

## 7. *Alternatives to the Proposed Project*

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### 7.1 INTRODUCTION

#### 7.1.1 Purpose and Scope

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR ) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Guidelines Section 15126.6). This chapter identifies potential alternatives to the proposed project and evaluates them, as required by CEQA.

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

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



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- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative” (15126.6[f][3]).

For each development alternative, this analysis:

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

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

### **7.1.2 Project Objectives**

As described in Section 4.2, the following objectives have been established for the proposed project and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts:

- Adopt a new General Plan that establishes the goals and policies to create a built environment that fosters the enjoyment, financial stability, and well-being of the entire community.
- Preserve a diverse mix of neighborhoods that provide an array of housing choices for a variety of life stages and lifestyles.
- Preserve the City’s rural character, where appropriate.
- Create a vibrant downtown, complete with a Community Center that serves as the central facility for our annual community celebrations and a gathering place for a broad spectrum of interests and ages.
- Preserve and promote historic and cultural resources that are unique to the City.
- Provide for adequate open space, recreational, and cultural amenities to serve existing and future residents.
- Provide access to rail, bus rapid transit, and local shuttle services and develop a citywide golf cart/neighborhood electric vehicle plan to minimize vehicular trips and improve air quality.
- Improve the community’s jobs-housing balance and fiscal sustainability by planning for a diversified employment base, supported by a variety of commercial, industrial, and mixed-use land uses through creation of the Economic Development Corridor (EDC) land use designation.
- Create a plan that promotes long-term economic vitality and fiscal responsibility.
- Reconcile General Plan buildout projections with regional and subregional estimates for growth.
- Incorporate housing sites identified in the Housing Element into the Land Use Element.

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- Ensure consistency with AB 32, SB 375, and other federal, state, and local mandates.
- Incorporate goals, policies, and programs that integrate multiple modes of transportation and meet the requirements of the Complete Streets Act.

### 7.2 SIGNIFICANT AND UNAVOIDABLE IMPACTS

The following significant and unavoidable impacts are identified in Chapter 5, *Environmental Analysis*, of this Draft EIR: Agricultural Resources, Air Quality, Greenhouse Gas Emissions, Noise, and Transportation and Traffic.

#### 7.2.1 Agricultural Resources

- **Impact 5.2-1.** The proposed project would convert 162 acres of Prime Farmland, 218 acres of Farmland of Statewide Importance, and 142 acres of Unique Farmland to nonagricultural use. Implementation of the General Plan would replace existing Important Farmland with urban development. Important Farmland conversion to nonagricultural uses would be a significant impact. The proposed Land Use Plan would ultimately convert all existing Important Farmland within the City to nonagricultural uses. The City is focusing on developing land in an economically productive way that would serve the growing population. Thus, Menifee's future development emphasizes mixed-use, commercial, industrial, and residential projects rather than supporting the continuation of agricultural uses, which are becoming less economically viable. Development and implementation of the General Plan would have significant impacts on agricultural resources.
- **Impact 5.2-2.** General Plan buildout would conflict with existing agricultural zoning. Six percent of the land area in Menifee is used for agricultural purposes, and those plus several more areas of the City are currently zoned for agricultural uses. The Menifee zoning code includes six separate designations specifically for agricultural land; the General Plan only includes one agriculture land use designation (Agriculture (AG)). The zoning code would remain as is for some time after adoption of the General Plan, which changes designations for all but one parcel of agricultural land (dairy/livestock feedyard along eastern edge of city just south of Newport Road). This would create conflicts between the zoning code and the General Plan land use designations on all but one parcel until the zoning code is updated. Because there is agricultural zoning conflicts, this impact is considered significant.
- **Impact 5.2-4.** The General Plan would result in the conversion of farmland to nonagricultural uses. Areas of Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance about the City of Menifee along the north, east, and south boundaries. General Plan buildout would place developed urban land uses closer to those surrounding mapped farmland areas than currently. Environmental impacts of farming, such as odors, noise, and water and air pollution, may affect future residents of the City next to those surrounding farmland areas. General Plan buildout would also likely contribute to increases in the cost of land adjacent to farmland. Such potential conflicts between agricultural and urban land uses would add to pressures on owners of agricultural land to sell and/or convert the land to nonagricultural uses.

Although the Riverside County General Plan Final EIR originally required mitigation that would establish an Agricultural Mitigation Land Bank, shortly after EIR certification a CEQA decision by the California Court of Appeal held that a mitigation measure of this nature does not actually



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avoid or reduce the loss of farmland subject to development (*Friends of the Kangaroo Rat v. California Department of Corrections* (August 18, 2003) Fifth Appellate District Number F040956). Therefore, the Agricultural Land Mitigation Bank was not a valid form of mitigation for farmland conversion impacts. Accordingly, the County of Riverside deleted the EIR Mitigation Measure, and found farmland conversion impacts significant and unavoidable. Since then, two other California appellate courts have issued conflicting rulings on whether preservation of offsite farmland mitigates conversion of farmland on a project site to nonagricultural uses. The three rulings are unpublished and are not legal precedents, but do include arguments that might be used in future legislation or court opinions on this topic. One of the rulings: *County of Santa Cruz v. City of San Jose* (2003; WL No. 1566913) by the Sixth District Appellate Court found that preservation of offsite farmland does not mitigate conversion of farmland by a project because it does not create new farmland or offset the loss of farmland due to the project. The other ruling, *South County Citizens for Responsible Growth v. City of Elk Grove* (2004; WL No. 219789) by the Third District Court disagreed with the earlier two rulings. The last ruling stated that conservation fees can mitigate for the loss of agricultural lands by diminishing development pressures due to the conversion of farmland and reducing the domino effect created by projects. The question of whether offsite preservation of farmland mitigates conversion of farmland to nonagricultural uses has yet to be settled by the courts or the legislature.

Considering the economic and regulatory constraints on the viability of agriculture in western Riverside County, it is also uncertain whether offsite mitigation within western Riverside County would be effective as a long-term mitigation strategy. Given this uncertainty of the permissibility of this method of mitigation, no offsite mitigation is required here for conversion of farmland to nonagricultural uses. Similar to the County of Riverside finding, the conversion of farmland in Menifee is considered a significant and unavoidable impact of the General Plan project.

### 7.2.2 Air Quality

- **Impact 5.3-1.** The General Plan would be inconsistent with South Coast Air Quality Management District's Air Quality Management Plan because buildout of the Land Use Plan would cumulatively contribute to the nonattainment designations of the South Coast Air Basin, and the AQMP does not account for emissions associated with buildout of the General Plan post Year 2035. Mitigation measures incorporated into future development projects for operation and construction phases would reduce criteria air pollutant emissions associated with buildout of the proposed General Plan. Goals and policies included in the proposed General Plan would facilitate continued City cooperation with SCAQMD and Southern California Association of Governments to achieve regional air quality improvement goals, promotion of energy conservation design and development techniques, encouragement of alternative transportation modes, and implementation of transportation demand management strategies. Implementation of mitigation would reduce criteria air pollutant emissions. However, no mitigation measures are available that would reduce impacts associated with inconsistency with the AQMP. Therefore, Impact 5.3-1 would remain significant and unavoidable.
- **Impact 5.3-2.** Construction activities associated with buildout of the General Plan would generate short-term emissions that exceed SCAQMD's regional and localized significance thresholds and would cumulatively contribute to the nonattainment designations of the SoCAB. Implementation of mitigation would reduce criteria air pollutant emissions from construction-related activities. However, due to the magnitude of emissions generated by future construction activities, no mitigation measures are available that would reduce impacts below SCAQMD's thresholds. Therefore, Impact 5.3-2 would remain significant and unavoidable.

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- **Impact 5.3-3.** Buildout in accordance with the General Plan would generate long-term emissions that would exceed SCAQMD's regional significance thresholds and cumulatively contribute to the nonattainment designations of the SoCAB. Goals and policies are included in the proposed General Plan that would reduce air pollutant emissions. Measures included as part of the General Plan to reduce idling and vehicle trip lengths and encourage use of alternative forms of transportation would also reduce criteria air pollutants within the City. However, due to the magnitude of emissions generated by office, commercial, industrial, and warehousing land uses, no mitigation measures are available that would reduce impacts below SCAQMD's thresholds. Therefore, Impact 5.3-3 would remain significant and unavoidable.
- **Impact 5.3-5.** Operation of new stationary/area sources and truck idling within the City of Menifee from buildout of the General Plan could expose sensitive receptors to toxic air contaminant concentrations. Buildout of the proposed General Plan could result in new sources of criteria air pollutant emissions and/or toxic air contaminants near existing or planned sensitive receptors. Goals and policies are included in the proposed General Plan that would reduce concentrations of criteria air pollutant emissions and TACs generated by new development. Review of projects by SCAQMD for permitted sources of air toxics (e.g., industrial facilities, dry cleaners, and gasoline dispensing facilities) would ensure health risks are minimized. Mitigation would ensure mobile sources of toxic air contaminants not covered under SCAQMD permits are considered during subsequent project-level environmental review. Development of individual projects may achieve the incremental risk thresholds established by SCAQMD. However, the incremental increase in health risk associated with individual projects is considered cumulatively considerable and would contribute to already elevated levels of cancer and noncancer health risks in the SoCAB. Therefore, Impact 5.3-5 would remain significant and unavoidable.

### 7.2.3 Greenhouse Gas Emissions

- **Impact 5.7-1.** General Plan buildout of the City of Menifee to the maximum level allowed would generate an increase in greenhouse gas (GHG) emissions over existing conditions. Goals and policies are included in the General Plan that would reduce GHG emissions. Compliance with the goals in the SCAG Regional GHG Reduction Plan and policies and implementation measures of the General Plan would ensure that long-term GHG emissions from buildout of the General Plan are reduced to the extent feasible. However, due to the magnitude of emissions generated by the buildout of residential, office, commercial, business park, and industrial land uses in the City, and the fact that no statewide long-term strategy to reduce emissions beyond year 2020 are available that would reduce impacts below SCAQMD's thresholds at buildout of the General Plan, GHG impacts would be significant and unavoidable.

### 7.2.4 Noise

- **Impact 5.12-1.** Buildout of the proposed Land Use Plan, implementation of the Circulation Plan, and regional growth would result in an increase in traffic on local roadways. An increase in traffic would result in an increase in noise along roadways ranging from 0.0 to 19.1 dBA CNEL. The highest increase would occur in areas that are least developed, along roadways that would be improved with additional lanes and connections currently not implemented, bringing an increase in pass-by traffic. Increases over individual projects associated with buildout of the proposed Land Use Plan would occur over a period of many years and the increase in noise on an annual basis would not be readily discernible because traffic and noise would increase incrementally.



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Implementation of the General Plan includes several policies to protect noise-sensitive uses from excessive noise. Although these policies could in certain cases reduce or prevent significant increases in ambient noise at sensitive land uses, measures to implement these policies would not be universally feasible, and some of the most effective noise-attenuation measures, including sound walls and berms, would be infeasible or inappropriate in a majority of locations where sensitive land uses already exist. Factors that would render these measures infeasible include but are not limited to cost, property access, aesthetic considerations, and negative impacts to pedestrian and bicycle connectivity. Since substantial cumulative increases in the ambient noise environment would occur at existing uses from buildout of the proposed Land Use Plan, impacts would be significant and unavoidable.

### **7.2.5 Transportation and Traffic**

- **Impact 5.16-2.** General Plan buildout trip generation would contribute to an exceedance of the CMP criteria at freeway mainline segments. The Congestion Management Program in effect in Riverside County was approved by the Riverside County Transportation Commission (RCTC) and adopted Level of Service (LOS) threshold of “E” for CMP facilities.

Three of the mainline segments on the I-215, from McCall Boulevard to south of Scott Road, currently operate and would continue to operate at LOS F at General Plan buildout. The proposed Land Use Plan would result in additional traffic volume that would cumulatively contribute to significant traffic impacts along this freeway segment. According to the CMP, when a deficiency is identified, a deficiency plan must be prepared by the local agency (in this case Caltrans). Other agencies identified as contributors to the deficiency, which includes the City of Menifee and the County of Riverside, will also be required to coordinate with Caltrans on the plan. Mitigation Measure 16-3 requires the City to contribute to the preparation of the deficiency plan, which would reduce the impacts at the I-215 mainline segments. However, the I-215 is under Caltrans’s sole jurisdiction, and the City itself cannot implement the freeway improvements. The City’s development impact fees cannot be used for improvements to roadway facilities under Caltrans jurisdiction, such as freeway mainline segments, and the City cannot widen the freeway. Consequently, impacts to freeway mainline segments would be significant and unavoidable.

### **7.3 ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING AND PROJECT PLANNING PROCESS**

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

#### **7.3.1 New Development Area Alternative**

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or reduced 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 (Guidelines Sec. 15126[5][B][1]). The proposed project is a General Plan for the City of Menifee. The General Plan is specific to the City and its jurisdiction; it is also specific to the natural, social, and cultural environments within the City. Therefore, an alternative development area for the proposed project is not possible. The

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City does not have jurisdiction over areas outside of its boundaries and cannot impose General Plan policies on such areas. Therefore, no alternative development areas were considered.

### **7.3.2 Revised Designation Alternative**

This alternative would affect a small portion of the City, less than 0.2 percent. A revised Small Estate land use designation was proposed on 50 acres of land along south side of Mapes Road at the north border of the City. As proposed in the General Plan, this area is designated Rural Residential 1 acre minimum (RR1). This alternative would designate this land Rural Residential 1/2 acre minimum (RR1/2). CEQA requires that project alternatives avoid or substantially lessen significant effects of the project. Because this alternative would result in such a small change in the General Plan, it would not affect the significance of any of the environmental impacts of the overall project. As a result, this alternative has been rejected from further consideration.

### **7.3.3 No Growth/No Development Alternative**

The No Project/No Development Alternative would prohibit all new development, restricting urban growth to its current extent. No alterations to the City would occur (with the exception of previously approved or entitled development); all existing residential, commercial, office, industrial, public facilities, agriculture and open space, along with utilities and roadways would generally remain in their current condition. As of May 2011 there were 53 projects approved by the City or County or both, ranging from small commercial buildings (equipment rentals and sprinkler supply) to large residential communities (Audie Murphy Ranch). So even without a General Plan, residential and nonresidential growth would occur within the City. A significant number of the approved projects are residential; therefore pushing the city further away from a balanced job/housing ratio. Implementation of this alternative would not provide adequate housing supply required to meet the City's obligations to provide its fair share of affordable housing. In addition, development under this alternative would not expand mixed-use development and would not improve the jobs/housing balance of the city, and would not reduce the number of vehicle miles traveled (VMT) in the South Coast Air Basin (SoCAB). It should also be noted that this alternative would not achieve any of the objectives established for the project. Finally, the State has mandated that the City adopt a General Plan by 2013. As a result, this alternative has been rejected from further consideration.



### **7.3.4 Low Growth Alternative**

The Low Growth Alternative was proposed to reduce significant and unavoidable impacts to air quality, greenhouse gas (GHG) emissions, noise, and transportation and traffic. In this alternative, the net increases in residential and nonresidential development potential at General Plan buildout, over existing conditions, are reduced by 50 percent compared to the proposed Land Use Plan. Under this alternative the number of residential units in the City would increase by about 50 percent over existing conditions, to 46,966; and nonresidential square footage would nearly triple, to 32,151,606 square feet..

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**Table 7-1  
Low Growth Alternative Compared to Proposed General Plan**

<b>Category</b>	<b>Existing Conditions</b>	<b>Proposed Project</b>	<b>Anticipated Growth</b>	<b>Low Growth Alternative</b>	<b>Difference</b>	<b>Change</b>
Dwelling Units	31,518	63,754	30,895	46,966	-16,789	-26.3%
Population	82,292	158,942	76,650	120,617	-38,325	-24.1%
Nonresidential (sq.ft.)	11,982,509	52,320,703	40,338,194	32,151,606	-20,169,097	-38.5%
Employment	8,980	100,554	91,574	54,767	-45,787	-45.5%
Jobs-Housing Ratio <sup>1</sup>	0.289	1.58	1.29	0.94	-0.64	-40.5%

### 7.4 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

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

- No Project/Existing RCIP Alternative
- Preserve Agriculture Alternative
- Reduced Intensity Alternative

An EIR must identify an “environmentally superior” alternative, and where the No Project Alternative is identified as environmentally superior, the EIR is then required to identify as environmentally superior an alternative from among the others evaluated. Each alternative's environmental impacts are compared to the proposed project and determined to be environmentally superior, neutral, or inferior. However, only those impacts found significant and unavoidable are used in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project. The impacts to agriculture, air quality, GHG, noise, and traffic were found to be significant and unavoidable. Section 7.7 identifies the Environmentally Superior Alternative. The proposed General Plan is analyzed in detail in Chapter 5 of this DEIR.

#### 7.4.1 Alternatives Comparison

The following statistical analysis provides a summary of general socioeconomic buildout projections determined by the three project alternatives, as compared to the proposed project and proposed project with Expanded EDC. It is important to note that these are not growth projections. That is, they do not anticipate what is likely to occur by a certain time horizon, but rather provide a buildout scenario that would only occur if all the areas of the City were to develop to the probable capacities yielded by the land use alternatives. The following statistics were developed as a tool to understand better the difference between the project alternatives analyzed in this DEIR. Table 7-2 identifies City-wide information regarding dwelling unit, population, and employment projections, and provides the jobs to housing ratio for each of the project alternatives.

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**Table 7-2  
Buildout Statistical Summary**

	<i>Existing Conditions</i>	<i>Proposed Project</i>	<i>Proposed Project with Expanded EDC</i>	<i>No Project/Existing RCIP Alternative<sup>1</sup></i>	<i>Preserve Agriculture Alternative</i>	<i>Reduced Intensity Alternative</i>
Dwelling Units	32,859	63,754	63,653	65,464	63,142	47,816
Population	82,292 <sup>2</sup>	158,942	158,661	197,055	157,416	119,207
Nonresidential <sup>3</sup> (square feet)	11,982,509	52,320,703	55,581,604	35,349,846	50,138,703	39,240,527
Employment	8,980 <sup>4</sup>	100,554 <sup>5</sup>	115,433 <sup>5</sup>	76,288	75,495	59,086
Jobs-to-Housing Ratio	0.32	1.58	1.81	1.16	1.20	1.24

<sup>1</sup> Riverside County 2008b.

<sup>2</sup> CDF 2013 (2012 estimate) (see DEIR Chapter 5.13, *Population and Housing*).

<sup>3</sup> Nonresidential includes Commercial Retail, Office, Industrial, Business Park, and EDC.

<sup>4</sup> USCB 2013

<sup>5</sup> Urban Crossroads 2013

### 7.5 NO PROJECT/EXISTING RCIP ALTERNATIVE

Section 15126.6(e) of the CEQA Guidelines requires that an EIR evaluate and analyze the impacts of the “No-Project” Alternative. When the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the no-project alternative is the continuation of the plan, policy, or operation into the future. Therefore, in the No Project/Existing RCIP Alternative, the current Land Use Plan would remain in effect. All proposed changes would not occur, and the existing RCIP land use designations would allow for an increase in residential and decrease in nonresidential development, with a total of 65,467 residential units, 35,349,846 square feet (sf) of nonresidential, and a total population of 197,054 (see Table 7-3 below). This alternative would not include adoption of the General Plan, including the following elements: Land Use, Circulation, Housing, Open Space and Conservation, Noise, Safety, Community Design, Economic Development.



**Table 7-3  
No Project / Existing RCIP Alternative Buildout Summary Compared to Proposed General Plan**

<i>Category</i>	<i>Proposed Project</i>	<i>No Project/ Existing RCIP Alternative<sup>2</sup></i>	<i>Difference</i>	<i>Percent Change</i>
Dwelling Units	63,754	65,464	1,710	2.7%
Population	158,942	197,055	38,113	24.0%
Nonresidential (sf)	52,320,703	35,349,846	-16,970,857	-32.4%
Employment	100,554 <sup>1</sup>	76,288	-24,266	-24.1%
Jobs-to-Housing Ratio	1.58	1.16	-0.42	-26.6%

<sup>1</sup> Urban Crossroads 2013

<sup>2</sup> Riverside County 2008b.

The following analysis is based on the significant environmental impacts identified in Section 7.1 above.

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### **7.5.1 Agricultural Resources**

There are currently 1,572 acres of agricultural uses (agriculture and dairy) in Menifee. A total of 522 acres are designated Prime Farmland, Farmland of Statewide Importance, and Unique Farmland—the three categories of farmland assessed in this EIR. The RCIP designates 102.3 acres for agricultural uses compared to 79 acres identified in the proposed Menifee General Plan. The Existing RCIP Alternative would increase land designated for agricultural use compared to the proposed General Plan by 23.3 acres. Therefore, this alternative would reduce impacts to mapped farmland compared to the proposed General Plan; however, impacts would remain significant and unavoidable.

### **7.5.2 Air Quality**

The No Project/Existing RCIP Alternative would generate similar emissions from area, energy, and mobile sources and short-term emissions from construction activities associated with new development. This alternative would have a 24-percent decrease in employment and a 24-percent increase in population Citywide, compared to buildout of the proposed General Plan. Thus, mobile-source emissions would be similar to those of buildout of the proposed Land Use Plan. Furthermore, area and energy sources of emissions would be similar. Short-term emissions related to project construction activities would be similar in this alternative due to the similar amount of total permitted development. This alternative would not substantially reduce significant short- and long-term criteria pollutant contributions of volatile organic compounds (VOC), NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>; would not be consistent with the air quality management plan, since criteria pollutant thresholds would be exceeded; and would cumulatively contribute to the SoCAB nonattainment designations for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Implementation of the proposed project was found to have significant and unavoidable impacts to short- and long-term air quality. Short- and long-term air quality impacts of this alternative would be neutral to those of the proposed project.

### **7.5.3 Greenhouse Gas Emissions**

The No Project/Existing RCIP Alternative would increase population in the City by about 24 percent, and decrease employment by about 24 percent, compared to the proposed Land Use Plan. For General Plan-level analysis, GHG emissions impacts are based on the efficiency of GHG emissions in the community (GHG emissions per capita). This alternative would reduce employment and increase population in the City and would result in an increase in VMT per capita compared to the proposed General Plan. With a 1.16 jobs-housing rate the City would be considered housing-rich.<sup>[1]</sup> Consequently, this alternative would be less efficient than the proposed project because GHG emissions on a per capita basis would be greater as residents drive farther to find work. Therefore, impacts under this alternative would be greater compared to the proposed project. Impacts from this alternative would still be significant and unavoidable, since additional statewide measures would be necessary to reduce GHG emissions to meet the long-term GHG reduction goals under Executive Order S-03-05, which identified a goal to reduce GHG emissions to 80 percent below 1990 levels by 2050.

### **7.5.4 Noise**

In this alternative, noise would be slightly decreased compared to that generated by buildout of the proposed General Plan. The number of residential units would be increased by 2.7 percent, but the total square footage of nonresidential land uses decreased by 24 percent, in this alternative compared to the proposed Land Use Plan. Residential land uses generate less noise than industrial land uses, and some

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<sup>[1]</sup> Jobs-housing ratio is considered balanced at 1.36; communities with more than 1.36 jobs per dwelling unit are considered jobs-rich and those with fewer are housing-rich (SCAG 2004).

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commercial land uses, that would be permitted in some nonresidential land use designations. Truck traffic on arterial roadways and vehicle commute trips to jobs in Menifee would be reduced due to the reduction in nonresidential square footage. Vehicle commute trips to jobs outside Menifee would be increased due to the increase in population and decrease in employment in this alternative. The overall distribution of land uses in the City would be similar with industrial and business park uses clustered in Romoland; in the northwest corner of the City; and in the south half of the City along the I-215 corridor. The majority of the City would be designated for residential uses.

Construction noise impacts of this alternative would be reduced because the reduction in nonresidential building square footage in this alternative, 24 percent, is larger than the 2.7-percent increase in residential units. Additionally, the reduction in construction activities would reduce potential vibration impacts to sensitive receptors. Traffic noise impacts of this alternative would be similar to those of the proposed Land Use Plan because the increase in population in this alternative, 24 percent, would be similar to the 24-percent decrease in employment. However, due to the scale of development activity associated with buildout of this alternative, it would still result in an increase in traffic on local roadways in the City of Menifee, which would increase the noise environment. Similar to the proposed project, this alternative would result in significant, unavoidable noise impacts. Overall this alternative would reduce noise impacts.

### **7.5.5 Transportation and Traffic**

This alternative would generate ADT similar to that of the proposed Land Use Plan. This alternative would increase population in the City by about 24 percent, and decrease employment by about 24 percent, compared to the proposed Land Use Plan. This alternative could still permit mixed-use and higher density developments; however, such developments would contain more residential uses, and less nonresidential uses, than would occur through buildout of the proposed Land Use Plan. In this alternative more Menifee residents would commute to jobs outside of the City, and fewer people would commute to jobs in Menifee from elsewhere. This alternative would include plans and policies for alternative transportation, and impacts on alternative transportation of this alternative would be similar to those of the proposed Land Use Plan. Additionally, under this alternative, circulation improvements would still adhere to roadway design standards that would preclude the construction of any unsafe features.

Three of the mainline segments on the I-215, from McCall Boulevard to south of Scott Road, currently operate and would continue to operate at LOS F at General Plan buildout. Because most of the freeway traffic is regional, a reduction in City traffic would have a minimal effect on these traffic impacts. Overall, transportation and traffic impacts of this alternative would be similar to those of the proposed Land Use Plan; this alternative would not reduce the project's significant and unavoidable impact to cumulative traffic impacts.

### **7.5.6 Conclusion**

Impacts of this alternative would be reduced compared to those of the proposed project for agricultural resources and noise. Impacts of this alternative to air quality and transportation and traffic would be neutral to those of the proposed Land Use Plan, and GHG emissions impacts would be increased. However, impacts of this alternative to each of those resources would remain significant and unavoidable. This alternative would meet the objectives for the General Plan, but to a lesser degree.



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### 7.6 PRESERVE AGRICULTURE ALTERNATIVE

Under this alternative, the City would modify the proposed General Plan to prevent the conversion of mapped important farmland land to urban uses. Three categories of important farmland are evaluated under CEQA—Prime Farmland, Farmland of Statewide Importance, and Unique Farmland. The important farmland in the City in 2010 totaled 522 acres, most of which was near the City’s northern and eastern boundaries.

There were 1,572 acres of existing land uses in Menifee in 2010, including 101 acres of dairy use. Preservation of all of the existing agricultural use was not chosen for this alternative because much of the existing agricultural use, in the northeastern part of the City, is on land already approved for development by the County of Riverside, with nonagricultural land uses under Specific Plan designations, and the City does not have the authority to reverse such approvals due to the executed development agreements.

Existing dairy use along the City’s east boundary, which is not included in the 522 acres of mapped important farmland, would remain and would be designated as agriculture (AG) in the proposed General Plan.

One area of prime farmland in the City, 98 acres along the east City boundary and along the south side of McLaughlin Road, is on land already approved for development by the County of Riverside with nonagricultural land uses under Specific Plan designation, and the City does not have the authority to reverse such approval. Thus, this alternative would preserve agricultural uses on 424 acres of mapped important farmland.

The reductions in the numbers of residential units and square feet of nonresidential land uses that would be developed under this alternative, compared to the proposed General Plan, are shown below in Table 7-4; buildout statistics for the Preserve Agriculture Alternative, compared to the proposed General Plan, are shown below in Table 7-5.

**Table 7-4  
Reductions in Residential Units and Square Feet of Nonresidential Land Uses,  
Preserve Agriculture Alternative**

<b>General Plan Designation</b>	<b>Acres<sup>1</sup></b>	<b>Assumed Density<sup>2</sup></b>	<b>Units/Square Feet</b>
<b>Residential Designations</b>			
2.1-5R	125	4 units per acre	500 units
5.1-8R	10	6 units per acre	60 units
RR1	52	1 unit per acre	52 units
		<b>Total</b>	612 Units
<b>Nonresidential Designations</b>			
EDC	174	13,000 square feet per acre <sup>3</sup>	2,262,000 square feet
AG	5	Not applicable	Not applicable

<sup>1</sup> Obtained from California Important Farmland Finder (DLRP 2013)

<sup>2</sup> Assumed density per General Plan

<sup>3</sup> Citywide average for EDC designation

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**Table 7-5  
Preserve Agriculture Alternative Buildout Summary Compared to Proposed General Plan**

<i>Category</i>	<i>Proposed Project</i>	<i>Preserve Agriculture Alternative</i>	<i>Difference</i>	<i>Percent Change</i>
Dwelling Units	63,754	63,142	-612	-1.0%
Population	158,942	157,416	-1,526	-1.0%
Nonresidential (square feet)	52,320,703	50,058,703	-2,262,000	-4.3%
Employment	100,554	96,207	-4,347 <sup>1</sup>	-4.3%
Jobs-to-Housing Ratio	1.58	1.52	-0.06	-3.2%

The reduction in dwelling units and nonresidential square feet for the preserve agriculture alternative were estimated as follows:

1 The acreage of each area of important farmland was obtained from the California Important Farmland Finder (California Division of Land Resource Protection).

2 The land use designated for each area of farmland was obtained from the General Plan Land Use map.

a. Residential densities are assumed densities specified in the General Plan.

b. All farmland areas in nonresidential designations are designated Economic Development Corridor (EDC). The density for the EDC designation is the citywide average of 13,000 square feet per acre.

<sup>1</sup> The reduction in employment in the Preserve Agriculture Alternative was estimated using the reduction in nonresidential square feet (2,262,000 SF) and the citywide average employment density at proposed General Plan buildout for all employment-generating land uses (52,320,703 square feet/100,554 workers, or 520 square feet per worker)

The following analysis is based on the significant environmental impacts identified in Section 7.1 above.

### 7.6.1 Agricultural Resources

This alternative would preserve agricultural uses on 424 of the 522 acres of mapped important farmland in the City; the remaining 98 acres of important farmland (Prime Farmland) in the City has already been approved for development with nonagricultural uses by the County of Riverside. Some of the mapped farmland is in relatively small patches: for instance, one area of four acres of Unique Farmland along the City's northeast boundary and a second area of 13 acres of Unique Farmland in the south part of the City along the west side of I-215. Land surrounding these smaller areas of important farmland would remain designated for development with nonagricultural land uses.

Larger contiguous areas of farmland benefit from economies of scale and offer greater flexibility regarding farm management and marketing decisions (CDC 1997). Thus, smaller areas of farmland might be subject to some constraints, including which crops could be economically cultivated. Nonagricultural land uses surrounding preserved farmland could be incompatible with some agricultural practices, for instance, the keeping of some types of animals and aerial spraying. However, it is assumed that all 424 acres of preserved farmland would remain in agricultural use. Under this alternative the significant unavoidable impacts to mapped farmland would be eliminated.

### 7.6.2 Air Quality

This alternative would reduce long-term emissions from area, energy, and mobile sources and short-term emissions from construction activities associated with new development. This alternative would have a 1 percent decrease in housing and population citywide and 4 percent decrease in nonresidential development. This would result in a reduction in the magnitude of mobile-source emissions. Furthermore, area and energy sources of emissions would be reduced because there would be less growth in population and employment compared to the proposed project. A reduction in overall development would reduce short-term emissions related to project construction activities. Although this alternative would reduce both long- and short-term pollutant emissions, it would not eliminate significant short- and long-term criteria pollutant contributions of VOC, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>; would not



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be consistent with the air quality management plan, since criteria pollutants thresholds would be exceeded; and would cumulatively contribute to the SoCAB nonattainment designations for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Implementation of the proposed project was found to have significant and unavoidable impacts to short- and long-term air quality. In comparison to the proposed project, this alternative would reduce but not eliminate short- and long-term air quality impacts.

### **7.6.3 Greenhouse Gas Emissions**

This alternative would decrease the amount of development compared to the proposed project, resulting in a reduction in the overall magnitude of GHG emissions. Although this alternative would reduce development, it may also lose the potential benefits derived from more mixed-use and higher intensity developments, especially near the I-215. These types of developments could reduce per-capita VMT by as much as 30 percent by reducing the distance between employment, services and amenities, and residences, in addition to supporting higher utilization of alternative modes of transportation (ULI 2008). For General Plan-level analysis, GHG emissions impacts are based on the efficiency of GHG emissions in the community (GHG emissions per capita). This alternative would reduce employment more than housing in the City and would result in an increase in VMT per capita compared to the proposed General Plan. With a 1.52 jobs-housing balance the City would be considered jobs-rich, but slightly less jobs-rich than the 1.58 jobs-housing balance for buildout of the proposed General Plan.<sup>1</sup> Consequently, this alternative would be less efficient than the proposed project because GHG emissions on a per capita basis would be greater as residents drive farther to find work. Therefore, impacts under this alternative would be greater compared to the proposed project. Impacts from this alternative would still be significant and unavoidable, since additional statewide measures would be necessary to reduce GHG emissions to meet the long-term GHG reduction goals under Executive Order S-03-05, which identified a goal to reduce GHG emissions to 80 percent below 1990 levels by 2050.

### **7.6.4 Noise**

This alternative would reduce permitted development, and consequently would reduce noise impacts. While traffic noise impacts would be reduced by this alternative, this impact would remain significant and unavoidable for this alternative, as it would for the proposed General Plan.

### **7.6.5 Transportation and Traffic**

This alternative would decrease the permitted amounts of residential and nonresidential development in the City. Thus, traffic impacts would be reduced by this alternative; however, this impact would remain significant and unavoidable, as it would for the proposed General Plan.

### **7.6.6 Conclusion**

This alternative would eliminate the significant and unavoidable impacts to agricultural resources. Impacts to air quality, noise, and transportation and traffic would be reduced by this alternative, but would still remain significant and unavoidable. GHG emissions impacts would be increased by this alternative and would also be significant and unavoidable.

At buildout of this alternative 1.4 percent of the area of the City, 424 acres, would remain in agricultural production. This alternative would meet the objectives for the General Plan, but to a lesser degree.

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<sup>1</sup> Jobs-housing ratio is considered balanced at 1.36; communities with more than 1.36 jobs per dwelling unit are considered jobs-rich and those with fewer are housing-rich (SCAG 2004).

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### 7.7 REDUCED INTENSITY ALTERNATIVE

The Reduced Intensity Alternative is proposed to reduce significant and unavoidable impacts to air quality, greenhouse gas (GHG) emissions, noise, and transportation and traffic. In this alternative, the net increases in residential and nonresidential development potential at General Plan buildout, compared to existing conditions, are reduced by 25 percent compared to the proposed project (see Table 7-6). Note that the buildout population of this alternative (119,207 people) would be half the growth anticipated under the proposed General Plan (158,942 people; 51 percent growth). The distribution of land use designations would be the same in this alternative as in the proposed project, but the densities would be reduced.

**Table 7-6  
Reduced Intensity Alternative Buildout Summary Compared to Proposed General Plan**

<b>Category</b>	<b>Existing Condition</b>	<b>Proposed Project</b>	<b>Anticipated Growth</b>	<b>Reduced Intensity Alternative</b>	<b>Difference</b>	<b>Change</b>
Dwelling Units	31,518	63,754	32,236	55,695	-8,059	-12.6%
Population	82,292	158,942	76,650	139,780	-19,163	-12.1%
Nonresidential (sq.ft.)	11,982,509	52,320,703	52,320,703	42,236,155	-10,084,549	-19.3%
Employment	8,980	100,554	91,574	77,661	-22,894	-22.8%
Jobs-to-Housing Ratio	0.289	1.58	1.29	1.26	-0.32	-20.4%



The following analysis is based on the significant environmental impacts identified in Section 7.1 above.

#### 7.7.1 Agricultural Resources

Agricultural impacts would be the same in this alternative as for the proposed project. Residential density would be reduced City-wide by about 13 percent, and nonresidential density by about 19 percent, percent in this alternative, but the areas of the City proposed for development would remain; therefore, the same reduction in agricultural lands would occur. Existing agricultural lands would be developed with residential, office, business park, public facilities, industrial and commercial land uses, similar to the proposed project.

#### 7.7.2 Air Quality

The reduced intensity alternative would reduce long-term emissions from area (landscape fuel, consumer products, architectural coatings), energy (natural gas use), and mobile sources and short-term emissions from construction activities associated with new development. Decreases of about 13 percent in residential units and about 19 percent in nonresidential building square footage citywide would result in a reduction in vehicle trips and associated mobile-source emissions. Area and energy sources of emissions would also be reduced because there would be less development under the Reduced Intensity Alternative compared to the proposed project. A reduction in development would also reduce the total short-term emissions related to project construction activities. Although this alternative would reduce both long- and short-term pollutant emissions, it would not eliminate significant short- and long-term criteria pollutant contributions of VOCs, NO<sub>x</sub>, CO, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>, and because criteria pollutant thresholds would be exceeded General Plan buildout under this alternative would not be consistent with the air quality management plan. Similar to the proposed project, this alternative would

## *7. Alternatives to the Proposed Project*

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cumulatively contribute to the SCAQMD nonattainment designations for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. Implementation of the proposed project was found to have significant and unavoidable impacts to short- and long-term air quality. In comparison to the proposed project, this alternative would reduce but not eliminate these short- and long-term air quality impacts; therefore the Reduced Intensity Alternative would be superior compared to the proposed project.

### **7.7.3 Greenhouse Gas Emissions**

The Reduced Intensity Alternative would potentially increase per capita GHG emissions (GHG emissions per service population) but decrease the total GHG (MTCO<sub>2</sub>e). The reduction in intensity of development would lose the potential benefits derived from more mixed-use and higher intensity developments. These types of developments could reduce per-capita VMT by as much as 30 percent by reducing the distance between employment, services and amenities, and residences, in addition to supporting higher utilization of alternative modes of transportation (ULI 2008). Under this alternative, VMT per capita would most likely increase. Because this alternative would provide less capacity for residential dwelling units and total square footage of nonresidential developments, the total magnitude of GHG emissions from project-related construction activities would be reduced. Impacts from this alternative would still be significant and unavoidable, since additional statewide measures would be necessary to reduce GHG emissions to meet the long-term GHG reduction goals under Executive Order S-03-05, which identified a goal to reduce GHG emissions to 80 percent below 1990 levels by 2050. GHG emissions impacts for a General Plan are based on the overall GHG efficiency, as measured as GHG emissions per service population. Because GHG emissions would increase on a per capita level under this alternative, overall this alternative would have greater GHG impacts than the proposed project.

### **7.7.4 Noise**

This alternative would reduce both construction- and operation-related noise of the proposed project. Under this alternative there would be less residential and nonresidential development planned, thereby eliminating some potential short-term construction noise impacts. Additionally, the reduction in construction activities would reduce potential vibration impacts to sensitive receptors. With less development there would be fewer impacts from traffic noise on local roads. However, due to the scale of development activity associated with buildout of this alternative, it would still result in a increase in traffic on local roadways in the City of Menifee, which would increase the noise environment. Similar to the proposed project, this alternative would result in significant unavoidable noise impacts. Overall this alternative would reduce noise impacts.

### **7.7.5 Transportation and Traffic**

The Reduced Intensity Alternative would generate fewer ADT than the proposed Land Use Plan; the average of the reductions in residential units and nonresidential building square footage would be 16 percent. Although this alternative would reduce overall vehicle trips, a reduction in land use intensity would result in fewer mixed-use and higher density developments. Although this alternative would include the plans and policies for alternative forms of transportation, as a result of the density loss, alternative forms of transportation (i.e., walking, nonmotorized modes of transportation, and public transit) could be reduced by the loss of infrastructure and critical mass needed to support it. Additionally, under this alternative, circulation improvements would still adhere to roadway design standards that would preclude the construction of any unsafe features.

Three of the mainline segments on the I-215, from McCall Boulevard to south of Scott Road, currently operate and would continue to operate at LOS F at General Plan buildout. Because most of the freeway

## 7. Alternatives to the Proposed Project

traffic is regional, a reduction in city traffic would have a minimal effect on these traffic impacts. Overall, this alternative would reduce but not eliminate the project’s significant and unavoidable impact to cumulative traffic impacts.

### 7.7.6 Conclusion

The Reduced Intensity Alternative would reduce impacts to air quality, noise, and transportation and traffic compared to those of the proposed General Plan. Impacts to agricultural resources would be similar, and impacts to GHG would be increased under this alternative. However, all significant and unavoidable impacts would remain.

Although the Reduced Intensity Alternative meets the objectives established for the project, the significant reduction in nonresidential square footage may reduce the City’s ability to reduce per-capita VMT for the region, which is one of the goals of SCAG’s Compass Blueprint for High Quality Transit Areas. By providing additional jobs-based square footage in the City, commuters would not need to travel outside the City to other areas of Orange, San Bernardino, or San Diego counties for employment. This alternative would meet the objectives for the General Plan, but to a lesser degree.

### 7.8 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In compliance with CEQA Guidelines Section 15126.6[e][2] the following project alternative is identified as the environmentally superior alternative among the alternatives:

- Preserve Agriculture Alternative

The Preserve Agriculture Alternative has been identified as the environmentally superior alternative because it meets the majority of the project objectives and would reduce impacts to air quality, noise, and transportation and traffic and would eliminate a significant unavoidable agricultural resource impact. Table 7- shows a comparison of the impacts of the project alternatives compared to the proposed project.



**Table 7-7  
Project Alternative Impact Comparison**

<i>Resource</i>	<i>Proposed Project Impact</i>	<i>Alternative: Impact Compared to Proposed Project</i>		
		<i>No Project/Existing RCIP Alternative</i>	<i>Preserve Agriculture Alternative</i>	<i>Reduced Intensity Alternative</i>
Agricultural Resources	S/U	<	<<	=
Air Quality	S/U	=	<	<
Greenhouse Gas Emissions	S/U	>	>	>
Noise	S/U	<	<	<
Transportation and Traffic	S/U	=	<	<

Environmental impacts of the project alternative compared to those of proposed General Plan

= Similar

< Reduced

> Increased

<< Eliminates a significant unavoidable impact

## *7. Alternatives to the Proposed Project*

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