

6. Alternatives to the Proposed Project

6.1 INTRODUCTION

6.1.1 Purpose and Scope

The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) include a discussion of reasonable range of 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” (State CEQA Guidelines § 15126.6[a]). As required by CEQA, this chapter identifies and evaluates potential alternatives to the proposed project.

Section 15126.6 of the State CEQA Guidelines explains the foundation and legal requirements for the alternatives analysis in an EIR. Key provisions are:

- “[T]he 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 is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the 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]).
- “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 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.

According to Section 15126.6(d) of the CEQA Guidelines, “[i]f an alternative would cause...significant effects in addition those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.”

6.1.2 Project Objectives

As described in Section 2.3, 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.

1. Encourage higher density residential development in the TVPA, consistent with the Transit Villages concepts identified in the 2035 General Plan for areas within a one-half mile radius of each rail transit station, to promote compact neighborhoods where people can live in close proximity to transit, and retail, office and entertainment uses.
2. Promote sustainable urban growth by encouraging development within the core areas of the City, where infrastructure already exists, at increased densities that translate into more efficient provision of municipal services, and that, by the virtue of close proximity of housing to jobs and services, will reduce vehicle miles travelled.
3. Promote transit ridership by allowing more residential development to be located within walking and biking distances from transit facilities.
4. Promote enhanced sense of community by encouraging higher density development in core areas of the City that can provide and promote public spaces for residents to use and congregate.
5. Providing new jobs, housing and entertainment opportunities in walkable environments.

6.2 ALTERNATIVES CONSIDERED AND REJECTED

The following is a discussion of the alternatives considered during preparation of the Draft SEIR, and an explanation of why they were not selected for detailed analysis.

6.2.1 Alternative Development Areas

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

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step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines § 15126[5][B][1]). The location of the TVPA is unique in that it is focused on maximizing access to the planned transit stations. As the transit stations have been planned for some time and will be constructed by San Bernardino County Transit Authority (SBCTA) rather than the City of Redlands, moving the transit stations was also rejected as infeasible. No other location in the City would have a similar orientation, therefore changing the location was not considered feasible.

6.2.2 Existing Exemptions of Measure U and Measure N/Proposition R

During the SEIR process, assertions were made that the proposed Project was unnecessary because an exemption for transit-oriented projects already exists within the Measures and Proposition R. Table 6-1 shows all existing exemptions could be used in lieu of the proposed Project.

Table 6-1 Measure U Exemptions

Measure U Exemption	Applicability to Proposed Project
1. Vested Projects. This initiative measure shall not apply to or affect any property on which a vested right has been legally perfected and acquired prior to the Effective Date pursuant to state law.	Not Applicable. There are no vested properties within the TVPA, and any property that would have a vested right on it would have acquired it after the Effective Date (December 12, 1997); thereby, this exemption would not apply.
2. Special Categories of Development. The provisions of this initiative measure shall not apply to the following:	
1. New individual infill construction of single-family homes on existing lots of record bounded by developed property as of March 1, 1997;	Not Applicable. There are no single-family homes being proposed under the proposed Project, and all new infill construction that would occur, would be constructed after March 1, 1997; therefore, this exemption is not applicable to the proposed Project.
2. Rehabilitation, remodeling, or additions to existing single-family residential structures;	Not Applicable. The proposed Project would not result in the rehabilitation, remodeling, or addition to existing single-family residential structures. Therefore, this exemption is not applicable.
3. Reconstruction or replacement of any uses to the same density, intensity, and classification of use as existed on the Effective Date, including legal non-conforming uses;	Not Applicable. The proposed Project would not propose densities or intensities that existed on the Effective Date (December 12, 1997); the proposed Project would propose higher densities and intensities (27 dwelling units/acre as evaluated in the 2035 General Plan). Therefore, this exemption is not applicable.
4. Development directly related to proposed Metrolink stations in the City of Redlands, including one at the University of Redlands;	Not Applicable. In Resolution 7173, adopted in June 2012, the City Council determined that this exemption applied to the establishment of a "Transit-Village Overlay" land use classification for the purposes of developing the Metrolink stations. The Council also determined that Measure "U" prohibited adding new land use classifications to the General Plan without a vote of the people. Consequently, this exemption would not apply to proposed Project.

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Table 6-1 Measure U Exemptions

Measure U Exemption	Applicability to Proposed Project
5. New development projects subject to the Downtown Specific Plan 45, upon a four-fifths (4/5ths) vote of the total authorized membership of the City Council; and	Potentially Applicable. New development in the Downtown Specific Plan 45 is exempt from Measure U. Specific Plan 45 limits buildings to 3-stories or 55 feet in height. Multiple Family development is a permitted use in Specific Plan 45 (Table 1), however no density is provided. General Plan Policy 4-P.14 establishes High Density Residential standard at up to 27 du/ acre.
6. Special, temporary, or occasional uses of public streets including parades, local sporting and cultural events, graduation ceremonies, approved school activities, and other occasional public gatherings.	Not Applicable. The proposed Project does not propose special, temporary, or occasional uses. Therefore, this exemption would not apply to the proposed Project.
3. Exemptions from Traffic and Socio-Economic Study Requirements Only. Development projects that directly further the primary institutional purposes of churches, hospitals, schools (including private schools and universities), and organizations such as the YMCA and YWCA, on sites held by such entities as of March 1, 1997, are exempt from the traffic level of service requirements and the requirement for a socio-economic study established by this initiative measure so long as such development projects are either 1) non-residential in character, or 2) provide only dormitory, staff housing or senior congregate care facilities for those exempt entities.	Not Applicable. The proposed Project proposes changes to residential uses, including removing the requirement for socio-economic studies for future development within the TVPA. Currently, the Council can waive the requirement with a 4/5ths vote if the project is located within Specific Plan 45. The Council also has the ability to require a socio-economic study as part of any future project. Pursuant to Section 15131 of the CEQA Guidelines, socio-economic impacts are not generally an environmental issue. Therefore, this exemption is not applicable to the proposed Project.

The exemptions of Measure U, as stated above, would not meet the project objectives, therefore it was determined that there are no existing exemptions that could be used in lieu of the proposed Project.

6.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

The following two 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 proposed 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:

- No Project/Existing General Plan Alternative
- Exemption of Measure U and Modification of Measure N and Proposition R

6.3.1 Alternatives Comparison

Table 6-2 shows that the existing buildout projections from the 2035 General Plan would not change as a result of the proposed Project or the two alternatives evaluated in this chapter of the SEIR. The proposed Project changes how the City can evaluate future projects within the TVPA, but there is nothing in the proposed Project that changes land use density and intensity.

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Table 6-2 Buildout Statistical Summary

	Proposed Project	No Project/Existing General Plan Alternative	Exemption of Measure U and Modification of Measure N and Proposition R
Dwelling Units	31,104	31,104	31,104
Population	79,013	79,013	79,013
Employment	42,769	42,769	42,769
Jobs-to-Housing Ratio	1.20	1.20	1.20

6.4 NO PROJECT/EXISTING GENERAL PLAN ALTERNATIVE

The No Project alternative is required to discuss the existing conditions at the time the notice of preparation is published and evaluate what would reasonably be expected to occur in the foreseeable future if the proposed Project is not approved (CEQA Guidelines, Section 15126.6(e)). Pursuant to CEQA, this alternative is also based on the existing 2035 General Plan. The No Project/Existing General Plan Alternative assumes that the proposed Project would not be adopted, and the TVPA would not be exempt from Measures U and N, and Proposition R. From a practical standpoint, this alternative would not allow for more than 400 housing units to be built citywide during any calendar year, establishes 18 units to the acre as the maximum density without a 4/5ths vote, and keeps building height for multiple family residential to 35 feet.

This alternative would assume that future development would occur consistent with the 2035 General Plan, and all growth management policies would remain in place. Impacts from development of the 2035 General Plan were evaluated in the General Plan EIR. All policies and programs intended to address environmental impacts would be implemented with any future development. Table 6-3 shows the General Plan EIR environmental determination for each of the environmental issue areas and compares the No Project alternative as well as the proposed Project.

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Table 6-3 Comparison of No Project Alternative to General Plan EIR and Proposed Project

Environmental Issue	General Plan EIR	No Project Alternative	Proposed Project
Aesthetics	LS	LS	LS
Agriculture and Forestry Resources	SU	NI	NI
Air Quality	SU	SU	SU
Biological Resources	LS	LS	LS
Cultural Resources	LS	LS	LS
Energy	LS	LS	LS
Geology and Soils	LS	LS	LS
Greenhouse Gas	LS	LS	LS
Hazards and Hazardous Materials	LS	LS	LS
Hydrology and Water Quality	LS	LS	LS
Land Use and Housing	LS	LS	LS
Mineral Resources	LS	LS	LS
Noise	LS	LS	LS
Public Services	LS	LS	LS
Recreation	LS	LS	LS
Transportation	SU	LS	LS
Tribal and Cultural Resources	LS	LS	LS
Utilities and Service Systems	LS	LS	LS
Wildfire	LS	LS	LS

NI = No Impact, LS = Less Than Significant Impact, LSM = Less Than Significant with Mitigation Incorporated, SU = Significant and Unavoidable

As shown in Table 6-3, the environmental determination for each of the issue areas remains the same and will therefore not be discussed further in this Chapter. The impact of the proposed Project on the following environmental issue areas were evaluated in the SEIR and are included below for comparison with the No Project Alternative.

6.4.1 Land Use and Housing

Unlike the proposed Project, the No Project/Existing General Plan Alternative would not exempt the TVPA from Measures U and N, and Proposition R. While this alternative would result in development of the 2035 General Plan as adopted, it may be more difficult to implement the vision for the TVPA articulated in Chapter 4.5 Transit Villages of the 2035 General Plan, however the changes to voting requirements and the City's ability to consider future projects, do not rise to the level of environmental impacts.

Similar to the proposed Project, the No Project alternative does not change the buildout assumptions contained in the 2035 General Plan and evaluated in the General Plan EIR. Similarly, this alternative does not change any

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regional plans based on the existing general plan designations or population projections. Unlike the proposed Project, this alternative does not allow the City flexibility in the consideration of future housing types or allow a new general plan designation that may have a larger range of densities. This alternative may also make it more difficult for developers to invest in development in the TVPA because of the uncertainty in obtaining building permits in any given year.

As neither the proposed Project nor the No Project alternative would result in land uses different than those in the 2035 General Plan and evaluated in the General Plan EIR concluding a less than significant impact, the impact of the No Project alternative would also be less than significant.

6.4.2 Transportation

As described in Section 4.2, *Transportation*, the requirement for the maintenance of traffic levels of service “C” for all intersections would no longer apply within the TVPA. Although the No Project/Existing General Plan Alternative would require the continued maintenance of traffic levels of service “C” for all intersections in the TVPA, the intersections within the TVPA that would operate below LOS C would not result in significant impacts if improvements are implemented. Also, none of the roadway segments in the TVPA would operate at a LOS of less than C in 2035. Segment #55 of I-10 would result in a LOS of less than C in 2035, however, because the City of Redlands does not have jurisdiction over freeways, impacts would be significant and unavoidable.

The adoption of SB 743 in 2013, eliminated the use of LOS as a determiner for significant environmental impacts associated with development. The new method of evaluation emphasizes a reduction in vehicle miles travelled and includes consideration of methods of transportation that do not require use of a personal automobile. (e.g. train, bus, bicycle, walking, ride share) The transition to VMT will occur in June 2020, shortly after consideration of the proposed Project by the voters. As such, the environmental analysis of future development projects in the City will include consideration of VMT, with a goal of reduction the number of miles travelled. One method of reducing miles travelled is to incorporate alternative transportation methods near homes. In this instance, the TVPA is uniquely suited to encourage development where residents could make maximum use of transit thereby reducing VMT. One effect of the transition to VMT will be that a project that does not maintain LOS C, will no longer automatically trigger an environmental analysis. If the 2035 General Plan policy remains intact, future projects might be denied for inconsistency with the General Plan but would not necessarily trigger an EIR. In this regard, both the No Project alternative and the proposed Project impact to LOS standards in the TVPA would be identical.

The No Project alternative would maintain the existing policies and requirements for consideration of projects within the TVPA. This alternative would not allow for greater flexibility in the consideration of development near the transit stations or recognize different transportation systems that can occur with a more comprehensive mixed-use design. However, like the proposed Project, this alternative does not change the density and intensity of development, therefore impacts would be identical to those of the proposed Project and evaluated in the General Plan EIR.

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6.4.3 Utilities and Service Systems

The proposed Project and the No Project/Existing General Plan Alternative do not propose specific development projects, however, the buildout of both would result in an increased demand for water, wastewater treatment, storm drainage, solid waste disposal, and other services. Compared to the proposed Project, impacts to utilities and service systems would be the same; impacts would be less than significant.

6.4.4 Conclusion

The No Project/Existing General Plan Alternative would result in similar impacts to all the topical areas compared to the proposed Project, as the proposed Project would not result in an increase or change to the overall buildout land use assumption or growth of the 2035 General Plan. As this alternative does not allow the City to consider a range of development options near the proposed transit stations, and does not reflect changes in state law emphasizing a reduction in vehicle miles travelled, the No Project alternative would result in greater impacts to transportation than the proposed Project.

6.5 THREE-YEAR UNIT TOTAL ALTERNATIVE

Rather than eliminate the 400-dwelling unit per year cap within the TVPA, this alternative would:

1. Exempt the TVPA from Measure U; and,
2. Amend Measure N and Proposition R to eliminate the annual 400-dwelling unit cap citywide and replace it with a 1,200 unit citywide cap per every three-year period, without rollover of unused dwelling units.

Table 6-4 compares the Three-Year Unit Total alternative to the General Plan EIR and the proposed Project.

Table 6-4 Comparison of Three-Year Unit Total Alternative to General Plan EIR and Proposed Project

Environmental Issue	General Plan EIR	Three-Year Unit Total	Proposed Project
Aesthetics	LS	LS	LS
Agriculture and Forestry Resources	SU	NI	NI
Air Quality	SU	SU	SU
Biological Resources	LS	LS	LS
Cultural Resources	LS	LS	LS
Energy	LS	LS	LS
Geology and Soils	LS	LS	LS
Greenhouse Gas	LS	LS	LS
Hazards and Hazardous Materials	LS	LS	LS
Hydrology and Water Quality	LS	LS	LS
Land Use and Housing	LS	LS	LS

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Table 6-4 Comparison of Three-Year Unit Total Alternative to General Plan EIR and Proposed Project

Mineral Resources	LS	LS	LS
Noise	LS	LS	LS
Public Services	LS	LS	LS
Recreation	LS	LS	LS
Transportation	SU	LS	LS
Tribal and Cultural Resources	LS	LS	LS
Utilities and Service Systems	LS	LS	LS
Wildfire	LS	LS	LS

NI = No Impact, LS = Less Than Significant Impact, LSM = Less Than Significant with Mitigation Incorporated, SU = Significant and Unavoidable

As shown in Table 6-4, the environmental determination for each of the issue areas remains the same and will therefore not be discussed further in this Chapter. The impact of the proposed Project on the following environmental issue areas were evaluated in the SEIR and are included below for comparison with the Three-Year Unit Total alternative.

6.5.1 Land Use and Housing

Unlike the proposed Project, the Three-Year Unit Total would require that development in the TVPA compete with the remainder of the City for the 1,200 dwelling unit allotment over each three-year period. As shown in Table 4.1-2 of this SEIR, the City has not met or exceeded the 400-unit annual cap in the last 19 years and averaged 109 units annually during the same period. However, the pace and pressure for residential development has significantly increased in the past couple of years as evidenced by the number of applications pending with the City. Since development throughout the City would be included in the three-year 1,200 dwelling unit calculation, this alternative has the potential to limit future development outside of the TVPA if one or more projects are entitled within the TVPA that equal the three-year unit total. Conversely, a large development project outside of the TVPA could limit the residential development potential within the TVPA as the total city-wide unit count would apply. The proposed Project would allow the City to approve development within the TVPA consistent with the Transit Villages component of the 2035 General Plan. This alternative could allow more development outside of the TVPA which could slow implementation of the Transit Village component of the 2035 General Plan.

As with the proposed Project this alternative would not increase the development potential as established in the 2035 General Plan and analyzed in the General Plan EIR.

6.5.2 Transportation

As described in Section 4.2, *Transportation*, the requirement for the maintenance of traffic levels of service “C” for all intersections would no longer apply within the TVPA. As this alternative would exempt the TVPA from

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the provisions of Measure U, the impacts would be identical to those of the proposed Project as discussed in Section 4.02 of this SEIR.

The adoption of SB 743 in 2013, eliminated the use of LOS as a determiner for significant environmental impacts associated with development. The new method of evaluation emphasizes a reduction in vehicle miles travelled and includes consideration of methods of transportation that do not require use of a personal automobile. (e.g. train, bus, bicycle, walking, ride share) The transition to VMT will occur in June 2020, shortly after consideration of the proposed Project by the voters. As such, the environmental analysis of future development projects in the City will include consideration of VMT, with a goal of reduction the number of miles travelled. One method of reducing miles travelled is to incorporate alternative transportation methods near homes. In this instance, the TVPA is uniquely suited to encourage development where residents could make maximum use of transit thereby reducing VMT. One effect of the transition to VMT will be that a project that does not maintain LOS C, will no longer automatically trigger an environmental analysis. In this regard, both the Three-Year Unit Total alternative and the proposed Project impact to LOS standards in the TVPA would be identical.

Unlike the proposed Project, this alternative could lead to the consideration of large residential projects outside of the TVPA. Projects outside of the TVPA would be further from the transit stations and unlikely to realize the vision for the Transit Villages as expressed in the 2035 General Plan. Like the proposed Project, this alternative does not change the density and intensity of development, therefore impacts would be identical to those of the proposed Project and evaluated in the General Plan EIR.

6.5.3 Utilities and Service Systems

No specified development projects are proposed under the proposed Project or the Three-Year Unit Total. However, buildout under both the proposed Project and this alternative would result in a demand for water, wastewater treatment storm drainage, solid waste disposal, and other services as evaluated in the General Plan EIR. Compared to the proposed Project, impacts to utilities and service systems would be the same; impacts would be less than significant.

6.5.4 Conclusion

The Three-Year Unit Total alternative would result in similar impacts to all the topical areas compared to the proposed Project and the General Plan EIR. If the 1,200 dwelling units are entitled over several projects outside of the TVPA, this alternative may discourage development within the TVPA as there would be added risk for developers and lenders in pursuing projects that may have to wait several years to obtain residential allocations needed to start construction. Consequently, this alternative might restrict development within the TVPA and thus fail to meet the Project objectives such as focusing on higher density near the transit stations and sustainable urban growth reducing vehicle miles travelled. These issues do not affect the environmental conclusions in the General Plan EIR, or in this SEIR.

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6.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the “environmentally superior alternative” and, in cases where the “No Project” Alternative is environmentally superior to the proposed project, the environmentally superior development alternative must be identified. In this instance there are no new environmental impacts beyond those evaluated in the General Plan EIR. As a result, the proposed Project, and each of the alternatives, consider changes to the development review process, and increase in flexibility permitted for consideration of future projects. From an environmental perspective, the proposed Project furthers the goals of the 2035 General Plan, as well as allowing greater flexibility in future design of projects within the TVPA. This is considered beneficial and maximizing use of transit and encouraging walkable communities, is considered an environmental benefit. Reducing vehicle miles travelled is both a regional and statewide initiative. The proposed Project would allow the City to consider future projects that would further these concepts.

The Three-Year Unit Total alternative would only address the dwelling unit issued over a three-year period and would leave the remainder of the growth management policies intact. This alternative would address only the ability of a developer (or several developers) to obtain a building permit for residential uses and does not address the other policies that could hinder future designs. Unlike the proposed Project this alternative could result in large residential development outside of the TVPA and further away from the transit stations. Table 6-5 compares each alternative to the proposed Project objectives.

Table 6-5 Comparison of Three-Year Unit Total Alternative to Project Objectives

	No Project	Three-Year Unit Total
1. Encourage higher density residential development in the TVPA, consistent with the Transit Villages concepts identified in the 2035 General Plan for areas within a one-half mile radius of each rail transit station, to promote compact neighborhoods where people can live in close proximity to transit, and retail, office and entertainment uses.	No	No
2. Promote sustainable urban growth by encouraging development within the core areas of the City, where infrastructure already exists, at increased densities that translate into more efficient provision of municipal services, and that, by the virtue of close proximity of housing to jobs and services, will reduce vehicle miles travelled.	No	No
3. Promote transit ridership by allowing more residential development to be located within walking and biking distances from transit facilities.	No	No
4. Promote enhanced sense of community by encouraging higher density development in core areas of the City that can provide and promote public spaces for residents to use and congregate.	No	Yes
5. Encourage housing near jobs and entertainment opportunities in walkable environments.	No	Yes
Overall		

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The No Project alternative fails to meet any of the proposed Project objectives. The Three-Year Unit Total alternative could result in large residential projects outside of the TVPA which does not further the intent of the Transit Villages as expressed in the 2035 General Plan. As the proposed Project does not result in any new or worsened environmental impacts as reported by the General Plan EIR, and since the alternatives fail to obtain most of the project objectives, the proposed Project is considered the environmentally superior alternative.