SECTION 7.0 Alternatives Analysis

7.1 Introduction

The identification and analysis of alternatives is a fundamental concept under California Environmental Quality Act (CEQA). The role of alternatives in an Environmental Impact Report (EIR) is set forth clearly and forthrightly within the *CEQA Guidelines* and statutes. Specifically, CEQA §21002.1(a) states:

> *"The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided."*

The *CEQA Guidelines* require an EIR to: "describe a range of reasonable alternatives to the project, or to the location of the project that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives" (*CEQA Guidelines* §15126.6(a)). The *CEQA Guidelines* direct that selection of alternatives focus on those alternatives capable of eliminating any significant environmental effects of the project or of reducing them to a less than significant level, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly. In cases where a project is not expected to result in significant impacts after implementation of recommended mitigation, review of project alternatives is still appropriate.

Alternatives that were considered but were rejected as infeasible during the scoping process should be identified along with a reasonably detailed discussion of the reasons and facts supporting the conclusion that such alternatives were infeasible.

Based on the alternatives analysis, an environmentally superior alternative is designated among the alternatives. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives (*CEQA Guidelines* §15126.6(e) (2)).

7.2 Criteria for Alternatives Analysis

The City, acting as the CEQA Lead Agency, is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. CEQA also requires the feasibility of alternatives be considered. Section 15126.6(f)(1) states that among the factors that may be considered in determining feasibility are: site suitability; economic viability; availability of infrastructure; general plan consistency; other plans and regulatory limitations; jurisdictional boundaries; and (when evaluating alternative project locations) whether the proponent can reasonably acquire, control, or otherwise have access to an alternative site.

The range of alternatives required within an EIR is governed by the 'rule of reason' that requires an EIR to include only those alternatives necessary to permit a reasoned choice. Furthermore, an EIR need not consider an alternative whose effects could not be reasonably identified, whose implementation is remote or speculative, or that would not achieve the basic project objectives.

7.3 Project Objectives

As stated in the ELSPA No. 11, the following objectives provide a framework for the purpose and intent of the proposed Project:

1. Set forth a comprehensive development plan that implements the City of Lake Elsinore General Plan and achieves the City's development goals for the East Lake area of the City.
2. Overhaul ELSP land uses, development regulations, circulation, drainage, and architectural guidelines in order to streamline development and make the ELSPA No. 11 document user-friendly.
3. Protect the natural resources in the Back Basin and maintain flood storage capacity.
4. Ensure that the City's "Action Sports Capital of the World" activities and land uses have a permanent home in the City.
5. Stimulate private sector investment in the East Lake area.
6. Provide the necessary infrastructure to facilitate proposed land uses in the East Lake area, guided by a fiscally sound plan for funding the construction and ongoing maintenance of these infrastructure systems.
7. Maximize the advantages of the site's location in terms of visibility and proximity to the Lake, State Route 74 and to Interstate 15.
8. Encourage action sports and related uses that benefit from and enhance the synergy of Diamond Stadium, The Links at Summerly Golf Course and skydiving activities.
9. Improve the housing stock by providing a residential component with a variety of residential product types and densities that are compatible with the City's economic mixed-use demand.
10. Increase City revenues by providing for a variety of actions sports, tourism, recreation, commercial and retail activities with the potential to generate substantial sales and property-tax revenue.
11. Anticipate changing market demand and public need over time by providing flexibility in plan implementation and in development standards that would allow the East Lake Specific Plan to accommodate changing product designs and consumer preferences.
12. Provide for improved connectivity within the ELSPA No. 11 site and nearby destinations by extending Malaga Road/Sylvester Street, Cereal Street and Lucerne Street to Planning Area 6, and by incorporating gathering places, strong pedestrian connections, and linkages to surrounding city-wide trails and open space.

7.4 Summary of the Proposed Project's Significant Unavoidable Impacts

The analysis provided in Section 5.0 determined that, despite the implementation of mitigation measures, significant environmental impacts would result from the construction and operation of the proposed Project. To satisfactorily provide the CEQA-mandated alternatives analysis, the alternatives considered must reduce or eliminate one or more of the following Project-related significant impacts:

Table 7-1. Summary of Proposed Project's Significant Unavoidable Impacts

Impact Category	Impact	
Air Quality	***Impact AQ-1***	*Individual and/or overlapping construction activity associated with future implementing development projects in the East Lake Specific Plan area may generate VOCs, NO_X, CO, SO_X, PM_{10}, and/or $PM_{2.5}$ emissions at levels above SCAQMD emissions standards and/or have temporary impacts on sensitive receptors.*
	Impact AQ-2	*Operations in the East Lake Specific Plan area at Year 2022 Phase I completion and Year 2040 Buildout completion would result in a significant increase in VOCs, NO_X, CO, PM_{10}, and/or $PM_{2.5}$ emissions at levels above SCAQMD emissions standards. Pending ultimate siting of future development and nature of activities, increased criteria pollutants could have negative impacts on sensitive receptors if not properly mitigated.*
Greenhouse Gas Emissions	***Impact GHG-1***	*The Project would allow for new development at the Project site, ultimately resulting in a future operational phase that may exceed the GHG target efficiency metric by approximately 9.3 Mton CO2e/SP in the year 2022 and by 11.5 Mton CO2e/SP in the year 2040. Future construction would also increase GHG emissions by an additional approximately 5% of the total estimated operational phase emissions, which may contribute to an exceedance of the target efficiency metric.*
Noise	***Impact NOI-1***	*Temporary exposure of persons to noise levels in excess of City standards and/or a potential substantial temporary increase in ambient noise levels may occur during future project construction activities within the East Lake Specific Plan, resulting in a temporary significant noise impact.*
	Impact NOI-2	*Temporary exposure of persons to noise levels in excess of City standards and/or a potential substantial temporary increase in ambient noise levels may occur during future project construction hauling and material delivery activities within the East Lake Specific Plan, potentially resulting in a temporary significant noise impact.*
	Impact NOI-3	*Future implementing development projects within the East Lake Specific Plan would generate additional traffic and associated traffic noise;*

		potentially resulting in a 3 dB noise increase in areas that exceed General Plan noise standards or result in a 5 dB noise increase in other areas.
	Impact NOI-4	*A potentially significant impact would occur if future noise sensitive land uses are sited within the 60 dB Ldn noise contour distances described in Table 5.10-20. A significant unavoidable impact would occur to existing sensitive uses within these noise contour distances if they remain during buildout of the East Lake Specific Plan.*
	Impact NOI-5	*Action Sports 1 and 2 racing facilities in Planning Area 6 and future Active Recreation 1 and 2 facilities in Planning Areas 2, 3 and/or 6 would increase ambient noise levels by 3 dB in areas that exceed General Plan noise standards and/or result in a 5 dB increase in other areas; thus, exceeding significance thresholds and potentially impacting sensitive uses.*
Transportation and Circulation	***Impact TC-1***	*Temporary disruptions in roadway and/or intersection levels of service may occur during future project construction hauling and material delivery activities within the East Lake Specific Plan, potentially resulting in a temporary significant traffic impact.*
	Impact TC-2	*The Project would indirectly result in an increase in traffic volumes associated with future development at the Project site, which may significantly impact the level of service at nine (9) intersections if not improved; two (2) additional intersections (Diamond Drive at Casino Drive/Auto Center Drive and Diamond Drive at Lakeshore Drive/Mission Trail) would be significantly impacted at Project Phase I and one (1) intersection (Diamond Drive at Casino Drive/Auto Center Drive) would remain significantly impacted at Project buildout, even with intersection improvements.*
	Impact TC-3	*The Project would indirectly result in an increase in traffic volumes associated with future development at the Project site, which may significantly impact the level of service along four (4) freeway segments (i.e. I-15 Northbound from Baxter Road to Bundy Canyon Road; I-15 Northbound from Bundy Canyon Road to Railroad Canyon Road; I-15 Southbound from Railroad Canyon Road to Bundy Canyon Road; I-15 Southbound from Bundy Canyon Road to Baxter Road) if not improved.*

7.5 Evaluation of Alternatives

The following section compares three alternatives to the proposed Project (ELSPA No. 11). These alternatives include the 'Alternative Site' (Rejected Alternative) and those analyzed for further

consideration: Alternative 1 – 'No Project' (Adopted ELSP) Alternative; and Alternative 2 – 'Proposed Project with no development in Planning Area 6 (PA 6)'. A discussion of why the 'Alternative Site' was rejected from consideration is provided below. Table 7-2 presents the development targets of the proposed Project compared with the two remaining Alternatives 1 and 2 that were not rejected, but rather considered for detailed comparative analysis. Figure 7-1 shows the proposed land uses in ELSPA No. 11. Section 3.4 of this EIR provides a detailed description of the proposed Project, including land use allocations, phasing, and descriptions of the land use categories. Figure 7-1 is a reproduction of Figure 3-4.

Table 7-2. Development Targets by Project Alternative

Land Use	Proposed Project (ELSPA No. 11)	Alternative 1: No Project (Adopted ELSP)	Alternative 2: Proposed Project with no development in PA 6
Active Recreation 1 Uses[1] (includes potential Outdoor Concert Venue with 10,000 attendees maximum)	1	0	1
Active Recreation 2 Uses[2]	3	0	3
Action Sports 1 Uses[3]	1	0	0
Action Sports 2 Uses[4]	1	0	0
Commercial/Industrial	458,000 square feet	1,563,804 square feet[5]	448,000 square feet
Golf Course (The Links at Summerly)	1	1	1
Hotels	4[6]	1	3[7]
Parks	36.4 acres	199.6 acres	36.4 acres
Preservation/Mitigation[8]	~~815.18~~835.0 acres minimum	792.64 acres	1,170.82 acres minimum
Mixed Use Overlay	1,350 dwelling units	1,884 dwelling units	1,350 dwelling units
Residential Neighborhoods	2,290 dwelling units	5,237 dwelling units	2,290 dwelling units
Restaurants	67,500 square feet	7,500 square feet	60,000 square feet
Private Recreational Airport Facility~~Skydive Airport~~	1	1	1

NOTES:

[1] Active Recreation 1 – More intense weekend trip generating land uses (e.g., baseball/field sports complex)

[2.] Active Recreation 2 – Includes less intense trip generating land uses (e.g., water park, cable ski park, hockey rink.

[3] Action Sports 1 – Motocross sports facility with up to 20,000 spectators per event.

[4] Action Sports 2 – Motorsports Race Track with minimum trip generation/parking needs.

[5] Alternative 1 does not include industrial uses.

[6] Maximum of 540 rooms.

[7] Maximum of 390 rooms.

[8] Preservation/Mitigation acreage is approximate. Actual acreage set aside for Preservation/Mitigation purposes may vary from listed amount.

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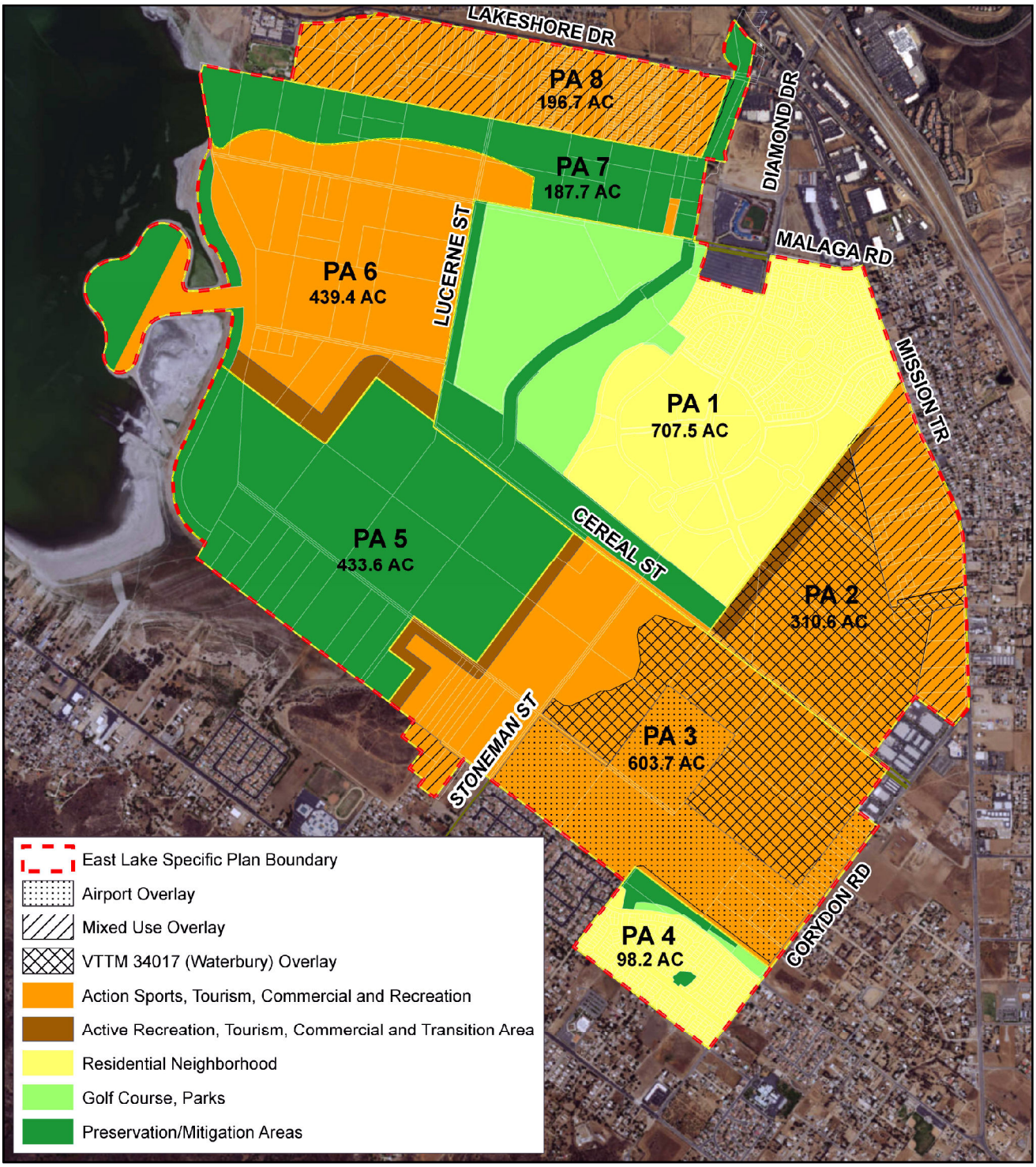

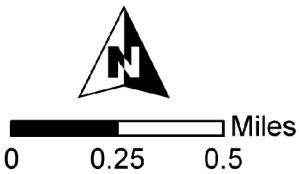

FIGURE 2-1
LAND USE PLAN

Prepared by:
City of Lake Elsinore GIS
November 9, 2017
Data Sources:
County of Riverside GIS
City of Lake Elsinore GIS
Stateplane NAD 83

Source: City of Lake Elsinore, ELSPA No. 11

Proposed Land Use Plan, Figure 7-1

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7.5.1 'Alternative Site' – Rejected Alternative

A key objective of the Project is to expand on the popularity of the Action Sports land uses that are already located within the Project site (The Links at Summerly Golf Course, Lake Elsinore Motocross, skydiving at Skylark Airport) and to attract similar development that would make the City an action sports destination. The success of this objective depends on the concentration of these facilities in one location and would not be possible at a different site. As a modification of the existing ELSP, the proposed Project is limited to the general boundaries approved for the existing ELSP, except for minor boundary adjustments detailed in Section 3, Project Description. Additionally, development of the proposed Project at a different location would still enable the Project site to be developed in accordance with the existing adopted East Lake Specific Plan. This would result in more overall development than allowed with the proposed Project and would result in greater cumulative impacts. For these reasons, the 'Alternative Site' alternative was rejected from further consideration and analysis.

7.5.2 Alternative No. 1: 'No Project' Alternative

According to CEQA Guidelines Section 15126.6 (e) (3):

> "*When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the "no project" alternative will be the continuation of the existing plan, policy or operation into the future. Typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan.*"

The following analysis for the No Project Alternative compares the development of the site as approved under the existing Adopted ELSP (Amendments Nos. 1-10) with the proposed Project. Table 7-3 shows the Conceptual Land Use Summary currently approved under the Adopted ELSP. Figure 7-2 shows a consolidation of the approved land uses in Amendments 1-10, which constitutes the No Project Alternative. Figure 7-2 is a reproduction of Figure 3-3 in the Project Description.

Table 7-3. Conceptual Land Use Summary Adopted ELSP

Planning Area	Land Use Type	Adopted ELSP Development Totals	
		Total	Units
Planning Area 1 (707.5 Acres)	Golf Course (18 Hole)	169 AC*	--
	Hotel		90 RM
	Single-Family Residential		1,979 DU**
	Preservation/Mitigation		100.43 AC*
Planning Area 2 (310.6 Acres)	Active Recreation 2 (e.g. Ski/Water/Hockey)	--	--
	Action Sport 1 (e.g. Motocross)	0	--
	Commercial	392,040 SF (30 AC)	--
	Hotel	--	--

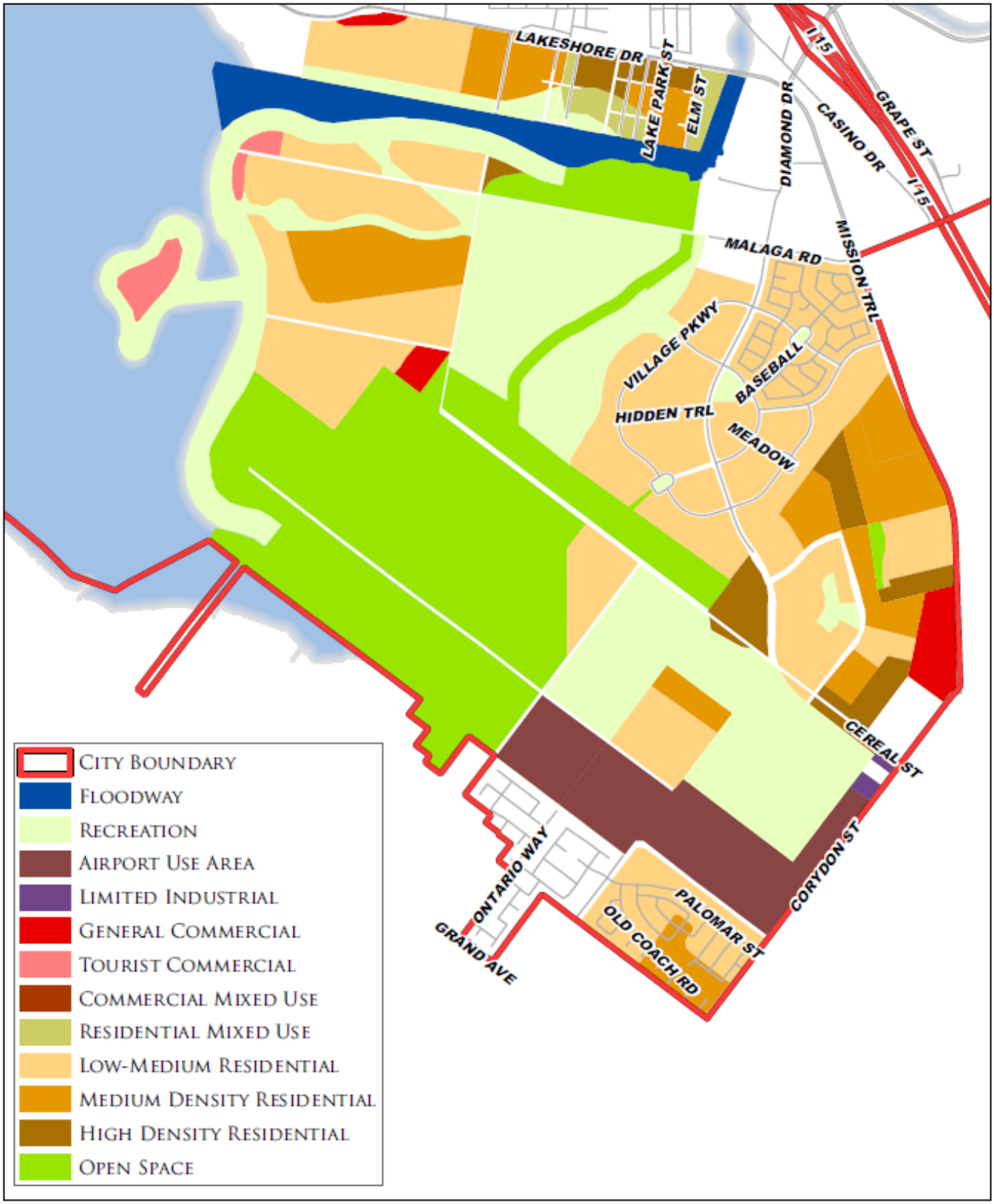
	Multi-Family Residential	--	1,301 DU
	Single-Family Residential	--	930 DU
	Restaurant	--	--
	Park	7.5 AC	--
Planning Area 3 (603.7 Acres)	Active Recreation 1 or 2	--	--
	Active Recreation 2 (e.g. Ski/Water/Hockey)	--	--
	Commercial	--	--
	Hotel	--	--
	Restaurant	--	--
	Private Recreational Airport Facility~~Skydive Airport~~	150 AC*	--
	Multi-Family Residential		48 DU
	Single-Family Residential		215 DU
	Active Open Space	186.6 AC	--
	Limited Industrial	--	--
	Preservation/Mitigation	--	--
Planning Area 4 (98.2 Acres)	Residential	--	311 DU*
	Park	5.5 AC*	--
	Preservation/Mitigation	11.73 AC*	--
Planning Area 5 (433.6~~422.6~~ Acres)	Preservation/Mitigation	433.6~~422.6~~ AC*	--
Planning Area 6 (439.4~~425.2~~ Acres)	Active Recreation 1 (Baseball/Concert)	--	--
	Action Sport 1 (Motocross)	--	--
	Action Sport 2 (Hard Track)	--	--
	Commercial	818,928 SF	--
	Hotel	--	--
	Multi-Family Residential	--	--
	Single-Family Residential	--	1,189 DU
	Restaurant	7,500 SF	--
	Preservation/Mitigation	84.4~~70.18~~ AC	--
Planning Area 7*** (187.7 AC)	Action Sports Uses	--	--
	Preservation/Mitigation	--	--
Planning Area 8 (196.7 Acres)	Commercial/Overlay	352,836 SF	--
	Multi-Family Residential	--	535 DU****
	Single-Family Residential	--	613 DU

*Existing development

**600 existing dwelling units

***Not a part of Adopted ELSP

****325 existing dwelling units



SOURCES: CITY OF LAKE ELSINORE, COUNTY OF RIVERSIDE , SPAS 1-10

CONSOLIDATED EAST LAKE SPECIFIC PLAN
LAND USE PLAN - ADOPTED APRIL 13, 2013

Source: City of Lake Elsinore, County of Riverside, SPAs 1-13

Existing Land Use Plan, Figure 7-2

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7.5.2.1 Environmental Impact of the 'No Project' Alternative

Aesthetics

The proposed Project was found to have a less than significant impact on Aesthetics with mitigation for potential light and glare. Buildout of the No Project Alternative would change the predominant character of the built portions of the Project site from the currently proposed Active Sports uses to residential uses and a tripling of commercial square footage. Residential uses would be less likely to produce intensive nighttime light and glare impacts; however, commercial uses would be more brightly lit. Home structures would be less massive than the proposed Action Sports facilities and hotels. Compared to the proposed Project, the No Project Alternative would have ***fewer*** impacts on Aesthetics.

Air Quality

The proposed Project was found to have Significant and Unavoidable impacts on Air Quality. Buildout of the No Project Alternative would change the predominant land use on the built portions of the Project site from the currently proposed Active Sports uses to mostly residential and commercial uses. This would bring more residents and shoppers into the area, increase VMT and air quality impacts. It would also reduce traffic and related air quality impacts from large events at Active Sports facilities. Compared to the proposed Project, the No Project Alternative would have ***similar*** impacts on Air Quality.

Biological Resources

The proposed Project was found to have Less than Significant impacts, with mitigation, on Biological Resources. Buildout of the No Project Alternative would not substantially change Mitigation/Preservation acreage of the Project site nor change the potential buildout footprint of development in the planning areas. Compared to the proposed Project, the No Project Alternative would have ***similar*** impacts on Biological Resources.

Cultural, Paleontological and Tribal Resources

The proposed Project was found to have Less than Significant impacts, with mitigation, on Cultural Resources. Buildout of the No Project Alternative would not substantially change the potential buildout footprint of development in the planning areas. Compared to the proposed Project, the No Project Alternative would have ***similar*** impacts on Cultural Resources.

Geology, Soils and Seismicity

The proposed Project was found to have Less than Significant impacts, with mitigation, on Geology, Soils and Seismicity. Buildout of the No Project Alternative would not substantially change the potential buildout footprint of development in the planning areas. Compared to the proposed Project, the No Project Alternative would have ***similar*** impacts on Geology, Soils and Seismicity.

Greenhouse Gas Emissions

The proposed Project was found to have potentially Significant and Unavoidable impacts on Greenhouse Gas Emissions. Buildout of the No Project Alternative would not substantially change the open space acreage of the Project site. It would change the predominant land use on the built portions of the Project site from the currently proposed Active Sports uses to residential uses and a tripling of commercial square

footage. This would bring more residents and shoppers into the area, increase VMT and greenhouse gas emissions. It would also reduce traffic and related greenhouse gas emissions from large events at Active Sports facilities. Compared to the proposed Project, the No Project Alternative would have ***similar*** impacts on Greenhouse Gas Emissions.

Hazards and Hazardous Materials

The proposed Project was found to have Less than Significant impacts, with mitigation, on Hazards and Hazardous Materials. The Action Sports 1 and 2 motor sports facilities and accessory uses, including equipment manufacturing, research and development, garages and welding/fabricating/painting, would concentrate fuel storage and hazardous materials on the Project site. Buildout of the No Project Alternative would not substantially change the potential buildout footprint of development in the planning areas; however, its residential and commercial uses would not use or store as great a quantity of hazardous materials. Compared to the proposed Project, the No Project Alternative would have ***fewer*** impacts on Hazards and Hazardous Materials.

Hydrology and Water Quality

The proposed Project was found to have Less than Significant impacts, with mitigation, on Hydrology and Water Quality. Buildout of the No Project Alternative would not substantially change the open space acreage of the Project site or the buildout footprint of development in the planning areas. It would change the predominant land use on the built portions of the Project site from the currently proposed Active Sports uses to mostly residential and commercial uses. Stormwater facilities and water quality features would be engineered to meet site specific demands for both alternatives. Compared to the proposed Project, the No Project Alternative would have ***similar*** impacts on Hydrology and Water Quality.

Land Use

The proposed Project was found to have Less than Significant impacts on Land Use. Buildout of the No Project Alternative would not substantially change the open space acreage of the Project site or the buildout footprint of development in the planning areas. It would change the predominant land use on the built portions of the Project site from the currently proposed Active Sports uses to mostly residential and commercial uses. These differences would not conflict with the City's General Plan or regional planning forecasts. Compared to the proposed Project, the No Project Alternative would have ***similar*** impacts on Land Use.

Noise

The proposed Project was found to have potentially Significant and Unavoidable impacts due to Construction Noise; Less than Significant impacts due to Construction Vibration; potentially Significant and Unavoidable impacts due to future Traffic Noise or Operational Noise; and Less than Significant impacts, with mitigation, from the potential airport relocation. Buildout of the No Project Alternative would preserve the mostly residential and commercial uses on the built portions of the Project site and reduce the number of Action Sports/Active Recreation facilities. Construction Noise impacts, Construction Vibration impacts, and impacts from the potential a~~p~~irport relocation would be similar for both alternatives. While there would be less noise impact from large events with the No Project Alternative, there would be more traffic generated, and more accompanying noise, from the larger

residential and commercial component. Thus, compared to the proposed Project, the No Project Alternative would have ***similar*** levels of impacts on Noise.

Population and Housing

The proposed Project was found to have Less than Significant impacts on Population and Housing. Buildout of the No Project Alternative would preserve the mostly residential uses on the built portions of the Project site and the number of Active Sports facilities would be reduced. This would induce substantial population growth in the area. Compared to the proposed Project, the No Project Alternative would have ***greater*** impacts on Population and Housing.

Public Services

The proposed Project was found to have Less than Significant impacts on Public Services. Buildout of the No Project Alternative would preserve the mostly residential uses on the built portions of the Project site and the number of Active Sports facilities would be reduced. This would increase the need for additional schools and libraries; however, these would be mitigated through standard development fees. The larger permanent population and tripling of commercial square footage would increase the need for police and fire protection services; however, there would be fewer large events related to the Active Sports uses in the currently proposed Project. Compared to the proposed Project, the No Project Alternative would have ***similar*** impacts on Public Services.

Recreation

The proposed Project was found to have Less than Significant impacts on Recreation. Buildout of the No Project Alternative would preserve the mostly residential and commercial uses on the built portions of the Project site and the number of Active Sports and Hotel facilities would be reduced. This would increase the need for additional parks; however, these would be mitigated through standard development fees. Compared to the proposed Project, the No Project Alternative would have ***greater*** impacts on Recreation.

Transportation and Circulation

The proposed Project was found to have Significant Unavoidable Impacts on Transportation and Circulation. Buildout of the No Project Alternative would preserve the mostly residential and commercial uses on the built portions of the Project site, and reduce the number of Action Sports/Active Recreation facilities and hotels. While the No Project Alternative would generate less traffic from large events, there would be more traffic generated from the larger residential and commercial components. The traffic generated by residential and commercial land uses are more likely to adversely impact AM and PM peak traffic levels than would the Action Sports/Active Recreation uses. Thus, compared to the proposed Project, the No Project Alternative would have ***greater*** levels of impacts on Transportation and Circulation.

Utilities

The proposed Project was found to have Less than Significant impacts on Utilities. Buildout of the No Project Alternative would preserve the mostly residential and commercial uses on the built portions of

the Project site and reduce the number of Action Sports/Active Recreation facilities and hotels. Compared to the proposed Project, the No Project Alternative would have ***similar*** impacts on Utilities.

Energy and Irretrievable Resources

The proposed Project was found to have Less than Significant impacts on Energy and Irretrievable Resources. Buildout of the No Project Alternative would preserve the residential uses on the built portions of the Project site, reduce the number of Action Sports/Active Recreation facilities and hotels, and triple the square footage of commercial uses as compared to the proposed Project. While land use allocations would differ under the No Project Alternative, construction and long-term energy consumption would be ***similar*** to the proposed Project.

Growth Inducing Impacts

Because new development and infrastructure improvements would be focused in the Project site and the targeted development would help to correct the current jobs/housing imbalance in the City, and because the Project site is currently zoned for development under the Adopted ELSP and General Plan, potential impacts associated with growth inducement are considered less than significant for the proposed Project. Development of the Project site would still occur under the No Project Alternative; therefore, growth inducement would be ***similar*** to the proposed Project.

Cumulative Impacts

Similar to the proposed Project, the No Project Alternative would contribute to the permanent conversion of open space in the City to residential, commercial, active recreation and action sports and other urbanized land uses. Development of this alternative would not generate less traffic, noise, long-term operational air pollutant or greenhouse gas emissions, and therefore the No Project Alternative impacts would be ***similar*** to the proposed Project.

Conclusion

Compared to the proposed Project, with mitigation, implementation of the No Project Alternative would result in similar impacts for all environmental issue areas except Aesthetics and Hazards and Hazardous Materials, which would have reduced impacts; and Population and Housing, Recreation, and Transportation and Circulation, which would have greater impacts.

7.5.2.2 Comparison of the 'No Project' Alternative to Project Objectives

The No Project Alternative would meet some of the objectives of the Project (Objectives 3, 5, 7, 12); however it would not set forth a comprehensive development plan (Objective 1); overhaul land uses, regulations, circulation, drainage and architectural guidelines to streamline development (Objective 2); ensure that "Action Sports Capital of the World" activities have a permanent home in the City (Objective 4); encourage synergistic land uses with Diamond Stadium and other action sports facilities (Objective 8). While the No Project Alternative would provide more housing stock than the proposed Project (Objective 9), its provision of infrastructure (Objective 6) would be reduced because the City would not undertake the installation of the backbone infrastructure and infrastructure would be constructed on a project-by-project basis. In -turn, the improved connectivity envisioned by Objective 12 would not occur. The residential and commercial uses in the No Project Alternative would generate sales and

property tax revenue, but not to the degree possible by the Action Sports and associated tourism uses envisioned by Objective 10.

7.5.3 Alternative No. 2: 'Proposed Project with no development in Planning Area 6'

The following analysis for Alternative No. 2 compares development of the proposed Project with an alternative that proposes the same Project with no development in Planning Area 6. This alternative would eliminate the possibility for Action Sports 1 and 2 racing facilities, eliminate 10,000 square feet of commercial land uses, eliminate 7,500 square feet of restaurant space, and eliminate one 150-room hotel from Planning Area 6. It would also eliminate the possibility of re-locating the Motocross sports facility with up to 20,000 spectators from Planning Area 2, and it would convert 355.02 acres of Planning Area 6 to Preservation/Mitigation. The Active Recreation 1 or 2 land use currently designated for Planning Area 6 could be re-located to Planning Areas 2 or 3.

Table 7-4 shows the land uses in Planning Area 6 and how they would be adjusted under Alternative 2. Figure 7-3 shows the proposed Project's Land Use Plan with no development in Planning Area 6, which constitutes Alternative No. 2.

Table 7-4. Land Uses in Proposed Planning Area 6 (~~425.2~~439.4 Acres)

Planning Area 6 Land Use Allocation (ELSPA No. 11)	Development Target	Notes	Disposition With Alternative No. 2 (Proposed Project with no development in PA 6)
Active Recreation 1 Uses (e.g., baseball/field sports complex. Includes Outdoor Concert Venue – 10,000 attendees maximum)	0-1	Maximum 1 of these facilities within ELSP. Either one Active Recreation 1 or one Active Recreation 2 facility is permitted in Planning Area 6.	Only one Active Recreation 1 or 2 can be developed within ELSP and it would be moved to Planning Area 2 or 3.
Active Recreation 2 Uses	0-1	Maximum 3 of these facilities within ELSP. Either one Active Recreation 1 or one Active Recreation 2 facility is permitted in Planning Area 6.	Only one Active Recreation 1 or 2 can be developed within ELSP and it would be moved to Planning Area 2 or 3.
Action Sports 1 Uses (Motocross sports facility with up to 20,000 spectators per event)	1	Maximum 1 of these facilities within ELSP.	Eliminated
Action Sports 2 Uses (Motorsports Race Track with minimum trip generation/parking needs)	1	Maximum 1 of these facilities within ELSP.	Eliminated
Commercial	10,000 sq.ft.		Eliminated
Hotel	1 (150 rooms)		Eliminated
Restaurants	7,500 sq.ft.		Eliminated
Preservation/Mitigation	~~70.18~~84.38 acres		355.02 acres added to Planning Area 6

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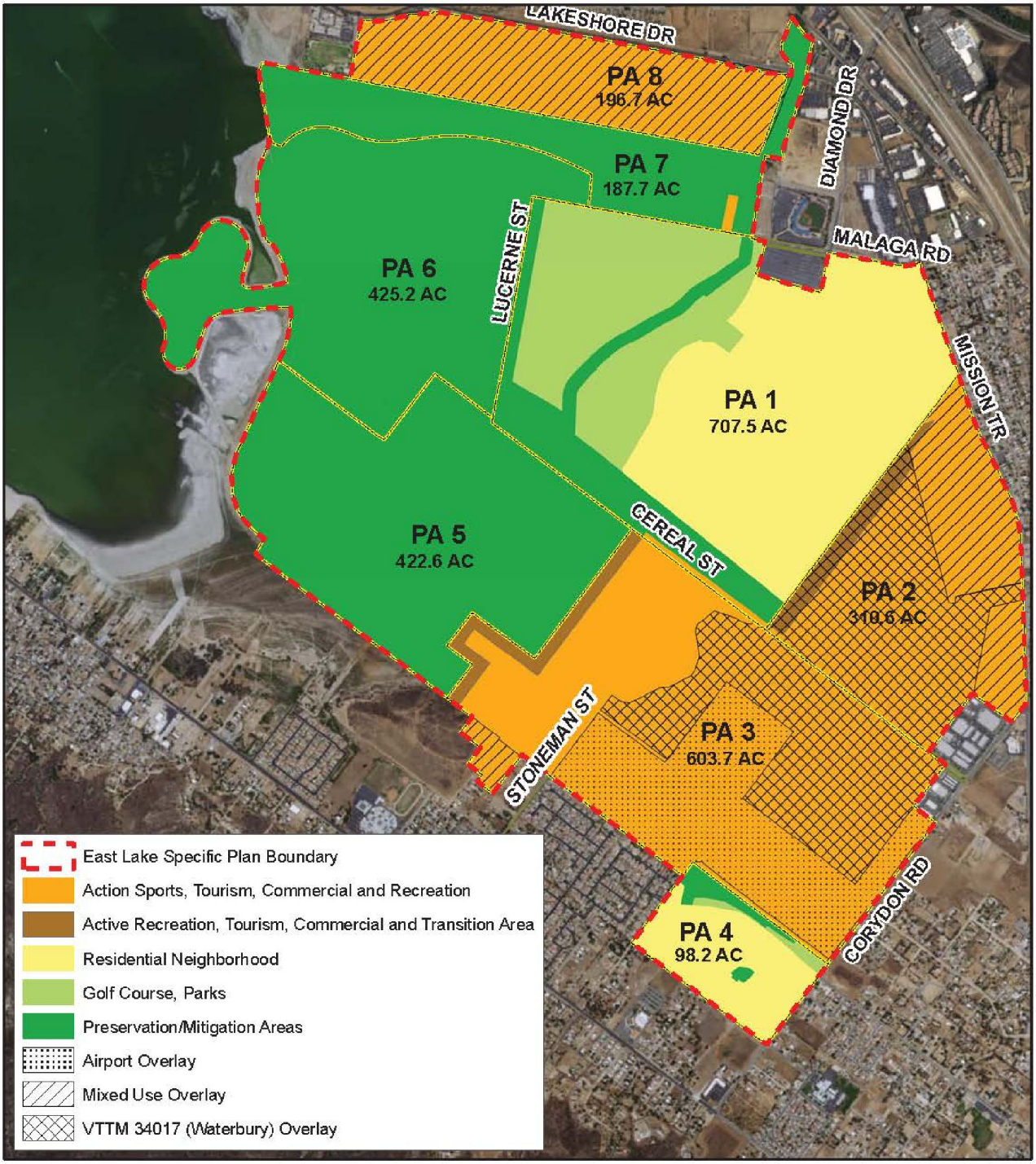

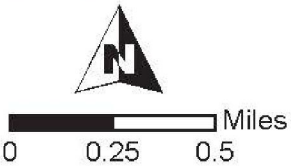

LAND USE PLAN

Prepared by:
City of Lake Elsinore GIS
November 15, 2017
Data Sources:
County of Riverside GIS
City of Lake Elsinore GIS
Stateplane NAD 83

Source: City of Lake Elsinore, ELSPA No. 11

Alternative No. 2, Figure 7-3

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7.5.3.1 Environmental Impact of Alternative 2: 'Proposed Project with no development in Planning Area 6'

Aesthetics

The proposed Project was found to have a Less than Significant impact on Aesthetics with mitigation for potential light and glare. Buildout of Alternative No. 2 would remove development from Planning Area 6, retaining its visual character as open space. Development would be concentrated in the remaining planning areas, with an Active Recreation 1 or 2 facility potentially relocating to Planning Area 2 or 3. The remaining planning areas would retain a similar visual aesthetic. Compared to the proposed Project, Alternative No. 2 would have ***similar*** impacts on Aesthetics.

Air Quality

The proposed Project was found to have Significant and Unavoidable impacts on Air Quality. Buildout of Alternative No. 2 would remove development from Planning Area 6, potentially relocating an Active Recreation 1 or 2 land use to Planning Areas 2 or 3. It would eliminate the Action Sports 1 and 2 land uses from the ELSP. Compared to the proposed Project, Alternative No. 2 would have ***fewer*** impacts on Air Quality.

Biological Resources

The proposed Project was found to have Less than Significant impacts, with mitigation, on Biological Resources. Buildout of Alternative No. 2 would remove development from the biologically rich open space in Planning Area 6, adding 355.02 acres of Preservation/Mitigation land. Compared to the proposed Project, Alternative No. 2 would have ***fewer*** impacts on Biological Resources.

Cultural, Paleontological and Tribal Resources

The proposed Project was found to have Less than Significant impacts, with mitigation, on Cultural Resources. Buildout of Alternative No. 2 would remove development from Planning Area 6, which includes a prehistoric lithic scatter with four areas of concentrated artifacts on the surface. The quantity of known cultural resources and their mapped locations suggest intensive prehistoric occupation along past manifestations of the Lake Elsinore shoreline. The elimination of development potential from Planning Area 6 would eliminate any potential for adverse development-related impacts to these known cultural resources. Compared to the proposed Project, Alternative No. 2 would have ***fewer*** impacts on Cultural Resources.

Geology, Soils and Seismicity

The proposed Project was found to have Less than Significant impacts, with mitigation, on Geology, Soils and Seismicity. Buildout of Alternative No. 2 would remove development from Planning Area 6 but some of that development could be transferred to other planning areas. Compared to the proposed Project, Alternative No. 2 would have ***similar*** impacts on Geology, Soils and Seismicity.

Greenhouse Gas Emissions

The proposed Project was found to have potentially Significant and Unavoidable impacts on Greenhouse Gas Emissions. Buildout of Alternative No. 2 would remove development from Planning Area 6, potentially

relocating a portion of it to other planning areas. It would reduce traffic and related greenhouse gas emissions from large events at Active Sports facilities. Compared to the proposed Project, Alternative No. 2 would have ***fewer*** impacts on Greenhouse Gas Emissions.

Hazards and Hazardous Materials

The proposed Project was found to have Less than Significant impacts, with mitigation, on Hazards and Hazardous Materials. The Action Sports 1 and 2 motor sports facilities and accessory uses, including equipment manufacturing, research and development, garages and welding/fabricating/painting, would concentrate fuel storage and hazardous materials on the Project site. Buildout of Alternative No. 2 would remove these uses from the Project site; therefore, Alternative No. 2 would have ***fewer*** impacts on Hazards and Hazardous Materials.

Hydrology and Water Quality

The proposed Project was found to have Less than Significant impacts, with mitigation, on Hydrology and Water Quality. Buildout of Alternative No. 2 would remove development from Planning Area 6. It would reduce the acreage of impermeable surfaces, thereby reducing stormwater flows. It would eliminate the need for backbone infrastructure to reach Planning Area 6. Compared to the proposed Project, Alternative No. 2 would have ***fewer*** impacts on Hydrology and Water Quality.

Land Use

The proposed Project was found to have Less than Significant impacts on Land Use. Buildout of Alternative No. 2 would remove development from Planning Area 6, potentially relocating a portion of it to other planning areas. It would change the land use designation of some privately-owned parcels to prohibit development, thereby requiring just compensation by the City. These differences would not conflict with the City's General Plan or regional population forecasts; however, the General Plan Land Use goals include creating a year-round recreation destination, opportunities for both tourists and residents, and a diverse and integrated balance of land uses. The implementation of Alternative 2 would preclude the opportunity to integrate extreme sports uses on the Project site and thus fulfill these General Plan goals. Compared to the proposed Project, Alternative No. 2 would have ***greater*** impacts on Land Use.

Noise

The proposed Project was found to have potentially Significant and Unavoidable impacts due to Construction Noise; Less than Significant impacts due to Construction Vibration; potentially Significant and Unavoidable impacts due to future Traffic Noise or Operational Noise; and Less than Significant impacts, with mitigation, from the Potential Airport Relocation. Buildout of Alternative No. 2 would remove development from Planning Area 6, potentially relocating an Active Recreation 1 or 2 land use to Planning Area 2 or 3. It would eliminate the Action Sports 1 and 2 land uses.

Construction Noise impacts, Construction Vibration impacts, and impacts from the potential airport relocation would be similar for both alternatives. There would be less noise impact from large events with Alternative No. 2, and no noise from motocross or motorsports activities. Compared to the proposed Project, Alternative No. 2 would have ***fewer*** Noise impacts.

Population and Housing

The proposed Project was found to have Less than Significant impacts on Population and Housing. Buildout of Alternative No. 2 would remove development from Planning Area 6, potentially relocating an Active Recreation 1 or 2 land use to Planning Areas 2 or 3. It would eliminate the Action Sports 1 and 2 land uses. Compared to the proposed Project, Alternative No. 2 would have ***similar*** impacts on Population and Housing.

Public Services

The proposed Project was found to have Less than Significant impacts on Public Services. Buildout of Alternative No. 2 would remove development from Planning Area 6, potentially relocating an Active Recreation 1 or 2 land use to Planning Areas 2 or 3. It would eliminate the Action Sports 1 and 2 land uses. Since there are no residential uses planned for Planning Area 6, this would not change the Project's need for additional schools and libraries; however, the reduced commercial, restaurant and hotel uses would decrease the level of police and fire protection services required. In addition, the elimination of the Action Sports 1 and 2 land uses would reduce the number of large events that would require additional police and fire protection services. Compared to the proposed Project, Alternative No. 2 would have ***fewer*** impacts on Public Services.

Recreation

The proposed Project was found to have Less than Significant impacts on Recreation. Buildout of Alternative No. 2 would remove development from Planning Area 6, potentially relocating an Active Recreation 1 or 2 land use to Planning Areas 2 or 3. It would eliminate the Action Sports 1 and 2 land uses. There would be no change in residential uses and no need for additional parks. Compared to the proposed Project, Alternative No. 2 would have ***similar*** impacts on Recreation.

Transportation and Circulation

The proposed Project was found to have Significant Unavoidable Impacts on Transportation and Circulation. Buildout of Alternative No. 2 would remove development from Planning Area 6, potentially relocating an Active Recreation 1 or 2 land use to Planning Areas 2 or 3. It would eliminate the Action Sports 1 and 2 land uses. Alternative No. 2 would eliminate the need to extend Malaga Road/Sylvester Street, Cereal Street and Lucerne Street to Planning Area 6, and would generate less traffic from large events, commercial areas and sports and recreation facilities. Compared to the proposed Project, Alternative No. 2 would have ***fewer*** impacts on Transportation and Circulation.

Utilities

The proposed Project was found to have Less than Significant impacts on Utilities. Buildout of Alternative No. 2 would remove development from Planning Area 6, potentially relocating an Active Recreation 1 or 2 land use to Planning Areas 2 or 3. It would eliminate the need for backbone infrastructure to reach Planning Area 6 and reduce commercial, restaurant, hotel land uses. It would eliminate the Action Sports 1 and 2 land uses and their need for supporting infrastructure. Compared to the proposed Project, Alternative No. 2 would have ***fewer*** impacts on Utilities.

Energy and Irretrievable Resources

The proposed Project was found to have Less than Significant impacts on Energy and Irretrievable Resources. Buildout of Alternative No. 2 would remove development from Planning Area 6, potentially relocating an Active Recreation 1 or 2 land use to Planning Areas 2 or 3. It would eliminate the Action Sports 1 and 2 land uses. In the short term, fewer resources would be needed for construction. Buildout would require less vehicular and operational energy consumption; however, energy consumption would remain considerable but with ***fewer*** impacts compared to the proposed Project.

Growth Inducing Impacts

Because new development and infrastructure improvements would be focused in the Project site and the targeted development would help to correct the current jobs/housing imbalance in the City, and because the Project site is currently zoned for development under the Adopted ELSP and General Plan, potential impacts associated with growth inducement are considered Less than Significant for the proposed Project. Because Alternative No. 2 does not allow development in Planning Area 6, there would be fewer growth inducement impacts.

Cumulative Impacts

Similar to the proposed Project, Alternative No. 2 would contribute to the permanent conversion of open space in the City to residential, commercial, active recreation and action sports and other urbanized land uses. While development of this alternative would generate less traffic, noise, long-term operational air pollutant or greenhouse gas emissions, impacts would still be substantial but result in ***fewer*** impacts.

Conclusion

Compared to the proposed Project, implementation of Alternative No. 2, with mitigation, would result in reduced impacts for Air Quality, Biological Resources, Cultural Resources, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise, Public Services, Transportation and Circulation, Utilities, Energy and Irretrievable Resources, and Growth Inducement. Similar impacts would occur for Aesthetics, Geology, Soils and Seismicity, Population and Housing, and Recreation. There would be greater impacts to Land Use.

7.5.3.2 Comparison of Alternative No. 2 (Proposed Project with no development in Planning Area 6) to Project Objectives

Alternative No. 2 would meet nearly all of the Project objectives, although some would be met to a lesser degree. Alternative No. 2 would not be able to ensure that the City's "Action Sports Capital of the World" activities have a permanent location in the City (Objective 4). The existing Motocross facility would remain a non-conforming use in Planning Area 2. If, in the future it decided to relocate away from encroaching residential development, there would not be a permanent location for it in Planning Area 6 or anywhere within the proposed Project, as the removal of development in Planning Area 6 would eliminate the Action Sports 1 and 2 uses. This would also mean that Objective 8, encouraging synergistic land uses with Diamond Stadium and other action sports facilities, would be less likely to be achieved, and the revenues envisioned from the action sports and associated tourism uses envisioned by Objective 10 would be substantially reduced.

Private sector investment in the East Lake area (Objective 5) would be diminished with implementation of Alternative No. 2 since private property owners in Planning Area 6 would no longer be entitled to full development rights under the land use designation of Single-Family Residential, and the City would need to provide just compensation.

Since development would be removed from Planning Area 6, the City would not undertake the installation of the backbone infrastructure and infrastructure would be constructed on a project-by-project basis. Thus, Alternative No. 2 would only partially meet Objective 6 and the improved connectivity envisioned by Objective 12 would not occur.

While Alternative No. 2 would continue to provide flexibility in plan implementation to accommodate changing product designs and consumer preferences (Objective 11), the flexibility would be limited by the removal of 355.02 acres from the area of development.

7.6 Environmentally Superior Alternative

Table 7-5 at the end of this Alternatives Section provides a qualitative comparison of the impacts for each alternative compared to the proposed Project. As noted in Table 7-5, Alternative No. 2, the 'Proposed Project with no development in Planning Area 6' Alternative, is considered the Environmentally Superior Alternative among the alternatives, since it would reduce many of the impacts identified for the proposed Project.

Specifically, Alternative No. 2 decreases impacts and results in a less than significant or mitigated to below a level of significance impact to biological resources, cultural resources, hazards and hazardous materials, hydrology and water quality, public services, and utilities. However, Alternative No. 2 would not reduce significant unavoidable air quality, greenhouse gas emissions, noise and transportation/circulation impacts to a less-than-significant level. Therefore, Alternative 2 would result in the same significant and unavoidable impacts that would result from the proposed Project.

CEQA does not require the lead agency (City of Lake Elsinore) to approve the environmentally superior alternative. Rather, CEQA requires that an EIR consider a reasonable range of feasible alternatives (CEQA Guidelines, Section 15126.6(a)) and then the lead agency may elect to approve the project or any of the analyzed alternatives; in addition, the lead agency may also elect not to approve the project or any of its alternatives. This alternatives analysis has been prepared for the City to consider environmentally superior alternatives and also to determine whether the benefits of the proposed Project or its alternatives outweigh the potential environmental impacts.

In summary, as stated above within the comparison of the Project's objectives to the Environmentally Superior Alternative, Alternative No. 2 would not meet or 'fulfill the objectives' of the Project as well as the proposed Project and would fail to ensure a permanent home within the Project site for motorsports

or the existing Motocross facility should encroaching future residential development lead it to consider relocation.

The partial fulfillment of the objectives call into question the economic viability of Alternative No. 2.

1) The removal of development from Planning Area 6 would eliminate Action Sports 1 and 2 uses from the Project site, which would diminish the ability of the City to build upon the synergy of Diamond Stadium, the Links at Summerly Golf Course and skydiving activities, and to promote Lake Elsinore as the "Action Sports Capital of the World." This, in turn, would diminish the ancillary commercial and hotel development that would be attracted to the City and preclude the economic viability of Alternative No. 2.

2) With the removal of development from Planning Area 6, the City would not undertake the installation of the backbone infrastructure and infrastructure would be constructed on a project-by-project basis. This would remove an incentive to developers and further decrease the economic viability of the Project.

3) Much of Planning Area 6 is privately owned. The property owners are currently entitled to develop their properties as Single-Family Residential development. As a cost of implementing Alternative No. 2 and removing these development rights, the City would be required to provide just compensation to these property owners. This would not be economically viable and would preclude implementation of this alternative.

Table 7-5. Comparison of Alternative Impacts

Environmental Issue Area	Proposed Project (ELSPA No. 11)	Alternative 1: No Project (Adopted ELSP)	Alternative 2: Proposed Project with no development in PA 6
Aesthetics	Project Level: Less than Significant with Mitigation Cumulative Level: Less than Significant	CEQA Significance: Less than Significant with Mitigation Comparison to Project: Fewer impacts	CEQA Significance: Less than Significant with Mitigation Comparison to Project: Similar impacts
Air Quality	Project Level: Significant and Unavoidable Cumulative Level: Significant and Unavoidable	CEQA Significance: Significant and Unavoidable Comparison to Project: Similar impacts	CEQA Significance: Significant and Unavoidable Comparison to Project: Fewer impacts
Biological Resources	Project Level: Less than Significant with Mitigation Cumulative Level: Less than Significant with Mitigation	CEQA Significance: Less than Significant with Mitigation Comparison to Project: Similar impacts	CEQA Significance: Less than Significant with Mitigation Comparison to Project: Fewer impacts
Cultural Resources	Project Level: Less than Significant with Mitigation Cumulative Level: Less than Significant with Mitigation	CEQA Significance: Less than Significant with Mitigation Comparison to Project: Similar impacts	CEQA Significance: Less than Significant with Mitigation Comparison to Project: Fewer impacts
Geology, Soils & Seismicity	Project Level: Less than Significant with Mitigation Cumulative Level: Less than Significant	CEQA Significance: Less than Significant with Mitigation Comparison to Project: Similar impacts	CEQA Significance: Less than Significant with Mitigation Comparison to Project: Similar impacts
Greenhouse Gas Emissions	Project Level: Potentially Significant and Unavoidable Cumulative Level: Potentially Significant and Unavoidable	CEQA Significance: Potentially Significant and Unavoidable Comparison to Project: Similar impacts	CEQA Significance: Potentially Significant and Unavoidable Comparison to Project: Fewer impacts

Hazards & Hazardous Materials	Project Level: Less than Significant with Mitigation Cumulative Level: Less than Significant	CEQA Significance: Less than Significant with Mitigation Comparison to Project: Fewer impacts	CEQA Significance: Less than Significant with Mitigation Comparison to Project: Fewer impacts
Hydrology & Water Quality	Project Level: Less than Significant with Mitigation Cumulative Level: Less than Significant with Mitigation	CEQA Significance: Less than Significant with Mitigation Comparison to Project: Similar impacts	CEQA Significance: Less than Significant with Mitigation Comparison to Project: Fewer impacts
Land Use	Project Level: Less than Significant Cumulative Level: Less than Significant	CEQA Significance: Less than Significant Comparison to Project: Similar impacts	CEQA Significance: Less than Significant Comparison to Project: Greater impacts
Noise	Project Level: Potentially Significant and Unavoidable Cumulative Level: Significant Unavoidable Impact	CEQA Significance: Potentially Significant and Unavoidable Comparison to Project: Similar impacts	CEQA Significance: Potentially Significant and Unavoidable Comparison to Project: Fewer impacts
Population & Housing	Project Level: Less than Significant Cumulative Level: Less than Significant	CEQA Significance: Less than Significant Comparison to Project: Greater impacts	CEQA Significance: Less than Significant Comparison to Project: Similar impacts
Public Services	Project Level: Less than Significant Cumulative Level: Less than Significant	CEQA Significance: Less than Significant Comparison to Project: Similar impacts	CEQA Significance: Less than Significant Comparison to Project: Fewer impacts
Recreation	Project Level: Less than Significant Cumulative Level: Less than Significant	CEQA Significance: Less than Significant Comparison to Project: Greater impacts	CEQA Significance: Less than Significant Comparison to Project: Similar impacts

Transportation & Circulation	Project Level: Significant Unavoidable Impacts Cumulative Level: Significant and Unavoidable	CEQA Significance: Significant Unavoidable Impacts Comparison to Project: Greater impacts	CEQA Significance: Significant Unavoidable Impacts Comparison to Project: Fewer impacts
Utilities	Project Level: Less than Significant Cumulative Level: Less than Significant	CEQA Significance: Less than Significant Comparison to Project: Similar impacts	CEQA Significance: Less than Significant Comparison to Project: Fewer impacts
Energy and Irretrievable Resources	Project Level: Less than Significant Cumulative Level: Less than Significant	CEQA Significance: Less than Significant Comparison to Project: Similar impacts	CEQA Significance: Less than Significant Comparison to Project: Fewer impacts
Growth Inducing Impacts	Project Level: Less than Significant Cumulative Level: No impact	CEQA Significance: Less than Significant Comparison to Project: Similar impacts	CEQA Significance: Less than Significant Comparison to Project: Fewer Impacts

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