of the proposed Project.

Climate Change

This alternative would reduce the overall density by 20%, thereby reducing required grading and construction activities, which in turn would decrease related emissions by a similar percentage. In addition, the reduced density would have corresponding reductions in electricity and natural gas demand, as well as indirect greenhouse gas emission generation from such factors as solid waste generation and water pumping. The number of vehicle trips generated and related emissions would also decrease, thereby reducing mobile greenhouse gas emissions. This alternative would incorporate design features and implement reasonable and feasible mitigation measures similar to the proposed Project. Nonetheless, greenhouse gas impacts would remain significant and unavoidable, as with the proposed Project, considering the volume of the emissions Impacts with regard to climate change associated with this alternative would be slightly reduced as compared to the proposed Project.

Cultural and Paleontological Resources

This alternative would result in similar impacts on historical, cultural, and paleontological resources as compared to the proposed Project, particularly with regard for unknown resources. As with the proposed Project, mitigation would be implemented to reduce potential impacts on such resources within and in the vicinity of the Project site to less than significant levels. A cluster development variation could slightly reduce the potential for disturbing unidentified resources. Therefore, impacts on historical, cultural, and paleontological resources resulting from this alternative would be similar to those of the proposed Project.

Geology, Soils, and Seismicity

Development of the 4,318 dwelling units with this alternative could have equivalent impacts with regard to geology, soils and seismicity as the alternative proposes a development footprint

similar to the proposed Project; however, the reduced density proposed with this alternative would reduce the amount of people that would be exposed to potential adverse impacts resulting from seismic ground shaking, landslides, seismic events, and unstable soils. All development would be subject to applicable Federal, State, and local codes, permits, and regulations pertaining to design requirements, as with the proposed Project, to reduce impacts to less than significant. Therefore, long-term impacts related to geology, soils, and seismicity would be reduced compared to those resulting with the proposed Project.

Hazards and Hazardous Materials

Short-term impacts resulting from the transport of debris and trash from grubbing and clearing, use of hazardous products, fuel spills, and accidental release and/or handling of hazardous waste would be similar to that of the proposed Project. Development of the Project site would result in increased exposure of people and structures to potential wildfire hazards when compared to existing conditions; however, such potential hazards would be reduced as compared to the Project, as a lesser number of dwelling units would be constructed. Wildland fire hazards could be further reduced through clustering development in lower elevations (although the Project includes mitigation to address this issue). Overall, impacts would not be substantially different than that which would result with the Project.

Hydrology and Water Quality

Development of the Project site under this alternative would result in fewer residential dwelling units than the proposed Project. The reduction in units could reduce the amount of impermeable surfaces, thereby reducing the amount of potential stormwater runoff from the developed portions of the Project site, and allowing for greater infiltration. This alternative would still require grading and disturbance of the site, thereby resulting in a potential for erosion and siltation to occur as the result of exposed soils during construction. It is assumed that the implementation of this alternative would result in the drainage improvements to Smith Creek similar to those proposed with the Project, including the onsite infiltration areas, which together would provide for reduced potential for erosion and increased groundwater infiltration. As a result of the reduced impervious surface area, impacts on hydrology and water quality would be slightly reduced as compared to those of the proposed Project.

Land Use and Planning

This alternative would result in development of the Project site consistent with the existing Specific Plan designation. In addition, development of the proposed 4,318 dwelling units would be sufficient to provide enough housing to meet the needs identified in the Regional Housing Needs Assessment. No conflicts with any applicable land use plan or habitat conservation plan would occur, nor would this alternative physically divide an established community. Similar to the proposed Project, the existing agricultural land uses would be permanently converted to urban land uses, including residences, schools, a golf course, parks, and commercial uses;

however, development would occur at a reduced density. Impacts on land use and planning would therefore be similar to those of the proposed Project.

Noise

Development of this alternative would include 4,318 dwelling units, two schools, and 67 acres of parks. As such, the reduced offsite vehicle trips would have a corresponding reduction in offsite Project-related traffic noise, and would reduce the Project's contribution toward cumulative noise impacts. Additionally, as a lesser number of dwelling units would be constructed, impacts resulting from construction noise would likely be decreased overall as compared to the Project. However, construction noise would remain the same on a day-to-day basis, as similar equipment would be utilized during project construction. The duration of Project construction would, however, be shorter. If clustering of the residential units would occur, pockets of the Project site would experience increased levels of noise as compared to the proposed Project, particularly within the lower elevations where clustered units would most likely be located.

Impacts on noise would therefore be slightly reduced as compared to those of the proposed Project, although significant cumulative noise impacts would remain due to existing, background growth and Project traffic noise.

Public Services and Utilities

This alternative would generate fewer residential units and residents compared to the proposed Project; therefore, the associated demand for public services (fire, police, schools, library, and solid waste) and utilities (water, sewer, electricity, and natural gas) would be reduced. Impacts with regard to fire and police services would be similar to that of the Project, with a slight decrease in demand for such services. In addition to these amenities, City infrastructure would require either upgrades or replacement to ensure the Project is supplied with adequate sewer and water services. Overall impacts regarding public services and utilities would be slightly reduced with this alternative as compared to the proposed Project.

Traffic and Transportation

Total net trip generation for this alternative would be an estimated 50,000 average daily traffic trips (ADT) as compared to the proposed Project, assuming an "across the board" reduction in Project land uses (residential, commercial and schools). This represents an approximate 20% reduction in offsite traffic, from 62,263 to 50,000 ADT. Due to the reduced offsite traffic volume, the Project's impact on City and local circulation systems would be reduced, although traffic mitigation fees would also be reduced.

Mitigation measures would be required to reduce potential impacts to area roadways and intersections, similar to the proposed Project. Due to the reduced traffic volume, certain offsite

improvements would either be reduced in magnitude or eliminated. Preliminary review by the Project traffic consultant, LSA, indicates that improvements could be reduced at some Study Area locations (2, 18, 20, 23, 27, 31, and 38) and may be eliminated at some Study Area locations (28, 32, 35, and 42). Reduced offsite traffic improvements would reduce the extent of impacts related to these improvements. As with the proposed Project, significant and unavoidable impacts remain after mitigation measures are implemented, as many improvements are required outside of the jurisdiction of the City of Banning, and certain improvements may be infeasible due to existing development and/or constrained right-of-ways. As such, recommended mitigation for cumulative impacts cannot be ensured, particularly over the time span assumed for buildout. Cumulative impacts would remain potentially significant and unavoidable, similar to the proposed Project.

Based on the analysis, the Reduced Density (20% Reduction) Alternative would result in reduced traffic impacts as compared to the Project, although unavoidable significant impacts would remain.

Water Supply

This alternative would reduce overall development by 20%, and therefore, the associated demand on water resources would decrease as compared to the proposed Project. It is assumed that the beneficial impacts associated with the realignment of Smith Creek and the proposed State Water Project water deliveries for storage and groundwater recharge would still occur under this alternative, thereby allowing for groundwater recharge. Existing City infrastructure would be required to be upgraded or replaced as needed, to ensure that adequate recycled water services are provided. Overall impacts related to water supply, including groundwater depletion, would be reduced with implementation of this alternative, as compared to the proposed Project.

CONCLUSION

As further described below, the Reduced Density Alternative would attain some of the basic objectives of the project, although not to the same extent as the proposed Project, since a number of project objectives would not be fulfilled.

The Reduced Density Alternative would reduce the level of impact for various topical issues as identified above, due to the overall 20% reduction in development and associated population and vehicle trips generated (refer to Table 6-1 for a comparison of impacts resulting from the Reduced Density Alternative). Although overall impacts would be reduced compared to the proposed Project, the significant, unavoidable impacts of the Project related to aesthetics, air quality, climate change, noise, traffic and transportation, and water would still occur. This alternative would offer less housing as compared to the proposed Project (4,318 DU vs. 5,387 DU, respectively)). In addition, according to the City's 2008 Draft Housing Element Update and the State Department of Finance, residential household units in the City of Banning have an

occupancy rate of 2.7 persons. Under this alternative, the 14,580 additional persons projected under the current entitlements (Deutsch SP) and the 14,544 additional persons under the proposed Project (Butterfield SP) would be reduced to 11,659 persons based on the 20% reduction. The 2008 Draft Housing Element (refer to Appendix D of this Housing Element) assumes the previous Deutsch SP's household unit growth as part of the "Approved Projects Inventory"; therefore, the 20% reduction proposed under this alternative would not be consistent with the City General Plan Housing Element.

Project objectives that would *not* be achieved under this alternative include:

1. **Master Planned Community:** This alternative conflicts with the City's vision of its future as articulated in the City's 2008 Draft Housing Element based on the reduction in household unit growth;
4. **Provide a Wide Range of Housing Opportunities:** This alternative allows less flexibility to respond to changing market demand and the developing economic profile of the community, because it would restrict the level of development (by 20%) that could occur with those Planning Areas proposed under the current Project as High Density Residential (HDR), Medium Density Residential (MDR), and Low Density Residential (LDR).

ACTIVE ADULT LAND USE PLAN ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

This alternative assumes that the Planning Areas 40-49 and 53-59 located in the northwestern part of the Specific Plan would be designated as exclusively age restricted, "active adult" homes (assumed to be 1,700 DU)[1]. Refer to Exhibit 3.0-3, *Land Use Plan*, to locate these Planning Areas within the Project site. A total of 5,387 DU would still be constructed with this alternative. These age-restricted planning areas would take access off the North Loop Collector Road. Under an age-restricted, "active adult" homes scenario, the North Loop Road could be proposed as a gated, access-controlled private roadway. All other aspects of this alternative would be similar to the proposed Project. This option, in fact, is presently permitted within the proposed Butterfield Specific Plan, as a variation to the traditional single-family housing (the Specific Plan includes two adult living scenarios, ranging from 1,460 DU to 2,042 DU). The net effect of the active adult housing in these PAs would be approximately 53,000 ADT in comparison to the Project's 62,263 ADT (due to reduced trip generation rates for active adult housing)[2]. The active adult land use plan may not require the same acreage for the community park based on a reduction in population within the Project site (due to the lower population

[1] A detailed description of "Active Adult" alternatives is provided in Section 3.0, Project Description.

[2] Using ITE trip generation rates, 1,700 DU of active housing results in approximately 6,600 ADT, with 10% internal trip capture, yields 6,000 ADT in offsite trip generation. This compares to approximately 15,300 ADT (17,000 ADT with 10% internal trip capture) with traditional single family housing, or approximately 9,000 ADT less than the proposed Project.

factor for age-restricted housing). In addition, the need for the proposed school sites may be reduce or eliminated, because the number of school-aged children within the Project site would be greatly reduced.

IMPACTS COMPARED TO THE PROPOSED PROJECT

Aesthetics, Light, and Glare

Development of active adult housing within the Butterfield Specific Plan area would overall be similar to the proposed Project, with a similar development footprint. Short-term construction impacts would be similar to the Project, as mass grading of the site would occur, resulting in temporary exposure of onsite soils and construction equipment and debris, and views to the site during construction would occur from surrounding public vantage points. Therefore, impacts related to aesthetics, light, and glare would be similar under this alternative as compared to the proposed Project.

Agricultural Resources

Implementation of this alternative would result in similar impacts to agricultural resources as compared to the proposed Project, specifically related to conversion of Farmland of Local Importance to non-agricultural use.

Air Quality

The proposed alternative would result in less offsite trip generation and lower utility/service demand from the active adult housing component, thereby reducing the overall air emissions associated with motor vehicles and energy demand. However, it is not anticipated that this alternative would reduce air emissions to a less than significant level, since this alternative would result in a 15 percent reduction in ADT and current emissions 4-14 times greater than their respective significance threshold. Based on this it is not anticipated that this alternative would eliminate significant unavoidable impacts associated with the proposed Project. The mitigation program identified for the proposed Project would apply to this alternative; however, while impacts would be reduced with this alternative due to a reduction in traffic and energy demand, significant unavoidable air quality impacts would still occur due to site grading and operational emissions.

Biological Resources

If this alternative design utilizes the same type of development footprint, then impacts to biological resources would be similar in nature to the proposed Project. For purposes of this analysis, impacts are considered to be similar to that of the proposed Project.

Climate Change

This alternative would have reduced offsite traffic (by approximately 15%), as well as reductions in electricity and natural gas demand, as well as indirect greenhouse gas emission generation from such factors as solid waste generation and water pumping. This equates to a reduction of approximately 16,000 metric tons of CO_2 equivalent. This alternative would incorporate design features and implement reasonable and feasible mitigation measures similar to the proposed Project. Nonetheless, greenhouse gas impacts would remain significant and unavoidable, as with the proposed Project, considering the volume of emissions. Impacts with regard to climate change associated with this alternative would be slightly reduced as compared to the proposed Project.

Cultural Resources

This alternative would result in similar impacts on historical, cultural, and paleontological resources as compared to the proposed Project, particularly with regard for unknown resources. As with the proposed Project, mitigation would be implemented to reduce potential impacts on such resources within and in the vicinity of the Project site to less than significant levels. Therefore, impacts on historical, cultural, and paleontological resources resulting from this alternative would be similar to those of the proposed Project.

Geology, Soils, and Seismicity

Development of this alternative would have equivalent impacts with regard to geology, soils and seismicity, if the alternative proposes a development footprint similar to what is proposed for the Project. All development would be subject to applicable Federal, State, and local codes, permits, and regulations pertaining to design requirements, as with the proposed Project, to reduce impacts to less than significant. Therefore, long-term impacts related to geology, soils, and seismicity would be similar compared to those resulting with the proposed Project.

Hazards and Hazardous Materials

Due to a similar development footprint and overall similar development density, overall impacts would not be substantially different than that which would result with the Project.

Hydrology and Water Quality

Development of the Project site under this alternative would result in similar development footprint and impermeable surfaces, and therefore similar stormwater runoff from the developed portions of the Project site. This alternative would require grading and disturbance of a similar surface area, thereby resulting in a similar potential for erosion and siltation to occur as the result of exposed soils during construction. It is assumed that the implementation of this alternative would result in the drainage improvements to Smith Creek similar to those

proposed with the Project, including the onsite infiltration areas, which together would provide for reduced potential for erosion and increased groundwater infiltration. Therefore, impacts on hydrology and water quality would be similar as compared to those of the proposed Project.

Land Use and Planning

This alternative would result in development of the Project site consistent with the existing Specific Plan designation and consistent with the goals and policies of the 2008 Housing Element. No conflicts with any applicable land use plan or habitat conservation plan would occur, nor would this alternative physically divide an established community. Similar to the proposed Project, the existing agricultural land uses would be permanently converted to urban land uses, including residences, schools, a golf course, parks, and commercial uses. Impacts on land use and planning would therefore be similar to those of the proposed Project.

Noise

The reduced offsite vehicle trips would have a corresponding reduction in offsite Project-related traffic noise, and would reduce the Project's contribution toward cumulative noise impacts. Impacts on noise would therefore be slightly reduced as compared to those of the proposed Project, although significant cumulative noise impacts would remain due to existing, background growth and Project traffic noise.

Public Services and Utilities

This alternative would generate reduced demand for public services (fire, police, schools, library, and solid waste) and utilities (water, sewer, electricity, and natural gas) due to typical reduced demand with active adult housing (with the possible exception of emergency medical care). By definition, active adult housing is age restricted, which means that household sizes are on average less than typical single-family residential units. In addition, Active Adult residential units tend to be smaller than units designed for families. As such, public service and utility demand factors for active adult housing are generally less than use factors for typical single-family residential units. Under both the alternative and the propose Project, City infrastructure would need to be upgraded or replaced to ensure adequate sewer and water services. Overall impacts regarding public services and utilities would be slightly reduced with this alternative as compared to the proposed Project.

Traffic and Transportation

Total net trip generation for this alternative would be an estimated 53,000 average daily traffic trips (ADT) as compared to the proposed Project, due to replacing 1,700 DU of single family housing with 1,700 DU in active adult housing. This represents an approximate 15% reduction in offsite traffic, from 62,263 to 53,000 ADT. Due to the reduced offsite traffic volume, the

Project's impact on City and local circulation systems would be reduced, although traffic mitigation fees would also be reduced.

Mitigation measures would be required to reduce potential impacts to area roadways and intersections, similar to the proposed Project. Due to the reduced traffic volume, certain offsite improvements would either be reduced in magnitude or eliminated[3]. As with the proposed Project, significant and unavoidable impacts remain after mitigation measures are implemented, as many improvements are required outside of the jurisdiction of the City of Banning, and certain improvements may be infeasible due to existing development and/or constrained right-of-ways. As such, recommended mitigation for cumulative impacts cannot be ensured, particularly over the time span assumed for buildout. Cumulative impacts would remain potentially significant and unavoidable, similar to the proposed Project.

Based on the analysis, this Alternative would result in reduced traffic impacts as compared to the Project, although unavoidable significant impacts would remain.

Water Supply

This alternative would reduce demand on water resources due to a slight reduction associated with active adult housing in comparison to single family housing. It is assumed that the beneficial impacts associated with the realignment of Smith Creek and the proposed State Water Project water deliveries for storage and groundwater recharge would still occur under this alternative, thereby allowing for groundwater recharge. Existing City infrastructure would be upgraded or replaced, to ensure that adequate recycled water services are provided. Overall impacts related to water supply, including groundwater depletion, would be reduced with implementation of this alternative since the anticipated reduction is less than the amount of groundwater depletion anticipated, as compared to the proposed Project.

CONCLUSION

The Active Adult Land Use Plan Alternative would reduce the level of impact for various topical issues as identified above, due to the change in land use and reduction in public service/utility demand and offsite vehicle trips generated as supported above (refer to "Public Services and Utilities" and "Traffic and Transportation".[4] Although overall impacts would be reduced compared to the proposed Project (refer to Table 6-1 below), the significant, unavoidable impacts of the Project related to aesthetics, air quality, climate change, noise, traffic and transportation, and water would still occur. This alternative would not meet the project objective of meeting market demands, since it would reduce the available supply of non-age restricted housing in the Project area, due to the amount of units restricted to "Active Adult"

[3] Preliminary review by LSA indicates that improvements could be reduced at some Study Area locations (2, 18, 20, 27, 29, 31, 37 and 38) and) and may be eliminated at some Study Area locations (23, 28, 32, 35, and 42). Reduced offsite traffic improvements would reduce the extent of impacts related to these improvements.

[4] Also, refer to footnotes 2 and 3, above, for more details regarding traffic reductions due to age restricted housing.

uses under this alternative. As a result this alternative would also limit the Project's ability to accommodate changes to the economic profile of the community, since fewer units would be available to adapt to these changing conditions.

Project objectives that would *not* be achieved under this alternative include:

2. **Update the Deutsch Specific Plan**: This alternative would not meet current and projected market conditions, since the high percentage of age-restricted units proposed onsite would reduce the ability of the remaining units to accommodate future development trends within the City.
4. **Provide a Wide Range of Housing Opportunities:** This alternative allows less flexibility to respond to changing market demand and the developing economic profile of the community, since a large portion of the site would be dedicated to the development of age-restricted housing. Under the proposed alternative, residents of any age (including those that qualify as active adults) could live in any planning area of the specific plan. Under the Active Adult alternative portions of the Project would preclude residents younger than 55 from establishing residence.

NO GOLF COURSE ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

This alternative assumes that development of the golf course in Planning Areas 35 and 39 would not occur. This alternative assumes that other types of open space and recreational uses would be permitted as alternatives in the event the golf course is not developed due to market conditions or other considerations. These alternative uses include various combinations of parks, trails, native habitat, drainage facilities, water quality improvements, groundwater recharge areas, and wetland mitigation areas. The potential impacts of a "no golf course" Alternative is discussed below.

IMPACTS COMPARED TO THE PROPOSED PROJECT

Aesthetics, Light, and Glare

Development of a no golf course alternative within the Butterfield Specific Plan area would overall be similar to the proposed Project, with a similar development footprint, grading, and Smith Creek re-alignment. Short-term construction impacts would be similar to the Project, as mass grading of the site would occur, resulting in temporary exposure of onsite soils and construction equipment and debris, and views to the site during construction would occur from surrounding public vantage points. The landscaping would create more natural condition in Planning Areas 35 and 39 because grass turf area would be reduced and more natural soil would be exposed. There would be no clubhouse facility lighting or driving range lighting, however it is reasonable to assume that some safety lighting and/or decorative lighting may be constructed in certain parts of these planning areas. Although some lighting could be

introduced with this alternative, it is anticipated to be less intense than the proposed Project, resulting in less light and glare impacts. Therefore, impacts related to aesthetics, light, and glare would be similar, but there would be a reduction in light and glare under this alternative as compared to the proposed Project.

Agricultural Resources

Implementation of this alternative would result in similar impacts to agricultural resources as compared to the proposed Project, specifically related to conversion of Farmland of Local Importance to non-agricultural use.

Air Quality

The proposed alternative would result in less offsite trip generation and lower utility/service demand because of the elimination of the club house facility and golf course, thereby reducing the overall air emissions associated with motor vehicles, golf course maintenance vehicles, and energy demand. The mitigation program identified for the proposed Project would apply to this alternative; however, while impacts would be reduced with this alternative due to a reduction in traffic and energy demand, significant unavoidable air quality impacts would still occur due to site grading and operational emissions.

Biological Resources

If this alternative design utilizes the same type of development footprint, then impacts to biological resources would be similar in nature to the proposed Project. However, the eliminated golf course creates an opportunity to landscape the area with native vegetation, which would create more natural habitat for biological resources. As such, impacts associated with this Alternative would be reduced in comparison to the proposed project.

Climate Change

This alternative would have reduced offsite traffic, as well as reductions in electricity and natural gas demand, as well as indirect greenhouse gas emission generation from such factors as solid waste generation and water pumping because there would be no golf course facility for out of area visitors to travel to and use. This alternative would incorporate design features and implement reasonable and feasible mitigation measures similar to the proposed Project. Nonetheless, greenhouse gas impacts would remain significant and unavoidable, as with the proposed Project, considering the volume of emissions. Impacts with regard to climate change associated with this alternative would be slightly reduced as compared to the proposed Project, although it is anticipated that the significant and unavoidable impact would remain.

Cultural Resources

This alternative would result in similar impacts on historical, cultural, and paleontological resources as compared to the proposed Project, particularly with regard for unknown resources. As with the proposed Project, mitigation would be implemented to reduce potential impacts on such resources within and in the vicinity of the Project site to less than significant levels. Therefore, impacts on historical, cultural, and paleontological resources resulting from this alternative would be similar to those of the proposed Project.

Geology, Soils, and Seismicity

Development of this alternative would have equivalent impacts with regard to geology, soils and seismicity, if the alternative proposes a development footprint similar to what is proposed for the Project. All development would be subject to applicable Federal, State, and local codes, permits, and regulations pertaining to design requirements, as with the proposed Project, to reduce impacts to less than significant. Therefore, long-term impacts related to geology, soils, and seismicity would be similar compared to those resulting with the proposed Project.

Hazards and Hazardous Materials

The elimination of the golf course would reduce the amount of fertilizer and pesticides that are typically used to maintain a golf course, which would reduce potential hazardous materials impacts. However, due to a similar development footprint and overall similar development density, overall impacts would not be substantially different than that which would result with the Project.

Hydrology and Water Quality

Development of the Project site under this alternative would result in similar development footprint and impermeable surfaces, and therefore similar stormwater runoff from the developed portions of the Project site. This alternative would require grading and disturbance of a similar surface area, thereby resulting in a similar potential for erosion and siltation to occur as the result of exposed soils during construction. It is assumed that the implementation of this alternative would result in the drainage improvements to Smith Creek similar to those proposed with the Project, including the onsite infiltration areas, which together would provide for reduced potential for erosion and increased groundwater infiltration. Therefore, impacts on hydrology and water quality would be similar as compared to those of the proposed Project.

Land Use and Planning

This alternative would result in development of the Project site consistent with the existing Specific Plan designation. No conflicts with any applicable land use plan or habitat conservation plan would occur, nor would this alternative physically divide an established community.

Similar to the proposed Project, the existing agricultural land uses would be permanently converted to urban land uses, including residences, schools, parks, open space, and commercial uses. Impacts on land use and planning would therefore be similar to those of the proposed Project.

Noise

The reduced offsite vehicle trips due to the elimination of the golf course facility would have a corresponding reduction in offsite Project-related traffic noise, and would reduce the Project's contribution toward cumulative noise impacts, because the golf course facility (club house & driving range) would be eliminated and would not attract regional visitors. Noise caused by golf course maintenance vehicles (mowers and blowers) would be eliminated. Impacts on noise would therefore be slightly reduced as compared to those of the proposed Project, although significant cumulative noise impacts would remain due to existing, background growth and Project traffic noise.

Public Services and Utilities

This alternative would generate reduced demand for public services and utilities (water, sewer, electricity, and natural gas) due to reduced demand with the elimination of the golf course and related facilities. Under both the alternative and the propose Project, City infrastructure would need to be upgraded or replaced to ensure adequate sewer and water services. Overall impacts regarding public services and utilities would be slightly reduced with this alternative as compared to the proposed Project.

Traffic and Transportation

Total net vehicle trip generation for this alternative would be slightly reduced due to the elimination of the golf course facility, because there would be no attraction that would cause more vehicle trips to the Project area. Due to the slightly reduced offsite traffic volume, the Project's impact on City and local circulation systems would be slightly reduced.

Mitigation measures would be required to reduce potential impacts to area roadways and intersections, similar to the proposed Project. As with the proposed Project, significant and unavoidable impacts remain after mitigation measures are implemented, as many improvements are required outside of the jurisdiction of the City of Banning, and certain improvements may be infeasible due to existing development and/or constrained right-of-ways. As such, recommended mitigation for cumulative impacts cannot be ensured, particularly over the time span assumed for buildout. Cumulative impacts would remain potentially significant and unavoidable, similar to the proposed Project.

Based on the analysis, this No Golf Course Alternative would result in slightly reduced traffic impacts as compared to the Project, although unavoidable significant impacts would remain.

Water Supply

This alternative would reduce demand on water resources due to the reduction associated with golf course water demand, club house water demand, and driving range water demand. These uses account for approximately 864 afy of potable and non-potable water demand of the proposed project. It is assumed that the beneficial impacts associated with the realignment of Smith Creek and the proposed State Water Project water deliveries for storage and groundwater recharge would still occur under this alternative, thereby allowing for groundwater recharge. Existing City infrastructure would be upgraded or replaced, to ensure that adequate recycled water services are provided. Overall impacts related to water supply, including groundwater depletion, would be reduced with implementation of this alternative, as compared to the proposed Project. However, the unavoidable significant impact identified under the proposed Project is expected to remain, since this Alternative would still require water consumption for 5,387 du.

CONCLUSION

The No Golf Course Alternative would reduce the level of impacts for various topical issues as identified above, due to the change in land use and reduction in public service/utility demand, water supply, and offsite vehicle trips generated (refer to Table 6-1 below for a comparison of impacts resulting from Project alternative). Although overall impacts would be reduced compared to the proposed Project, the significant, unavoidable impacts of the Project related to aesthetics, air quality, climate change, noise, traffic and transportation, and water would still occur. This alternative would eliminate the golf course, but would meet other basic Project objectives.

Project objectives that would *not* be achieved under this alternative include:

10. **Recreational Amenities**: This alternative would not provide one of the central amenities of the proposed Project, the golf course. However, in its place the Project would develop Planning Areas 35 and 39 with other types of open space and recreational uses (e.g., parks, trails, native habitat, drainage facilities, water quality improvements, groundwater recharge areas, and wetland mitigation areas.

6.6 ALTERNATIVES REJECTED FROM FURTHER CONSIDERATION

An EIR must briefly describe the rationale for selection and rejection of alternatives. The lead agency may make an initial determination as to which alternatives are feasible and therefore merit in depth consideration, and which are infeasible. Alternatives that are remote or speculative, or the effects of which cannot be reasonably predicted, need not be considered (State CEQA Guidelines, Section 15126.6(f)(3)). This section identifies alternatives considered,

but rejected as infeasible, and provides a brief explanation of the reasons for their exclusion. Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the Project objectives, are infeasible, or do not avoid any significant environmental effects (State CEQA Guidelines, Section 15126.6(c)). Alternatives considered that failed to meet the basic objectives of the proposed Project, or were deemed infeasible, and were thus eliminated from further consideration, are discussed below.

6.6.1 No Project/No Development Alternative

The No Project / No Development Alternative assumes that the proposed Butterfield Specific Plan Project would not occur, and the Project site would remain in its existing condition. No development would occur. The existing open space would remain, and the owner may continue the limited cattle grazing activities. No residential development, landscaping, infrastructure, commercial, public or private recreational facilities would be constructed or implemented. It is important to note that this Alternative does not reflect the landowner/Applicant's current entitlement as set forth in the Deutsch Specific Plan. The site is designated for development in a manner generally consistent with the proposed Project, the City's General Plan reflects this designation, and there have been no indications by City staff, elected officials or the public through the EIR scoping process that there is a desire to repurchase the site from the owner to preserve it as permanent open space.

The No Project / No Development Alternative does not meet any of the basic Project objectives because it does not implement a comprehensive and cohesive plan for the physical and economic development of the property, does not provide a variety of residential uses oriented toward many types of incomes and stages of life, does not provide enhanced recreational amenities or establish a community plan that would provide well-integrated and compatible land uses, and does not provide adequate drainage flood control and water quality improvements. The No Project/No Development Alternative would also be inconsistent with the City's Housing Element and General Plan, would fail to provide increased revenue, employment and housing opportunities within the City, and would not provide the various infrastructure and service improvements associated with the Project (such as two new schools, a reserved fire station site, a new satellite wastewater treatment plant site, and offsite drainage and road improvements). For these reasons, this alternative has been rejected from further consideration.

6.6.2 Alternative Site Alternative

The Alternative Site Alternative proposes that the proposed Project be built at an alternative location within the City of Banning; however, there are no available sites within the City that would accommodate the size, density, and amenities of the proposed Project while maintaining proximity to downtown Banning, and the feasibility of the applicant be able to assemble a site of similar size within a reasonable time frame is questionable. Currently, there are other land

development projects underway that require large tracts of land, and available land within the City is physically incapable of accommodating the size and/or density of the proposed Project. Furthermore, this alternative would not achieve the Project objectives of updating the previously-approved 1993 Deutsch Property Specific Plan based on changes of circumstances and market conditions, or of implementing a comprehensive and cohesive plan for the physical and economic development of the property. For the above reasons, the Alternative Site Alternative was rejected from further consideration.

6.7 CONCLUSION AND IDENTIFICATION OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126(d) of the State CEQA Guidelines indicates that an analysis of alternatives to the proposed project shall identify one alternative to the project as the environmentally superior alternative. Table 6-1 below provides a summary matrix that compares the impacts associated with the Project with the impacts of each of the proposed alternatives. Of the alternatives analyzed in this EIR, the Reduced Density Alternative is considered environmentally superior overall.

Although superior in reducing environmental impacts (refer to Section 6.5, subsection "Reduced Density (20% Reduction) Alternative", above for analysis of impacts regarding relevant CEQA topical areas), it would still have the same types of significant and unavoidable impacts. Even with a 20% reduction in project size and design changes, there would still be significant and unavoidable project impacts associated with light and glare, construction and operational air quality, Air Quality Management Plan (AQMP) consistency, and traffic and cumulative impacts associated with light and glare, operational air quality, climate change, mobile source noise, and traffic. Also, by reducing the density of the project by approximately 20%, the reduced density would not fulfill certain objectives to the same degree as the proposed Project.

Table 6-1
Comparison of Impacts Resulting from Project Alternatives
As Compared to the Proposed Project

Impact	No Project/No Development[1]	No Project/Existing Specific Plan Alternative	Reduced Density – 20% Reduction Alternative	Active Adult Community Alternative	No Golf Course Alternative
Aesthetics, Light, and Glare	Reduced	Greater	Reduced	Similar	Reduced
Agricultural Resources	Reduced	Similar	Similar	Similar	Similar
Air Quality	Reduced	Reduced	Reduced	Reduced	Reduced
Biological Resources	Reduced	Greater	Similar	Similar	Reduced
Climate Change	Reduced	Similar/Greater	Reduced	Reduced	Reduced
Cultural Resources	Reduced	Greater	Similar	Similar	Similar
Geology, Soils, and Seismicity	Reduced	Greater	Reduced	Reduced	Reduced
Hazards and Hazardous Materials	Reduced	Similar	Similar	Similar	Reduced
Hydrology and Water Quality	Reduced	Greater	Reduced	Similar	Similar
Land Use and Planning	Greater	Similar/Greater	Similar	Similar	Similar
Noise	Reduced	Similar	Reduced	Reduced	Reduced
Public Utilities and Services	Reduced	Greater	Reduced	Reduced	Reduced
Traffic and Transportation	Reduced	Reduced	Reduced	Reduced	Reduced
Water Supply	Reduced	Reduced	Reduced	Reduced	Reduced

[1] This alternative has been rejected from further consideration.