

5.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) describe a range of reasonable alternatives to the Project, or to the location of the Project, that would feasibly attain most of the basic objectives of the project while avoiding or substantially lessening any of the significant environmental impacts of the project. An EIR must include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Plan. This section identifies and describes alternatives to the proposed Plan, evaluates the environmental impacts that would result from each of these alternatives, and compares these with the proposed Plan, as required by CEQA.

Key provisions of the State CEQA Guidelines¹ relating to this Alternatives analysis are summarized below:

- The discussion of alternatives shall focus on Alternatives to the Project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives or would be costlier.
- The No Project Alternative shall be evaluated along with its impact. The No Project analysis shall discuss the existing conditions at the time the notice of preparation is published. Additionally, the analysis shall discuss what would be reasonably expected to occur in the foreseeable future if the Project were not approved, based on current plans and consistent with available infrastructure and community services.
- If the project is a development project on an identifiable property, the No Project Alternative is the circumstance under which the project does not proceed. Discussion of this alternative shall compare the environmental effects of the property remaining in its existing State to the environmental effects that would occur if the project were approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this No Project consequence should be discussed. In certain instances, the No Project Alternative means “no build,” wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical results of not approving the project rather than

1 California Code of Regulations, tit. 14, CEQA Guidelines, sec. 15126.6.

create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.²

- The range of alternatives required in an EIR is governed by a “rule of reason;” therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.
- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.³
- The range of feasible alternatives to a proposed project is to be selected and discussed in a manner that fosters meaningful public participation and informed decision-making. Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, General Plan consistency, regulatory limitations, jurisdictional boundaries, and whether the applicant could reasonably acquire, control, or otherwise have access to the alternative site.⁴

5.2 PROJECT OBJECTIVES

The State CEQA Guidelines requires an EIR to include a statement of objectives that addresses the underlying purpose of the Plan.

As described in **Section 2.0: Project Description**, the proposed Etiwanda Heights Neighborhood and Conservation Plan (EHNCP or Plan) will include a General Plan Amendment to establish land use and development standards for the Plan Area; a proposed Zoning Map Amendment to amend the Zoning Map to designate and regulate the Plan Area; and a proposed Etiwanda North Specific Plan Amendment to update the Specific Plan and remove the Etiwanda Heights area from the 1990’s Etiwanda North Specific Plan, and adoption of the Specific Plan (and Zone text amendment along with Map amendment), and the Local Agency Formation Commission (LAFCO) annexation of approximately 4,088 acres into the City of Rancho Cucamonga, and detachment of this same area from County Service Area 70.

The EHNCP is proposed to regulate the use of the 4,393 acres of land within the Plan Area. The EHNCP Regulating Plan is shown in **Figure 2.0-4: Regulating Plan** of **Section 2.0: Project Description**. The

² CEQA Guidelines, sec. 15126.6.

³ CEQA Guidelines, sec. 15126.6(f)(3).

⁴ CEQA Guidelines, sec. 15126.6(f)(1).

Regulating Plan establishes the boundaries of 13 Sub-Areas and identifies the zones created to regulate the use of land within the Plan Area to achieve the vision. The Neighborhood Area (NA) is organized into Sub-Areas 1-9, which are intended for the development of new walkable neighborhoods. The Rural Conservation Area (RCA) is organized into four Sub-Areas 10-13. Sub-Area 10 contains an existing Southern California Edison transmission line. Sub-Area 12 is the existing North Etiwanda Preserve, where no development is permitted now or pursuant to the EHNCP, and Sub-Areas 11 and 13 are zoned for a very limited amount of rural residential development on privately-owned property to ensure the existing rural and open space character of this area is preserved.

The 828-acre NA allows for open space, parks, a school, neighborhood shops and restaurants, a community center, and new neighborhoods. A network of parks and open space areas linked by pedestrian/equestrian trails and neighborhood streets would be provided in the NA. These pedestrian/equestrian trails would connect to existing trails in the upper portion of the NA and the RCA. The extension of Wilson Avenue through the NA is proposed, along with the extension of Rochester Avenue connecting to Wilson Avenue. The Plan allows for 2,900 residential units in the NA.

Limited low density rural residential development would be allowed in the RCA, where the priority of the EHNCP is preserving the natural open space character of this foothill area. The EHNCP will include the establishment of a habitat conservation program or similar mechanism for all conservation and mitigation lands within the EHNCP Area. The Plan allows for up to 100 residential units in the 3,565-acre RCA, where otherwise allowable, and outside of conservation areas.

Pursuant to the State CEQA Guidelines,⁵ the following objectives have been identified for the proposed EHNCP:

1. Conserve the natural resources and open space character of this unique foothill area.
2. Establish local control by annexing this area to the City and adopting a community-based plan that meets the City's high-quality standards.
3. Develop an economically feasible, fiscally responsible plan that pays its own way without levying new taxes on existing residents.
4. Respect the rights of existing property owners.
5. Provide a range of open space and park areas offering a range of recreation opportunities.

5 CEQA Guidelines, sec. 15124(b).

6. In the Neighborhood Area, provide for the development of high-quality, single-family neighborhoods with a range of housing opportunities- including equestrian-oriented housing - that are compatible in character with the existing surrounding neighborhoods.
7. Improve access to the existing and new foothill neighborhoods by extending, connecting and improving Wilson Avenue, Rochester Avenue, and Milliken Avenue, and providing a network of walkable and bikeable neighborhood streets.
8. Enhance fire safety throughout the Plan Area, in particular reduce wildfire hazard to existing and new neighborhoods.
9. Provide a limited amount of small-scale neighborhood shops and restaurants to meet the daily needs of residents in the existing and future foothill neighborhoods.
10. Develop a land use plan for the Neighborhood Area that provides the County with an opportunity for meeting their fiduciary responsibility of selling their surplus land for a reasonable price.

5.3 ALTERNATIVES CONSIDERED AND ELIMINATED FROM FURTHER CONSIDERATION

The State CEQA Guidelines⁶ requires an EIR to identify any alternatives that were considered by the Lead Agency but were rejected as infeasible and to briefly explain the reasons underlying the Lead Agency's determination. The State CEQA Guidelines states the following:

The EIR should also identify any alternatives that were considered by the Lead Agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the Lead Agency's determination....Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

Several alternatives were initially considered for further evaluation in this EIR based on the potential for each to reduce or eliminate the significant environmental impacts identified for the proposed Plan. The following alternatives were considered and rejected from further consideration.

5.3.1 100 Percent Open Space Alternative

This Alternative would preserve the entire 4,393-acre area as Open Space. No development would be allowed in the RCA or the NA. This alternative would not be feasible as existing property owners –

⁶ CEQA Guidelines, sec. 15126.6(c).

including the San Bernardino County – would need to be compensated for a reasonable fair market value of their properties, which would financially burden Rancho Cucamonga tax payers in the absence of alternative sources of capital to acquire those properties or their development rights. In particular, the San Bernardino County Flood Control District—which owns almost all of the NA as well as large portions of the Rural Conservation Area—has declared their Neighborhood Area holdings to be surplus property, as they are no longer needed for flood control purposes. The District has also offered those properties for sale to developers in the past, and in the absence of a City plan to annex the area and plan a portion of it for development, has expressed the intention to do so again. Other property owners within the RCA have likewise expressed the intention of pursuing development as allowed under existing County Zoning (see No Project Alternative discussion) and would require compensation for their property at fair market value in order to ensure that no further development could occur. The cost to acquire the development rights to all these properties could be expected to be in the \$100,000,000 to \$200,000,000 range or more, and community surveys conducted in 2018 made clear that there was little support for any new taxes or assessments to fund open space acquisition. Therefore, this alternative has been eliminated from detailed consideration within this EIR. Further, the 100 Percent Open Space Alternative would not be able to meet the following EHNCP objectives:

- Establish local control by annexing this area to the City and adopting a community-based plan that meet the City’s high-quality standards, because there would not be a plan, but only allow just for conservation and open space;
- Develop an economically feasible, fiscally responsible plan that pays its own way without levying new taxes on existing residents because this alternative would impose substantial taxes on existing residents;
- Respect the rights of existing property owners, because this alternative would prevent existing property owners the right to develop their property;
- Provide a range of open space and park areas offering a range of recreation opportunities, because this alternative would provide for open space, however, not park area;
- In the NA, provide for the development of high-quality, single-family neighborhoods with a range of housing opportunities- including equestrian-oriented housing that are compatible in character with the existing surrounding neighborhoods, because this alternative does not provide for housing;
- Enhance fire safety throughout the Plan Area, in particular reduce wildfire hazard to existing and new neighborhoods, because this alternative would not reduce the wildfire risk between the neighborhoods to the east and west of the NA, but retain the existing conditions;
- Provide a limited amount of small-scale neighborhood shops and restaurants to meet the daily needs of residents in the existing and future foothill neighborhoods, because this alternative would not allow for these uses;

- Develop a land use plan for the NA that provides the County with an opportunity for meeting their fiduciary responsibility of selling their surplus land for a reasonable price because this alternative would not allow for development of the NA.

With the exception of conserving the natural resources and open space character of this unique foothill area; this alternative would not meet any of the Plan objectives. For these reasons, this alternative was eliminated from detailed consideration within this EIR.

5.3.2 3,800 Residential Unit Alternative

In response to the initial set of project objectives, which included the development of a mixed-use village center, a 2017 conceptual plan included up to 3,800 dwelling units and 280,000 square feet of commercial and office use. This plan extended the development footprint into the portion of the Plan Area proposed for preservation as the Etiwanda Heights Preserve in the EHNCP. In community workshops in late 2017 public response to this initial plan was negative, and the City determined not to pursue this plan because it was not aligned with the community input received. The City undertook an extensive process of public engagement through which a refined set of project objectives and new conceptual community plan was developed. The project objectives listed above resulted from that process and the 3,800 dwelling unit program does not meet these following updated objectives:

- Conserve the natural resources and open space character of this unique foothill area while providing additional housing opportunities to meet regional housing needs in an environmentally sensitive manner. This alternative proposed to directly conserve 491 acres of the “lower band” of the Plan Area, as well as conserving much of the “upper band” as additional mitigation of habitat impacts. Based on second opinions regarding the “lower band” conservation, it was determined that it was somewhat speculative, and there was a potential to invest a great deal of money in restoring and conserving that area without creating viable, high-quality habitat. The fact that it has been cut off from natural seasonal stormwater flows for so long, that the reintroduction of such flows would be dependent on removing a portion of the Diversion Levee, and that the area would be surrounded by neighborhoods argued against this alternative from a habitat perspective.
- Provide a range of open space and park areas offering a range of recreation opportunities. This alternative could meet this objective, although by focusing the Plan around a very large central open space from which humans would be excluded does not offer the same recreational opportunities as a large central open space to which they have access.
- In the NA, provide for the development of high-quality, single-family neighborhoods with a range of housing opportunities- including equestrian-oriented housing that is compatible in character with the existing surrounding neighborhoods; Community concern was expressed that mixed-use development and multi-family housing would not be compatible with surrounding neighborhoods.

- Improve access to the existing and new foothill neighborhoods by extending, connecting and improving Wilson Avenue, Rochester Avenue, and Milliken Avenue, and providing a network of walkable and bikeable neighborhood streets; Could partially meet this objective, but the very large central open space, off limits to humans, very significantly reduced connectivity for all modes other than automobiles.
- Enhance fire safety throughout the Plan Area, in particular reduce wildfire hazard to existing and new neighborhoods; Fire officials expressed grave concerns that the very large, wild open space in the center of the neighborhoods – with very limited opportunities for fuel modification – this alternative presented fire hazard that could not be mitigated.
- Provide a limited amount of small-scale neighborhood shops and restaurants to meet the daily needs of residents in the existing and future foothill neighborhoods and a community center in a pedestrian oriented environment. A larger quantity of shops and restaurants, as well as potential office spaces, could have accomplished this basic objective, but greatly exceeded the community's expectation for "limited."

This alternative was eliminated from detailed consideration within this EIR because it is not consistent with the objectives for the Plan, which were developed based on public outreach, and would also result in a greater intensity of residential and commercial development over a larger portion of the Plan Area, which would increase impacts, such as an increase in emissions and vehicle trips associated with an increase in residential units and commercial uses, rather than decrease the impacts of the Plan.

This alternative was eliminated from detailed consideration within this EIR because it is not consistent with the objectives for the Project, which were developed based on public outreach, and would also result in a greater intensity of residential and commercial development over a larger portion of the Plan Area, which would increase impacts, such as an increase in emissions and vehicle trips associated with an increase in residential units and commercial uses, rather than decrease the impacts of the Plan.

This alternative was eliminated from detailed consideration within this EIR because it is not consistent with the objectives for the Plan, which were developed based on public outreach, and would also result in a greater intensity of residential and commercial development over a larger portion of the Plan Area, which would increase impacts, such as an increase in emissions and vehicle trips associated with an increase in residential units and commercial uses, rather than decrease the impacts of the Plan.

5.3.3 All ½-Acre Lots Alternative

In the public engagement process of late 2017 and 2018, the possibility of developing the entire NA with ½ acre lots was suggested by the public. The planning team conducted a preliminary market feasibility analysis of such an alternative, which would have yielded between 1,100 and 1,650 ½ -acre lots, depending on whether the ½-acre size is measured based on gross land area or net land area. In either

case, however, based on recent and projected sales of properties of that size in the local market it was projected that development and sales of such a project would take decades, likely 40 to 50 years, which would not result in an economically feasible project. Supporting evidence for this conclusion includes the fact that there are a number of such lots as yet unbuilt in the neighborhoods to the west of the NA, and an approved tract with many such lots a half mile to the east of the NA that has not moved forward to development due to the developer's conclusion that home or lot sales would not occur at a sufficient pace to cover the cost of infrastructure construction plus a reasonable return on the investment. Further, this alternative would not be able to meet the following objectives defined for the EHNCP:

- Conserve the natural resources and open space character of this unique foothill area. This alternative was determined to be economically infeasible based on the cost of grading and infrastructure and time and cost associated with selling up to 2,000 homes at the rate of 2 per month which could take up to 84 years. This would reduce the ability to fund conservation and would cover the southerly portion of the proposed Etiwanda Heights Preserve with development.
- Provide a range of open space and park areas offering a range of recreation opportunities. All "½ acre lot" program comparable to those built previously to the west of the NA would not include any park space for community use.
- In the NA, provide for the development of high-quality, single-family neighborhoods with a range of housing opportunities- including equestrian-oriented housing that are compatible in character with the existing surrounding neighborhoods because it would allow for only large ½ acre lot estates; 2,000 homes on ½ acre equestrian lots would by definition not provide homes appealing to or affordable to families unable to or uninterested in owning a ½ acre equestrian home.
- Improve access to the existing and new foothill neighborhoods by extending, connecting and improving Wilson Avenue, Rochester Avenue, and Milliken Avenue, and providing a network of walkable and bikeable neighborhood streets; This alternative would extend Wilson Avenue through the Plan Area, and connect Rochester to Wilson. It would also preserve the existing trails on flood control channel service roads. Additional network for pedestrians, bicyclists and equestrians would depend on the neighborhood pattern. If tracts were gated like existing tracts to the east and west, that connectivity would be very limited. If the network were more connective like some older areas of Etiwanda and Alta Loma, more connectivity could be provided.
- Provide a limited amount of small-scale neighborhood shops and restaurants to meet the daily needs of residents in the existing and future foothill neighborhoods. A program that utilized the entire area for ½-acre residential lots would by definition include none of the neighborhood-serving shops and restaurants that are included in the Etiwanda Heights Neighborhood & Conservation Plan and were also included in the 1992 Etiwanda North Specific Plan.

This alternative was eliminated from detailed consideration within this EIR because it would be economically infeasible and would also not meet the basic objectives defined for the EHNCP Project. In

addition, residential development on ½ acre lots throughout the Plan Area would result in greater impacts to biological resources. Therefore, this alternative has been eliminated from detailed consideration within this EIR.

5.4 ALTERNATIVES CONSIDERED

The following alternatives were identified for evaluation:

- **Alternative 1: No Project Alternative**
- **Alternative 2: County Development of NA**
- **Alternative 3: Annexation Under Current City Plans**
- **Alternative 4: Annexation With Alternative Land Use Plan**

Each of these alternatives is described in more detail in the following sections.

5.5 ALTERNATIVES ANALYSIS

A comparison of the impacts of the EHNCP and the alternatives selected for further evaluation is provided in this section for each of the environmental topics addressed in the Draft EIR. This comparison of impacts assumes, for each topic, that the mitigation measures identified in this Draft EIR for the Plan would also be incorporated into the alternatives.

In accordance with the State CEQA Guidelines, the discussion of the environmental effects of the alternatives in an EIR may be less detailed than provided for in the proposed Plan but should be sufficiently detailed to allow meaningful evaluation, analysis, and comparison with the proposed Plan.⁷

5.5.1 Alternative 1—No Project Alternative

Under the No Project Alternative, the City would not prepare a new plan or annex any County land and existing County Zoning would shape future development within the annexation area and existing City zoning / Etiwanda North Specific Plan (ENSP) would shape future development within the small portions of the Plan Area currently within City limits. Refer to **Figure 5.0-1: No Project Alternative** which shows San Bernardino County General Plan Land Use Designations.

This alternative would include no development within the NA north of Banyan Street or west of Rochester Avenue due to the County General Plan Flood Control designation east of Milliken Avenue

⁷ California Code of Regulations, tit. 14, CEQA Guidelines sec. 15126.6(d).

(see below) and the City Flood Control Designation in the area west of Milliken. Approximately 120 to 200 residences would be expected in Sub-Area 1, south of Banyan Street and west of Milliken Avenue as this area is already in the City of Rancho Cucamonga and zoned Low Medium Residential. Refer to **Figure 3.0-1: General Plan Land Use Map** in **Section 3.0: Environmental Setting**, which shows the City's current land use designations.

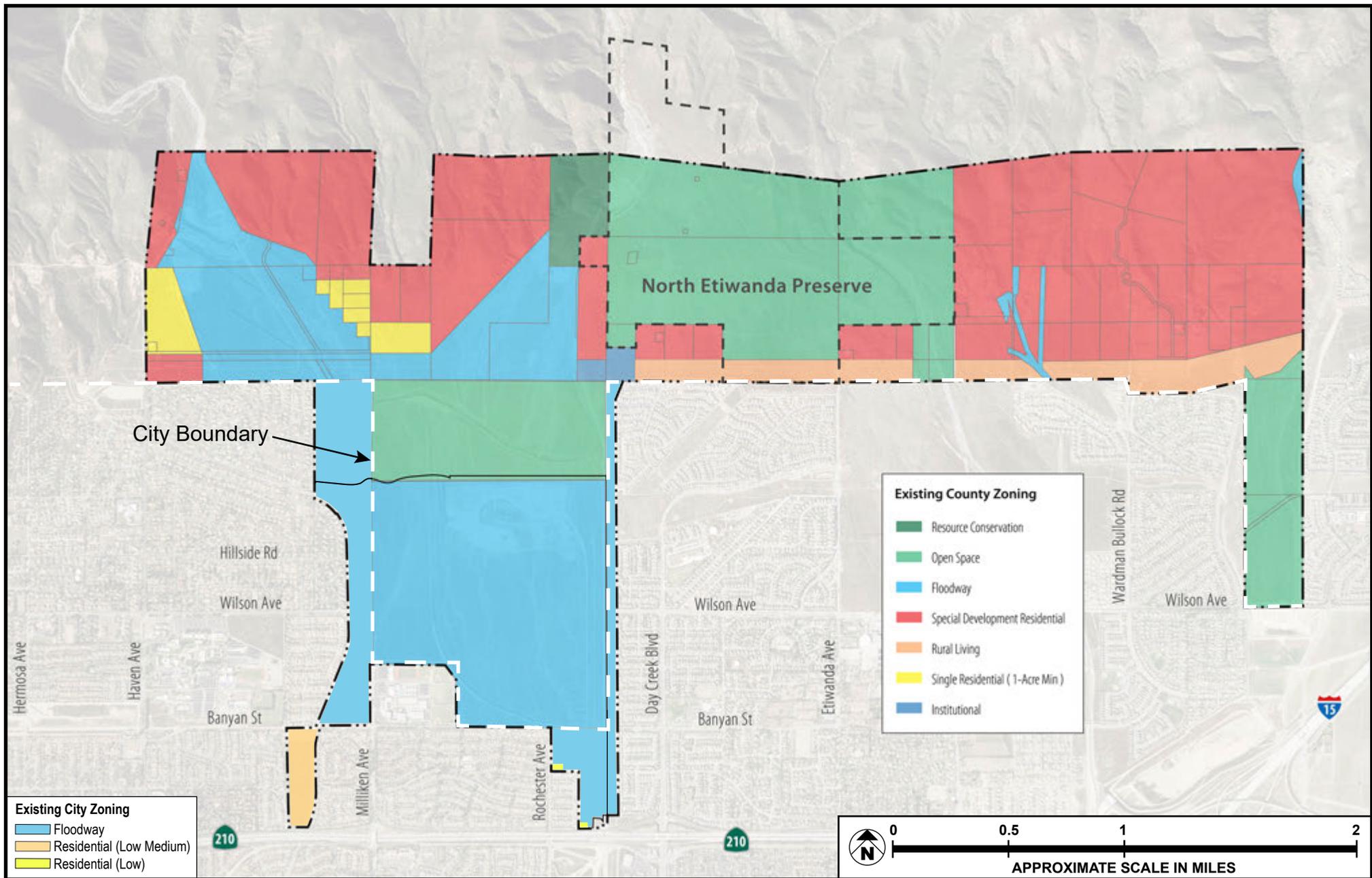
The County General Plan anticipates up to 7,000 residences in the Rancho Cucamonga Sphere of Influence area, of which the EHNCP Plan Area is more than half. Based on the existing County General Plan Land Use/Zoning designations for the Plan Area, it is estimated that approximately 3,500 to 4,500 homes could be developed in the RCA. The County's General Plan designates the NA as Floodway and would not permit any development in this area.

Aesthetics

Under the No Project Alternative, substantially greater development, approximately 3,500 to 4,500 homes, would be allowed in the foothill area above Rancho Cucamonga. This level of development would significantly impact views of scenic vistas, scenic resources, and visual character within the RCA, unlike the Plan, which limits development to a maximum of 100 homes in this area and would have less than significant impacts through compliance with the EHNCP Plan, City's General Plan, and compliance with the CBC. In addition, a significant amount of light and glare would be introduced with new roadways, and greater residential development into an area largely dark due to the undeveloped nature of the hillsides. Further, with this Alternative, the visual character would greatly change from scenic undeveloped hillsides to large tracts of residential uses. By comparison, EHNCP as proposed would limit development to the lower southern portion of the Plan Area, between the existing residential neighborhoods of Rancho Etiwanda and the Deer Creek and Haven View Estates neighborhoods and would be consistent in visual character with these existing residential neighborhoods and would preserve the existing visual character of the steeper hillside areas by limiting development. Under this alternative, substantially greater aesthetic impacts would occur than those under the Plan.

Air Quality

This alternative would have a greater number of units than the Plan and would therefore result in an increased air pollutant concentration for construction and operation. This alternative would include more building construction within the Plan Area as there would be more proposed uses, and greater areas of construction when compared to the more compact development contemplated by the Plan. This alternative would comply with SCAQMD Rule 403 for Fugitive Dust as well as comply with South Coast Air Quality Management District (SCAQMD) and California Air Resources Board (CARB) rules for the Plan during other construction activities. Similar to the Plan, exceedances would occur if concurrent



SOURCE: Sargent Town Planning - 2019

FIGURE 5.0-1

Meridian
Consultants

Alternative 1, No Project Alternative

grading and building in each individual phase were to take place. Implementation of Mitigation Measure **MM AQ-2** would develop the Plan over phases to minimize concurrent development. In addition, implementation of Mitigation Measure **MM AQ-1** would require the use of Tier 3 off-road diesel-powered construction equipment equipped with any emissions-control device such as a Level 3 Diesel Particulate Filter (DPF). With implementation of these measures, impacts related to construction air quality would remain less than significant for all criteria pollutants and localized pollutant concentrations during construction, however, when compared to the Plan, would result in increased emissions due to the greater areas of construction.

The Plan's air quality impacts during operation were determined to be significant and unavoidable with mitigation due to the increased amount of mobile emissions that would be generated within the Plan Area. This alternative would result in an increase in the amount of development, and related air emissions, in comparison to the EHNCP. Traffic generated from this alternative would also be greater when compared to the Plan which would result in increased emissions with respect to regional criteria pollutants when compared to the Plan, both because of the increased number of units and because the more spread out development pattern would generate more vehicle miles traveled (VMT) per capita. Operational emissions would be greater than the Plan and significant and unavoidable.

Biological Resources

Under the No Project Alternative impacts to the higher quality habitat in the RCA would be greater than with the EHNCP as proposed, while impacts to existing habitat in the NA, which is degraded, would be avoided as development would not occur in this area. As previously stated, while no San Bernardino kangaroo rats were observed during any of the small mammal trapping surveys within the EHNCP Area, there are approximately 758 acres of United States Fish and Wildlife Service (USFWS) Critical Habitat for San Bernardino kangaroo rat present within the NA, covering the majority of the site. Within the RCA site, there are 2,056 acres of USFWS Critical Habitat for San Bernardino kangaroo rat present, located within the southern half of the Plan Area. This Alternative would allow for approximately 3,500 to 4,500 residences uses in the RCA; whereas the EHNCP implements the City's General Plan in the RCA and supplements the City's existing hillside development regulations by limiting the number of homes permitted in the RCA and defining additional development standards. Development in the RCA would be limited to 100 residences on private property, and the Plan includes a Conservation and Transfer of Development Rights (TDR) Program allowing for the voluntary transfer of residential density from privately-owned properties in the RCA to the NA in exchange for financial or other negotiated compensation to the RCA property owner. However, impacts associated with habitat modification, species identified as a candidate, sensitive, or special-status, and jurisdictional aquatic resources within

the NA under Plan implementation are considered potentially significant if mitigation within the RCA is not implemented.

Under the proposed Plan, any development in the RCA would be subject to the requirements and review procedures of City Municipal Code 17.16.140 (Hillside Development Review). These City standards serve to prevent or greatly reduce potential impacts to resources, such as biological resources. However, these development standards do not currently apply to the RCA or a majority of the NA. In addition to those requirements, applications for development in the RCA would include site-specific biological resources studies and any required permits from State and Federal regulatory agencies. With compliance with RCA Development Design Review procedures and implementation of mitigation measures, impacts would be reduced to less than significant.

The impact of the Plan on biological resources within the NA were found to be significant, even with compliance with the existing regulations, Mitigation Measures **MM BIO-1** through **MM BIO-9**, preservation of open space, development standards and the provisions outlined in the Specific Plan. Impacts to jurisdictional features and San Bernardino kangaroo rat (SBKR) habitat in the NA would also be considered significant if unmitigated without the necessary acreage conservation within the RCA. Similar to the Plan, significant impacts to SBKR habitat and jurisdictional features would occur, yet for land in the RCA under the No Project Alternative and would not benefit from conserving land within the RCA. Further, habitat fragmentation for the SBKR would occur under this alternative, and further conservation efforts would not be realized.

Cultural and Tribal Resources

Under this alternative, substantially more land would be disturbed and graded than under the Plan, thereby increasing the likelihood of unearthing cultural and tribal cultural resources. Based on the results of the records searches, eighteen potential resources are recorded within the RCA and six archaeological resources within the NA. The majority of the previously recorded resources located within the RCA consist of historic era homestead structures, water conveyance systems, remnants of mining operations, and transmission lines. None of these resources (isolates or site) in the NA were found to contain information that would qualify them for a finding of significance and/or eligibility for listing in the California Register of Historical Resources (CRHR) under any significance criteria. The Plan involves grading which has the potential to disturb subsurface cultural and Tribal cultural resources that might be present within the Plan Area. The Plan would result in less than significant impacts on cultural and Tribal cultural resources through the implementation of Mitigation Measures **MM TCUL-1** and **MM TCUL-2**. Given that this alternative could involve disturbance of subsurface soils, the potential disturbance to cultural and Tribal cultural resources would not be avoided. In regard to historic

resources, the Plan would result in less than significant impacts on historic resources because none of the buildings on the Plan Area are listed or eligible for listing in either the National Register of Historic Places (National Register) or the California Register of Historic Resources (California Register). Implementation of this alternative would not result in the demolition of any buildings within the Plan Area. While impacts on cultural and historic resources would be less than significant under the Plan, impacts would be greater under this alternative as substantially more land would be disturbed yet reduced to less than significant with the same mitigation identified for the Plan. Further, for this alternative and the Plan, Tribal consultation is currently and ongoing process, and as such, may require augmentation with any mitigation measures that come out of consultation.

Energy Conservation

This alternative would have a greater number of units than the Plan and would therefore result in an increased demand for electricity, and natural gas consumption for both construction and operation. While these services systems would be available, the extension of services and related impacts would be greater than those of the Plan. While the Plan would result in less than significant impacts with regard to energy, the energy efficiency that would come with the new high-performance building design and conservation measures of the Plan would not be fully realized. The Plan takes into account not only energy measures that meet regulatory compliance of local, State, and federal regulations, but would also include measures for water and energy conservation, water quality, green building practices, urban agriculture or community gardens integrated into neighborhood and building design, which this alternative would not meet all of these encompassing features. However, this alternative would be constructed and designed in accordance with the most current version of Title 24, California's Energy Efficiency Standards for buildings and the State Energy Conservation Standards. These standards include minimum energy efficiency requirements related to building envelope, mechanical systems (e.g., HVAC and water heating systems), indoor and outdoor lighting, and illuminated signs. Furthermore, this alternative would be less compacted and consolidated pattern not than the Plan, thus there would also be an increase in overall consumption of transportation fuel from the associated increase in VMT. As such, the overall impacts of this alternative would be greater as compared to the Plan due to increased energy consumption and the lack of all the energy efficient measures listed above. However, this alternative would still be less than significant as it would continue to follow local, State, and federal regulatory compliance for energy standards and therefore would not cause wasteful, inefficient, and unnecessary consumption of energy during construction or operation.

Geology and Soils

This alternative would have a greater number of units than the Plan and would also result in more development in portions of the RCA where there is indication of significant impacts to seismic hazards

and soils as shown in **Figure 4.6-1** through **Figure 4.6-3**. The Plan would result in less than significant impacts related to geology and soils through compliance with the California Building Code (CBC), and incorporation of the Mitigation Measures **MM GEO-1** through **MM GEO-11** presented in the Geotechnical Report (see **Appendix G** of this Draft EIR). As stated previously, this alternative would result in more development near areas of expansive soils, greater slopes, and fault lines, and therefore could exacerbate existing environmental conditions associated with seismic fault rupture, strong seismic ground shaking, landside/lateral spreading, seismic-induced settlement, subsidence soil stability, expansive soils, or acceleration of geologic hazards. However, similar to the Plan, this alternative would comply with the CBC as well as implement the above mitigation measures to reduce the significant impacts for geology and soil impacts to a less than significant level. As such, this alternative would have greater impacts than the Plan's less than significant impacts with mitigation for geology and soils due to the increased development, but would remain less than significant with mitigation.

Greenhouse Gas Emissions

Under this alternative, more construction and operational activities would occur due to the increase in the amount of development in the RCA. New greenhouse gas (GHG) emissions that would be generated from construction activities would be greater when compared to the Plan. Daily trips associated with this alternative, upon which the calculations of GHG emissions are mainly based, would be greater than that of the Plan as this alternative would have substantially greater development, approximately 3,500 to 4,500 homes, would be allowed in the foothill area above Rancho Cucamonga. This Alternative would be required to comply with the California CalGreen Building Code and the Southern California Association of Governments (SCAG) 2016 – 2040 RTP/SCS related to growth forecasts and consistent with the VMT reduction strategies and policies. However, similar to the Plan, with implementation and enforcement of Mitigation Measures **MM GHG-1** through **MM GHG-3**, impacts would remain significant and unavoidable.

Hazards and Hazardous Materials

Under this alternative, there would be potential to create upset or accident conditions involving the release of hazardous materials into the environment during both construction and operation. For construction activities, similar to the Plan, all potentially hazardous materials would be used and stored in compliance with applicable federal, State, and local regulations.

Only two sites were identified near the Plan Area that are on a list of hazardous materials pursuant to Government Code 65962.5, which is the Hazardous Waste and Substances (Cortese) List.⁸ California Department of Toxic Substances Control (DTSC) has determined that both these sites received DTSC concurrence that no further action is required. However, similar to the Plan, this alternative would not release subsurface hazardous substances to the environment or expose future occupants or site users to hazardous materials. Prior to any construction activities, similar to the Plan, this alternative would incorporate Mitigation Measures **MM HAZ-1** through **MM HAZ-3** to reduce any potential impacts to less than significant levels from hazardous substances. As far as wild fire, this alternative may result in greater impacts due to the RCA area be more readily impacted by fires. In addition, the RCA would not be bordered on three sides by existing development, as is the case with the Plan's proposed development in the NA. Implementation of Mitigation Measures **MM HAZ-4** and **MM HAZ-5** would reduce impacts to less than significant, however, this alternative would result in greater wildfire potential than the Plan. Further, fire officials expressed grave concerns that the very large, wild open space in the center of the neighborhoods with very limited opportunities for fuel modification—this alternative presented fire hazard that could not be mitigated.

Hydrology and Water Quality

This alternative would involve a greater number of units than the Plan and would therefore result in more development in portions of the RCA. This would result in more grading in the steeper hillside areas in the RCA, increasing the potential for soil erosion and sedimentation in stormwater runoff during construction in comparison to the EHNCP. In addition, construction could contribute other pollutants to stormwater drainage. Like the Plan, this alternative would be required to comply with National Pollution Discharge Elimination System (NPDES) and implement a Storm Water Pollution Prevention Plan (SWPPP) with BMPs in addition to supplying this alternative would be required to provide infiltration basins per County requirement, thereby making impacts to runoff less than significant. Impacts would be similar, but greater, with this alternative.

The location of the RCA along the base of the San Gabriel Mountains also places it in the region's natural hydrologic system, with many creeks flowing south toward Rancho Cucamonga. The western half of the RCA includes portions of the 100-year flood plain. In the RCA, this alternative would allow for the development of 3,500 to 4,500 dwelling units, including development within the 100-year floodplain located in the RCA of which the County allows. In addition, this alternative would result in less

⁸ State Water Resources Control Board (SWRCB), GeoTracker (2015), database, accessed February 12, 2018, <https://geotracker.waterboards.ca.gov/map/>.

percolation of the groundwater due to the inclusion of more permeable surfaces. This alternative would result in greater impacts the existing hydrology and water quality of the area than the EHNCP.

Land Use and Planning

This alternative would implement the existing County and City land use plans and would be consistent with these plans. Both the County and City General Plan currently designate the NA as floodway or flood protection reflecting the need for this area, owned by San Bernardino County, to accept and detain storm flows from Deer and Day Canyons. As discussed in **Section 1.0: Introduction**, because of the construction of flood control improvements in both Day and Deer Creek Canyons and associated downstream improvements, the portions of the NA designated for flood control purposes is no longer needed for this purpose and has been determined to be surplus property. For this reason, this surplus property will be sold by the County at some point in the future and entitled for development. This alternative would result in more development in the RCA than the EHNCP and would also likely result in additional development in the NA if County plans were to be amended. This pattern of development would have greater effects on the existing neighborhoods around the Plan Area.

Mineral Resources

Under this alternative, there would be no development within the NA north of Banyan Street or west of Rochester Avenue and approximately 3,500 to 4,500 units would be developed throughout the RCA.

A small portion of the NA and all of the RCA that is private owned land, would be able to be developed. This would leave all three aggregate resources zones within the EHNCP available to be mined. However, due to the proximity of the mines to residential units, mining may be limited in these areas regardless. Nonetheless, since the availability of these resources would be greater under this alternative, impacts would be considered less than those of the proposed Plan.

Noise

Depending on the location of future development in the RCA there may be more or less construction occurring near the existing residential neighborhoods around the Plan Area. This alternative would not, therefore, eliminate the potential for significant noise impacts during construction, but would change the location of the impacts. Implementation of Mitigation Measures **MM N-1** and **MM N-2** would reduce impacts for nearby uses sensitive to noise. These mitigation measures would provide noise abatement during construction near adjacent sensitive receptors. Similar to the Plan, with the implementation of mitigation, construction impacts with this alternative would be less than significant.

After development, noise would be generated by people using outdoor spaces, vehicles, roadway noise, and building equipment. Similar to the Plan, this alternative would result in an increase in noise levels compared to existing conditions and a similar or higher amount of traffic on local roadways. This alternative would also have a higher population growth than the EHNCP as approximately 3,500 to 4,500 homes would be developed throughout the RCA, as compared to 3,000 home that would be allowed by the Plan as proposed. Similar to the proposed Plan, the dominant noise source on the southeast and southwest corners of the Plan Area is the SR-210 freeway. With implementation of Mitigation Measure **MM N-3**, the incorporation of architectural features (such as a sound wall adjacent to the SR-210 freeway) would ensure that residential habitable rooms facing the freeway have interior noise levels of 45 dBA or less, as required by the CBC. As such, potential significant impacts under this alternative would be similar to that of the proposed Plan and would be less than significant with mitigation.

Population and Housing

Under this alternative, there would be an increase in dwelling units and associated increase in population compared to the Plan as approximately 3,500 to 4,500 residential units and 10,605 to 13,635 residents. This would result in an increase of 500 to 1,500 residential units and 1,515 to 4,545 residents compared to the EHNCP. The population growth associated with the annexation area and existing City zoning / ENSP is not accounted for in SCAG's adopted 2016–2040 and draft 2020–2045 Regional Growth Forecasts; thus, the impact of this growth under this alternative would also be considered significant and unavoidable, similar to the Plan. As this increase in residential units and associated population would represent a greater percentage of total growth in the County through 2040 compared to the Plan, overall impacts of this alternative would be greater as compared to the Plan, and would be significant and unavoidable.

Public Services and Recreation

As discussed above, under this alternative, there would be an increase in dwelling units and associated increase in population compared to the Plan. Therefore, this alternative would generate a greater demand for public services and recreational facilities. As this alternative would result in residential development throughout the RCA, as opposed to the Plan, which would concentrate development in new neighborhoods in the NA adjacent to existing neighborhoods in the City, there would be a greater impact on public services.

Fire Protection

Similar to the Plan, this alternative would have consultation with the Rancho Cucamonga Fire Protection District (RCFPD) to ensure that it would be adequately served by the existing fire stations and no new or altered facilities would be needed to serve the uses that would be allowed. All development within the

area would be reviewed by the RCFPD for compliance. Since this alternative would allow for a greater increase in fire service, impacts to fire protection would be greater than those of the Plan.

Police Protection

Similar to the Plan, this alternative would comply with Chapter 3.64, Police Impact Fee, of the RCMC, which is collected to fund new facilities, vehicles, and equipment, and any fees established through a Community Facilities District. This alternative would also have consultation with Rancho Cucamonga Police Department (RCPD) to ensure adequate service provided from existing Sheriff's department facilities. However, this alternative would not include a police substation as part of the planned Joint Use Public Facility which would provide additional facilities to meet additional service needs. Since this alternative would allow for a greater increase in police service, impacts to police protection would be greater than those of the Plan.

Schools

Similar to the Plan, the need for additional school facilities and related services is addressed through compliance with the school impact fee assessment. The ALSD, ESD, and Chaffey Joint Union High School District (CJUHS) would be able to collect these school impact fees for proposed development in the Plan Area and for future developments. Therefore, if the ALSD, ESD, and CJUHS are not able to adequately serve a larger future population, they would have funds to acquire land for future schools. Since this alternative would allow for a greater service population, impacts to schools would be greater than those of the Plan.

Libraries

Similar to the Plan, this alternative would address library impacts through the Library Impact Fee where revenue from the impact fees can be used for, but would not be limited to land acquisition, site improvements, building construction/expansion, interior building improvements, furniture fixtures and equipment. However, this alternative would not include a Joint Use Public Facility which would provide additional library facilities to meet additional service needs within the Plan Area. Since this alternative would allow for a greater service population, impacts to libraries would be greater than those of the Plan.

Parks and Recreation

Similar to the Plan, this alternative would need to meet the City's established standard of 5.0 acres per 1,000 residents. However, this alternative would not include the total amount of open space, parkland, and recreation facilities that are proposed with the Plan. Therefore, since this alternative would have a

greater service population and less proposed facilities, impacts to parks and recreation would be greater than those of the Plan.

Transportation and Traffic

Under this alternative, there would be more residential development within the Plan Area. The Plan would result in less than significant intersection impacts through implementation of Mitigation Measures **MM TRAF-1** through **MM TRAF-3**, but would still have significant and unavoidable impacts for freeway mainlines due to no feasible mitigation as part of the Plan. As noted previously, this alternative would result in more development throughout the RCA compared to the Plan which would concentrate development in the NA, with access provided by extending Wilson Ave through the Plan Area and extending and improving Milliken and Rochester Avenues. These street improvements and mitigation measures would be necessary as part of the design to meet regulatory and circulation needs for the proposed population growth and vehicular travel. Under this alternative, there would be a further need for street improvements to meet these needs for a higher associated VMT. In addition, construction impacts for traffic would be greater as the Plan due to the increased amount of development; however, this alternative would include a Master Fire Protection Plan for the entire site and neighborhood specific fire protection plans for the proposed phases of construction. As such, this alternative would have greater impacts than the Plan as proposed due greater traffic volumes and impacts would be significant and unavoidable.

Utilities and Service Systems

The proposed Plan would allow for the development of 2,900 units in the NA area and would permit the development of up to 100 residences on private property in the RCA. Up to 3,000 units could be developed in the NA if development rights from the RCA are transferred to the NA through the TDR Program the Plan would establish. Under this alternative, no development within the NA north of Banyan Street or west of Rochester Avenue and approximately 3,500 to 4,500 units would be developed throughout the RCA.

Water

Under this alternative, portions of the RCA would already be within the Cucamonga Valley Water District (CVWD) service boundary area and portions would be outside the service area boundary. This alternative would require either extending the CVWD service boundary area, or require that water wells be drilled. Although the proposed plan determined that sufficient supplies would be available, the demand exceeds the current supply. This alternative would have a greater number of units than the Plan, and would have an even higher demand on CVWD which may be considered potentially significant. Additionally, CVWD would need to extend water improvements to the RCA or water wells would need to

be drilled to service the properties, either of which would have greater construction impacts than the proposed Plan. Impacts under this alternative would be greater and may be potentially significant.

Wastewater

Under this alternative, portions of the RCA would already be within the Inland Empire Utilities Agency (IEUA) service boundary area and portions would be outside the service boundary area. Since this alternative would have a greater number of units than the Plan, estimated wastewater generation would also be greater. Additionally, IEUA would need to extend sewer improvements to the portions of the RCA not currently served, the construction of which would be much greater than the proposed Plan. This alternative would likely still be required to adhere to Mitigation Measure **MM UTIL-1** which requires there be adequate capacity to any downstream sewer mains as determined needed by CVWD. However, impacts would be considered greater and would be potentially significant.

Electricity, Natural Gas, and Communication Infrastructure

This alternative would result in more development throughout the RCA than the EHNCP which would result in an increased demand for electricity, natural gas, and communication services and infrastructure. The extension of services throughout the RCA would require much more construction than the proposed Plan and would result in greater impacts than the extension of those services to the NA with the Plan. There would also be an increase in services needed during operation of this alternative. Impacts would be greater than the proposed Plan.

Solid Waste

No portions of the RCA are currently provided solid waste collection services and services would need to be extended throughout the RCA. Since this alternative has a greater number of units when compared to the proposed Plan, solid waste generation would also increase. Overall, impacts to solid waste under this alternative would be greater than those under the proposed Plan due to an increase in the amount of construction for solid waste infrastructure, and the increase in solid waste generation.

Summary of Impacts

Implementation of this No Project Alternative would increase environmental impacts when compared to the Plan. At the same time, all of the objectives would not be fully realized under this Plan. As summarized in **Section 4.0: Environmental Analysis** of this Draft EIR, most environmental impacts of the Plan that are less than significant or can be reduced to less than significant levels through adherence to regulatory requirements, incorporation of design features, and the implementation of mitigation measures. However, under the Plan, impacts related to air quality, biological resources, mineral resources, population and housing, and transportation and traffic would be significant and unavoidable

due to no feasible mitigation to reduce impacts to a less than significant level. Under this alternative, impacts to mineral resources would be considered less when compared to the Plan. Impacts to cultural and tribal resources would be considered similar under this alternative. Impacts to aesthetics; air quality; biological resources; cultural and tribal resources, energy; geology and soils; greenhouse gas emissions; hazards and hazardous materials; hydrology and water quality; land use and planning; noise; population and housing; public services and recreation; transportation and traffic; and utilities and service systems would be greater under this alternative when compared to those for the Plan. A summary of impacts is provided in **Table 5.0-1: Comparison of Alternatives to the Project**.

Relationship to Project Objectives

In addition to overall greater impacts associated with this Alternative, the following Project objectives would not be achieved:

- Conserve the natural resources and open space character of this unique foothill area because the RCA would be developed with approximately 3,500 to 4,500 homes thereby greatly reducing the potential for conservation of natural resources;
- Establish local control by annexing this area to the City and adopting a community-based plan that meet the City's high-quality standards, because this alternative would leave control with the County of San Bernardino;
- Provide a range of open space and park areas offering a range of recreation opportunities, because the conversion of undeveloped lands to residential development in the RCA would greatly diminish both open space and recreational opportunities;
- In the NA, provide for the development of high-quality, single-family neighborhoods with a range of housing opportunities- including equestrian-oriented housing - that are compatible in character with the existing surrounding neighborhoods because this alternative would not allow for development of residential uses in the NA other than 120 to 200 residences in Sub-Area 1, south of Banyan Street and west of Milliken Avenue, the area currently in the City of Rancho Cucamonga and zoned Low Medium Residential.;
- Improve access to the existing and new foothill neighborhoods by extending, connecting and improving Wilson Avenue, Rochester Avenue, and Milliken Avenue, and providing a network of walkable and bikeable neighborhood streets because the County's General Plan designates the NA as Floodway and would not permit any development in this area;
- Enhance fire safety throughout the Plan Area, in particular reduce wildfire hazard to existing and new neighborhoods, because the greatly increased residential uses in the RCA in a high fire hazard zone would directly conflict with this objective, and also increase risks by leaving the NA undeveloped, therefore placing homes in an area surrounded by unmaintained vegetation, or potential wildfire fuel;

- Provide a limited amount of small-scale neighborhood shops and restaurants to meet the daily needs of residents in the existing and future foothill neighborhoods because this alternative does not provide for small-scale neighborhood shops and restaurants.

5.5.2 Alternative 2—County Development of NA Alternative

The proposed County Development of NA Alternative would ensure the County meets its fiduciary responsibility to sell their surplus land for a reasonable price. This alternative allows for development within the City under the guiding General Plan land use designations and densities in the NA. This alternative would have the following characteristics:

1. The City does not prepare a new plan or annex any County land.
2. The County's General Plan for the RCA would not be amended and would allow the development of approximately 3,500 to 4,500 residential units in the RCA as described and evaluated as the No Project Alternative.
3. Under this alternative, development of the NA is assumed to occur after the County sells their surplus property as was proposed in response to the County's 2008 request for proposals. Based on recent market studies and current products for sale in Rancho Cucamonga, a likely average residential density would be around 8 units per net acre or 6 units per gross acre. At that density, a neighborhood development of 900 acres would yield 5,400 residences. The proposals received in 2008 also included a neighborhood-serving commercial "main street" thus up to 160,000 s.f. of commercial use is also assumed. Refer to **Figure 5.0-2: Alternative 2—County Development of NA** for the illustrative site plan for this alternative. Approximately 120 to 200 residences would be expected in Sub-Area 1, south of Banyan Street and west of Milliken Avenue as this area is already in the City of Rancho Cucamonga and zoned Low Medium Residential. Refer to **Figure 3.0-1: General Plan Land Use Map** in **Section 3.0: Environmental Setting**, which shows the City's current land use designations.

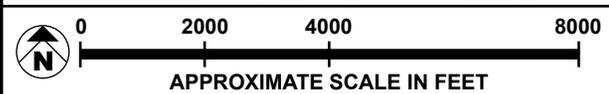
Aesthetics

With this Alternative, substantially greater development, approximately 3,500 to 4,500 homes, would be allowed in the foothill area above Rancho Cucamonga in the RCA, and 5,400 homes and commercial area would be developed in the NA. This level of development would significantly impact views of scenic vistas, scenic resources, and visual character within the RCA, unlike the Plan, which would allow for less than 100 homes in this area, resulting in less than significant aesthetic impact through compliance with the EHNCP Plan, City's General Plan, and compliance with the CBC. In addition, under this alternative, a significant amount of light and glare would be introduced with new roadways, and associated vehicle headlights and streetlighting, as well as greatly increased residential and commercial lighting and glare into an area largely dark due to the undeveloped nature of the hillsides. Further, with this Alternative, the visual character would greatly change from scenic undeveloped hillsides to large tracts of residential

1. Golf Park
2. Sports Park
3. Linear Park (Equestrian Trail Optional)
4. Neighborhood Park
5. Main Street Park
6. Mitigation Land
7. High School
8. Police Station
9. Main Street
10. Neighborhood
11. Retail
12. Public / Civic
(Options may include Community Center, Library, YMCA, Senior Center, Winery)



City Boundary



SOURCE: DUDEK - 2019; Sargent Town Planning - 2019

FIGURE 5.0-2

uses in the RCA. With this alternative and the Plan, development of new residential neighborhoods, neighborhood-oriented shops and restaurants and supporting public facilities in the NA would occur. Residential development under the Plan and this alternative in the NA would be located between the residential neighborhoods of Rancho Etiwanda and the Deer Creek and Haven View Estates neighborhoods, and consistent in visual character, however this alternative would allow for far denser residential development in the NA, roughly 2,400 more homes. Overall visual resource impacts in the RCA and NA under this alternative would be significant even with implementation of City or County ordinances and standards and guidelines established within each guiding Specific Plan.

Air Quality

This alternative would result in a greater amount of residential development with approximately 8,900 to 9,900 units developed throughout the RCA and NA which would result in increased air pollutant emissions from construction and operation. This alternative would include more building construction within the Plan Area as there would be more proposed uses when compared to the Plan. Similar to the Plan, this alternative would comply with SCAMQD Rule 403 for Fugitive Dust as well as comply with SCAQMD and CARB rules for the Plan during other construction activities. Similar to the Plan, exceedances would occur if concurrent grading and building in each individual phase were to take place. Implementation of Mitigation Measure **MM AQ-2** would develop the Plan over phases to minimize concurrent development. In addition, implementation of Mitigation Measure **MM AQ-1** would require the use of Tier 3 off-road diesel-powered construction equipment equipped with any emissions-control device such as a Level 3 DPF. With implementation of these measures, impacts related to construction air quality would remain less than significant for all criteria pollutants and localized pollutant concentrations during construction; however, when compared to the Plan, would result in increased emissions due to the greater areas of construction.

The proposed Plan's air quality impacts during operation were determined to be significant and unavoidable with mitigation due to the increase number of mobile emissions that would be generated within the Plan Area. In regard to operations, this alternative would emit more air quality operational emissions compared to the Plan as there would be an increase in total proposed development and additional trips from 8,900 to 9,900 residences. Consequently, this alternative would result in increased emissions with respect to regional criteria pollutants when compared to the Plan. Similar to the Plan, operational emissions would be potentially significant and unavoidable.

Biological Resources

With this alternative, impacts to biological resources in the RCA would be substantially greater than those with the Plan, which would preclude preservation and habitat conservation for numerous species,

including critical habitat for SBKR in the RCA. This Alternative would allow for approximately 3,500 to 4,500 residences in the RCA; as compared to the EHNCP which implements the City's General Plan in the RCA and supplements the City's existing hillside development regulations by limiting the number of homes permitted in the RCA and defining additional development standards. The introduction of this level of development in the RCA would result in greater wildlife migration impact than that of the Plan. Development in the RCA would be no more than 100 residences, and the Plan also includes a Conservation and TDR Program allowing for the voluntary transfer of residential density from privately-owned properties in the RCA to the NA in exchange for financial or other negotiated compensation to the RCA property owner. The number of residential units that may be transferred from the RCA parcel to a NA phase/Sub-Area is the number of units that could be developed on the RCA parcel considering the maximum density allowed based on the zone, slope, and other environmental constraints (e.g., fault zone, wildfire and Wildland-Urban Interface (WUI), riparian or streambed environs, flood zone, etc.), and thereby reducing the potential for significant impacts to biological resources. Development of these residences would be subject to the guidelines and independent environmental review and mitigation in accordance with the Plan. While development under the Plan would result in significant impacts to biological resources in the RCA, these impacts would be associated with development of a maximum of 100 homes if constructed, and if desired conservation lands are not acquired. Impacts associated with habitat modification; species identified as a candidate, sensitive, or special-status; and jurisdictional aquatic resources within the NA under Plan implementation are considered potentially significant if mitigation within the RCA is not feasible. Biological resource impacts in the NA would be significant with this alternative and would not allow for conservation in the RCA, thereby resulting in substantially greater impacts.

As previously discussed, biological resource impacts of the Plan associated with development of the NA were found to be significant even with compliance with the existing regulations, Mitigation Measures **MM BIO-1** through **MM BIO-9**, preservation of open space, development standards and the provisions outlined in the Specific Plan. Impacts to jurisdictional features and SBKR habitat in the NA would be considered significant if unmitigated without the necessary acreage conservation within the RCA. Similar to the Plan, significant impacts to SBKR habitat and jurisdictional features would occur, yet for land in the RCA under the No Annexation, County Proceeds Alternative would not benefit from conserving land within the RCA and would result in significant impacts.

Cultural and Tribal Resources

Under this alternative, more development in both the RCA and NA would occur than compared to the Project. Based on the results of the records searches, six archaeological resources within the NA. The Project involves grading which has the potential to disturb subsurface cultural and Tribal cultural

resources that might be present within the NA. The Project would result in less than significant impacts on cultural and Tribal cultural resources through the implementation of Mitigation Measures **MM TCUL-1** and **MM TCUL-2**. Given that this alternative would involve much greater disturbance of subsurface soils and overall graded acres, the potential disturbance to cultural and Tribal cultural resources would not be avoided. In regard to historic resources, the Project would result in less than significant impacts on historic resources because none of the buildings on the Project Site are listed or eligible for listing in either the National Register of Historic Places (National Register) or the California Register of Historic Resources (California Register). Implementation of this alternative would not result in the demolition of any buildings within the Plan Area, however the potential for undiscovered buried historic artifact remains. Given the substantially greater land disturbance and grading that would occur under this alternative, potential impacts on cultural and historic resources would be equally greater. However, these impacts would be less than significant with implementation of mitigation.

Energy Conservation

Under this alternative, 5,400 homes would be developed in the NA and approximately 3,500 to 4,500 units would be developed throughout the RCA which would result in an increased demand for electricity, and natural gas consumption for both construction and operation. While these services are available, the extension of services into both the NA and the RCA to accommodate the development included in this Alternative would be much greater than those of the Project. The Plan is considering not only energy measures that meet regulatory compliance of local, State, and federal regulations but would also include measures for water and energy conservation, water quality, green building practices, urban agriculture or community gardens integrated into neighborhood and building design, which this alternative would not meet all of these encompassing features. However, this alternative would be constructed and designed in accordance with the most current version of Title 24, California's Energy Efficiency Standards for buildings and the State Energy Conservation Standards. These standards include minimum energy efficiency requirements related to building envelope, mechanical systems (e.g., HVAC and water heating systems), indoor and outdoor lighting, and illuminated signs. This alternative would have an increased fuel consumption due to having additional residences compared to the Plan. As such, the overall impacts of this alternative would be greater as compared to the Plan due to increased energy consumption and the lack of all the energy efficient measures listed above. However, this alternative would still be less than significant as it would continue to follow local, State, and federal regulatory compliance for energy standards and therefore would not cause wasteful, inefficient, and unnecessary consumption of energy during construction or operation.

Geology and Soils

This alternative would have a greater number of units than the Plan and would therefore result in more development in portions of both the RCA and NA where there is indication of significant impacts to geology and soils. The Plan would result in less than significant impacts related to geology and soils through compliance with the CBC, and incorporation of the Mitigation Measures **MM GEO-1** through **MM GEO-11** presented in the Geotechnical Report (see **Appendix G** of this Draft EIR). As stated previously, this alternative would result in more development near more expansive soils and fault lines, and therefore could exacerbate existing environmental conditions associated with seismic fault rupture, strong seismic ground shaking, liquefaction, landside/lateral spreading, seismic-induced settlement, subsidence soil stability, expansive soils, or acceleration of geologic hazards. It is assumed that this alternative would comply with existing local and State codes for building design. As such, this alternative would have greater than the Plan's less than significant impacts with mitigation for geology and soils due to the increased development, but would remain less than significant with mitigation.

Greenhouse Gas Emissions

Under this alternative, GHG emissions from construction and after development would occur as approximately 8,900 to 9,900 units would be developed in the RCA and NA. New GHG emissions that would be generated from construction activities would be greater than would result from implementation of the EHNCP. Daily trips associated with this alternative, upon which the calculations of GHG emissions are mainly based, would be greater as 8,900 to 9,900 residences would generate an increased amount of trips. However, similar to the Plan, this Alternative would be required to comply with all County requirements, including SCAGs 2016–2040 RTP/SCS related to growth forecasts and consistent with the VMT reduction strategies and policies. However, similar to the Plan, with implementation and enforcement of Mitigation Measures **MM GHG-1** through **MM GHG-3**, impacts would remain significant and unavoidable.

Hazards and Hazardous Materials

Under this alternative, there would be potential to create upset or accident conditions involving the release of hazardous materials into the environment during either construction or operation. For construction activities, similar to the Plan, all potentially hazardous materials would be used and stored in compliance with applicable federal, State, and local regulations.

Only two sites were identified within one mile of the Plan Area that are on a list of hazardous materials pursuant to Government Code 65962.5, which is the Hazardous Waste and Substances (Cortese) List.⁹ DTSC has determined that both these sites received DTSC concurrence that no further action is required. However, similar to the Plan, this alternative would not include release of subsurface hazardous substances to the environment or expose future occupants or site users to hazardous materials. Prior to any construction activities, similar to the Plan, this alternative would incorporate Mitigation Measures **MM HAZ-1** through **MM HAZ-3** to reduce any potential impacts to less than significant levels for hazardous substances and wildfires. Prior to construction activities, any structures potentially containing hazardous materials should be inspected. Therefore, this alternative would result in similar impacts as the Plan, which are less than significant with mitigation.

Most of the land within the Plan has been identified by Cal Fire as a very high fire hazard severity zone. The entire area of the Plan is within the Rancho Cucamonga Fire District's designated Wildland-Urban Interface Fire Area (WUIFA). Under this alternative, 5,400 homes would be developed in the NA and approximately 3,500 to 4,500 units would be developed throughout the RCA. This alternative, like the Plan, would introduce residential and commercial uses, and expose people to wildfire impacts. As far as wild fire, this alternative may result in greater impacts due to the RCA area be more readily impacted by fires. In addition, the RCA would not be bordered on three sides by existing development, as is the case with proposed development in the NA. Mitigation measures Mitigation Measures **MM HAZ-4** and **MM HAZ-5** would reduce impacts under this alternative, like the Plan, to less than significant. However, for the reason above, this alternative would result in greater wildfire impacts.

Hydrology and Water Quality

This alternative would involve more development throughout the Plan Area than would occur with the EHNCP. This would result in more grading of the entire Plan Area site. However, the grading would still temporarily increase the bare soil area during construction, which may increase soil erosion and sedimentation in stormwater runoff. In addition, construction could contribute other pollutants to stormwater drainage. Like the Plan, this alternative would be required to comply with NPDES and implement a SWPPP with BMPs in addition to supplying this alternative would be required to provide infiltration basins per County requirements, thereby making impacts to runoff less than significant. Impacts would be similar under this alternative as the Plan.

9 State Water Resources Control Board (SWRCB), GeoTracker (2015), database, accessed February 12, 2018, <https://geotracker.waterboards.ca.gov/map/>.

Under this alternative, development of the NA is assumed to occur after the County sells its surplus property. Based on recent market studies and current products for sale in Rancho Cucamonga, a likely average residential density would be around 8 units per net acre or 6 units per gross acre. At that density, a neighborhood development of 900 acres would yield 5,400 residences. Like the Plan, it is assumed that under this alternative that the on-site drainage facilities would be sized to the predevelopment Qs thus preventing any increased amounts of runoff. In addition, on-site drainage features would include street side bioswales, park ponds, greenways, and conventional detention ponds which would remove pollutants from any on-site runoff. This portion of the alternative would result in similar impacts within the NA under the Plan.

The location of the RCA along the base of the San Gabriel Mountains also places it in the region's natural hydrologic system, with many creeks flowing south toward Rancho Cucamonga. The western half of the RCA includes portions of the 100-year flood plain. In the RCA, this alternative would allow for the development of 3,500 to 4,500 dwelling units, including development within the 100-year floodplain located in the RCA. This alternative would result in greater impacts the existing hydrology and water quality of the area than the EHNCP.

Land Use and Planning

This alternative would require an amendment to the County General Plan to allow development of the County's surplus property as this area is currently designated Floodway and Open Space, designations that do not allow development. Development of up to 5,400 residential units in the NA would result in less compatible pattern of development than the EHNCP, which would limit development in the NA to 2,900 units, with a maximum of 3,000 units if development rights from the RCA are transferred to the NA through the Conservation and TDR Program included in the EHNCP. Land Use impacts would be greater with this alternative due to the increase in the amount of development in both the RCA and the NA.

Mineral Resources

Under this alternative, both the NA and the RCA would have more development compared to the Plan. The NA would consist of approximately 5,400 residential units while the RCA would be permitted to allow for 3,500 to 4,500 units.

Since both the NA and RCA would be able to be developed, all three aggregate resources zones within the EHNCP would be impacted. Impacts under this alternative would be much greater than the proposed Plan and significant and unavoidable.

Noise

Under this alternative, more construction would occur in both the RCA and NA. As such, the alternative would not eliminate the Plan's potentially significant noise impacts during construction, but would change the location of impacts. Implementation of Mitigation Measures **MM N-1** and **MM N-2** to reduce impacts for nearby sensitive receptors. These mitigation measures would provide noise abatement during construction near adjacent sensitive receptors. Similar to the Plan, with the implementation of mitigation, impacts under this alternative would be less than significant.

Operational noise would be generated by people using outdoor spaces, vehicles, roadway noise, and building equipment. Similar to the Plan, this alternative would result in an increase in operational noise compared to existing conditions and the number of daily trips to and from the Plan Area. This alternative would also result in a greater amount of population growth with development of approximately 8,900 to 9,900 residences throughout the RCA and NA.

Similar to the proposed Plan, the dominant noise source on the southeast and southwest corners of the Plan Area include the SR-210 freeway. With implementation of Mitigation Measure **MM N-3**, the incorporation of architectural features (such as a sound wall adjacent to the SR-210 freeway) would ensure that residential habitable rooms facing the freeway have interior noise levels of 45 dBA or less, as required by the CBC. As such, operational impacts under this alternative would be similar to that of the proposed Plan and would be less than significant with mitigation.

Population and Housing

Under this alternative, there would be an increase in dwelling units and associated increase in population compared to the Plan as approximately 8,900 to 9,900 residential units and 26,967 to 29,997 residents, respectively. This would result in an increase of up to 6,900 residential units and 20,907 residents under this alternative compared to the EHNCP. The population growth associated with County development of the NA is not accounted for in SCAG's adopted 2016–2040 and draft 2020–2045 Regional Growth Forecasts; thus, the impact of this growth under this alternative would also be considered significant and unavoidable, similar to the Plan. As this increase in residential units and associated population would represent a greater percentage of total growth in the County through 2040 compared to the Plan, overall impacts of this alternative would be greater as compared to the Plan, and would be significant and unavoidable.

Public Services and Recreation

As discussed above, under this alternative, there would be an increase in dwelling units and associated increase in population compared to the Plan. Therefore, this alternative would generate a greater demand for public services and recreation facilities.

Fire Protection

Similar to the Plan, this alternative would have consultation with the RCFPD to ensure that it would be adequately served by the existing fire stations and no new or altered facilities would be needed to serve the uses that would be allowed. All development within the area would be reviewed by the RCFPD for compliance. Since this alternative would allow for a greater increase in fire service, impacts to fire protection would be greater than those of the Plan.

Police Protection

Similar to the Plan, this alternative would comply with Chapter 3.64, Police Impact Fee, of the RCMC, which is collected to fund new facilities, vehicles, and equipment, and any fees established through a Community Facilities District. This alternative would also have consultation with RCPD to ensure adequate service provided from existing Sheriff's department facilities. However, this alternative would not include a police substation as part of the planned Joint Use Public Facility which would provide additional facilities to meet additional service needs. Since this alternative would allow for a greater increase in police service, impacts to police protection would be greater than those of the Plan.

Schools

Similar to the Plan, the need for additional school facilities and related services is addressed through compliance with the school impact fee assessment. The ALSD, ESD, and CJUHSD would be able to collect these school impact fees for proposed development in the Plan Area and for future developments. Therefore, if the ALSD, ESD, and CJUHSD are not able to adequately serve a larger future population, they would have funds to acquire land for future schools. Since this alternative would allow for a greater service population, impacts to schools would be greater than those of the Plan.

Libraries

Similar to the Plan, this alternative would address library impacts through the Library Impact Fee where revenue from the impact fees can be used for, but would not be limited to land acquisition, site improvements, building construction/expansion, interior building improvements, furniture fixtures and equipment. However, this alternative would not include a Joint Use Public Facility which would provide

additional library facilities to meet additional service needs within the Plan Area. Since this alternative would allow for a greater service population, impacts to libraries would be greater than those of the Plan.

Parks and Recreation

Similar to the Plan, this alternative would need to meet the City's established standard of 5.0 acres per 1,000 residents. However, this alternative would not include the amount of open space, parkland, and recreation facilities that are proposed with the Plan. Therefore, since this alternative would have a greater service population and less proposed facilities, impacts to parks and recreation would be greater than those of the Plan.

Transportation and Traffic

Under this alternative, there would be more residential development within the Plan Area. The Plan would result in less than significant intersection impacts through implementation of a Mitigation Measures **MM TRAF-1** through **MM TRAF-3**, but would still have significant and unavoidable impacts for freeway mainlines due to no feasible mitigation as part of the Plan. These street improvements and mitigation measures would be necessary as part of the design to meet regulatory and circulation needs for the proposed population growth and vehicular travel. Under this alternative, there would be a further need for street improvements to meet these needs for a higher associated VMT. In addition, construction impacts for traffic would be greater as the Plan will include a Master Fire Protection Plan for the entire Plan Area and neighborhood specific fire protection plans for the proposed phases of construction. As such, this alternative would have greater impacts than the Plan due greater traffic volumes, and impacts would be significant and unavoidable.

Utilities and Service Systems

The proposed Plan would allow for the development of 2,900 units in the NA area and would permit the development of up to 100 residences on private property in the RCA. Up to 3,000 units could be developed in the NA if development rights from the RCA are transferred to the NA through the TDR Program the Plan would establish.

Under this alternative, 5,400 homes would be developed in the NA and approximately 3,500 to 4,500 units would be developed throughout the RCA.

Water

Under this alternative, portions of the RCA would already be within the CVWD service boundary area and portions would be outside the service area boundary. This alternative would have a greater number

of units than the Plan, and would have an even higher demand on CVWD which may be considered potentially significant. Additionally, CVWD would need to extend water improvements to the RCA or water wells would need to be drilled to service the properties, either of which would have greater construction impacts than the proposed Plan. Wadeable Streams Assessment (WSA) prepared by CVWD concluded available water supplies are sufficient to meet the demands of the 3,000 residential uses and other uses that would be allowed by the Plan but nor surplus water would be available. CVWD can purchase additional MWD Tier II water and also has rights to pump additional groundwater in the Cucamonga Basin. Since this alternative would allow for large developments within both the NA and the RCA, the estimated water usage would greatly increase and may exceed available water supplies. Impacts to water supply and infrastructure would be greater than with the Plan as proposed and potentially significant.

Wastewater

Under this alternative, portions of the RCA would already be within the IEUA service boundary area and portions would be outside the service boundary area. Since this alternative would have a greater number of units than the Plan, estimated wastewater generation would also be greater. Additionally, IEUA would need to extend sewer improvements to the portions of the RCA not currently served, the construction of which would be much greater than the proposed Plan. This alternative would likely still be required to adhere to Mitigation Measure **MM UTIL-1** which requires there be adequate capacity to any downstream sewer mains as determined needed by CVWD. However, impacts would be greater than those of the plan and potentially significant.

Electricity, Natural Gas, and Communication Infrastructure

This alternative would result in more development throughout the RCA than the EHNCP which would result in an increased demand for electricity, natural gas, and communication infrastructure. The extension of services throughout the RCA would result in greater impacts than the extension of those services to the NA with the Plan. Impacts would be considered potentially significant.

Solid Waste

This alternative would require solid waste services be extended to serve throughout the RCA. Additionally, since this alternative would allow for large developments within the NA and the RCA, solid waste generation would also increase greatly. Overall, impacts to solid waste under this alternative would be greater than those under the proposed Plan, and potentially significant.

Summary of Impacts

Implementation of this alternative would increase environmental impacts when compared to the Plan as the vast majority of the Plan Area would be developed with urban uses and very little additional open space would be acquired and conserved. At the same time, all of the objectives would not be fully realized under this Plan. As summarized in **Section 4.0: Environmental Analysis** of this Draft EIR, most environmental impacts of the Plan that are less than significant or can be reduced to less than significant levels through adherence to regulatory requirements, incorporation of design features, and the implementation of mitigation measures. However, under the Plan, impacts related to air quality, biological resources, greenhouse gas emissions, mineral resources, population and housing, and transportation and traffic would be significant and unavoidable due to no feasible mitigation to reduce impacts to a less than significant level. Under this alternative, impacts to land use and planning would be reduced. Impacts to aesthetics; air quality; biological resources; cultural and tribal resources; energy; geology and soils; greenhouse gas emissions; hazards and hazardous materials; land use and planning; mineral resources; noise; population and housing; public services and recreation; transportation and traffic; and utilities and service systems would be greater under this alternative when compared to those for the Plan. A summary of impacts is provided in **Table 5.0-1**.

Relationship to Project Objectives

In addition to overall greater impacts associated with this Alternative, the following Project objectives would not be achieved:

- Conserve the natural resources and open space character of this unique foothill area, because the RCA would not be preserved, but would be developed with up to 4,500 homes;
- Establish local control by annexing this area to the City and adopting a community-based plan that meet the City's high-quality standards, because this alternative would leave the RCA and majority of the NA under control of the County;
- Provide a range of open space and park areas offering a range of recreation opportunities because this alternative would fully develop the RCA and NA with residential uses, without conservation of the majority of the RCA;
- In the NA, provide for the development of high-quality, single-family neighborhoods with a range of housing opportunities- including equestrian-oriented housing - that are compatible in character with the existing surrounding neighborhoods, because the housing density in the NA would be too great to allow for equestrian-oriented housing;

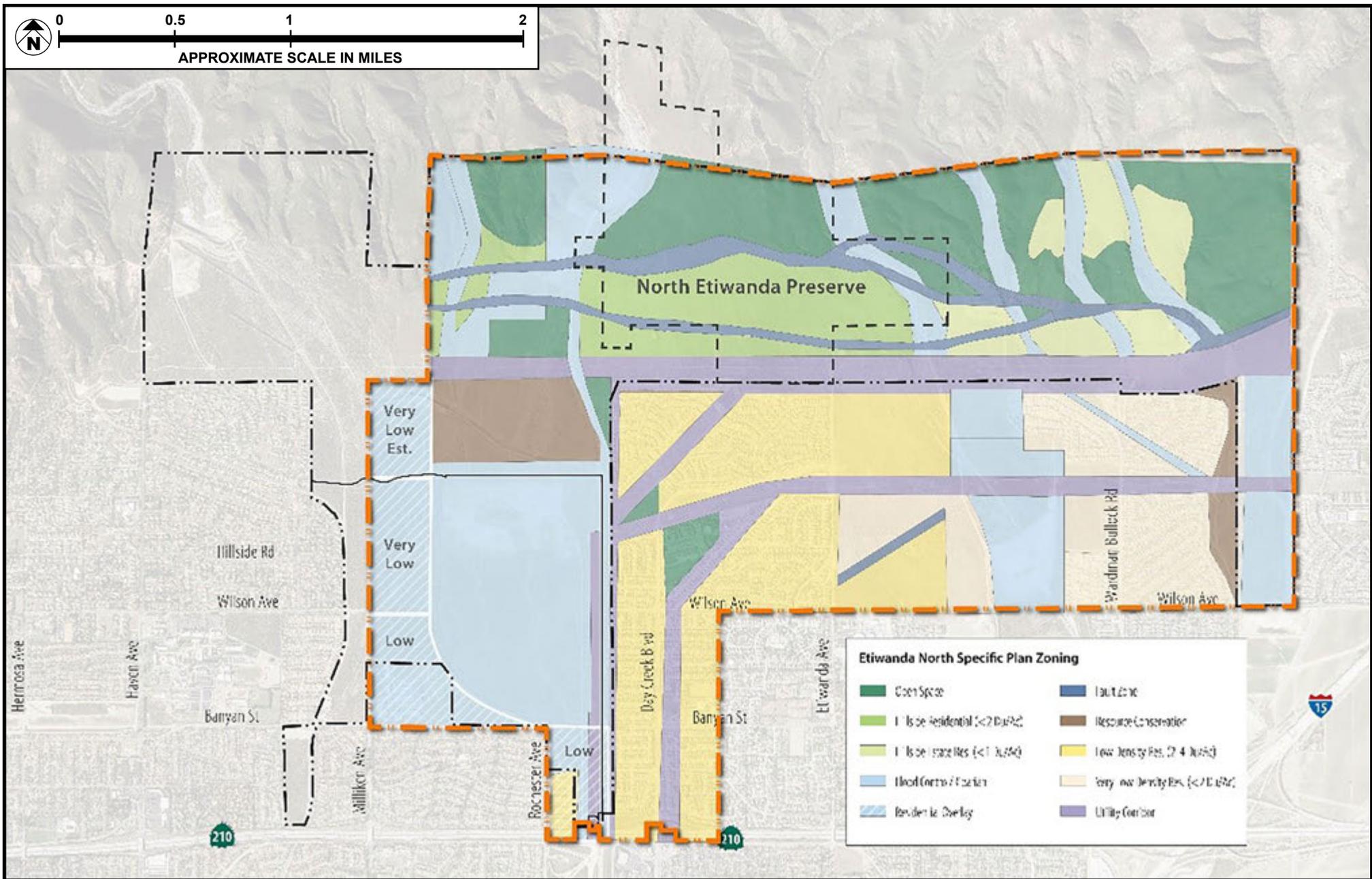
5.5.3 Alternative 3—Annexation Under Current City Plans Alternative

This alternative considers annexation without the approval of the EHNCP as proposed. The area would be regulated under the City's existing General Plan and the ENSP, which covers the majority of the Plan

Area, excluding the portion west of Milliken Avenue, which would be regulated under the City's current General Plan, with consistent zoning adopted for this area.

This alternative would assume the same land use map for the RCA as the EHNCP but would not allow for the transfer development rights or rural clustering standards in the majority of the developable portion of the RCA, and as such, would allow for approximately 150 homes in the RCA. Additionally, the proposed rural development standards would reduce the overall footprint of development for each individual future home site. Refer to **Figure 5.0-3: Alternative 3—Annexation Under Current City Plans**, which shows the ENSP Land Use Map. This alternative would have the following characteristics:

1. Within the NA, the area north of the Diversion Levee is zoned Resource Conservation (RC) by the ENSP and would not allow new residential development.
2. Within the NA in the area south of the Diversion Levee and east of the flood control channel, the Flood Control (FC) zoning would be removed now that the land is no longer needed for flood control purposes, however the future land use designation is RC, so no new housing would be allowed in this area.
3. Within the NA in the area south of the Diversion Levee and west and south of the flood control channel, the FC zoning would be removed now that the land is no longer needed for flood control purposes, and the ENSP Residential Overlay would apply. The land use designations identified by ENSP in the Residential Overlay are Low Density Residential (2-4 du/ac), Very Low Density Residential (<2 du/ac), and Very Low Residential Estate (1 du/ac). A portion of the area south of Banyan Street is zoned Low Density Residential by the ENSP. This zoning would allow for residential development similar to the neighborhoods to the east, which were also developed under the low and very low-density residential zoning designation of the ENSP.
4. Within the area outside the ENSP, south of Banyan Street and west of Milliken Avenue, the City's existing zoning of Low Medium Residential would apply.
5. Development of the following amounts of housing would be allowed with the alternative:
 - FC (VLE) area = 85 acres x 1 = 85 DU (ENSP)
 - FC (VL) area = 85 acres x 2 = 170 DU (ENSP)
 - FC (L) area = 86 acres x 4 = 344 DU (ENSP)
 - LM area = 28 acres x 8 = 224 DU (Zoning)
 - Total capacity for the NA= 823 DU (2.9 DU/acre)
6. In addition, 28 acres of neighborhood commercial development would be expected based on the ENSP Neighborhood Commercial Floating Zone, which has not been developed in other areas of the ENSP. This alternative would allow for up to 150 homes in the RCA and 823 homes in the NA.



SOURCE: DUDEK - 2019; Sargent Town Planning - 2019

FIGURE 5.0-3

Aesthetics

Under the Annexation Under Current City Policy/Regulations Alternative, roughly 150 homes would be allowed in the foothill area above Rancho Cucamonga, and roughly 823 homes in the NA. This level of development would incrementally increase impacts to views of scenic vistas, scenic resources, and visual character within the RCA, commensurate with the increased number (50 more homes) of homes in the RCA, and would result similar impacts in the NA, with the exception of views of open space within the NA. However, these impacts would be less than significant through compliance with the guiding plan, City's General Plan, and compliance with the CBC. In addition, under this alternative, an increased amount of light and glare would be introduced with new roadways, and associated vehicle headlights and streetlighting, as well as increased residential lighting and glare into an area largely dark due to the undeveloped nature of the hillsides. Further, with this Alternative, the visual character would change from scenic undeveloped hillsides to incrementally more residential uses in the RCA, similar to the Project, but with up to 50 more homes. With this alternative and the Project, development of new residential neighborhoods in the NA would occur. Residential development under the Project and this alternative in the NA would be located between the residential neighborhoods of Rancho Etiwanda and the Deer Creek and Haven View Estates neighborhoods, and consistent in visual character. Overall visual resource impacts in the NA under the Project and for this alternative would be less than significant with implementation of City ordinances and standards and guidelines established within each guiding Specific Plan, however, under this alternative greater visual resource impacts commensurate to the increase residential development in the RCA would occur.

Air Quality

This alternative would have a reduced amount of residential development which would result in reduced air pollutant concentration for construction and operation. Similar to the Plan, this alternative would be required to comply with SCAMQD Rule 403 for Fugitive Dust as well as comply with SCAQMD and CARB rules for the Plan during other construction activities. Impacts related to construction air quality would remain similar and less than significant for all criteria pollutants and localized pollutant concentrations during construction.

The Plans air quality impacts during operation were determined to be significant and unavoidable with mitigation due to the increase number of mobile emissions that would be generated within the Plan Area. In regards to operations, this alternative would emit less air quality operational emissions compared to the Plan as there would be a decrease in total proposed building area and trips from the 823 homes in the NA and 150 homes in the RCA. Consequently, the development of this quantity would still result in increased mobile emissions and thus would be potentially significant, but less impactful than the Plan.

Biological Resources

Under the Annexation Under Current City Policy/Regulations Alternative, impacts to biological resources in the RCA would be significant, as with the proposed Plan; however, with reduced residential development in the NA, lesser impacts than the Project would occur. Both this alternative and the Project implement the City's General Plan in the RCA and supplement the City's existing hillside development regulations by limiting the number of homes permitted in the RCA and defining additional development standards. This alternative, however, does not include the Conservation Incentive TDR Program allowing for the voluntary transfer of residential density from privately-owned properties in the RCA to the NA in exchange for financial or other negotiated compensation to the RCA property owner. The number of residential units that may be transferred from the RCA parcel to a NA phase/Sub-Area is the number of units that could be developed on the RCA parcel considering the maximum density allowed based on the zone, slope, and other environmental constraints (e.g., fault zone, wildfire and WUI, riparian or streambed environs, flood zone, etc.), and thereby reducing the potential for significant impacts to biological resources. Development of these residences under this alternative and the Plan would be subject to the guidelines and independent environmental review and mitigation in accordance with guiding specific plans. Development under the Plan would result in potentially significant impacts to biological resources in the RCA and the NA. Further, under this alternative and the Plan impacts associated with habitat modification, species identified as a candidate, sensitive, or special-status, and jurisdictional aquatic resources within the NA are considered potentially significant if mitigation within the RCA is not feasible. Biological resource impacts in the NA would be significant with this alternative, although less than the Plan, and would allow for less conservation in the RCA with the increased number of homes allowed in the hillsides.

As previously discussed, biological resource impacts of the Plan associated with development of the NA were found to be significant even with compliance with the existing regulations, Mitigation Measures **MM BIO-1** through **MM BIO-9**, preservation of open space, development standards and the provisions outlined in the Specific Plan. Under this alternative and the Plan, impacts to jurisdictional features and SBKR habitat in the NA would be considered significant if unmitigated without the necessary acreage conservation within the RCA. Similar to the Plan, significant impacts to SBKR habitat and jurisdictional features would occur. However, this alternative would not benefit from conserving as much land within the RCA as the Plan and would result in significant impacts.

Cultural and Tribal Resources

Under this alternative, development in the RCA and NA would occur. Based on the results of the records searches, eighteen potential resources are recorded within the RCA and six archaeological resources within the NA. This alternative involves grading which has the potential to disturb subsurface cultural

and Tribal cultural resources that might be present within the area. The alternative, similar to the Plan, would result in less than significant impacts on cultural resources through the implementation of Mitigation Measures **MM TCUL-1** and **MM TCUL-2**. Given that this alternative could involve disturbance of subsurface soils, the potential disturbance to cultural and Tribal cultural resources would not be avoided. However, with increased grading and development in the RCA, an increased potential for disturbing cultural and Tribal cultural resources would occur. Conversely, this alternative would result in a reduced potential for disturbance of cultural and tribal resources in the NA given the reduced amount of grading and development allowed. In regard to historic resources, this alternative and the Plan would result in less than significant impacts on historic resources because the majority of the previously recorded resources located within the RCA consist of historic era homestead structures, water conveyance systems, remnants of mining operations, and transmission lines. None of these resources (isolates or site) in the NA were found to contain information that would qualify them for a finding of significance and/or eligibility for listing in the CRHR under any significance criteria. Implementation of this alternative would not result in the demolition of any buildings within the Plan Area. While impacts on cultural and Tribal cultural and historic resources would be less than significant under the Project, impacts would be similar when compared to the Project, and would be less than significant with mitigation.

Energy Conservation

This alternative would have a lower number of units than the Plan and would therefore result in a decreased demand for electricity and natural gas consumption for both construction and operation. Similar to the Plan, the extension of services would be similar, or possibly less, than those of the Plan due to less connections needed. While the Plan would result in less than significant impacts with regard to energy, the energy efficiency that would come with the new high-performance building design and conservation measures of the Plan would not be fully realized. The Plan is considering not only energy measures that meet regulatory compliance of local, State, and federal regulations but would also include measures for water and energy conservation, water quality, green building practices, urban agriculture or community gardens integrated into neighborhood and building design, which this alternative would not meet all of these encompassing features. However, this alternative would be constructed designed in accordance with the most current version of Title 24, California's Energy Efficiency Standards for buildings and the State Energy Conservation Standards. These standards include minimum energy efficiency requirements related to building envelope, mechanical systems (e.g., HVAC and water heating systems), indoor and outdoor lighting, and illuminated signs. In addition, this alternative would produce less VMT due to a decreased vehicular traffic from less development than the Plan, thus there would also be a decrease in overall consumption of transportation fuel. Therefore, overall impacts of this alternative would be less as compared to the Plan and would be less than

significant as it would continue to follow local, State, and federal regulatory compliance for energy standards. As such, this alternative would not cause wasteful, inefficient, and unnecessary consumption of energy during construction or operation. As such, the overall impacts of this alternative would be less as compared to the Plan, and therefore, would be less than significant.

Geology and Soils

This alternative would have overall less units than the Plan but would result in more development in portions of the RCA where there is indication of significant impacts to seismic hazards and soils. The Plan would result in less than significant impacts related to geology and soils through compliance with the CBC, and incorporation of the Mitigation Measures **MM GEO-1** through **MM GEO-11** presented in the Geotechnical Report (see **Appendix G** of this Draft EIR). As stated previously, this alternative would result in more development near more expansive soils and fault lines associated with the RCA, and therefore an increased exacerbation of existing environmental conditions associated with seismic fault rupture, strong seismic ground shaking, liquefaction, landside/lateral spreading, seismic-induced settlement, subsidence soil stability, expansive soils, or acceleration of geologic hazards. It is assumed that this alternative would comply with existing local and State codes for building design. As such, this alternative would have greater geology and soils impacts than the Plan, but would still be less than significant impacts with mitigation.

Greenhouse Gas Emissions

Under this alternative, construction and operational activities from the development of 823 homes in the NA and 150 homes in the RCA would be less when compared to the Plan. Daily trips associated with this alternative, upon which the calculations of GHG emissions are mainly based, would be less than those of the Plan as there would be a reduced amount of residential development. This alternative would be required to be developed in compliance with the City's Development Code, which states that new non-residential and residential development comply with all mandatory provisions of the applicable City of Rancho Cucamonga, Green Building Compliance Matrix as required by the California CalGreen Building Code. Similar to the Plan, this Alternative would be inconsistent with the growth forecasts listed in the SCAG 2016–2040 RTP/SCS. However, similar to the Plan, with implementation and enforcement of Mitigation Measures **MM GHG-1** through **MM GHG-3**, impacts would remain significant and unavoidable.

Hazards and Hazardous Materials

Under this alternative, there would be potential to create upset or accident conditions involving the release of hazardous materials into the environment during either construction or operation. For

construction activities, similar to the Plan, all potentially hazardous materials would be used and stored in compliance with applicable federal, State, and local regulations.

Only two sites were identified near the Plan Area that are on a list of hazardous materials pursuant to Government Code 65962.5, which is the Hazardous Waste and Substances (Cortese) List.¹⁰ DTSC has determined that both these sites received DTSC concurrence that no further action is required. However, similar to the Plan, this alternative would not release subsurface hazardous substances to the environment or expose future occupants or site users to hazardous materials. Prior to any construction activities, similar to the Plan, this alternative would incorporate Mitigation Measures **MM HAZ-1** through **MM HAZ-3** to reduce any potential impacts to less than significant levels for hazardous substances and wildfires. Prior to construction activities, any structures potentially containing hazardous materials should be inspected. Therefore, this alternative would result in similar impacts as the Plan, which are less than significant with mitigation.

Most of the land within the Plan has been identified by Cal Fire as a very high fire hazard severity zone. The entire area of the Plan is within the Rancho Cucamonga Fire District's designated WUIFA. Under this alternative, 823 would be developed in the NA and approximately 150 units would be developed throughout the RCA. This alternative, like the Plan, would introduce residential and commercial uses, and expose people to wildfire impacts. As far as wild fire, this alternative may result in greater impacts due to the introduction of more residential unit in the RCA area which more readily impacted by fires. Mitigation measures **MM HAZ-4** and **MM HAZ-5** would reduce impacts under this alternative, like the Plan, to less than significant. However, for the reason above, this alternative would result in greater wildfire impacts.

Hydrology and Water Quality

This alternative would involve a greater number of units than the Plan and would therefore result in more development when combined in the NA and RCA area. This would result in more grading of the entire Plan Area site. However, the grading would still temporarily increase the bare soil area during construction, which may increase soil erosion and sedimentation in stormwater runoff. In addition, construction could contribute other pollutants to stormwater drainage. Like the Plan, this alternative would be required to comply with NPDES and implement a SWPPP with BMPs in addition to supplying this alternative would be required to provide infiltration basins per City of Rancho Cucamonga

10 State Water Resources Control Board (SWRCB), GeoTracker (2015), database, accessed February 12, 2018, <https://geotracker.waterboards.ca.gov/map/>.

requirements, thereby making impacts to runoff less than significant. Impacts would be similar under this alternative as the Plan.

The location of the RCA along the base of the San Gabriel Mountains also places it in the region's natural hydrologic system, with many creeks flowing south toward Rancho Cucamonga. The western half of the RCA includes portions of the 100-year flood plain. In the RCA, this alternative would allow for the development of up to 150 dwelling units. A portion of Sub-area 11 of the Plan Area includes the 100-year floodplain. This alternative would not permit the development of homes within the 100-year floodplain. Therefore, this alternative would result in similar impacts as the Plan, which are less than significant.

Land Use and Planning

This alternative would implement the City's current General Plan, including the ENSP. This alternative would result in a greater amount of residential development in the RCA than the EHNCP and the development allowed in the NA would not include the planned network of open space and parks, nor the limitation on the amount and scale of commercial uses included in the EHNCP. The compatibility of the pattern of development that would be allowed by the ENSP would not be as compatible as the neighborhoods that would be developed under the EHNCP. Land use impacts would be greater with this alternative for this reason.

Mineral Resources

Under this alternative, both the NA and the RCA would be available for development. The NA would have less development than the proposed Plan (823 units versus 2,900 units) because the FC District Area would not be developed which is where aggregate resource zone D-3 is located. As indicated in the EIR, portions of the D-3 area have already been processed for the termination of mineral resource designation in 2009 due to the presence of adjacent incompatible land uses and approximately a 200-acre portion of the D-3 area is already restricted by the existing Open Space Easement. Nonetheless, if this D-3 resource zone is removed there would be a significant regional loss. Additionally, the RCA would allow for up to 150 units.

Since the D-3 resource zone of the NA would not be developed under this alternative, there would be no significant impact. Impacts to the RCA would be similar to those of the proposed Plan since minimal development would occur, and it would be on private property. Impacts under this alternative would be less than the proposed Plan and less than significant.

Noise

Under this alternative, there would be reduced construction activities due to the development of the 823 homes in the NA and 150 homes in the RCA, less than the Plan. However, this alternative would not eliminate the Plan's potentially significant noise impacts during construction. Implementation of Mitigation Measures **MM N-1** and **MM N-2** would reduce impacts for nearby uses sensitive to noise. These mitigation measures would provide noise abatement during construction near adjacent sensitive receptors. Similar to the Plan, with the implementation of mitigation, impacts under this alternative would be less than significant.

Operational noise would be generated by people using outdoor spaces, vehicles, roadway noise, and building equipment. This alternative would result in an increase in operational noise compared to existing conditions and the number of daily trips to and from the Plan Area. This alternative would have a reduced population growth due to the 823 homes in the NA and 150 homes in the RCA than the 3,000 contemplated by the Plan. Similar to the proposed Plan, the dominant noise source on the southeast and southwest corners of the Plan Area include the SR-210 freeway. With implementation of Mitigation Measure **MM N-3**, the incorporation of architectural features (such as a sound wall adjacent to the SR-210 freeway) would ensure that residential habitable rooms facing the freeway have interior noise levels of 45 dBA or less, as required by the CBC. Operational impacts under this alternative would be less than that of the proposed Plan and would be less than significant with mitigation.

Population and Housing

Under this alternative, there would be a substantial decrease in the number of dwelling units and associated decrease in population compared to the Plan at approximately 973 residential units and 2,948 residents, respectively. This would result in a decrease of up to 2,027 residential units and 6,142 residents under this alternative compared to the EHNCP. The population growth associated with County development of the NA is not accounted for in SCAG's adopted 2016–2040 Regional Growth Forecasts; thus, the impact of this growth under this alternative would also be considered significant and unavoidable, similar to the Plan. As this increase in residential units and associated population would represent a smaller percentage of total growth in the County through 2040 compared to the Plan, overall impacts of this alternative would be reduced as compared to the Plan, and would be significant and unavoidable.

Public Services and Recreation

As discussed above, under this alternative, there would be a decrease in dwelling units and associated increase in population compared to the Plan. Therefore, this alternative would generate a lower overall demand for public services and recreation facilities. This alternative would follow the same regulatory

requirements and appropriate actions as the Plan to reduce the increase demands to less than significant levels.

Fire Protection

Similar to the Plan, this alternative would have consultation with the RCFPD to ensure that it would be adequately served by the existing fire stations and no new or altered facilities would be needed to serve the uses that would be allowed. All development within the area would be reviewed by the RCFPD for compliance. Since this alternative would allow for a decrease in fire service from a decreased population, impacts to fire protection would be less than those of the Plan.

Police Protection

Similar to the Plan, this alternative would comply with Chapter 3.64, Police Impact Fee, of the RCMC, which is collected to fund new facilities, vehicles, and equipment, and any fees established through a Community Facilities District. This alternative would also have consultation with RCPD to ensure adequate service provided from existing Sheriff's department facilities. Since this alternative would allow for a decrease in police service from a decreased population, impacts to police protection would be less than those of the Plan.

Schools

Similar to the Plan, the need for additional school facilities and related services is addressed through compliance with the school impact fee assessment. The ALSD, ESD, and CJUHSD would be able to collect these school impact fees for proposed development in the Plan Area and for future developments. Therefore, if the ALSD, ESD, and CJUHSD are not able to adequately serve a larger future population, they would have funds to acquire land for future schools. Since this alternative would allow for a reduced service population, impacts to schools would be less than those of the Plan.

Libraries

Similar to the Plan, this alternative would address library impacts through the Library Impact Fee where revenue from the impact fees can be used for, but would not be limited to land acquisition, site improvements, building construction/expansion, interior building improvements, furniture fixtures and equipment. Since this alternative would have a lower service population, impacts to libraries would be less than those of the Plan.

Parks and Recreation

Similar to the Plan, this alternative would need to meet the City's established standard of 5.0 acres per 1,000 residents. However, this alternative would not include the amount of open space, parkland, and

recreation facilities that are proposed with the Plan. Therefore, since this alternative would have less proposed facilities, impacts to parks and recreation would be greater than those of the Plan.

Transportation and Traffic

Under this alternative, there would be less development within the Plan Area compared to the Plan. The Plan would result in less than significant intersection impacts through implementation of a Mitigation Measure **MM TRAF-1** through **MM TRAF-3**, but would still have significant and unavoidable impacts for freeway mainlines due to no feasible mitigation as part of the Plan. Although this alternative would have a decreased population, there would be a need for street improvements to meet these needs for a higher associated VMT in the Plan Area. In addition, construction impacts for traffic would be less than the Plan and would also include a Master Fire Protection Plan for the entire site and neighborhood specific fire protection plans for the proposed phases of construction. As there would be a reduced level of traffic-related impacts under this alternative, impacts would be less than the Plan, however impacts would be potentially significant.

Utilities and Service Systems

The proposed Plan would allow for the development of 2,900 units in the NA area and would permit the development of up to 100 residences on private property in the RCA. Under this alternative, 823 homes would be developed in the NA and approximately 150 units would be developed throughout the RCA.

Water

Infrastructure improvements under this alternative would be similar to the proposed Plan. Overall development would be less, but the development areas would be more spread out within the NA and RCA. However, since the WSA identified sufficient water supplies for the proposed Plan, with overall development less than the proposed Plan, estimated water usage would also be less. Impacts would be less than the proposed Plan and less than significant.

Wastewater

Infrastructure improvements under this alternative would be similar to the proposed Plan. Overall development would be less, but the development areas would be more spread out within the NA and RCA. However, with overall development less than the proposed Plan, estimated wastewater generation would also be less. This alternative would likely still be required to adhere to Mitigation Measure **MM UTIL-1** which requires there be adequate capacity to any downstream sewer mains as determined needed by CVWD. Impacts to wastewater would be less than the Plan and less than significant.

Electricity, Natural Gas, and Communication Infrastructure

This alternative would have a much smaller number of units than the proposed Plan and would therefore result in a smaller demand for electricity, natural gas, and communication infrastructure. The extension of services would also be similar to the Plan, since development would be more spread out within the NA and RCA. However, impacts to electricity, natural gas, and communication infrastructure would be less and less than significant under this alternative.

Solid Waste

Infrastructure improvements under this alternative would be similar to the proposed Plan since development would be less, but more spread out than the Plan. However, since there would be less development overall, impacts to solid waste would be less than those under the proposed Plan, and less than significant.

Summary of Impacts

Implementation of this alternative would increase environmental impacts when compared to the Plan. At the same time, all of the objectives would not be fully realized under this Plan. As summarized in **Section 4.0: Environmental Analysis** of this Draft EIR, most environmental impacts of the Plan that are less than significant or can be reduced to less than significant levels through adherence to regulatory requirements, incorporation of design features, and the implementation of mitigation measures. However, under the Plan, impacts related to air quality, biological resources, greenhouse gas emissions, mineral resources, population and housing, and transportation and traffic would be significant and unavoidable due to no feasible mitigation to reduce impacts to a less than significant level. Under this alternative, impacts to air quality; biological resources; energy; greenhouse gas emissions; mineral resources; noise; population and housing; public services and recreation; transportation and traffic; and utilities and service systems would be reduced. Impacts to cultural and tribal resources; and hydrology and water quality would be considered similar under this alternative. Impacts to aesthetics; geology and soils; hazards and hazardous materials; and land use and planning would be greater under this alternative when compared to those for the Plan. A summary of impacts is provided in **Table 5.0-1**.

Relationship to Project Objectives

In addition to overall similar impacts associated with this Alternative, the following Project objectives would not be achieved:

- Enhance fire safety throughout the Plan Area, in particular reduce wildfire hazard to existing and new neighborhoods because Fire officials expressed grave concerns that the very large, wild open

space in the center of the neighborhoods – with very limited opportunities for fuel modification – this alternative presented fire hazard that could not be mitigated.

- Provide a limited amount of small-scale neighborhood shops and restaurants to meet the daily needs of residents in the existing and future foothill neighborhoods and a community center in a pedestrian oriented environment. A larger quantity of shops and restaurants, as well as potential office spaces, could have accomplished this basic objective, but greatly exceeded the community’s expectation for “limited”. This alternative would allow for at least two large commercial centers in the NA, which community input was strongly against this level of commercial development in a residential neighborhood.
- Develop a land use plan for the NA that provides the County with an opportunity for meeting their fiduciary responsibility of selling their surplus land for a reasonable price, because this alternative allows for far fewer homes in the NA that would not make this a financially viable project.

5.5.4 Alternative 4—Annexation with Alternative Land Use Plan

Under the Annexation with Alternative Land Use Plan alternative, a new Specific Plan would be approved. This alternative was one of three developed as part of the community outreach program conducted by the City in the fall of 2017. Under this alternative, the new neighborhood would be located in the northeast portion of the NA, at the closed mine site. This alternative would allow for similar development in the RCA of up to 100 homes. Alternative 4 would have the following characteristics:

1. This alternative would allow for up to 2,000 homes with a large area of Riversidean Alluvial Fan Sage Scrub preserved between the new neighborhoods in the NA. Refer to **Figure 5.0-4: Alternative 4—Annexation with Alternative Land Use Plan** which shows the development priority areas.
2. This alternative was determined to have fire hazard risks that could not be mitigated and was the least preferred based on community surveys in 2018.

Aesthetics

With this alternative, roughly 100 homes would be allowed in the foothill area above Rancho Cucamonga, and roughly 2,000 homes in the NA. This level of development would result in less than significant impact on views of scenic vistas, scenic resources, and visual character within the RCA, similar to the Plan. Compliance with the City’s General Plan, and compliance with the CBC would reduce impacts to aesthetics to less than significant levels. Under this alternative, view corridors through the NA would be better preserved than that of the Project. With this alternative and the Plan, development of new residential neighborhoods in the NA would occur. Residential development under the Plan and this alternative in the NA would be located between the residential neighborhoods of Rancho Etiwanda and the Deer Creek and Haven View Estates neighborhoods, and consistent in visual character. Overall

visual resource impacts in the NA under the Plan and for this alternative would be less than significant with implementation of City ordinances and standards and compliance with the CBC.

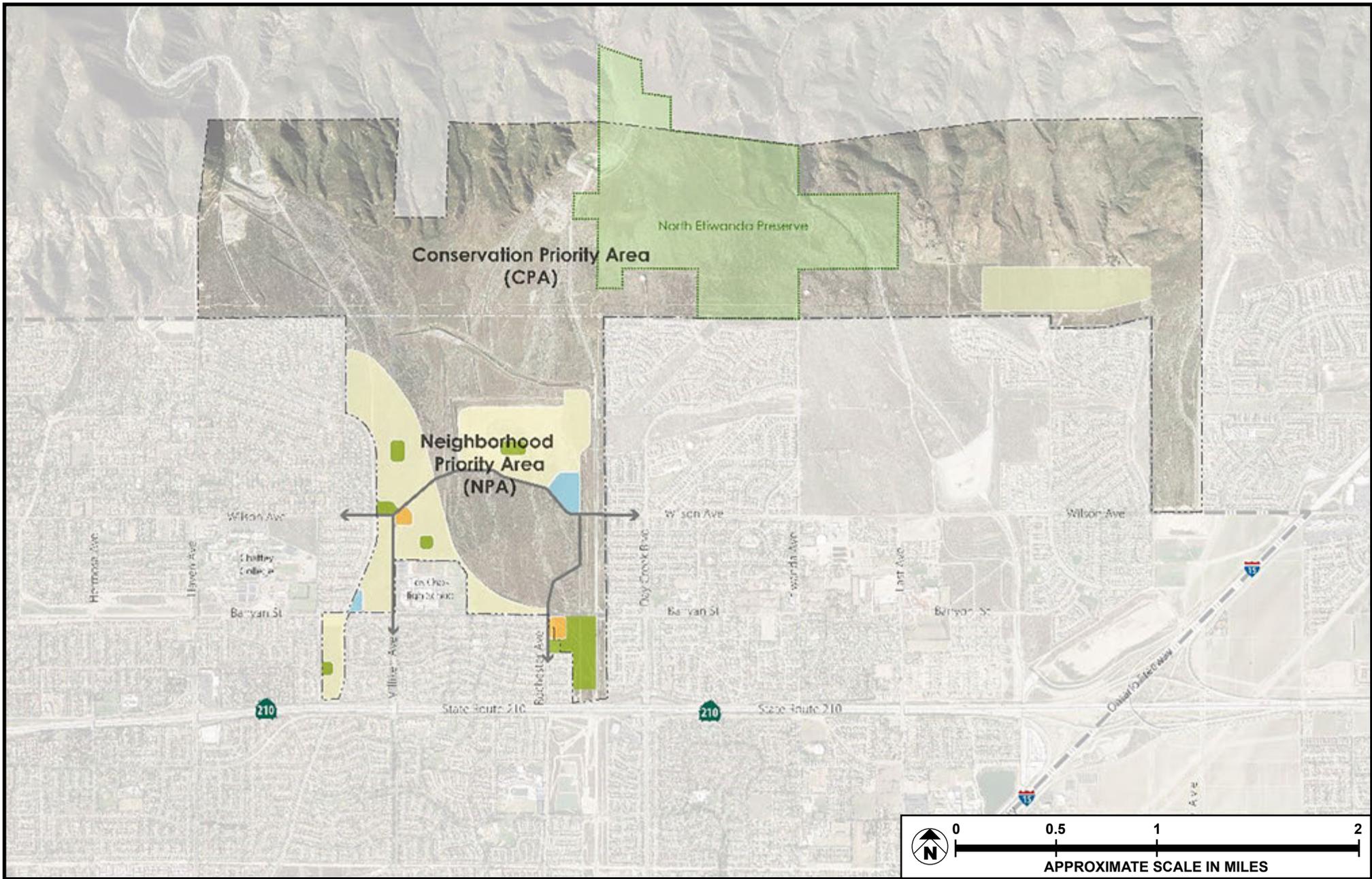
Air Quality

This alternative would have a reduced amount of residential development which would result in reduced air pollutant concentration for construction and operation. This alternative would include less building construction within the Plan Area as there would be less proposed uses when compared to the Plan. Similar to the Plan, this alternative would comply with SCAMQD Rule 403 for Fugitive Dust as well as comply with SCAQMD and CARB rules for the Plan during other construction activities. Impacts related to construction air quality would remain less than significant for all criteria pollutants and localized pollutant concentrations during construction.

The Project's air quality impacts during operation were determined to be significant and unavoidable with mitigation due to the increase number of mobile emissions that would be generated within the Plan Area. In regard to operations, the alternative would emit less air quality operational emissions compared to the Plan as there would be a decrease in total proposed building area and trips from the 2,000 residences. Consequently, the development of 2,000 residences would still result in increased mobile emissions and thus would be potentially significant, but less impactful than the Project.

Biological Resources

Under Alternative 4—Annexation with Alternative Land Use Plan, impacts to biological resources in the RCA would be significant, as with the Plan. This alternative and the Plan implement the City's General Plan in the RCA and supplement the City's existing hillside development regulations by limiting the number of homes permitted in the RCA and defining additional development standards. This alternative, however, does not include the Conservation and TDR Program allowing for the voluntary transfer of residential density from privately-owned properties in the RCA to the NA in exchange for financial or other negotiated compensation to the RCA property owner. The number of residential units that may be transferred from the RCA parcel to a NA phase/Sub-Area is the number of units that could be developed on the RCA parcel considering the maximum density allowed based on the zone, slope, and other environmental constraints (e.g., fault zone, wildfire and WUI, riparian or streambed environs, flood zone, etc.), and thereby reducing the potential for significant impacts to biological resources. Development of these residences under the Plan would be subject to the guidelines and independent environmental review and mitigation in accordance with guiding specific plans. Development under this alternative would result in significant impacts to biological resources in the RCA, similar to the Plan with associated grading and construction of 100 homes. As the exact number and location new rural residential homes that may be developed on private property cannot be determined at this time, the



SOURCE: Sargent Town Planning - 2019

FIGURE 5.0-4

Meridian
Consultants

Alternative 4—Annexation With Alternative Land Use Plan

analysis of potential impacts to biological resources from development of up to 100 homes assumes that each home would result in up to 6.3 acres of disturbance associated with the development of each home, or a total of 630 acres, which also takes into account disturbance for access, utility extensions, well development, on-site sewer systems, construction of buildings, and required fire breaks. As discussed above, a primary objective of the Plan is to preserve the open space character of the RCA, yet without the TDR Program, this alternative precludes the conservation of up to approximately 630 acres. Further, impacts associated with habitat modification, species identified as a candidate, sensitive, or special-status, and jurisdictional aquatic resources within the NA under Plan implementation are considered potentially significant if mitigation within the RCA is not feasible. While more SBKR habitat is preserved in the NA under this alternative, biological resource impacts in the NA would be significant and would allow for less conservation in the RCA with the increased number of homes allowed in the hillsides without the TDR Program.

Biological resource impacts of the Plan associated with development of the NA were found to be significant, even with compliance with the existing regulations, Mitigation Measure **MM BIO-1** though **MM BIO-9**, preservation of open space, development standards and the provisions outlined in the Specific Plan. Impacts to jurisdictional features and SBKR habitat in the NA would be considered significant if unmitigated without the necessary acreage conservation within the RCA. While this alternative impacts fewer acres of SBKR habitat and jurisdictional features in the NA than the Plan, these impacts would be potentially significant. In addition, and similar to the Plan, long-term edge effects could include intrusions by humans and possible trampling of individual plants, invasion by exotic plant and wildlife species, exposure to urban pollutants (fertilizers, pesticides, herbicides, and other hazardous materials), soil erosion, litter, fire, and hydrologic changes (e.g., surface and groundwater level and quality). For these reasons, this alternative would result in similar or greater impacts to biological resources in the RCA, yet would reduce impacts in the NA, but would remain potentially significant.

Cultural and Tribal Resources

Under this alternative, development of 100 homes in the RCA would be allowed. Based on the results of the records searches, eighteen potential resources are recorded within the RCA and six archaeological resources within the NA. The Plan involves grading which has the potential to disturb subsurface cultural resources that might be present within the Plan Area. The Plan would result in less than significant impacts on cultural and Tribal cultural resources through the implementation of Mitigation Measures **MM TCUL-1** and **MM TCUL-2**. Given that this alternative could involve disturbance of subsurface soils, the potential disturbance to cultural and Tribal cultural resources would not be avoided. In regard to historic resources, the Plan would result in less than significant impacts on historic resources because

the majority of the previously recorded resources located within the RCA consist of historic era homestead structures, water conveyance systems, remnants of mining operations, and transmission lines. None of these resources (isolates or site) in the NA were found to contain information that would qualify them for a finding of significance and/or eligibility for listing in the CRHR under any significance criteria. Cultural and Tribal cultural resources impacts under this alternative would be similar when compared to the Plan, and would be less than significant with mitigation

Energy Conservation

This alternative would have a lower number of units than the Plan and would therefore result in a decreased demand for electricity and natural gas consumption for both construction and operation. Similar to the Plan, the extension of services would be similar, or possibly less, than those of the Plan due to less connections needed. While the Plan would result in less than significant impacts with regard to energy, the energy efficiency that would come with the new high-performance building design and conservation measures of the Plan would not be fully realized. The Plan is considering not only energy measures that meet regulatory compliance of local, State, and federal regulations but would also include measures for water and energy conservation, water quality, green building practices, urban agriculture or community gardens integrated into neighborhood and building design, which this alternative would not meet all of these encompassing features. However, this alternative would be constructed designed in accordance with the most current version of Title 24, California's Energy Efficiency Standards for buildings and the State Energy Conservation Standards. These standards include minimum energy efficiency requirements related to building envelope, mechanical systems (e.g., HVAC and water heating systems), indoor and outdoor lighting, and illuminated signs. In addition, this alternative would produce less VMT due to a decreased vehicular traffic from less development than the Plan, thus there would also be a decrease in overall consumption of transportation fuel. Therefore, overall impacts of this alternative would be less as compared to the Plan and would be less than significant as it would continue to follow local, State, and federal regulatory compliance for energy standards. As such, this alternative would not cause wasteful, inefficient, and unnecessary consumption of energy during construction or operation. As such, the overall impacts of this alternative would be less as compared to the Plan, and therefore, would be less than significant.

Geology and Soils

This alternative would have less units than the Plan and would therefore result in less development in portions of the RCA where there is indication of significant impacts to seismic hazards and soils. The Plan would result in less than significant impacts related to geology and soils through compliance with the CBC, and incorporation of the Mitigation Measures **MM GEO-1** through **MM GEO-11** presented in the Geotechnical Report (see **Appendix G** of this Draft EIR). As stated previously, this alternative would

result in less development near more expansive soils and fault lines, but could still exacerbate existing environmental conditions associated with seismic fault rupture, strong seismic ground shaking, liquefaction, landside/lateral spreading, seismic-induced settlement, subsidence soil stability, expansive soils, or acceleration of geologic hazards. It is assumed that this alternative would comply with existing local and State codes for building design. As such, this alternative would have similar to the Plan's less than significant impacts with mitigation for geology and soils.

Greenhouse Gas Emissions

Under this alternative, GHG emissions from construction activities and after development would occur as approximately 2,100 residences would be developed. New GHG emissions that would be generated from construction activities would be reduced than would result from implementation of the EHNCP. Daily trips associated with this alternative, upon which the calculations of GHG emissions are mainly based, would be reduced as 2,100 residences would generate a reduced number of trips. Similar to the proposed Plan, this alternative would be developed in compliance with the City's Development Code, which required that new non-residential and residential development comply with all mandatory provisions of the applicable City of Rancho Cucamonga, Green Building Compliance Matrix as required by the California CalGreen Building Code. Compliance with the City's Development Code would be consistent with the applicable plans that address reduction of GHG emissions. Similar to the Plan, this Alternative would be inconsistent with the growth forecasts listed in the SCAG 2016–2040 RTP/SCS. However, similar to the Plan, with implementation and enforcement of Mitigation Measures **MM GHG-1** through **MM GHG-3**, impacts would remain significant and unavoidable.

Hazards and Hazardous Materials

Under this alternative, there would be potential to create upset or accident conditions involving the release of hazardous materials into the environment during either construction or operation. For construction activities, similar to the Plan, all potentially hazardous materials would be used and stored in compliance with applicable federal, State, and local regulations.

Only two sites were identified near the Plan Area that are on a list of hazardous materials pursuant to Government Code 65962.5, which is the Hazardous Waste and Substances (Cortese) List.¹¹ DTSC has determined that both these sites received DTSC concurrence that no further action is required. However, similar to the Plan, this alternative would not release subsurface hazardous substances to the

11 State Water Resources Control Board (SWRCB), GeoTracker (2015), database, accessed February 12, 2018, <https://geotracker.waterboards.ca.gov/map/>.

environment or expose future occupants or site users to hazardous materials. Prior to any construction activities, similar to the Plan, this alternative would incorporate Mitigation Measures **MM HAZ-1** through **MM HAZ-3** to reduce any potential impacts to less than significant levels for hazardous substances and wildfires. Prior to construction activities, any structures potentially containing hazardous materials should be inspected. Therefore, this alternative would result in similar impacts as the Plan, which are less than significant with mitigation.

Most of the land within the Plan has been identified by Cal Fire as a very high fire hazard severity zone. The entire area of the Plan is within the Rancho Cucamonga Fire District's designated WUIFA. Under this alternative, 2,000 homes would be developed in the northeast portion of the NA. Under this alternative a large area of Riversidean Alluvial Fan Sage Scrub would be preserved between the new neighborhoods in the NA. This alternative, like the Plan, would introduce residential and commercial uses, and expose people to wildfire impacts. As far as wild fire, this alternative may result in greater impacts due the preservation of the Riversidean Alluvial Fan Sage Scrub and thus not allowing for a fire break to be developed as would occur under the Plan, Mitigation Measures **MM HAZ-4** and **MM HAZ-5** would reduce impacts under this alternative. However, this alternative was determined to have fire hazard risks that could not be mitigated and was the least preferred based on community surveys in 2018.

Hydrology and Water Quality

This alternative would involve a reduction in number of units than the Plan and would therefore result in less development. This would result in less grading of the entire Plan Area site. However, the grading would still temporarily increase the bare soil area during construction, which may increase soil erosion and sedimentation in stormwater runoff. In addition, construction could contribute other pollutants to stormwater drainage. Like the Plan, this alternative would be required to comply with NPDES and implement a SWPPP with BMPs in addition to supplying this alternative would be required to provide infiltration basins per City of Rancho Cucamonga requirements, thereby making impacts to runoff less than significant. Impacts would be similar under this alternative as the Plan.

The location of the Alternative 4 along the base of the San Gabriel Mountains also places it in the region's natural hydrologic system, with many creeks flowing south toward Rancho Cucamonga. The western half of the RCA includes portions of the 100-year flood plain. This alternative would not allow for the development within the RCA area and thus would not permit the development of homes within the 100-year floodplain. Therefore, this alternative would result in less impacts as the Plan.

Land Use and Planning

With this alternative, a new Specific Plan would be prepared, and the same actions would need to be approved as proposed for the EHNCP, including a General Plan Amendment, revisions to the City's Development Code and annexation of the site. The pattern of development in the NA would be fragmented with this alternative with open space separating the new neighborhoods. The development in the NA would not include the planned network of parks included with the EHNCP and, for this reason, the same level of connectivity for pedestrians and bicycles would not be provided and the amount of recreational open space and parks provided for residents of the new and existing neighborhoods would be less. This plan would also create a long edge of development around the preserved open space area between the neighborhoods which would create the potential for indirect impacts from the urban development on this open space area as well as greater risks associated with proximity to potential wildfire hazards. For these reasons, the land use impacts of this alternative are considered to be greater.

Mineral Resources

Under this alternative, less development would occur in the NA and the RCA would be the same as the proposed Plan, limiting the amount of residential development on private property to a maximum of 100 units. Portions of the D-3 area located within the NA have already been processed for the termination of mineral resource designation in 2009 due to the presence of adjacent incompatible land uses and approximately a 200-acre portion of the D-3 area is already restricted by the existing Open Space Easement. Nonetheless, if this D-3 resource zone is removed there would be a significant regional loss. Less development would occur in the NA, as shown above, the aggregate resource zone D-3, would not be fully developed as it would under the proposed Plan. However, with residential development surrounding the D-3 aggregate resource zone it is likely that mining activities would not be allowed within the D-3 zone anyway, making this alternative potentially significant. Nonetheless, since there would be less loss to the D-3 zone, there would be less of an impact.

Development in the RCA under this alternative would be the same as the proposed Plan. Impacts to mineral resources from the RCA under this alternative would be similar to the proposed Plan and less than significant.

Noise

Under this alternative, there would be reduced construction activities due to the decrease in proposed building area and the amount of residences. However, this alternative would not eliminate the Plan's potentially significant noise impacts during construction. Implementation of Mitigation Measures **MM N-1** and **MM N-2** would reduce impacts for nearby uses sensitive to noise. These mitigation measures would provide noise abatement during construction near adjacent sensitive receptors. Similar to the

Plan, with the implementation of mitigation, construction impacts with this alternative would be less than significant.

After development, noise would be generated by people using outdoor spaces, vehicles, roadway noise, and building equipment. Similar to the Plan, this alternative would result in an increase in noise levels compared to existing conditions and a similar or higher amount of traffic on local roadways. This alternative would also have a reduced population growth due to the 2,000 residential homes than the 3,000 contemplated by the Plan. Similar to the proposed Plan, the dominant noise source on the southeast and southwest corners of the Site Plan Area include the SR-210 freeway. With implementation of Mitigation Measure **MM N-3**, the incorporation of architectural features (such as a sound wall adjacent to the SR-210 freeway) would ensure that residential habitable rooms facing the freeway have interior noise levels of 45 dBA or less, as required by the CBC. As such, potential significant impacts under this alternative would be similar to that of the proposed Plan and would be less than significant with mitigation.

Population and Housing

Under this alternative, there would be a decrease in the number of dwelling units and associated decrease in population compared to the Plan at approximately 2,100 residential units and 6,363 residents, respectively. This would result in a decrease of up to 900 residential units and 2,727 residents under this alternative compared to the EHNCP. The population growth associated with County development of the NA is not accounted for in SCAG's adopted 2016–2040 Regional Growth Forecasts; thus, the impact of this growth under this alternative would also be considered significant and unavoidable, similar to the Plan. As this increase in residential units and associated population would represent a smaller percentage of total growth in the County through 2040 compared to the Plan, overall impacts of this alternative would be reduced as compared to the Plan, and would be significant and unavoidable.

Public Services and Recreation

As discussed above, under this alternative, there would be a decrease in dwelling units and associated increase in population compared to the Plan. Therefore, this alternative would generate a lower overall demand for public services and recreation facilities. This alternative would follow the same regulatory requirements and appropriate actions as the Plan to reduce the increase demands to less than significant levels.

Fire Protection

Similar to the Plan, this alternative would have consultation with the RCFPD to ensure that it would be adequately served by the existing fire stations and no new or altered facilities would be needed to serve the uses that would be allowed. All development within the area would be reviewed by the RCFPD for compliance. Since this alternative would allow for a decrease in fire service from a decreased population, impacts to fire protection would be less than those of the Plan.

Police Protection

Similar to the Plan, this alternative would comply with Chapter 3.64, Police Impact Fee, of the RCMC, which is collected to fund new facilities, vehicles, and equipment, and any fees established through a Community Facilities District. This alternative would also have consultation with RCPD to ensure adequate service provided from existing Sheriff's department facilities. Since this alternative would allow for a decrease in police service from a decreased population, impacts to police protection would be less than those of the Plan.

Schools

Similar to the Plan, the need for additional school facilities and related services is addressed through compliance with the school impact fee assessment. The ALSD, ESD, and CJUHSD would be able to collect these school impact fees for proposed development in the Plan Area and for future developments. Therefore, if the ALSD, ESD, and CJUHSD are not able to adequately serve a larger future population, they would have funds to acquire land for future schools. Since this alternative would allow for a reduced service population, impacts to schools would be less than those of the Plan.

Libraries

Similar to the Plan, this alternative would address library impacts through the Library Impact Fee where revenue from the impact fees can be used for, but would not be limited to land acquisition, site improvements, building construction/expansion, interior building improvements, furniture fixtures and equipment. Since this alternative would have a lower service population, impacts to libraries would be less than those of the Plan.

Parks and Recreation

Similar to the Plan, this alternative would need to meet the City's established standard of 5.0 acres per 1,000 residents. However, this alternative would not include the amount of open space, parkland, and recreation facilities that are proposed with the Plan. Therefore, since this alternative would have less proposed facilities, impacts to parks and recreation would be greater than those of the Plan.

Transportation and Traffic

Under this alternative, there would be less development within the Plan Area. The Plan would result in less than significant intersection impacts through implementation of a Mitigation Measure **MM TRAF-1** through **MM TRAF-3**, but would still have significant and unavoidable impacts for freeway mainlines due to no feasible mitigation as part of the Plan. Although this alternative would have a decreased population, there would be a need for street improvements to meet these needs for a higher associated VMT in the Plan Area. In addition, construction impacts for traffic would be less than the Plan and would also include a Master Fire Protection Plan for the entire site and neighborhood specific fire protection plans for the proposed phases of construction. As there would be a reduced level of traffic-related impacts under this alternative, impacts would be less than the Plan, however they would still be potentially significant.

Utilities and Service Systems

Under this alternative, less development would occur in the NA with approximately 2,000 units, and the RCA would be the same as the proposed Plan, limiting the amount of residential development on private property to a maximum of 100 units. Overall, development would be less than the Plan.

Water

Infrastructure improvements under this alternative would be similar to the proposed Plan. Overall development would be less, but the development areas would be more spread out within the NA and RCA. However, since the WSA identified sufficient water supplies for the proposed Plan, and with overall development less than the proposed Plan, estimated water usage would also be less. Impacts would be less than the proposed Plan and less than significant.

Wastewater

Infrastructure improvements under this alternative would be similar to the proposed Plan. Overall development would be less, but the development areas would be more spread out within the NA and RCA. However, with overall development less than the proposed Plan, estimated wastewater generation would also be less. This alternative would likely still be required to adhere to Mitigation Measure **MM UTIL-1** which requires there be adequate capacity to any downstream sewer mains as determined needed by CVWD. Impacts to wastewater would be less than the Plan and less than significant.

Electricity, Natural Gas, and Communication Infrastructure

This alternative would have a fewer number of units than the proposed Plan and would therefore result in a decreased demand for electricity, natural gas, and communication infrastructure. The extension of

services would also be similar to the Plan, since development would be more spread out within the NA and RCA. Impacts to electricity, natural gas, and communication infrastructure would be less under this alternative, and less than significant.

Solid Waste

Infrastructure improvements under this alternative would be similar to the proposed Plan since development would slightly less, but more spread out within the RCA and NA. However, since there would be less development overall, impacts to solid waste would be less than those under the proposed Plan.

Summary of Impacts

Implementation of this alternative would increase environmental impacts when compared to the Plan. At the same time, all of the objectives would not be fully realized under this Plan. As summarized in **Section 4.0: Environmental Analysis** of this Draft EIR, most environmental impacts of the Plan that are less than significant or can be reduced to less than significant levels through adherence to regulatory requirements, incorporation of design features, and the implementation of mitigation measures. However, under the Plan, impacts related to air quality, biological resources, greenhouse gas emissions, mineral resources, population and housing, and transportation and traffic would be significant and unavoidable due to no feasible mitigation to reduce impacts to a less than significant level. Under this alternative, impacts to air quality; energy; greenhouse gases; hydrology and water quality; land use and planning; mineral resources; population and housing; public services and recreation; transportation and traffic; and utilities and service systems would be reduced. Impacts to aesthetics; biological resources; cultural and tribal resources; geology and soils; hazards and hazardous materials; noise would be considered similar under this alternative. Impacts to land use and planning would be greater under this alternative. A summary of impacts is provided in **Table 5.0-1**.

Relationship to Project Objectives

In addition to overall reduced impacts associated with this Alternative, the following Project objectives would not be achieved:

- Conserve the natural resources and open space character of this unique foothill area while providing additional housing opportunities to meet regional housing needs in an environmentally sensitive manner. This alternative proposed to directly conserve 491 acres of the “lower band” of the Plan Area, as well as conserving much of the “upper band” as additional mitigation of habitat impacts. Based on second opinions regarding the “lower band” conservation, it was determined that it was somewhat speculative, and there was a potential to invest a great deal of money in restoring and conserving that area without creating viable, high-quality habitat. The fact that it has been cut off

from natural seasonal stormwater flows for so long, that the reintroduction of such flows would be dependent on removing a portion of the Diversion Levee, and that the area would be surrounded by neighborhoods argued against this alternative from a habitat perspective.

- Provide a range of open space and park areas offering a range of recreation opportunities. This alternative could meet this objective, although by focusing the Plan around a very large central open space from which humans would be excluded does not offer the same recreational opportunities as a large central open space to which they have access.
- Improve access to the existing and new foothill neighborhoods by extending, connecting and improving Wilson Avenue, Rochester Avenue, and Milliken Avenue, and providing a network of walkable and bikeable neighborhood streets; Could partially meet this objective, but the very large central open space, off limits to humans, very significantly reduced connectivity for all modes other than automobiles.
- Enhance fire safety throughout the Plan Area, in particular reduce wildfire hazard to existing and new neighborhoods; Fire officials expressed grave concerns that the very large, wild open space in the center of the neighborhoods – with very limited opportunities for fuel modification – this alternative presented fire hazard that could not be mitigated.

5.5.5 Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that the analysis of alternatives to a project shall identify an environmentally superior alternative among the alternatives evaluated. The purpose of the alternatives analysis is to explain potentially feasible ways to avoid or minimize the significant effects identified for the Plan. The CEQA Guidelines indicate that if the No Project Alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives.

A summary comparison of impacts associated with the Plan alternatives is provided in **Table 5.0-1**. As indicated in **Table 5.0-1**, the first line compares each alternative's incremental increase, decrease, or results in similar impacts, to the Plan's identified impact. The second line compares the level of significance of each alternative's impact to the level of significance of the Plan's impact. Of the alternatives considered in this Draft EIR section, Alternative 3— Annexation Under Current City Plans Alternative is environmentally superior to the other alternatives considered because this alternative would include less residential development than the EHNCP would permit, and would preserve more natural habitat identified as critical habitat for the SBKR and provide the opportunity to restore this habitat, which is currently degraded as a result of the long-term hydrologic and sediment transport changes from the existing diversion levees.

However, as with the Plan, long-term edge effects for this alternative could include intrusions by humans and domestic pets, and possible trampling of individual plants, invasion by exotic plant and wildlife species, exposure to urban pollutants (fertilizers, pesticides, herbicides, and other hazardous materials), soil erosion, litter, fire, and hydrologic changes (e.g., surface and groundwater level and quality). For these reasons, this alternative would result in similar significant impacts as those under the Plan to biological resources.

This alternative does not meet the basic objectives of the EHNCP, including enhancing fire safety throughout the Plan Area and providing a high level of pedestrian, bicycle, and vehicle circulation between the new neighborhoods and the existing surrounding neighborhoods. In addition, the alternative would entail substantial additional costs to remove the west end of the Diversion Levee to restore drainage flows to the habitat area that would be preserved and fund an experimental habitat restoration and monitoring program, which may or may not be successful. Additionally, the indirect impact to the habitat area from human intrusion, domestic pets, and lighting from the new neighborhoods around the preserve area would further feasibility. For these reasons, this alternative is not considered feasible. Lastly, input provided by the community was a strong preference for limited commercial space, yet this alternative would allow for 28 acres of neighborhood commercial development, which greatly exceeds that of the Plan.

**Table 5.0-1
Comparison of Alternatives to the Project**

Environmental Issue Area	Project	Alternative 1— No Project Alternative	Alternative 2— County Development of Neighborhood Area	Alternative 3— Annexation Under Current City Plans	Alternative 4— Annexation with Alternative Land Use Plan
Aesthetics	Less than Significant	Greater (Less than Significant)	Greater (Less than Significant)	Greater (Less than Significant)	Similar (Less than Significant)
Air Quality	Significant and Unavoidable with Mitigation	Greater (Significant and Unavoidable with Mitigation)	Greater (Significant and Unavoidable with Mitigation)	Reduced (Potentially Significant with Mitigation)	Reduced (Potentially Significant with Mitigation)
Biological Resources	Significant and Unavoidable with Mitigation	Greater (Significant and Unavoidable with Mitigation)	Greater (Significant and Unavoidable with Mitigation)	Similar (Potentially Significant with Mitigation)	Similar (Potentially Significant With Mitigation)
Cultural and Tribal Resources	Less than Significant with Mitigation	Greater (Less than Significant with Mitigation)	Greater (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Energy	Less than Significant	Greater (Less than Significant)	Greater (Less than Significant)	Reduced (Less than Significant)	Reduced (Less than Significant)
Geology and Soils	Less than Significant with Mitigation	Greater (Less than Significant with Mitigation)	Greater (Less than Significant with Mitigation)	Greater (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Greenhouse Gas Emissions	Significant and Unavoidable with Mitigation	Greater (Significant and Unavoidable with Mitigation)	Greater (Significant and Unavoidable with Mitigation)	Reduced (Significant and Unavoidable with Mitigation)	Reduced (Significant and Unavoidable with Mitigation)
Hazards and Hazardous Materials	Less than Significant with Mitigation	Greater (Less than Significant with Mitigation)	Greater (Less than Significant with Mitigation)	Greater (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)

Environmental Issue Area	Project	Alternative 1— No Project Alternative	Alternative 2— County Development of Neighborhood Area	Alternative 3— Annexation Under Current City Plans	Alternative 4— Annexation with Alternative Land Use Plan
Hydrology and Water Quality	Less than Significant	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)	Reduced (Less than Significant)
Land Use and Planning	Less than Significant	Greater (Less than Significant)	Reduced (Less than Significant)	Greater (Less than Significant)	Reduced (Less than Significant)
Mineral Resources	Significant and Unavoidable	Reduced (Less than Significant)	Greater (Significant and Unavoidable)	Reduced (Less than Significant)	Reduced (Potentially Significant)
Noise	Less than Significant with Mitigation	Greater (Less than Significant with Mitigation)	Greater (Less than Significant with Mitigation)	Reduced (Less than Significant with Mitigation)	Reduced (Less than Significant with Mitigation)
Population and Housing	Significant and Unavoidable	Greater (Significant and Unavoidable)	Greater (Significant and Unavoidable)	Reduced (Significant and Unavoidable)	Reduced (Significant and Unavoidable)
Public Services and Recreation	Less than Significant	Greater (Less than Significant)	Greater (Less than Significant)	Reduced (Less than Significant)	Reduced (Less than Significant)
Transportation and Traffic	Significant and Unavoidable With Mitigation	Greater (Significant and Unavoidable With Mitigation)	Greater (Significant and Unavoidable With Mitigation)	Reduced (Potentially Significant With Mitigation)	Reduced (Potentially Significant With Mitigation)
Utilities and Service Systems	Less than Significant with Mitigation	Greater (Potentially Significant with Mitigation)	Greater (Potentially Significant with Mitigation)	Reduced (Less than Significant with Mitigation)	Reduced (Less than Significant with Mitigation)