5.0 ALTERNATIVES TO THE PROPOSED PROJECT

5.1 INTRODUCTION

The *California Environmental Quality Act* (*CEQA) Guidelines* (Section 15126.6(a)) emphasize the selection of a reasonable range of technically feasible alternatives and adequate assessment of these alternatives to allow for a comparative analysis and consideration by decision-makers. The *CEQA Guidelines* state that the discussion of alternatives shall focus on alternatives capable of eliminating or reducing significant adverse environmental effects of a proposed project, even if these alternatives would impede, to some degree, the attainment of the project objectives or would be more costly.

Key provisions of the *CEQA Guidelines* on alternatives to a proposed project (Sections 15126.6[b] through [f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in the Environmental Impact Report (EIR).

- 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 more costly (15126.6[b]).
- The specific alternative of "no project" shall also be evaluated along with its impact (15126.6[e][1]). The "no project" analysis shall discuss the existing conditions at the time the Notice of Preparation is published and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (15126.6[e][2]).
- The range of alternatives required in an EIR is governed by the "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of potentially feasible alternatives shall be selected and discussed in such a manner as to foster 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, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent) (15126.6[f]).
- The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed,

the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed (15126.6[d]).

- For alternative locations, only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (15126.6[f][2][A]).
- If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR. For example, in some cases there may be no feasible alternative locations for a geothermal plant or mining project, which must be in close proximity to natural resources at a given location (15126.6[f][2][B]).
- An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (15126.6[f][3]).

Pursuant to the guidelines stated above, a range of alternatives to the La Entrada Specific Plan (proposed project) is considered and evaluated in this EIR. These alternatives were developed in the course of project planning and environmental review. The discussion in this section provides the following.

1. A description of the alternatives considered.
2. Comparative analysis of each alternative that focuses on the potentially significant unavoidable environmental impacts of the proposed project. The purpose of this analysis is to determine whether alternatives are capable of eliminating or substantially reducing the project's significant environmental impacts.
3. Conclusions regarding: (1) the alternatives' ability to avoid or substantially lessen the significant unavoidable impacts of the project; (2) the ability of each alternative to attain most of the basic project objectives (as stated below); and (3) the merits and feasibility of each alternative compared to the merits of the proposed project.

5.2 PROPOSED PROJECT

The proposed project is located in the City of Coachella (City), in the County of Riverside (County). The project site is bounded by Interstate 10 (I-10) to the north, the Coachella Branch of the All-American Canal (Coachella Canal) to the west and south, and the Little San Bernardino Mountains to the east. The proposed project would result in the creation of a 2,200-acre (ac) master-planned community that includes residential, commercial, office, and mixed-use development, as well as open space/recreational uses. The proposed project establishes land use types, locations, and densities; a circulation concept; infrastructure and public facility improvements; development standards and design guidelines; and an implementation program that would guide development for the project site. Implementation of the proposed project would result in the development and operation of up to 7,800 residential units, 1,510,879 square feet (sf) of commercial and office uses, sites for four schools, approximately 345 ac of park/recreational uses, and approximately 557 ac of preserved open space.

In addition, the proposed project includes the extensions of Avenues 50 and 52 from their existing termini into the project site, with Avenue 50 to connect to a future proposed interchange at I-10. CEQA clearance for the future interchange project at Avenue 50 and I-10 is not part of the environmental documentation included in this EIR; separate environmental clearance will be required

for that future interchange project. However, the areas impacted by the extensions of Avenues 50 and 52 are included in this EIR analysis. A detailed description of the various project components is provided in Chapter 3.0, Project Description, in this EIR.

5.2.1 Significant Unavoidable Environmental Impacts of the Proposed Project

The analysis provided in Chapter 4.0, Existing Environmental Setting, Environmental Analysis, Impacts, and Mitigation Measures, determined that, despite the implementation of Project Design Features, mitigation measures, and standard conditions of approval, significant environmental impacts would result from the construction and operation of the land uses proposed in the Specific Plan. To satisfactorily provide the CEQA-mandated alternatives analysis, the alternatives considered must reduce the following project-related significant impact(s).

Aesthetics. The proposed project would result in significant unavoidable adverse impacts related to visual character and quality because there are no feasible mitigation measures to reduce impacts associated with a change in visual character to a less than significant level.

Agricultural Resources. Implementation of the proposed project would result in the conversion of State-designated Farmland to a nonagricultural use. Due to the physical design constraints associated with the Avenue 50 alignment through the project site (e.g., the need to cross the Coachella Canal), the loss of approximately 0.025 ac of Prime Farmland and 9.5 ac of Unique Farmland cannot be avoided, and no feasible mitigation is available.

Air Quality. Construction activities associated with the proposed project would exceed South Coast Air Quality Management District (SCAQMD) construction emission thresholds for reactive organic gases (ROG), nitrogen oxides (NO_X), and carbon monoxide (CO). Operational activities would exceed SCAQMD operational emission thresholds for ROG, NO_X, CO, particulate matter less than 2.5 microns in size ($PM_{2.5}$), and particulate matter less than 10 microns in size (PM_{10}). Because these impacts cannot be fully mitigated, construction and operation air quality impacts are also considered cumulatively significant.

Geology and Soils. Implementation of the proposed project would result in development within an area with known and potentially active earthquake faults (e.g., the San Andreas fault) and would subject that development to strong ground motion. Because these impacts cannot be fully mitigated, earthquake-related impacts are considered significant and unavoidable.

Global Climate Change. Implementation of the proposed project would result in the generation of 170,000 metric tons per year (MT/year) of carbon dioxide equivalent (CO_2e) at the completion of Phases 1 and 2, which is 0.17 million metric tons per year of carbon dioxide equivalent per year ($MMTCO_2e$/year). The project will produce 280,000 MT/year of CO_2e at the completion of Phases 3 and 4, which is 0.28 $MMTCO_2e$/year. The total project will produce 560,000 MT/year of CO_2e at the completion of Phase 5, which is 0.56 $MMTCO_2e$/year. GHG emissions generated by the project

would exceed the 2020 and 2035 Performance Targets for Tier 4 projects. Because these impacts cannot be fully mitigated, these GHG emission impacts are considered significant and unavoidable.

The proposed project is consistent with the goals in the Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy (SCAG RTP/SCS) of combining transportation and land use elements in order to achieve greenhouse gas (GHG) emissions reduction targets. However, because the proposed project would generate significant amounts of GHG emissions, it would conflict with applicable plans, policies, or regulations adopted to reduce emissions of GHGs to statewide target levels. In addition, the proposed project would make a significant contribution to cumulative GHG impacts.

Public Services and Utilities. Development of the proposed project would result in a population increase that would result in additional demands on existing fire, police, and library services. Existing facilities would not be able to meet service or response time goals at project build out. Once new public facilities are constructed, it is anticipated that fire, police, and library services and response times would be met. However, in the interim development phases, impacts to police and fire/ emergency services would be significant. The Badlands and Lamb Canyon Sanitary Landfills are anticipated to be closed in 2021 and 2024, respectively, prior to completion of project build out (2045). It is currently undetermined where the solid waste would be rerouted after both landfills serving the project site close. Therefore, subsequent to the closure of these landfills, the proposed project would have a significant adverse impact related to solid waste. The project would also result in a significant unavoidable adverse impact related to wastewater.

Traffic. Development of the proposed project would result in the generation of traffic that would affect existing intersections, freeway mainlines, and freeway ramps as follows:

- **Intersections.** Under the existing General Plan level of service (LOS) standard, implementation of the project would result in significant impacts at 14 study area intersections and cause further LOS delays at 4 intersections in the existing year scenario. For Year 2035, the project would result in significant impacts at 3 study area intersections and cause further LOS delays at 61 intersections.
- **Freeway Mainlines.** The addition of project traffic would result in three study area freeway mainline lanes operating at unsatisfactory LOS in the existing baseline plus project build out (with Avenue 50 interchange) scenario. For Year 2035, the project would result in significant impacts at 4 study area freeway mainline lanes and would contribute to further degradation of LOS at 18 study area freeway mainline lanes.
- **Freeway Ramps.** The addition of project traffic would result in one study area freeway ramp location operating at an unsatisfactory LOS in the existing year scenario. Under the existing baseline plus project build out (with the Avenue 50/I-10 interchange) scenario, four study area freeway ramp locations are forecast to operate at unsatisfactory LOS resulting from project-generated traffic. For Year 2035, the project would result in significant impacts at 4 freeway ramp locations and would contribute to further degradation of LOS at 18 study area freeway ramps.

Although payment of fees would reduce impacts associated with traffic LOS on affected roadways, some traffic infrastructure is outside the City's jurisdiction. Because the City has no control over when and how such improvements to State facilities would be put in place, impacts to the freeway mainline and ramps would remain significant and unavoidable until such improvements are constructed.

In addition to the noted traffic impacts above, potential environmental impacts to air quality, biological resources, hazardous materials, drainage, cultural resources, and noise resulting from construction of off-site intersection improvements within areas outside of current right-of-way may occur with implementation of the off-site intersection improvements. Construction of the improvements contained in Mitigation Measures 4.16.1 and 4.16.2 would require the City or other applicable jurisdiction(s) to conduct preliminary design studies, prepare final design plans, and determine whether or not additional CEQA review is required for each individual improvement. It is anticipated that impacts associated with the future construction of these off-site improvements will be less than significant. However, these off-site improvements will be subject to subsequent CEQA review by the City when determined as necessary, designed, and constructed as dictated by the traffic generated by the land uses covered by each Tentative Tract Map.

As discussed in Chapter 4.0, other potentially significant impacts have been identified prior to mitigation. All those impacts would be reduced to less than significant levels with implementation of the mitigation measures identified in the respective impact analysis sections in Chapter 4.0.

5.3 PROJECT OBJECTIVES

The intent of the proposed project is to provide a cohesive planning framework, such that the major land use, circulation, and infrastructure requirements are coordinated and logically planned. The proposed project seeks to achieve the following objectives:

- Develop a master-planned community that incorporates fundamentals of great neighborhood design by balancing land uses, providing for vehicular and pedestrian mobility, providing for the preservation/enhancement of recreation and open spaces, and reducing the impacts of the previous development approvals;
- Establish a land use plan that locates active uses, community-serving elements, higher densities, and mixed-use designations within activity nodes ("Community Cores");
- Create central activity nodes with reduced development intensity along the site's periphery;
- Identify opportunities for a variety of residential land uses through the development, with high- and medium-density uses located in proximity to transit and mixed-use activity nodes/community cores;
- Provide a full range of residential, commercial, recreational, and business activities and services to the City;
- Distribute commercial uses in intensified core areas throughout the site to promote the ability to access retail services through nonvehicular modes of travel and deemphasize an auto-centric orientation;

- Implement a circulation plan that enhances connectivity with existing General Plan Circulation Element roadways, promotes connections to existing downtown Coachella via Avenues 50 and 52, and provides the opportunity for a future freeway interchange with I–10 at Avenue 50;
- Create a network of nonvehicular multipurpose pathways through the development that promotes connectivity to schools, commercial areas, and recreation facilities, and allows for greater mobility for residents;
- Provide a variety of recreational opportunities, incorporating a comprehensive trail system, parks, and recreation areas;
- Develop a land use plan that is responsive to the topography and reduces hillside grading where possible, preserving select natural features in their original state and concentrating higher-density residential uses in areas with more gently sloping topography;
- Retain the existing drainages on site to use as open space connections for pedestrian and nonmotorized mobility along their edges and for storm flow conveyance;
- Create a land use concept that avoids development within areas of known geologic hazards through the use of appropriate recreational uses, setbacks, and restricted use areas;
- Implement green building practices and sustainable development methods throughout the project; and
- Implement community design and landscaping elements that complement and are responsive to the Coachella Valley desert environment.

5.4 ALTERNATIVES ELIMINATED FROM FURTHER CONSIDERATION

An EIR should identify alternatives that were considered by the lead agency but were rejected as infeasible. Factors to be considered when addressing the feasibility of an alternative include the ability to meet most of the basic project objectives and the ability to avoid or substantially lessen significant environmental impacts. Other factors to be considered include site suitability, economic viability, availability of infrastructure, general plan consistency, jurisdictional and regulatory limitations, and whether the project proponent can reasonably acquire, control, or otherwise have access to an alternative site. An EIR need not consider an alternative that would result in effects that cannot be reasonably ascertained and for which implementation is remote and speculative.

In determining an appropriate range of alternatives to be evaluated in the EIR, a number of possible alternatives were initially considered by the City and, for a variety of reasons, rejected. Alternatives were rejected because they could not accomplish most of the basic objectives of the project, would not have resulted in a reduction of potentially significant impacts of the proposed project, or were considered infeasible. The reasons for not selecting the rejected alternatives are discussed below.

5.4.1 Alternative Location

Locating the proposed project on another site within the City could achieve the objectives of the proposed project, which include providing a diverse range of residential product types and housing densities; providing for the orderly and master-planned development of land uses in the project area to ensure that an economically viable project can be developed; recognizing the unique environmental

qualities of the site by retaining portions of the site for open space and recreational uses; creating a high-quality community to meet the needs of individuals and families seeking affordable or move-up housing complemented by open space areas; adding jobs to the local economy; and generating additional sales tax revenues for the City.

CEQA Guidelines Section 15126.6(f)(2)(A) states, "The key question [with regard to alternative locations] and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR." Further, *CEQA Guidelines* Section 15126.6(f)(1) states that alternative locations need only be considered if the project proponent can reasonably acquire or already owns the identified alternative site. The analysis of alternative sites included (1) inquiries into the availability of the sites under the control of the applicant that could accommodate the proposed use (e.g., finding a parcel similar in size to the 2,200 ac project site); (2) an assessment of sites in the City that would be suitable for the development as proposed; and (3) identification of sites outside the City (in unincorporated parts of Riverside County) that were appropriately zoned/General Plan-designated to accommodate the proposed project. The specific alternative location sites considered and rejected for the proposed project are described below.

Desert Lakes Property. As shown on Figure 5.1 (Alternative Site Locations), the 1,500 ac Desert Lakes property on the north side of I-10 between Polk Street and Lincoln Street was considered as an alternative site. This alternative site would still need infrastructure to be brought up through the project site to get potable water and sewer flows to the Coachella Waste Water Treatment Plant at Avenue 54 and Polk Street.

The Desert Lakes property could be developed in uses similar to the uses in the proposed project, which would result in similar significant and unavoidable impacts as identified for the proposed project (e.g., aesthetics, agricultural resources, air quality, geology and soils, GHGs, traffic, and public services/utilities). The Desert Lakes Property would not result in a conversion of designated Farmland because there is no designated Farmland on that property. Therefore, the significant and adverse conversion of farmland that would occur under the proposed project would not occur under this alternative location site.

However, a potentially new significant and unavoidable impact related to biological resources could occur on the Desert Lakes property. Although no site-specific surveys have been conducted for the Desert Lakes property, because of the proximity of that property to the project site, it is anticipated that biological communities on that property would be similar to biological communities on the project site. While the presence of sensitive species on that property site cannot be confirmed without a biological survey, if sensitive species were absent from the Desert Lakes Property site, biological resource impacts would be similar to those of the proposed project. However, if sensitive species are present on the Desert Lakes property, impacts to biological resources resulting from development of that site could be greater than those identified for the proposed project, resulting in a new and significant and unavoidable impact.

Although this alternative location site would avoid the significant and unavoidable impact associated with the conversion of designated Farmland, this alternative could result in a new

significant and unavoidable impact to biological resources. Although it is anticipated that biological communities on the Desert Lakes Property would be similar to those on the project site as noted above, there is no supporting evidence that eliminates the possibility of potentially significant and unavoidable impacts associated with biological resources on the Desert Lakes Property. To make this assumption would be speculative. Therefore, to provide conservative assumptions, the potential for significant and unavoidable adverse impacts to biological resources was noted for this alternative location site. As a result, this alternative location site would not avoid or lessen the overall significant impacts of the proposed project on the project site. In addition, the project site is not owned by the project proponent. Based on this information and the guidance provided in CEQA Section 15126.6(f)(2)(A), this alternative site was eliminated from further consideration.

Shadow View Area. A 1,200 ac alternative site consisting of the 750 ac Shadow View Specific Plan property and land adjacent to that property was considered. As shown on Figure 5.1 (Alternative Site Locations), the Shadow View area is bounded on the west by the 86-S Expressway and Dillon Road, on the north by I-10, on the east by the Coachella Canal, and on the south by Avenue 50.

The total amount of farmland (442 ac) that would be converted to urban uses with the development of the Shadow View area would be substantially more than the amount of farmland that would be converted under the proposed project (9.5 ac). Unlike the proposed project, the development of the Shadow View area would have substantially greater potential to result in the additional conversion of adjacent farmland to urban uses. There are pending plans for development at this regional commercial destination around the Spotlight 29 Casino. The Twentynine Palms Band of Indians is expanding the Spotlight Casino property to include a 47 ac hotel/resort complex at Dillon Road and Shadow View Boulevard, immediately east of the existing casino property. Additionally, the Cabazon Band of Indians has approximately 30 ac of reservation land, with a long-range plan for commercial uses in the vicinity of Avenue 49 and Tyler Street.

Based on preliminary information, the Shadow View area alternative site would not avoid or result in a substantial reduction of the significant and unavoidable impacts (e.g., aesthetics, agricultural resources, air quality, farmland, geology and soils, GHG, traffic, and public services/utilities) associated with the La Entrada Specific Plan and would only result in similar impacts on a different project site. This alternative location site would not be able to accommodate all the land uses in the proposed project because, at approximately 750 ac, it is substantially smaller than the approximately 2,200 ac project site. The Shadow View Specific Plan site is approximately one-third the size of the La Entrada Specific Plan site. If the same types and densities of land uses proposed for the La Entrada Specific Plan site were assumed at the Shadow View Specific Plan property, the total amount of development would be only about one-third the amount of development proposed for the La Entrada Specific Plan site. In addition, The project proponent does not own the Shadow View Specific Plan property or land in the immediate vicinity of that property. Based on this information and the guidance provided in CEQA Section 15126.6(f)(2)(A) above, this alternative site was eliminated from further consideration.

Despite a reasonable attempt, an alternative location for the proposed project has not been identified. The alternative locations that were considered were either unavailable for development, would not feasibly accommodate a project such as the proposed project, and/or would not reduce the significant impacts associated with the proposed project. Furthermore, as noted above, no property under the control of the project proponent is available or could reasonably be acquired for use as an alternative site within or in the vicinity of the City. Therefore, the off-site alternative has been rejected and was not considered further.

5.5 OVERVIEW OF SELECTED ALTERNATIVES

The following alternatives to the proposed project (shown on Figure 5-2) have been identified and evaluated to provide decision-makers with a reasonable range of alternatives that would eliminate or reduce the impacts of the proposed project. An EIR need not consider an alternative whose impact cannot be reasonably ascertained and whose implementation is remote or speculative. In accordance with the *CEQA Guidelines*, the alternatives considered in this EIR include those that (1) could accomplish most of the basic objectives of the project, (2) are potentially feasible given the nature of the project and surrounding land uses, and (3) could avoid or substantially lessen one or more of the adverse environmental impacts of the project. The following development scenarios have been identified as potential alternatives to implementation of the proposed project:

- **Alternative 1:** No Project/McNaughton Specific Plan Alternative;
- **Alternative 2:** No Project/No Development Alternative;
- **Alternative 3:** Retirement Community Alternative; and
- **Alternative 4:** No Annexation Alternative.

Each of these alternatives is analyzed in Section 5.6. A summary of the characteristics of these alternatives is provided in Table 5.A.

Table 5.A: Alternatives Summary

Alternative	Residential (DU)	Commercial/Office (sf)	Parks (ac)	Preserved Open Space (ac)
Proposed La Entrada Specific Plan Project	7,800	1,510,879	344.7	556.9
Alternative 1: No Project/McNaughton Specific Plan[1]	8,000	2,792,196[2]	191.0	257.0
Alternative 2: No Project/No Development	0	0	0	0
Alternative 3: Retirement Community	7,800	1,510,879	344.7	556.9
Alternative 4: No Annexation	6,504	1,510,879	318.4	349.9

Sources: Draft La Entrada Specific Plan, April 2013; and LSA Associates, Inc. (June 2013).

[1] Assumes development of the land uses in the previously approved McNaughton Specific Plan.

[2] Square footage is based on the floor area ratio (FAR) identified in the County of Riverside General Plan Socioeconomic Build-Out Projections Assumptions and Methodology.

ac = acres
DU = dwelling units
sf = square feet

The following discussion compares the potential impacts of each alternative with the impacts of the proposed project, as detailed in Chapter 4.0. A conclusion is provided as to whether each alternative would result in one of the following:

- Reduction or elimination of a significant and unavoidable impact of the proposed project;
- A greater significant impact than the proposed project;
- The same significant impact as the proposed project;
- No impact; or
- A new significant impact in addition to the impacts of the proposed project.

5.6 ALTERNATIVE 1: NO PROJECT/MCNAUGHTON SPECIFIC PLAN ALTERNATIVE

5.6.1 Description

This alternative evaluates the circumstances under which the proposed project would not proceed and assumes that the existing General Plan land use designations of Low-Density Residential (LDR), Medium-Density Residential (MDR), Entertainment Commercial (C-E), General Commercial (C-G), and Open Space (O-S) and the zoning of "Specific Plan" would continue to be the regulating land uses for the project site. For this No Project Alternative, it is assumed that the project site would be developed as foreseen in the approved McNaughton Specific Plan. The approved McNaughton Specific Plan allows for the development of the 1,788 ac within the City (and no land in unincorporated Riverside County) with up to 8,000 low-, medium-, and high-density residential dwelling units; 2,792,196 sf of commercial, office, and hotel/hospitality uses; 191 ac of parks or recreational uses; and 257 ac of open space uses (McNaughton Specific Plan 88-3, General Plan Amendment 88-8, Program EIR 1998).

5.6.2 Environmental Analysis

Aesthetics. As with the proposed project, under the No Project/McNaughton Specific Plan Alternative, the change in the site from a somewhat rural to an urban environment would constitute a permanent alteration of the existing visual character of the project area. The No Project/McNaughton Specific Plan Alternative would also be required to incorporate specific project design features, grading guidelines, and hillside development guidelines that would be intended to avoid, reduce, offset, or otherwise minimize identified potential adverse impacts associated with the change from a rural to a more urban environment. However, similar to the proposed project, development of the site under Alternative 1 would not retain the existing visual character of the site. The approved McNaughton Specific Plan allows for up to 8,000 residential units and up to 2,792,196 sf of commercial, office, and hotel/hospitality uses, which is more residential units and commercial space than proposed under the La Entrada Specific Plan. Therefore, project-related visual character impacts associated with the No Project/McNaughton Specific Plan Alternative are anticipated to be greater in magnitude than those identified for the proposed project and would remain significant and unavoidable even with mitigation.

Agricultural Resources. Development of the No Project/McNaughton Specific Plan Alternative would have the same agriculture-related impacts as those identified for the proposed project. The McNaughton Specific Plan would also require the extension of Avenue 50. As identified in Section 4.2 in this EIR, the extension of Avenue 50 would result in the conversion of State-designated Farmland and the loss of State-designated Prime Farmland soils (9.5 ac total). Because there are no feasible mitigation measures that would mitigate for the loss of Prime Farmland, impacts associated with development of the No Project/McNaughton Specific Plan Alternative would also remain significant and unavoidable.

Air Quality.

Construction Impacts. Although the land area to be developed with the No Project/McNaughton Specific Plan would be 412 ac less than under the proposed project, it is anticipated that a similar mix of equipment would operate during earthmoving activities. Total construction emissions are anticipated to be proportionally decreased due to the reduced amount of land that would be graded under this alternative. Although reduced, it is anticipated that peak daily construction emissions for Alternative 1 would still be above the SCAQMD thresholds for ROG, NO_x, and CO. It is anticipated that when compared to the proposed project, impacts would remain significant and unavoidable because there are no feasible mitigation measures identified that would reduce construction emissions to below the SCAQMD thresholds.

Operational Impacts. Under the No Project/McNaughton Specific Plan Alternative, daily gross traffic volumes[1] would be increased by 56,149 trips (41 percent more) compared to the proposed project. This increase in traffic volumes is attributable to an increased amount of commercial and office land uses. The No Project/McNaughton Specific Plan Alternative would result in the operation of approximately 2,792,196 sf of commercial and office uses, which is 1,281,317 sf more than proposed for the La Entrada Specific Plan. Under the McNaughton Specific Plan, approximately 2,750 single-family homes, 1,510 townhomes, 2,200 condominiums, and 1,520 multifamily units could be constructed. Therefore, Alternative 1 would result in the generation of additional operational air quality pollutants compared to the proposed project.

As identified in Table 5.B, the volume of each operational pollutant emitted during the operation of Alternative 1 (i.e., ROG, CO, NO_X, sulfur oxides [SO_X], $PM_{2.5}$, and PM_{10}) would be correspondingly increased due to the increased traffic volumes. Thus, the operational emissions for ROG, NO_x, CO, PM_{10}, and $PM_{2.5}$ under Alternative 1 would exceed the SCAQMD thresholds as does the proposed project. Impacts would remain significant and unavoidable because there are no feasible mitigation measures identified that would reduce emissions to below the SCAQMD threshold; however, the degree of significance would be less than the proposed project.

[1] The gross traffic volumes include internal trips (within the project site) and external trips (to and from the project site).

Table 5.B: Alternative 1 (No Project/McNaughton Specific Plan) Operational Emissions

Source	Pollutant Emissions (lbs/day)					
	CO	**ROG**	**NO_X**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Proposed Project	9,800	1,470	4,900	31	3,200	220
Alternative 1	14,000	1,990	6,900	44	4,500	310
Net Change	+4,200	+520	+2,000	+13	+1,300	+90
SCAQMD thresholds	**550**	**55**	**55**	**150**	**150**	**55**
Does Alternative 1 exceed thresholds?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**

Source: LSA Associates, Inc., June 2013.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
PM_{10} = particulate matter less than 2.5 microns in diameter
ROG = reactive organic gases
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOC = volatile organic compounds

Geology and Soils. Development of the No Project/McNaughton Specific Plan Alternative would result in similar geologic and soil-related impacts as the proposed project. Similar to the proposed project, development under the No Project/McNaughton Specific Plan Alternative would be required to prepare a preliminary geotechnical investigation report for the specific development site that would include recommendations that address potential impacts related to the stability of on-site soils and seismic issues. Similar to the proposed project, the No Project/McNaughton Specific Plan Alternative would result in potentially significant impacts related to risks to people and structures associated with seismic activity, including surface rupture, slope instability, and/or landslides, and risks associated with erosion (loss of topsoil) and/or sedimentation. Specifically, the impacts associated with fault rupture would be significant and unavoidable under the No Project/McNaughton Specific Plan Alternative.

Global Climate Change. As shown in Table 5.C, the No Project/McNaughton Specific Plan Alternative would generate 770,000 MT/year of carbon dioxide (CO_2), 140 MT/year of methane (CH_4), and 1.3 MT/year of nitrous oxide (N_2O). GHG emissions resulting from operation of the land uses under the No Project/McNaughton Specific Plan Alternative would be increased compared to the proposed project based on the General Plan land uses assumed on the site under that alternative. The total CO_2e for Alternative 1 would be 770,000 MT/year of CO_2e, which is more than the 560,000 MT/year under the proposed project. This is attributable to the increased traffic volumes. Thus, as the No Project/McNaughton Specific Plan Alternative would generate more GHG emissions than the proposed project, impacts associated with the generation of project-specific GHG emissions would remain significant and unavoidable because there is no mitigation available to fully reduce GHG emissions at this time. The severity of the significant impact would be greater than the proposed project.

Table 5.C: Alternative 1 Greenhouse Gas Emissions

Source	Greenhouse Gas Emissions (MT/year)					
	Bio-CO_2	**NBio-CO_2**	**Total CO_2**	**CH_4**	**N_2O**	**CO_2e**
Proposed Project	1,800	550,000	560,000	140	1.1	560,000
Alternative 1	1,700	770,000	770,000	140	1.3	770,000
Net Difference	**-100**	**+220,000**	**+210,000**	**0**	**0.2**	**+210,000**

Source: LSA Associates, Inc. (June 2013).
CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent
MT/year = metric tons per year
N_2O = nitrous oxide

Public Services and Utilities. Compared to the proposed project, Alternative 1 would result in a greater amount of residential, commercial, and office uses. Because of the increased number of new residents and jobs under the No Project/McNaughton Specific Plan Alternative, demands on schools, parks, other public facilities, law enforcement, and fire protection services would be increased compared to the proposed project. However, similar to the proposed project, development under Alternative 1 would require payment of development impact fees for schools, police services, and fire services. The payment of development impact fees would offset impacts to these public services that may result from Alternative 1. However, there would still be a need to provide additional fire, police, and library facilities in order to meet service and response time requirements. Similar to the proposed project, impacts under the No Project/McNaughton Specific Plan Alternative would remain significant and unavoidable until such time that additional facilities are constructed.

Like the proposed project, the No Project/McNaughton Specific Plan Alternative would also generate solid waste. Alternative 1 is anticipated to generate more solid waste as a result of the greater amount of development under this alternative. Therefore, demands on solid waste services and landfill capacity would be increased in magnitude under Alternative 1 compared to the proposed project. In addition, similar to the proposed project, development under the No Project/McNaughton Specific Plan Alternative would not be complete by the time that the two landfills serving the project site are anticipated to be closed. When compared to the proposed project, solid waste impacts would remain significant and unavoidable. Therefore, the No Project/ McNaughton Specific Plan Alternative would not reduce or eliminate any of the proposed project's significant unavoidable adverse impacts to police, fire, library, wastewater, and solid waste generation.

Traffic. As identified in Table 5.D and based on trip generation rates published in the *Institute of Transportation Engineers (ITE) Trip Generation Handbook, 9th Edition*, Alternative 1 would generate approximately 191,779 daily gross trips, approximately 41 percent more than the proposed project.

Table 5.D: Alternatives Daily Gross Trips

Alternative	Daily Gross Trips
Proposed La Entrada Specific Plan Project	135,630
Alternative 1: No Project/McNaughton Specific Plan	191,779
Alternative 2: No Project/No Development	0
Alternative 3: Retirement Community	116,105
Alternative 4: No Annexation	122,730

Sources: LSA Associates, Inc. (June 2013).

With a 41 percent increase in daily trips, traffic volumes on local roads and intersections would increase under Alternative 1. With this increase, the volume of traffic under Alternative 1 would result in impacts to LOS at nearby intersections and roadway segments and would still require mitigation. The traffic volumes associated with Alternative 1 could result in a deficient LOS at one or more of the intersections in the project vicinity during the lifetime of the development. While significant traffic impacts may occur under Alternative 1, those impacts would be mitigated similar to the mitigation of the traffic impacts under the proposed project. However, despite the identification of mitigation measures, certain roadway improvements would not be under the jurisdiction of the City and cannot be guaranteed to be in place when the No Project/McNaughton Specific Plan Alternative would become operational. Therefore, traffic-related impacts would remain significant and unavoidable, similar to the proposed project.

5.6.3 Conclusion – Alternative 1 (No Project/McNaughton Specific Plan)

Because Alternative 1 assumes the allowable development under the approved McNaughton Specific Plan, the development of a master-planned community with adequate infrastructure to serve it would occur. As a result, residential, commercial, office, and park uses and roads and other infrastructure facilities would be developed on the project site. Under the approved McNaughton Specific Plan, up to 8,000 residential units and up to 2,792,196 sf of commercial, office, and hotel/hospitality uses could be constructed. This is more residential units and commercial space than proposed under the La Entrada Specific Plan on 412 fewer acres. The No Project/McNaughton Specific Plan Alternative would fulfill the majority of the basic objectives of the proposed project as stated in Chapter 3.0.

Under Alternative 1, significant impacts associated with agricultural resources, and geology and soils would remain the same as those identified for the proposed project. Operational air quality, GHG, and traffic impacts would be increased due to increased anticipated traffic volumes and would remain significant. The development that could occur under the No Project/McNaughton Specific Plan Alternative would result in similar but incrementally greater significant environmental impacts for aesthetics and public services and utilities than the proposed project. A comparison of how the No Project/McNaughton Specific Plan Alternative avoids or reduces significant environmental impacts as it relates to the proposed project is provided later in Section 5.10 (Environmentally Superior Alternative).

5.7 ALTERNATIVE 2: NO PROJECT/NO DEVELOPMENT ALTERNATIVE

5.7.1 Description

Under the No Project/No Development Alternative, the project site would remain vacant and undeveloped. This alternative would not include the development of the project site with the land uses in either the proposed La Entrada Specific Plan or the adopted McNaughton Specific Plan (the latter being consistent with the General Plan land use and zoning). Alternative 2 allows for a comparison of the effects of the proposed La Entrada Specific Plan with the effects of leaving the project site in its current undeveloped condition.

5.7.2 Environmental Analysis

Because no development would occur under Alternative 2 (i.e., the project site would remain vacant and undeveloped), the development of a master-planned community with adequate infrastructure to serve it would not occur. None of the significant environmental impacts of the proposed project would occur under Alternative 2.

5.7.3 Conclusion – Alternative 2 (No Project/No Development)

In the absence of development on the project site, no impacts would occur and Alternative 1 would be the Environmentally Superior Alternative. However, Alternative 2 would not fulfill any of the objectives of the proposed project as stated in Chapter 3.0 in this EIR. Retention of the project site in its current vacant and undeveloped condition would not provide for housing with supporting land uses or additional employment opportunities in the City, and would not generate sales tax or increased property tax revenues for the City. A comparison of how the No Project/No Development Alternative avoids or reduces significant environmental impacts as it relates to the proposed project is provided later in Section 5.10.

5.8 ALTERNATIVE 3: RETIREMENT COMMUNITY ALTERNATIVE

5.8.1 Description

Alternative 3: Retirement Community would implement a Specific Plan with the same land uses and layout as the proposed project but with senior housing replacing the single-family housing units in the proposed La Entrada Specific Plan. As shown earlier in Table 5.A, Alternative 3 would include 7,800 age-restricted (senior) dwelling units, 1,510,879 sf of commercial/office uses, 345 ac of park uses, and 557 ac of open space use. Similar to the proposed project, Alternative 3 would include the extensions of Avenues 50 and 52 onto the project site, as well as the other proposed infrastructure facilities.

5.8.2 Environmental Analysis

Aesthetics. Similar to the proposed project, under the Retirement Community Alternative, the change in the site from a somewhat rural to an urban environment would constitute a permanent alteration of the existing visual character of the project area. Alternative 3 would also be required to incorporate specific project design features, grading guidelines, and hillside development guidelines that would

be intended to avoid, reduce, offset, or otherwise minimize identified potential adverse impacts associated with the change from a rural to a more urban environment. Similar to the proposed project, Alternative 3 would not retain the existing visual character of the site. Therefore, project-related visual character impacts associated with the Retirement Community Alternative would be the same as those identified for the proposed project and would remain significant and unavoidable.

Agricultural Resources. Development of the Retirement Community Alternative would have the same agriculture-related impacts as the proposed project. As identified in Section 4.2, Aesthetics, in the EIR, the extension of Avenue 50 would result in the conversion of State-designated Farmland and State-designated Prime Farmland. Because there are no feasible mitigation measures that would mitigate for the loss of Prime Farmland, impacts associated with development of the Retirement Community Alternative (which requires the extension of Avenue 50) would remain significant and unavoidable.

Air Quality.

Construction Emissions. Because the land area to be developed with Alternative 3 (Retirement Community Alternative) would be the same as under the proposed project, it is anticipated that a similar mix of equipment would operate during earthmoving activities. Peak daily construction emissions for Alternative 3 would be below SCAQMD thresholds of significance for sulfur oxides (SO_X), PM_{10}, and $PM_{2.5}$ but above the SCAQMD threshold for ROG, NO_X, and CO. Similar to the proposed project, compliance with SCAQMD rules would ensure fugitive dust emissions remain less than significant. As such, construction emissions from the development of Alternative 3 would be similar to the proposed project.

Operational Emissions. As noted in Table 5.D, under Alternative 3, average daily gross traffic volumes would be reduced by 19,525 trips (14 percent) in comparison with the proposed project, assuming that senior residents would make fewer and/shorter vehicular trips, and use alternative energy vehicles such as neighborhood electric vehicles (NEVs). As indicated in Table 5.E, due to the reduction of vehicle trips associated with Alternative 3, the volume of each operational pollutants emitted during operation of Alternative 3 (i.e., ROG, CO, NO_X, SO_X, $PM_{2.5}$, and PM_{10}) would be correspondingly reduced.

Although ROG, NO_X, CO, $PM_{2.5}$, and PM_{10} operational emissions would be reduced compared to the proposed project, impacts would remain significant and unavoidable because there are no feasible mitigation measures identified that would reduce emissions to below the SCAQMD thresholds.

Table 5.E: Alternative 3 (Retirement Community) Operational Emissions

Source	Pollutant Emissions (lbs/day)					
	CO	**ROG**	**NO_X**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Proposed La Entrada Specific Plan Project	9,800	1,470	4,900	31	3,200	220
Alternative 3	5,400	920	2,600	16	1,700	110
Net Change	-4,400	-550	-2,300	-15	-1,500	-110
SCAQMD thresholds	**550**	**55**	**55**	**150**	**150**	**55**
Does Alternative 3 exceed the thresholds?	**Yes**	**Yes**	**Yes**	No	**Yes**	**Yes**

Source: LSA Associates, Inc., June 2013.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
PM_{10} = particulate matter less than 2.5 microns in diameter
ROG = reactive organic gases
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOC = volatile organic compounds

Geology and Soils. Development of Alternative 3 would have similar geologic and soil-related impacts as under the proposed project because of the same land use types, layout, and intensity. Similar to the proposed project, development under Alternative 3 would be required to prepare a preliminary geotechnical investigation report for the specific development site that would include recommendations that address potential impacts related to the stability of on-site soils. Similar to the proposed project, the Retirement Community Alternative would result in potentially significant impacts related to risks to people and structures associated with seismic activity, including surface rupture, slope instability, and/or landslides, and risks associated with erosion (loss of topsoil) and/or sedimentation. The impacts of the Retirement Community Alternative related to soils, geology, and seismicity impacts would be similar to the impacts under the proposed project. As a result, because potential impacts regarding soils, geology, and seismicity are directly related to land disturbance areas and the land disturbance area would be the same for Alternative 3 and the proposed project, impacts associated with fault rupture remain significant and unavoidable.

Global Climate Change. As shown in Table 5.F, the Retirement Community Alternative would generate 310,000 MT/year of CO_2, 130 MT/year of CH_4, and 1.1 MT/year of N_2O. GHG emissions resulting from operation of the uses envisioned under Alternative 3 would be correspondingly reduced because this alternative would reduce the number of daily traffic trips and energy consumed. The total CO_2e for Alternative 3 would be 310,000 MT/year of CO_2e, which is less than the 560,000 MT/year of CO_2e that would result from the operation of the proposed project. Although Alternative 3 would generate less GHG emissions than the proposed project, impacts associated with project-specific GHG emissions would remain significant and unavoidable because there is no mitigation available to fully reduce GHG emissions at this time.

Public Services and Utilities. Alternative 3 would result in the same amount of residential, commercial, and office uses as the proposed project. However, it is also anticipated that the number of residents would be less under Alternative 3 because a typical senior citizen household is smaller than the average household size estimates. Because of the incrementally reduced number of residents under Alternative 3, demands on schools, parks, other public facilities, law enforcement, and fire protection services would be proportionally less compared to the proposed project. Similar to the

Table 5.F: Alternative 3 Greenhouse Gas Emissions

Source	Greenhouse Gas Emissions (MT/year)					
	Bio-CO_2	**NBio-CO_2**	**Total CO_2**	**CH_4**	**N_2O**	**CO_2e**
Proposed Project	1,800	550,000	560,000	140	1.1	560,000
Alternative 3	1,800	310,000	310,000	130	1.1	320,000
Net Difference	**0**	**-240,000**	**-250,000**	**-10**	**0**	**-240,000**

Source: LSA Associates, Inc. (June 2013).
CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent
MT/year = metric tons per year
N_2O = nitrous oxide

proposed project, development under Alternative 3 would require payment of impact fees for schools, police services, and fire services for the new community. The payment of development impact fees would offset impacts to these public services under Alternative 3. However, there would still be a need to provide additional fire, police, and library facilities in order to meet service and response time requirements. Similar to the proposed project, impacts under Alternative 3 would, therefore, remain significant and unavoidable until such time that additional facilities are constructed.

The Retirement Community Alternative, with the same phasing as proposed for the La Entrada Specific Plan, would also generate solid waste. Alternative 3 is anticipated to generate less solid waste because fewer residents are anticipated to live on the project site. Therefore, demands on solid waste services and landfill capacity would be reduced compared to the proposed project. However, similar to the proposed project, development under the Retirement Community Alternative would not be complete by the time that the two landfills serving the project site are anticipated to be closed. When compared to the proposed project, solid waste impacts would remain significant and unavoidable.

Traffic. Based on trip generation rates published in *ITE Trip Generation Handbook, 9th Edition*, and as identified in Table 5.D, the Retirement Community Alternative would generate approximately 116,105 gross daily trips, approximately 14 percent fewer than the proposed project. With a 14 percent reduction in daily trips, it is reasonable to conclude that traffic volumes on local roadways and intersections would be reduced under Alternative 3. Although the volume of traffic is reduced under Alternative 3, impacts to LOS at nearby intersections and roadway segments would still occur and would require mitigation. The traffic volumes associated with Alternative 3 could result in a deficient LOS at one or more of the intersections in the project vicinity during the lifetime of the project. While significant traffic impacts may occur under Alternative 3, these impacts would be mitigated in a manner similar to the impacts of the proposed project. However, despite the identification of mitigation measures, certain roadway improvements would not be under the jurisdiction of the City and cannot be guaranteed to be in place when development under the Retirement Community Alternative would become operational. Therefore, traffic-related impacts would remain significant and unavoidable, similar to the proposed project.

5.8.3 Conclusion – Alternative 3 (Retirement Community)

Alternative 3 would meet most of the project objectives to develop a residential mixed-use master-planned community. With the Retirement Community Alternative, impacts related to aesthetics, agricultural resources, and geology and soils would be similar to those under the proposed project. Although reduced in magnitude, air quality construction and operational emissions, GHG emissions, and operational traffic impacts at certain roadway segments and intersections under Alternative 3 would be significant and unavoidable, similar to the proposed project. The decrease in household size (i.e., senior citizen households tend to be smaller than the average household) would result in fewer residents on the Specific Plan site than with the proposed project. As a result, Alternative 3 would have a reduced demand for public services and solid water. However, as with the proposed project, although the payment of fees and adherence to utility requirements would reduce these impacts, there would still be a need to provide additional fire, police, and library facilities to meet response time requirements. Impacts would, therefore, remain significant and unavoidable until such time that additional facilities are constructed. Because of the reduction in vehicle trips achieved under Alternative 3, impacts to the operation of local roadways and intersections would be proportionate compared to the proposed project, but would remain significant and unavoidable. A comparison of how the Retirement Community Alternative avoids or reduces significant environmental impacts as it relates to the proposed project is provided in Section 5.10.

5.9 ALTERNATIVE 4: NO ANNEXATION ALTERNATIVE

5.9.1 Description

The No Annexation Alternative would include the proposed Specific Plan land uses on the 1,612 ac part of the project site in the City and would exclude the 588 ac area in unincorporated Riverside County. Alternative 4 would reduce the number of residential units to 6,504 and would eliminate approximately 26 ac of park uses, 207 ac of open space, and one 16 ac school site. Under Alternative 4, it is assumed that some drainage channel improvements would still be required within the County to facilitate stormwater runoff that originates from a large area north of I-10 through the project site and southwest toward the Coachella Canal. Similar to the proposed project, Alternative 4 would also include the extensions of Avenues 50 and 52 onto the project site.

5.9.2 Environmental Analysis

Aesthetics. Development of Alternative 4 would result in the alteration of the existing visual character of the site similar to the proposed project. Development of the residential, commercial, and office uses on the 1,612 ac site would be required to comply with design standards, such as setbacks, building height, lot dimensions, and maximum lot coverage, contained in the City of Coachella Zoning and Municipal Codes. Although Alternative 4 would proportionally reduce aesthetic impacts associated with the development of only the 1,612 ac site in the City, development of the No Annexation Alternative would still result in a substantial alteration of the existing visual character of the site. Therefore, the visual character impacts under the No Annexation Alternative would be the same as under the proposed project and would remain significant and unavoidable.

Agricultural Resources. Development of the No Annexation Alternative would have the same agriculture-related impacts as those identified for the proposed project. As identified in Chapter 4.2, Agricultural Resources, in the EIR, the extension of Avenue 50 would result in the conversion of State-designated Farmland and the loss of Prime Farmland. Because there are no feasible mitigation measures that would mitigate for the loss of Prime Farmland, impacts associated with development of the No Annexation Alternative (which requires the extension of Avenue 50) would remain significant and unavoidable.

Air Quality.

Construction Emissions. Although the land area to be developed with Alternative 4 would be reduced by 588 ac compared to the proposed project, it is anticipated that a similar mix of equipment would operate during earthmoving activities. Although construction emissions are anticipated to be proportionally reduced, peak daily construction emissions for Alternative 4 would still be above the SCAQMD thresholds for ROG, NO_X, and CO. Although ROG, NO_X, and CO construction emissions would be reduced compared to the proposed project, impacts would remain significant and unavoidable because there are no feasible mitigation measures identified that would reduce construction emissions to below the SCAQMD thresholds.

Operational Emissions. Under Alternative 4, average daily gross traffic volumes would be reduced by 12,900 trips (10 percent) compared to the proposed project. As indicated in Table 5.G, due to the reduction of vehicle trips (resulting from the reduction of development proposed), the volume of each pollutant emitted during the operation of Alternative 4 (i.e., ROG, CO, NO_X, SO_X, $PM_{2.5}$, and PM_{10}) would be correspondingly reduced.

However, like the proposed project, operational emissions for ROG, NO_X, CO, $PM_{2.5}$, and PM_{10} would still exceed the daily SCAQMD thresholds. Although ROG, NO_X, CO, $PM_{2.5}$, and PM_{10} operational emissions would be reduced compared to the proposed project, impacts would remain significant and unavoidable because there are no feasible mitigation measures identified that would reduce emissions to below the SCAQMD thresholds.

Table 5.G: Alternative 4 (No Annexation) Operational Emissions

Source	Pollutant Emissions (lbs/day)					
	CO	**ROG**	**NO_X**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Proposed La Entrada Specific Plan Project	9,800	1,470	4,900	31	3,200	220
Alternative 4	8,800	1,270	4,300	28	2,900	200
Net Change	-1,000	-200	-600	-3	-300	-20
SCAQMD thresholds	**550**	**55**	**55**	**150**	**150**	**55**
Does Alternative 4 exceed the threshold?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**

Source: LSA Associates, Inc. (June 2013).
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in diameter
PM_{10} = particulate matter less than 2.5 microns in diameter
ROG = reactive organic gases
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOC = volatile organic compounds

Geology and Soils. Development of the No Annexation Alternative would have similar geologic and soil-related impacts as under the proposed project. Similar to the proposed project, the No Annexation Alternative would result in potentially significant impacts related to risks to people, utilities, and infrastructure associated with seismic activity, including surface rupture, slope instability, and/or landslides, and risks associated with erosion (loss of topsoil) and/or sedimentation. Similar to the proposed project, future site-specific development under Alternative 4 would be required to prepare a preliminary geotechnical investigation report that would include recommendations that address potential impacts related to active faults and the stability of on-site soils. Because the No Annexation Alternative would only develop 1,612 ac in the City, impacts associated with seismicity and exposure to seismic impacts would be proportionally reduced. Nonetheless, the No Annexation Alternative would still result in the development and operation of residential and commercial uses in a seismically active area. Although the No Annexation Alternative would be required to implement the same type of mitigation measures as the proposed project, due to the presence of the San Andreas fault, impacts associated with fault rupture remain significant and unavoidable under Alternative 4.

Global Climate Change. As shown in Table 5.H, Alternative 4 would generate 490,000 MT/year of CO_2, 99 MT/year of CH_4, and 0.92 MT/year of N_2O per year. GHG emissions resulting from operation of the uses envisioned under the No Annexation Alternative would be correspondingly reduced because this alternative would reduce the number of daily traffic trips and amount of energy consumed. The total CO_2e for Alternative 4 would be 490,000 MT/year of CO_2e, which is less than the 560,000 MT/year of CO_2e that would result from operation of the proposed project. Although Alternative 4 would generate less GHG emissions than the proposed project, impacts associated with project-specific GHG emissions and global climate change (GCC) would remain significant and unavoidable because there is no mitigation available to fully reduce GHG emissions at this time.

Table 5.H: Alternative 4 Greenhouse Gas Emissions

Source	Greenhouse Gas Emissions (MT/year)					
	Bio-CO_2	**NBio-CO_2**	**Total CO_2**	**CH_4**	**N_2O**	**CO_2e**
Proposed Project	1,800	550,000	560,000	140	1.10	560,000
Alternative 4	1,200	490,000	490,000	99	0.92	490,000
Net Difference	**- 600**	**-60,000**	**-70,000**	**-41**	**-0.18**	**-70,000**

Source: LSA Associates, Inc. (June 2013).
CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent
MT/year = metric tons per year
N_2O = nitrous oxide

Public Services and Utilities. Compared to the proposed project, Alternative 4 would result in a reduced amount of residential, commercial, and office uses. Because of the decreased amount of development that would occur under Alternative 1, demands on schools, parks, other public facilities, law enforcement, and fire protection services would be reduced in magnitude compared to the proposed project. However, similar to the proposed project, development under Alternative 4 would require payment of development impact fees for schools, police services, and fire services. The

payment of development impact fees would offset any impacts to these public services that may result from the development of Alternative 4. However, there would still be a need to provide additional fire, police, and library facilities in order to meet service and response time requirements. Similar to the proposed project, impacts under Alternative 4 would, therefore, remain significant and unavoidable until such time as facilities are constructed.

Like the proposed project, the No Annexation Alternative would also generate solid waste. Alternative 4 is anticipated to generate less solid waste as less total development would occur under this alternative. Therefore, demands on solid waste services and landfill capacity would be reduced. However, similar to the proposed project, development under the No Annexation Alternative would not be complete by the time the two landfills serving the project site are anticipated to be closed. When compared to the proposed project, solid waste impacts would remain significant and unavoidable.

Traffic. Based on trip generation rates published in the *ITE Trip Generation Handbook, 9th Edition*, and as identified in Table 5.D, Alternative 4 would generate approximately 122,730 gross daily trips, approximately 10 percent less than the proposed project. With a 10 percent reduction in daily net trips, it is reasonable to conclude that traffic volumes on local roadways and intersections would be reduced under Alternative 4. Although the volume of traffic would be reduced under Alternative 4, impacts to LOS at nearby intersections and roadway segments would still occur and would require mitigation. The addition of traffic volumes associated with Alternative 4 could result in a deficient LOS at one or more of the intersections in the project vicinity during the lifetime of the development. While significant traffic impacts may occur under Alternative 4, these impacts would be mitigated in a manner similar to the impacts caused by the proposed project. However, despite the identification of mitigation measures, certain roadway improvements would not be under the jurisdiction of the City and cannot be guaranteed to be in place when development in the No Annexation Alternative would become operational. Therefore, traffic-related impacts would remain significant and unavoidable, similar to the proposed project.

5.9.3 Conclusion – Alternative 4 (No Annexation)

Alternative 4 would meet the majority of the project objectives to develop a residential mixed-use master-planned community. With the No Annexation Alternative, impacts related to aesthetics, agricultural resources, and geology and soils would be similar to those under the proposed project. Although reduced in physical size and intensity, short-term air quality construction emissions, long-term air quality operational emissions, GHG emissions, and operational traffic LOS for certain roadway segments and intersections under Alternative 4 would remain significant and unavoidable, similar to the proposed project. The reduction in development under Alternative 4 would result in a reduction in the total number of residents and employment opportunities on the site, which would result in reduced demand to public services and solid waste. Although the payment of fees and adherence to utility requirements would reduce these impacts, there would still be a need to provide additional fire, police, and library facilities in order to meet response time requirements. Similar to the proposed project, public service impacts under Alternative 4 would remain significant and unavoidable until such time as facilities are constructed. Because of the reduction in vehicle trips achieved under Alternative 4, impacts to the operation of local roadways and intersections would be proportionally reduced from the proposed project, but would remain significant and unavoidable. A

comparison of how the No Annexation Alternative avoids or reduces significant environmental impacts as it relates to the proposed project is provided in Section 5.10.

5.10 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The following discussion compares the impacts of each alternative with the impacts of the proposed project. Table 5.I compares the impacts of the alternatives with those of the proposed project and identifies whether each alternative results in (1) a reduction of the impact, (2) a greater impact than the project, or (3) the same impact as the project.

Table 5.I: Comparison of Alternatives to the Proposed Project

Environmental Issue	Proposed Project	Alternative 1: No Project/McNaughton Specific Plan	Alternative 2: No Project/No Development	Alternative 3: Retirement Community	Alternative 4: No Annexation
Aesthetics	SIG	SIG	*	=	=
Agricultural Resources	SIG	=	*	=	=
Air Quality	SIG	→SIG	*	←SIG	← SIG
Geology and Soils	SIG	=	*	=	=
Global Climate Change	SIG	→SIG	*	←SIG	←SIG
Public Services and Utilities	SIG	→SIG	*	←SIG	←SIG
Transportation and Traffic	SIG	→SIG	*	←SIG	←SIG

Proposed Project

SIG: Significant and Unavoidable Impact with or without Mitigation

Project Alternatives

= Compared with the proposed project, no change in the significance of the impact will occur.
+ Compared with the proposed project, a new impact has been identified.
* Compared with the proposed project, an impact has been eliminated.
→ Compared with the proposed project, the significance of the impact is increased.
← Compared with the proposed project, the significance of the impact is reduced.
←SIG Compared with the proposed project, the volume or extent of the impact is reduced, yet still significant.
→SIG Compared with the proposed project, the volume or extent of the impact is increased and still significant.

CEQA requires that the environmentally superior alternative be identified in the EIR. Based on the analysis in this section and the summary contained in Table 5.I, Alternative 2, the No Project/No Development Alternative, is the environmentally superior alternative. Although Alternative 2 is the environmentally superior alternative, this alternative would not satisfy any of the identified project objectives because it would not provide for an orderly development of residential and commercial uses that would retain revenue-generating uses, provide new employment opportunities to residents, provide commercial services for residents, or provide additional housing for residents in an area that is easily accessible to public transportation, retail, and service uses. Pursuant to the *CEQA Guidelines* Section 15126.6 (e)(2), if the project alternative is determined to be the environmentally superior alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

As identified in Table 5.I, Alternative 1 would result in greater air quality and GHG emissions and traffic trips than the proposed project. Alternatives 3 and 4 would reduce the severity of air quality and GHG emissions compared to the proposed project. Though reduced, the air quality and GHG emission impacts would remain significant after mitigation for Alternatives 3 and 4.

Alternatives 3 and 4 would reduce the volume of daily traffic trips compared to the proposed project. However, traffic impacts to certain intersections, and roadway and freeway segments are anticipated to remain significant and unavoidable after mitigation for Alternatives 3 and 4. Compared to the proposed project, traffic impacts for Alternatives 3 and 4 would be reduced in magnitude but would remain significant and unavoidable.

Compared to the proposed project, aesthetic impacts under Alternative 1 would increase due to the increased development density and would be significant and unavoidable. The aesthetic impacts under Alternatives 3 and 4 would be the same as those identified for the proposed project (i.e., significant and unavoidable).

Alternatives 1, 3, and 4 would have similar impacts to agricultural resources because the extension of Avenue 50 would be required under Alternatives 1, 3, and 4. Therefore, agricultural resource impacts under Alternatives 1, 3, and 4 would be the same as under the proposed project (i.e., significant and unavoidable) because the amount of designated farmland that would be converted under Alternatives 1, 3, and 4 would be the same as under the proposed project.

The magnitude of the impact for geology and soils (exposure of people and infrastructure to fault rupture) would be the same for Alternatives 1, 3, and 4 because these alternatives would be developed in the same seismically active area as the proposed project. Therefore, fault surface rupture impacts would remain significant and unavoidable for Alternatives 1, 3, and 4, the same as under the proposed project.

Alternative 1 would result in an increase in demand for public services and utility provisions and impacts related to public services and utilities would remain significant and unavoidable compared to the proposed project. For Alternatives 3 and 4, public services and utility impacts would be reduced because fewer residents would require fire protection, police, and school services and fewer demands would occur for water, wastewater, and solid waste services. Although reduced in magnitude, impacts associated with public services and utilities would remain significant and unavoidable for Alternatives 3 and 4, similar to the proposed project.

Alternatives 3 and 4 would meet the majority of the identified project objectives while still reducing air quality and traffic impacts. While Alternative 3 would result in reduced air quality and GHG emissions and allow for the development of employment and revenue-generating uses, the restriction on the type of housing (e.g., age-restricted housing) would not provide additional diverse housing opportunities in the City. Alternative 3 would have a greater percentage of reduced operational traffic than Alternative 4 compared to the proposed project. Alternative 4 would still allow the development of employment- and revenue-generating uses as well as provide additional diverse housing opportunities in City, while at the same time reducing the impacts associated with the proposed project. Therefore, Alternative 4 has been determined to be the environmentally superior alternative. However, as noted in the analysis of Alternative 4, the magnitude of the impacts of that alternative would be proportionally reduced but the impacts remain significant. Therefore, although Alternative 4

would lessen the magnitude of significant impacts, it would not result in the avoidance of significant impacts identified for the proposed project. As a result, a comparison of the proposed project and Alternative 4 does not result in a conclusion that Alternative 4 performs substantially better in avoiding significant adverse impacts that would occur under the proposed project.

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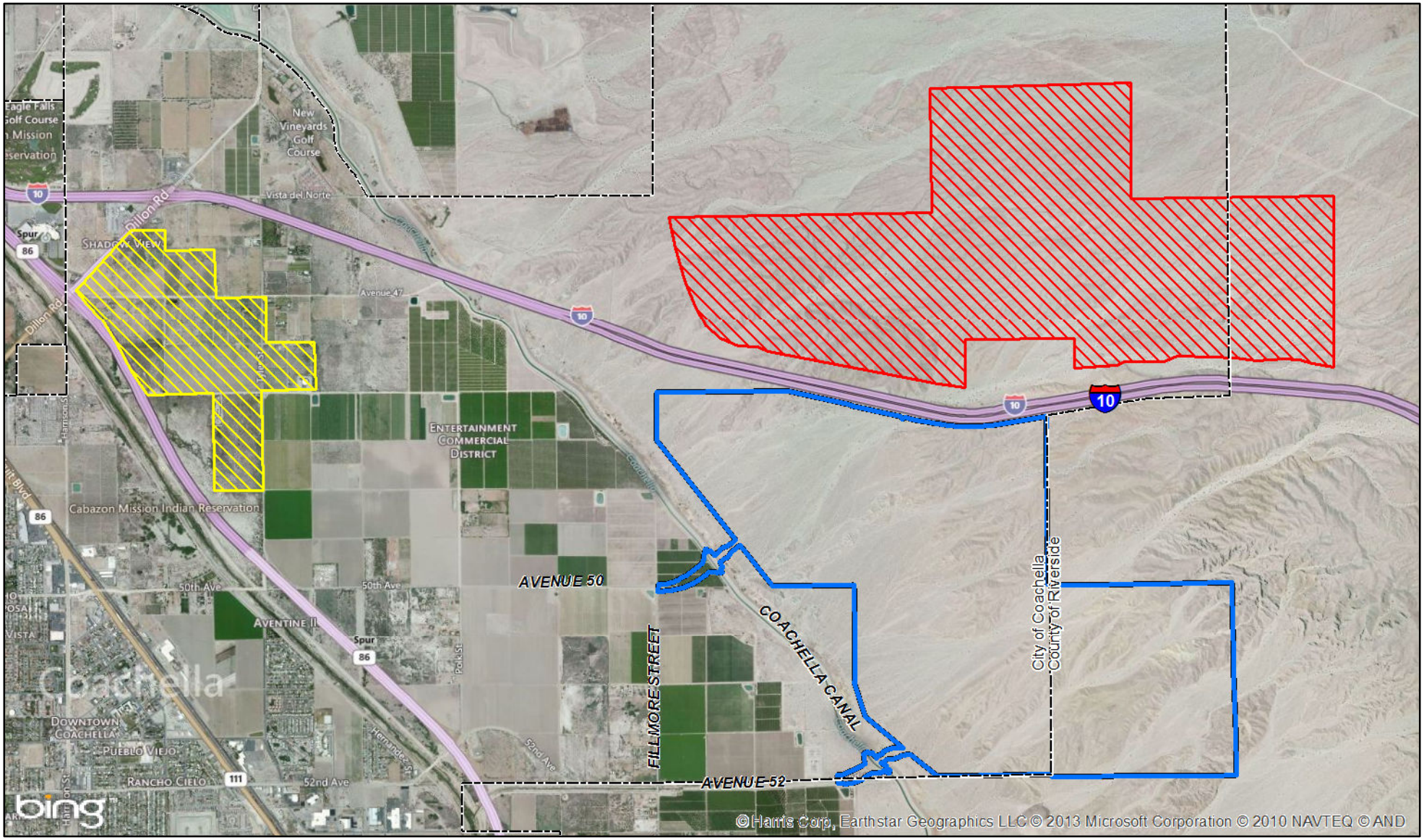

LSA

LEGEND

Project Location

Alternative Location Sites

Desert Lakes Specific Plan

Shadow View Specific Plan

0 1875 3750

FEET

FIGURE 5.1

La Entrada Specific Plan

Alternative Location Sites

SOURCE: Bing (c. 2010); City of Coachella (2010); County of Riverside (2013)

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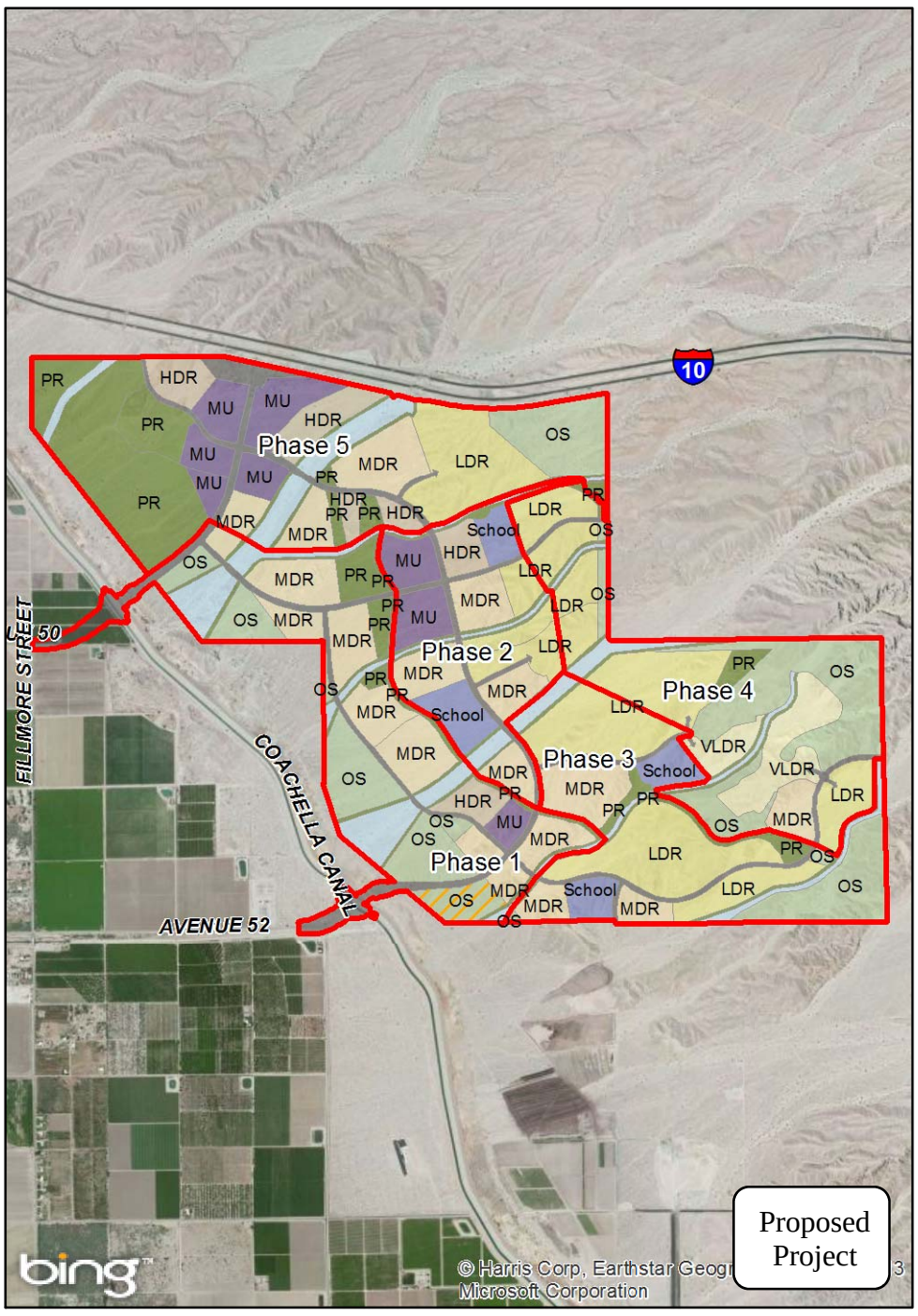
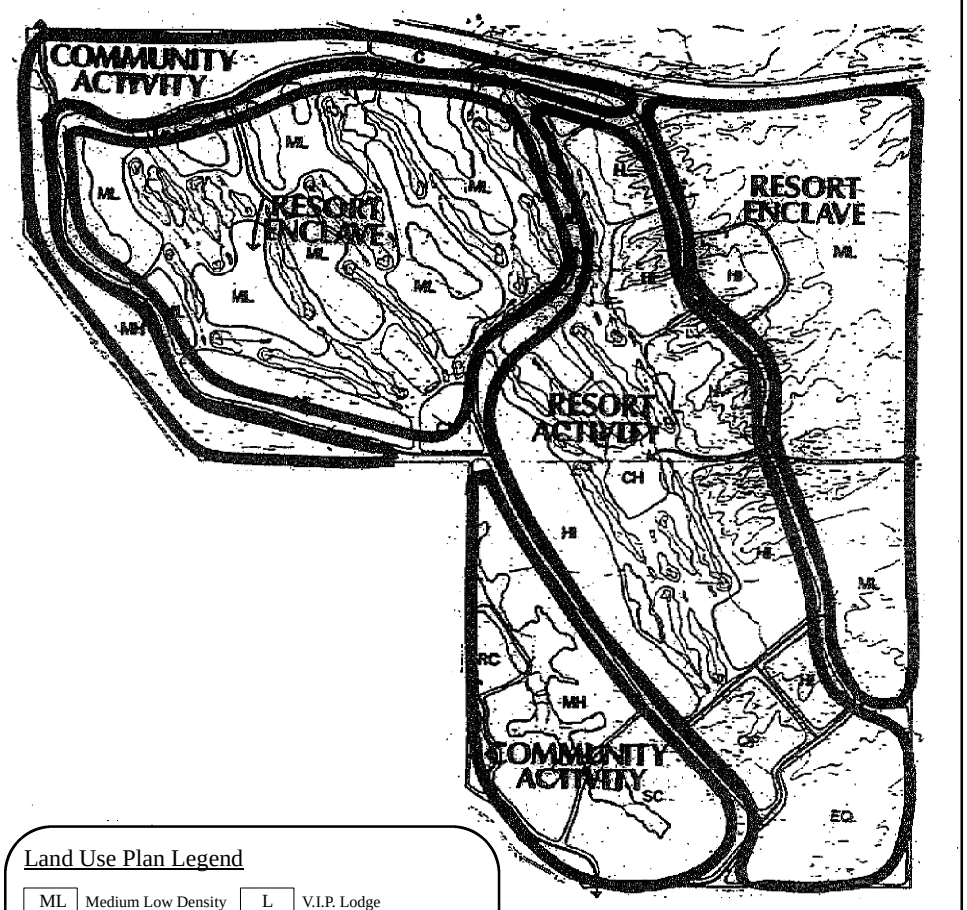


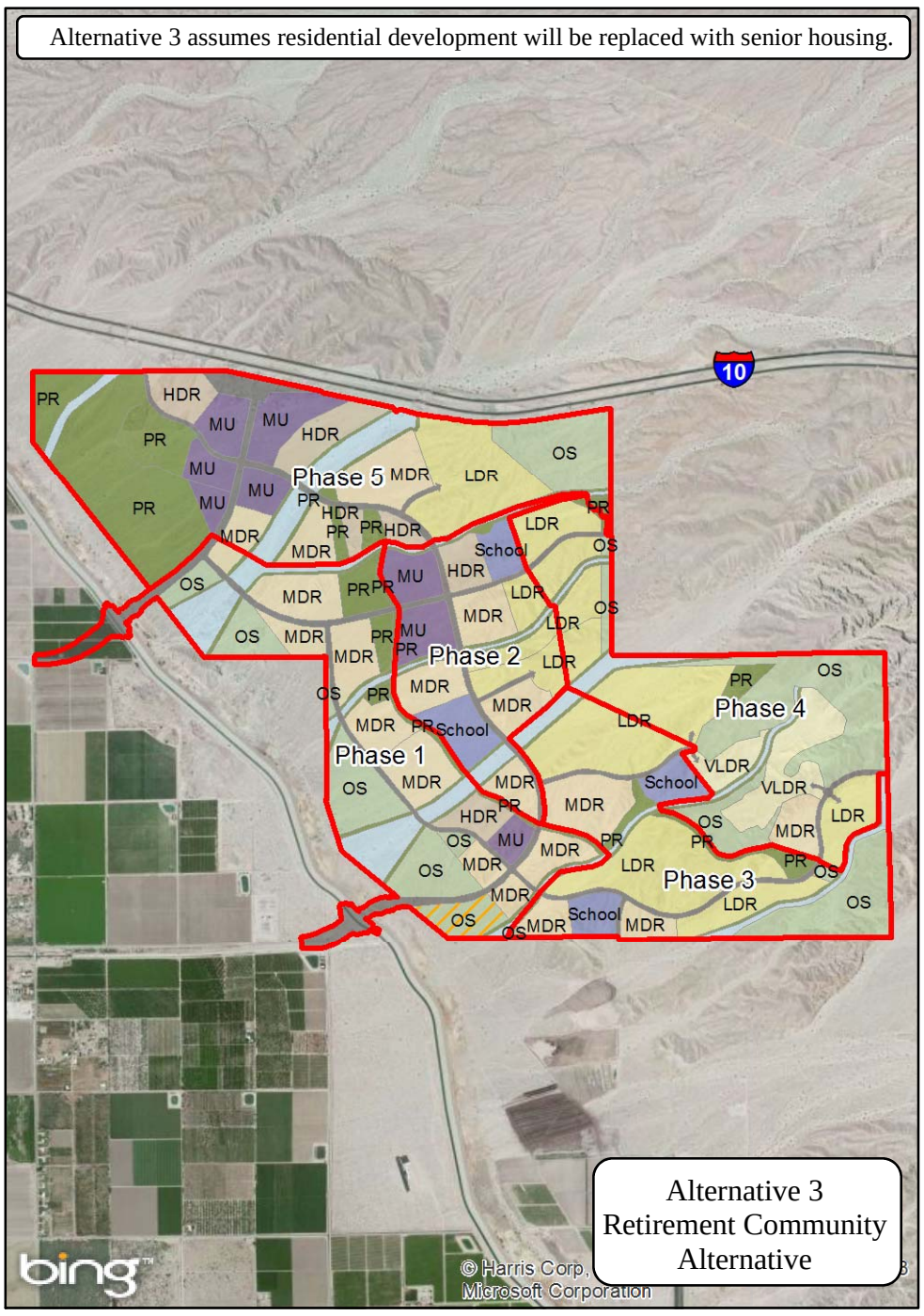


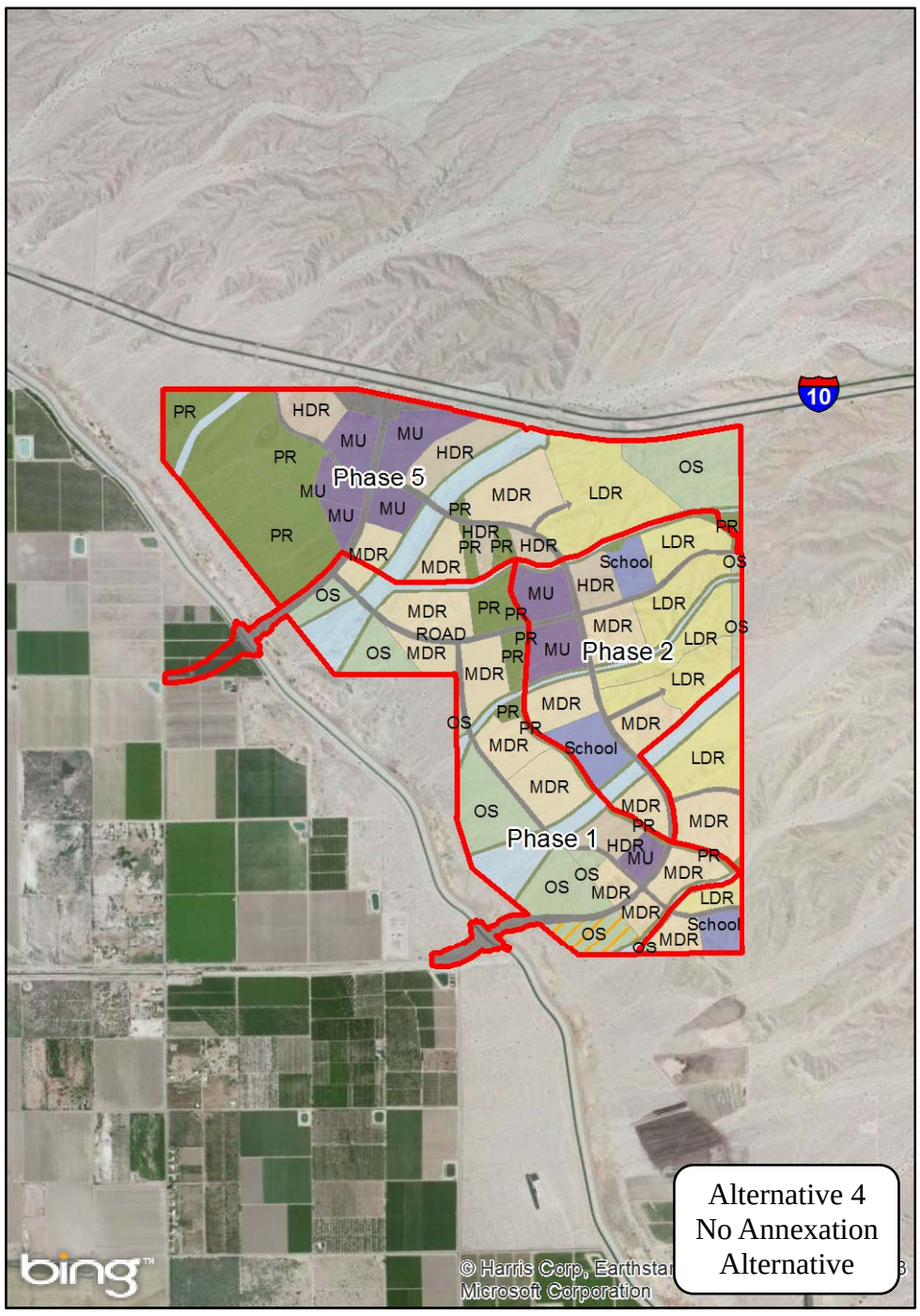
Land Use Plan Legend

ML	Medium Low Density	L	V.I.P. Lodge
MH	Medium High Density	CH	Club House
HI	High Density	RV	Recreational Vehicle Resort
C	Commercial	RC	Rowing Club
SC	Shopping Center	EQ	Polo & Equestrian Center
OP	Office Park		Golf Course
H	Hotel		Lake

Alternative 1
No Project/McNaughton SP Alternative

Alternative 3 assumes residential development will be replaced with senior housing.





LSA

LEGEND

- Phases
- Medium Density Residential Overlay Zone
- Very Low Density Residential (VLDR)
- Low Density Residential (LDR)
- Medium Density Residential (MDR)
- High Density Residential (HDR)
- Mixed Use (MU)
- School
- Parks/Recreation (PR)
- Open Space (OS)
- Drainage
- Road

N

0 1650 3300
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FIGURE 5.2

La Entrada Specific Plan
Project Alternatives

SOURCE: Bing (c. 2010); RBF (2012)

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