This section has been revised in response to comments received on the Draft EIS/EIR (April 2009), and based on additional independent review by the lead agencies (U.S. Army Corps of Engineers and California Department of Fish and Game). The revised or additional text is shown in double-underline; deleted text is shown in ~~strikeout~~. Revised or new figures or tables (if applicable) are indicated by the addition of the following text to the figure or table title: **(Revised)** or **(New)**. The primary change made to **Section 5.0** was to add an environmental analysis of the Draft Least Environmentally Damaging Practicable Alternative (LEDPA), which is found toward the end of this section (see **Subsection 5.9)**.

5.1 INTRODUCTION

This section presents a summary of the impact findings previously presented in revised **Section 4.0**, Environmental Impact Analysis of Alternatives and Mitigation, of ~~this~~ the Final EIS/EIR. The information is organized by alternative, rather than by environmental resource category, in order to facilitate an evaluation of the comparative merits of the "No Action/No Project" alternative, the proposed Project (Alternative 2), and the ~~five~~ six Project alternatives (Alternatives 3-7 and the Draft LEDPA). The impacts of each alternative are summarized in the text of this section, and a tabular comparison of impacts is presented in revised **Subsection 5.10**~~9~~. A detailed description of the elements of the proposed Project and alternatives is found in revised **Section 2.0**, Project Description, and revised **Section 3.0**, Description of Alternatives, of ~~this~~ the Final EIS/EIR.

5.1.1 Overview of On-Site Alternatives Analyzed

The ~~seven~~ on-site alternatives described and analyzed in revised **Section 3.0**, Description of Alternatives, of ~~this~~ the Final EIS/EIR, include the No Action/No Project alternative (Alternative 1), the applicant's proposed Project (Alternative 2), and the ~~five~~ six "build" alternatives (Alternatives 3-7 and the Draft LEDPA). Land use plans for ~~six~~ seven of the ~~seven~~ alternatives are shown graphically in the discussion of each alternative (there is no land use plan for the No Action/No Project alternative). These alternatives are evaluated by environmental category in revised **Section 4.0**, Environmental Impact Analysis of Alternatives and Mitigation, of ~~this~~ the Final EIS/EIR, with the exception of the Draft LEDPA, the configuration of which is substantially similar to that of Alternative 3, with some reductions of specific impacts. The detailed analysis of these impacts, and where it differs from Alternative 3, is contained in both this section (see **Subsection 5.9**) and in **Appendix F1.0** of the Final EIS/EIR.

In general, the No-Action/No Project alternative (Alternative 1) is a description of what would occur should the lead agencies (*i.e.*, the Corps and CDFG) decide not to approve the permits and other approvals associated with the proposed Project. Thus, the No Action/No Project alternative would result in the inability to develop any of the RMDP infrastructure or facilitated development, none of the proposed spineflower preserves would be established, and none of the open space within the Project area would be dedicated and managed as contemplated by the proposed Project.[1]

[1] If implemented, the Specific Plan would provide approximately 10,200 acres of open space (including the 1,517-acre Salt Creek area), the VCC planning area would provide 143.6 acres, and the Entrada portion would provide 129.5 acres, for a combined total of approximately 10,473 acres of open space (see **Table 3.0-5** in **Section 3.0**, Description of Alternatives, of this EIS/EIR).

The CWA section 404 permit, Master Streambed Alteration Agreement, and Incidental Take Permits proposed under Alternative 2 (proposed Project) would allow construction of the proposed RMDP infrastructure and SCP components of the proposed Project, and would facilitate development of the approved Specific Plan, the approved development in the VCC planning area, and the planned development in a portion of the Entrada planning area.

The ~~five~~ six other build alternatives (Alternatives 3-7 and the Draft LEDPA) address a broad range of ~~different~~ configurations for the major RMDP infrastructure in the waters of the ~~U.S.~~ United States or CDFG jurisdictional streams (Santa Clara River and tributary drainages), which is necessary to facilitate development of the Specific Plan. These alternatives also focus on different configurations for the spineflower preserves, which, in turn, affect the conservation of sensitive biotic and aquatic resources within a managed open space/preserve system.

The ~~five~~ six build alternatives focus on a range of proposed permitting activities that avoid or minimize impacts to jurisdictional waters and spineflower. As impacts to jurisdictional waters are primarily associated with construction of bridges, bank stabilization, the grading and realigning of tributary drainages to facilitate Specific Plan development, and the conversion of minor tributary drainages to buried storm drains to facilitate residential and commercial development pads, public streets, road crossings, schools, and other associated Specific Plan infrastructure and facilities, alternative configurations for the major RMDP infrastructure are reflected in each build alternative. Similarly, because the proposed Project could impact spineflower outside of designated preserves, a broad range of spineflower preserve design options and their connectivity to open space were evaluated. Each of the build alternatives (Alternatives 3-7 and the Draft LEDPA) reduces the RMDP infrastructure and increases the size of spineflower preserves from those of the proposed Project, resulting in reduced development facilitated in the Specific Plan and the VCC and Entrada planning areas, and, correspondingly, ~~minimizes or avoids~~ reduces jurisdictional waters and spineflower impacts.

The build alternatives also have been designed so that the impact reduction characteristics of the preceding alternative are generally incorporated into the subsequent alternatives. For example, Alternative 3 would modify the proposed RMDP and SCP, respectively, by eliminating the planned Potrero Canyon Road ~~B~~bridge and increasing spineflower preserve acreage in the Specific Plan's Airport Mesa preserve and on Entrada. Alternative 4 would eliminate Potrero Canyon Road ~~B~~bridge, but retain the preserve acreage added by Alternative 3, and increase further the preserve acreage in the Specific Plan's Airport Mesa, Potrero, and Grapevine Mesa preserves and on Entrada. Alternative 4 also would add a spineflower preserve in the VCC planning area. Alternative 5 would widen tributary drainages, add a spineflower preserve within the VCC planning area, and include the same three bridge crossings over the Santa Clara River as the proposed Project. Alternative 6 would eliminate the planned Commerce Center Drive ~~B~~bridge and maximize spineflower preserve buffers and open space connectivity. Alternative 7 would incorporate a two-prong approach: (i) preservation of all spineflower occurrences along with 300-foot buffers; and (ii) elimination of two planned bridges (Commerce Center and Potrero Canyon Road ~~B~~bridges), and the avoidance of the 100-year floodplain along the Santa Clara River and nearly all of the tributary drainages. The Draft LEDPA would eliminate the planned Potrero Canyon Road bridge, increase spineflower preserve acreage, and include wider tributary drainage areas when compared to the proposed

Project. Key differences between the ~~seven~~ alternatives evaluated in this EIS/EIR are summarized in **Table 5.0-1** below.

The environmental impacts of each of the alternatives are summarized below so that reviewers may evaluate the comparative merits of the proposed Project (Alternative 2) and the other identified alternatives.

(Revised) Table 5.0-1
Comparison Of Key Development Components -- All Alternatives

Alternative	Bridges	Culverts	Tributary Drainage Preserved (Linear Feet)	Tributary Drainage Modified (Linear Feet)	Tributary Drainage Converted to Buried Storm Drain (Linear Feet)	Spineflower Preserve (Acres)	Total Acres of Urban Development Facilitated	Total Residential Dwelling Units	Total Commercial/ Industrial/ Business Park (msf)
Existing Condition	0	0	0	0	0	0	0	0	0
Alternative 2	3	15	126,434	55,770	59,845	167.56	3,815	22,610	9.40
Alternative 3	5	12	130,314	51,725	60,010	221.76	3,506	21,558	9.33
% Change vs. Alternative 2	67%	-20%	3%	-7%	Within 1%	32%	-8%	-5%	-1%
Alternative 4	4	13	132,392	49,789	59,868	259.9	3,340	21,846	5.93
% Change vs. Alternative 2	33%	-13%	5%	-11%	Within 1%	55%	-12%	-3%	-37%
Alternative 5	10	8	132,820	48,545	60,683	338.61	3,247	21,155	5.87
% Change vs. Alternative 2	233%	-47%	5%	-13%	1%	102%	-15%	-6%	-38%
Alternative 6	11	8	147,153	51,561	43,334	891.16	2,876	20,212	5.78
% Change vs. Alternative 2	267%	-47%	16%	-8%	-28%	432%	-25%	-11%	-39%
Alternative 7	20	0	209,809	12,910	19,330	660.56	2,079	17,323	3.82
% Change vs. Alternative 2	567%	-100%	66%	-77%	-68%	294%	-46%	-23%	-59%
Draft LEDPA	5	13	131,769	54,001	56,291	247	3,023	21,537	9.26
% Change vs. Alternative 2	67%	-13%	4%	-3%	5%	47%	-21%	-5%	-1.5%

Source: URS, 2009

5.2. ALTERNATIVE 1 (NO ACTION/NO PROJECT)

Because no RMDP facilities or infrastructure would be authorized under this alternative, and because spineflower preserves would not be established pursuant to the proposed SCP, there would be no direct environmental impacts resulting from Alternative 1. In addition, Alternative 1 would not result in any indirect impacts, because there would be no development facilitated in uplands on the Specific Plan, VCC, or Entrada planning areas. The No Action/No Project alternative also would not cause any off-site activities resulting in secondary impacts, because there would be no Project-related development activities on the Specific Plan, VCC, or Entrada. However, the existing agricultural, grazing, oil leasing, and other activities in the Project area would continue to occur under this alternative. The applicant leases portions of the Specific Plan area for oil and natural gas production, as well as for cattle grazing, ranching, and agricultural operations (*e.g.*, food crop production, dry land farming, honey farming). All such operations are currently ongoing. In addition, the applicant leases the Specific Plan site to the movie industry for set locations. A minor existing land use includes employee houses, an oil company office, and miscellaneous structures. There also are several existing easements on the Specific Plan site, including oil, natural gas, electrical, telephone, and water easements. In particular, Southern California Edison and Southern California Gas Company maintain distribution lines within on-site easements.

Grazing activities and oil and natural gas production have had an effect on much of the natural habitat on site. Scrub habitats have been displaced by annual grasslands as a result of grazing and land clearing for agriculture and other historic land uses. In addition, the Specific Plan site has been fragmented by dirt and asphalt roads, graded oil well pads and pipelines, and pumping, storage, and transmission facilities. Please refer to revised **Section 2.0**, Project Description, of ~~this~~ the Final EIS/EIR for a description of the Project area's existing conditions, including, specifically, **Figure 2.0-6**, which depicts the ongoing agricultural, grazing, and oil leasing activities within the Project area.

5.2.1 Surface Water Hydrology and Flood Control

Because no RMDP facilities or SCP conservation activities would be authorized under this alternative, and because no upland development would be indirectly facilitated, Alternative 1 would not result in any significant impacts related to surface water hydrology or flood control. Nonetheless, existing and ongoing agricultural, grazing, oil leasing, and other activities in the Project area create opportunities to cause erosion, which may adversely impact surface water hydrology; however, such effects result from existing conditions under the No Action/No Project alternative, not from the proposed Project actions or activities. In addition, surface water hydrology and flood control impacts resulting from this alternative would be fewer when compared to the RMDP and SCP components of the proposed Project. Please refer to revised **Section 4.1**, Surface Water Hydrology and Flood Control, of ~~this~~ the Final EIS/EIR for a complete discussion of the hydrology and flood control-related impacts of Alternative 1.

5.2.2 Geomorphology and Riparian Resources

Because no RMDP facilities or SCP conservation activities would be authorized under this alternative, and because no upland development would be indirectly facilitated, Alternative 1 would not result in any impacts related to geomorphology and riparian resources. However, the existing unstable geomorphic conditions in the three southern tributary drainages (Lion, Long, and Potrero) would not be remedied.

Additionally, the existing land uses (agriculture and oil production) would persist and geomorphic conditions may continue to degrade in these existing tributary drainages. However, such effects result from existing conditions under the No Action/No Project alternative, not from the proposed Project actions or activities. Geomorphology and riparian resource impacts resulting from this alternative would be greater when compared to the proposed Project.

Please refer to revised **Section 4.2**, Geomorphology and Riparian Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the geomorphology-related impacts of Alternative 1.

5.2.3 Water Resources

Because no RMDP facilities or SCP conservation activities would be authorized under this alternative, and because no upland development would be indirectly facilitated, Alternative 1 would not result in any significant impacts related to water resources. Nonetheless, the existing uses in the Project area (*e.g.*, agriculture) would continue to use groundwater to irrigate fields; but, such activities result from existing conditions under the No Action/No Project alternative, not from the proposed Project actions or activities. In addition, water supply impacts resulting from this alternative would be less when compared to the RMDP and SCP components of the proposed Project. Please refer to revised **Section 4.3**, Water Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of water resource impacts of Alternative 1.

5.2.4 Water Quality

Because no RMDP facilities or SCP conservation activities would be authorized under this alternative, and because no upland development would be indirectly facilitated, Alternative 1 would not result in any significant water quality impacts. Nonetheless, the existing uses in the Project area (*e.g.*, agriculture, grazing, oil leasing) would continue to cause adverse erosion impacts resulting in adverse water quality effects; but, such activities result from existing conditions under the No Action/No Project alternative, not from the proposed Project actions or activities. In addition, water quality impacts resulting from this alternative would be fewer when compared to the RMDP and SCP components of the proposed Project. Please refer to revised **Section 4.4**, Water Quality, of ~~this~~ the Final EIS/EIR for a complete discussion of water quality impacts of Alternative 1.

5.2.5 Biological Resources

Because no RMDP facilities or SCP conservation activities would be authorized under this alternative, and because no upland development would be indirectly facilitated, Alternative 1 would not result in any impacts to biological resources, except with respect to potential impacts to sensitive biological resources arising from ongoing agricultural, grazing, oil leasing, and other ongoing activities in the Project area. However, such activities result from existing conditions under the No Action/No Project alternative, not from the proposed Project actions or activities. In addition, biological resource impacts resulting from this alternative would be fewer when compared to the RMDP and SCP components of the proposed Project. Please refer to revised **Section 4.5**, Biological Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the biological resource impacts of Alternative 1. The comparative impacts of all ~~seven~~ alternatives evaluated in this EIS/EIR on the San Fernando Valley spineflower are presented in **Table 5.0-2**.

(Revised) Table 5.0-2
Summary Of Impacts To Spineflower Populations – All Alternatives

	Take (Acres)	Take (%)	Preserved (Acres)	Preserved (%)	Expansion Area (Acres)	Buffer Area (Acres)	Total Preserve Area (Acres)
Existing Condition	0	0	0	0	0	0	0
Alternative 2	6.35	31.4%	13.88	68.6%	42.91	110.76	167.56
Alternative 3	4.54	22.4%	15.70	77.1%	61.87	144.28	221.76
Percentage Change Compared to Alternative 2	28% Take Reduction		13% Preservation Increase		44% Expansion Area Increase	30% Buffer Area Increase	32% Increase in Total Preserve Area
Alternative 4	3.53	17.4%	16.71	82.6%	68.65	174.63	259.90
Percentage Change Compared to Alternative 2	44% Take Reduction		20% Preservation Increase		60% Expansion Area Increase	58% Buffer Area Increase	55% Increase in Total Preserve Area
Alternative 5	3.18	15.7%	17.06	84.3%	53.63	268.01	338.61
Percentage Change Compared to Alternative 2	50% Take Reduction		23% Preservation Increase		25% Expansion Area Increase	142% Buffer Area Increase	132% Increase in Total Preserve Area
Alternative 6	2.32	11.5%	17.92	88.5%	195.29	678.05	891.16
Percentage Change Compared to Alternative 2	63% Take Reduction		29% Preservation Increase		355% Expansion Area Increase	512% Buffer Area Increase	432% Increase in Total Preserve Area
Alternative 7	0.36	1.8%	19.88	98.2%	83.04	557.78	557.00
Percentage Change Compared to Alternative 2	94% Take Reduction		43% Preservation Increase		93% Expansion Area Increase	403% Buffer Area Increase	232% Increase in Total Preserve Area
Draft LEDPA	5.87	29.6%	13.97	70.4%	87.81	92.75	247.39
Percentage Change Compared to Alternative 2	7.5% Take Reduction		0.5% Preservation Increase		104% Expansion Area Increase	16% Buffer Area Decrease	48% Increase in Total Preserve Area

Source: URS, 2009

5.2.6 Jurisdictional Waters and Streams

Because no RMDP facilities or SCP conservation activities would be authorized under this alternative, and because no upland development would be indirectly facilitated, Alternative 1 would not result in any significant impacts on waters of the ~~U.S.~~ United States, CDFG jurisdictional streams, or federally protected wetlands. However, the existing and ongoing agricultural, grazing, oil leasing, and other activities in the Project area may adversely impact waters of the ~~U.S.~~ United States, CDFG jurisdictional streams, or federally-protected wetlands, but such impacts result from existing conditions under the No Action/No Project alternative, not from the proposed Project actions or activities. In addition, impacts to jurisdictional waters and streams resulting from this alternative would be fewer when compared to the RMDP and SCP components of the proposed Project. Please refer to revised **Section 4.6**, Jurisdictional Waters and Streams, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts of Alternative 1 on jurisdictional waters and streams. The impacts of all ~~seven~~ alternatives evaluated in this EIS/EIR on jurisdictional waters and streams are presented comparatively in **Table 5.0-3** (Corps) and **Table 5.0-4** (CDFG).

5.2.7 Air Quality

Because no RMDP facilities or SCP conservation activities would be authorized under this alternative, and because no upland development would be indirectly facilitated, Alternative 1 would not result in any significant air quality impacts. However, the existing and ongoing agricultural, grazing, oil leasing, and other activities in the Project area may slightly impact air quality, but such impacts result from existing conditions under the No Action/No Project alternative, not from the proposed Project actions or activities. In addition, impacts to air quality resulting from this alternative would be far less than the RMDP and SCP components of the proposed Project. Please refer to revised **Section 4.7**, Air Quality, of ~~this~~ the Final EIS/EIR for a complete discussion of the air quality impacts of Alternative 1.

5.2.8 Traffic

Because no RMDP facilities or SCP conservation activities would be authorized under this alternative, and because no upland development would be indirectly facilitated, Alternative 1 would not result in any significant traffic impacts. However, the existing and ongoing agricultural, grazing, oil leasing, and other activities in the Project area require traffic trips to and from the Project area, but such effects result from existing conditions under the No Action/No Project alternative, not from the proposed Project actions or activities. In addition, the modest existing traffic trips resulting from this alternative would be far less than the RMDP and SCP components of the proposed Project. Please refer to revised **Section 4.8**, Traffic, of ~~this~~ the Final EIS/EIR for a complete discussion of the traffic impacts of Alternative 1.

(Revised) Table 5.0-3
Summary of Impacts to Waters of the United States -- All Alternatives

	Santa Clara River (Including Wetlands, Acres)	Chiquito Canyon (Acres)	San Martinez Grande Canyon (Acres)	Lion Canyon (Acres)	Long Canyon (Acres)	Potrero Canyon (Including Wetlands, Acres)	Salt (Including Wetlands, Acres)	Other Drainages (Including Wetlands, Acres)	Total all Waters of U.S. (Including Wetlands, Acres)
Existing Condition (Acres)	471.2	12.2	2.6	6.9	5.7	38.7	88.5	34.4	**660.1**
Post-Alternative 2 Jurisdictional Acres	485.8	12.5	5.8	3.4	7.7	27.2	105.9	7.2	**655.5**
Change from Existing	+14.5	+0.3	+3.2	-3.5	+2.0	-11.6	+17.5	-27.2	**-4.8**
Post-Alternative 3 Jurisdictional Acres	506.4	15.7	8.7	3.4	7.1	70.2	106.4	9.6	**727.5**
Change from Existing	+35.2	+3.4	+6.1	-3.5	+1.4	+31.5	+18.0	-24.8	**+67.4**
Change Compared to Alternative 2	+20.7	+3.1	+2.9	No Change	-0.6	+43.1	+0.5	+2.5	**+72.0**
Post-Alternative 4 Jurisdictional Acres	506.4	12	5.9	3.4	10.6	39.5	105.9	9.6	**693.4**
Change from Existing	+35.2	-0.2	+3.3	-3.5	+4.9	+0.8	+17.5	-24.8	**+33.3**
Change Compared to Alternative 2	+20.7	-0.5	+0.1	No Change	+2.9	+12.3	No Change	+2.5	**+37.9**
Post-Alternative 5 Jurisdictional Acres	494.3	20.5	9.5	3.4	10.5	96.7	105.9	9.7	**750.5**
Change from Existing	+23.1	+8.3	+6.9	-3.5	+4.8	+58.0	+17.5	-24.7	**+90.4**
Change Compared to Alternative 2	+8.5	+8.0	+3.7	No Change	+2.7	+69.6	No Change	+2.6	**+95.0**
Post-Alternative 6 Jurisdictional Acres	501.7	15.7	7.3	3.4	9.6	77.8	87.7	16.3	**719.3**
Change from Existing	+30.5	+3.5	+4.8	-3.5	+3.9	+39.1	-0.8	-18.1	**+59.2**
Change Compared to Alternative 2	+15.9	+3.2	+1.5	No Change	+1.8	+50.6	-18.3	+9.1	**+63.9**
Post-Alternative 7 Jurisdictional Acres	508.9	21.9	7.6	11.5	13	81	87.7	27.6	**759.1**
Change from Existing	+37.7	+9.7	+5.0	+4.6	+7.3	+42.3	-0.8	-6.8	**+99.0**
Change Compared to Alternative 2	+23.1	+9.4	+1.8	+8.1	+5.2	+53.9	-18.3	+20.4	**+103.6**
Post-Draft LEDPA Jurisdictional Acres	499.6	18	8.4	3.5	22.4	86.9	106.5	9.6	**754.9**
Change from Existing	+28.4	+5.8	+5.8	-3.4	+16.7	+48.2	+18.0	-24.8	**+94.8**
Change Compared to Alternative 2	+13.9	+5.5	+2.6	+0.1	+14.7	+59.8	+0.5	+2.4	**+99.5**

[1] Data presented herein reflects GIS source data, with very high data resolution. To facilitate the reader, values are rounded to the nearest 1/10th of an acre. Values reported as 0.0 may represent up to 0.04 acres.

(Revised) Table 5.0-4
Summary of Impacts to CDFG Jurisdictional Stream Acreages -- All Alternatives

	Santa Clara River	Chiquito	San Martinez Grande	Lion	Long	Potrero	Salt	Other Drainages	Totals
Existing Condition (Acres)	760.3	18.3	2.6	6.9	5.7	42.9	42.9	86.1	965.7
Post-Alternative 2 Jurisdictional Acres	801.5	16.4	5.8	10.7	49.8	3.7	115.8	32.6	1,036.3
Change from Existing	+41.2	-1.9	+3.3	+3.8	+44.1	-39.2	+72.9	-53.6	+70.6
Post-Alternative 3 Jurisdictional Acres	830.0	23.2	15.6	10.7	102.9	3.7	116.3	33.3	1,135.5
Change from Existing	+69.7	+4.9	+13.0	+3.9	+97.2	-39.2	+73.3	-52.9	+169.8
Change (Alt 3 v. Alt 2)	+28.5	+6.8	+9.7	+0.1	+53.0	No Change	+0.5	+0.7	+99.3
Post-Alternative 4 Jurisdictional Acres	829.9	16.4	5.9	19.8	71.4	3.7	114.9	33.3	1,095.3
Change from Existing	+69.6	-1.9	+3.4	+12.9	+65.7	-39.2	+71.9	-52.8	+129.6
Change (Alt 4 v. Alt 2)	+28.4	No Change	+0.1	+9.1	+21.6	No Change	-0.9	+0.7	+59.0
Post-Alternative 5 Jurisdictional Acres	815.3	31.2	20.4	19.8	129.9	3.7	115.8	32.7	1,168.8
Change from Existing	+55.0	+12.9	+17.9	+12.9	+124.2	-39.2	+72.9	-53.4	+203.1
Change (Alt 5 v. Alt 2)	+13.8	+14.8	+14.6	+9.1	+80.1	No Change	No Change	+0.1	+132.5
Post-Alternative 6 Jurisdictional Acres	827.2	23.2	24.4	31.8	192.1	3.7	97.5	36.8	1,236.7
Change from Existing	+66.9	+4.9	+21.9	+25.0	+186.4	-39.2	+54.6	-49.3	+271.0
Change (Alt 6 v. Alt 2)	+25.7	+6.8	+18.6	+21.2	+142.3	No Change	-18.3	+4.2	+200.4
Post-Alternative 7 Jurisdictional Acres	1,038.5	82.1	25.6	44.1	211.6	56.7	97.5	138.0	1,694.1
Change from Existing	+278.2	+63.8	+23.0	+37.3	+205.9	+13.8	+54.6	+51.9	+728.5
Change (Alt 7 v. Alt 2)	+237.0	+65.7	+19.7	+33.5	+161.8	+53.0	-18.3	+105.5	+657.9
Post-Draft LEDPA Jurisdictional Acres	852.7	32.1	15.7	3.8	40.7	103.0	114.2	9.6	1,171.7
Change from Existing	+92.4	+13.8	+13.1	-3.0	+35.0	+60.1	+71.3	-76.5	+206.1
Change (Draft LEDPA v. Alt 2)	+51.1	+15.7	+9.8	-6.9	-9.1	+99.3	-1.6	No Change	+211.7

Notes:
NC = No Change
Source: URS, 2009.

5.2.9 Noise

Because no RMDP facilities or SCP conservation activities would be authorized under this alternative, and because no upland development would be indirectly facilitated, Alternative 1 would not result in any significant noise impacts. However, the existing and ongoing agricultural, grazing, oil leasing, and other activities in the Project area cause noise in the Project area, but such impacts result from existing conditions under the No Action/No Project alternative, not from the proposed Project actions or activities. In addition, the existing modest noise levels resulting from this alternative would be far less than the RMDP and SCP components of the proposed Project. Please refer to **Section 4.9**, Noise, of ~~this~~ the Draft EIS/EIR for a complete discussion of the noise impacts of Alternative 1.

5.2.10 Cultural Resources

Because no RMDP facilities or SCP conservation activities would be authorized under this alternative, and because no upland development would be indirectly facilitated, Alternative 1 would not result in any significant impacts to cultural/archeological sites or resources. However, the existing and ongoing agricultural, grazing, oil leasing, and other activities in the Project area cause impacts to the ground surface in the Project area, but such impacts result from existing conditions under the No Action/No Project alternative, not from the proposed Project actions or activities. In addition, the existing modest ground surface impacts resulting from this alternative would be far less than the RMDP and SCP components of the proposed Project. Please refer to revised **Section 4.10**, Cultural Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the cultural resource impacts of Alternative 1.

5.2.11 Paleontological Resources

Because no RMDP facilities or SCP conservation activities would be authorized under this alternative, and because no upland development would be indirectly facilitated, Alternative 1 would not result in any significant impacts to paleontological resources. However, the existing and ongoing agricultural, grazing, oil leasing, and other activities in the Project area cause impacts to the ground surface in the Project area, but such impacts result from existing conditions under the No Action/No Project alternative, not from the proposed Project actions or activities. In addition, the existing modest ground surface impacts resulting from this alternative would be far less than the RMDP and SCP components of the proposed Project. Please refer to revised **Section 4.11**, Paleontological Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the paleontological resource impacts of Alternative 1.

5.2.12 Agricultural Resources

Because no RMDP facilities or SCP conservation activities would be authorized under this alternative, and because no upland development would be indirectly facilitated, Alternative 1 would not result in the conversion of agricultural lands to non-agricultural uses. The existing and ongoing agricultural and grazing activities in the Project area would likely remain under private ownership and in agricultural production. Compared to the proposed Project, Alternative 1 would result in fewer impacts on existing agricultural resources within the Project area. Please refer to revised **Section 4.12**, Agricultural Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the agricultural resource impacts of Alternative 1.

5.2.13 Geology and Geologic Hazards

Because no RMDP facilities or SCP conservation activities would be authorized under this alternative, and because no upland development would be indirectly facilitated, Alternative 1 would not result in any significant geologic hazards within the Project area. Alternative 1, therefore, would result in fewer geologic impacts when compared to the proposed Project. Please refer to revised **Section 4.13**, Geology and Geologic Hazards, of ~~this~~ the Final EIS/EIR for a complete discussion of the geology/geologic hazards of Alternative 1.

5.2.14 Land Use

Alternative 1 would preclude implementation of the RMDP facilities and SCP conservation activities under the proposed Project (Alternative 2). As a result, this alternative would not enable implementation of the approved Specific Plan, completion of the VCC commercial/industrial complex, or planned development within a portion of the Entrada planning area. By not facilitating such development, this alternative would conflict with the approved Specific Plan, the approved development within the VCC planning area, and the Los Angeles County General Plan/Area Plan, as amended. As a result of this conflict, Alternative 1 would have a significant, unavoidable impact on land use in Los Angeles County.

According to the Los Angeles County General Plan Housing Element 2008-2014, between 2000 and 2007, population increased at a much higher rate than the number of housing units in the North Los Angeles County subregion. Further, the population in this subregion is projected to increase by 76% from 2005 to 2014, while employment is projected to increase by only 56%. By not proceeding with the County-approved development in the VCC planning area and completing the VCC commercial/industrial complex, this alternative would impede efforts to achieve a jobs/housing balance in the Santa Clarita Valley. Thus, Alternative 1 would likely result in greater land use planning conflicts when compared to the proposed Project (Alternative 2). Please refer to **Section 4.14**, Land Use, of ~~this~~ the Draft EIS/EIR for a complete discussion of the land use impacts of Alternative 1.

5.2.15 Visual Resources

Because no RMDP facilities or SCP conservation activities would be authorized under this alternative, and because no upland development would be indirectly facilitated, Alternative 1 would not result in any visual resource impacts within the Project area. Alternative 1, therefore, would result in fewer visual resource impacts when compared to the proposed Project. Please refer to **Section 4.15**, Visual Resources, of ~~this~~ the Draft EIS/EIR for a complete discussion of the visual resource impacts of Alternative 1.

5.2.16 Parks, Recreation, and Trails

Because no RMDP facilities or SCP conservation activities would be authorized under this alternative, and because no upland development would be indirectly facilitated, Alternative 1 would not result in any parks and recreation impacts within the Project area. Alternative 1, therefore, would result in fewer parks and recreation impacts when compared to the proposed Project. Please refer to **Section 4.16**, Parks, Recreation, and Trails of ~~this~~ the Draft EIS/EIR for a complete discussion of the parks and recreation impacts of Alternative 1.

5.2.17 Hazards, Hazardous Materials, and Public Safety

Because no RMDP facilities or SCP conservation activities would be authorized under this alternative, and because no upland development would be indirectly facilitated, Alternative 1 would not result in any significant hazards and hazardous materials within the Project area. However, the existing and ongoing agricultural, grazing, oil leasing, and other activities in the Project area cause the use of potentially hazardous materials in the Project area, but such impacts result from existing conditions under the No Action/No Project alternative, not from the proposed Project actions or activities. Nonetheless, this alternative would result in far less impacts resulting from the use, handling, or storage of potentially hazardous materials than the RMDP and SCP components of the proposed Project. Please refer to revised **Section 4.17**, Hazards, Hazardous Materials, and Public Safety of ~~this~~ the Final EIS/EIR for a complete discussion of such impacts under Alternative 1.

5.2.18 Public Services

Because no RMDP facilities or SCP conservation activities would be authorized under this alternative, and because no upland development would be indirectly facilitated, Alternative 1 would not result in any public services impacts within the Project area. Alternative 1, therefore, would result in fewer public services impacts when compared to the proposed Project. Please refer to **Section 4.18**, Public Services, of ~~this~~ the Draft EIS/EIR for a complete discussion of the public services impacts of Alternative 1.

5.2.19 Socioeconomics and Environmental Justice

Under Alternative 1, the RMDP and SCP components of the proposed Project would not be implemented, and no development would be facilitated in the Specific Plan area, or the VCC or Entrada planning areas. As a result, under this alternative, the County-approved Specific Plan would not proceed. This would preclude the development of 20,885 approved residential units and the creation of approximately 20,000 jobs within the Specific Plan area, along with associated affordable housing, schools, recreation, cultural and worship facilities, public services, and open area. In addition, under this alternative, the County-approved VCC commercial/industrial complex would not be completed, precluding the development of significant employment uses (*e.g.*, 3.40 million square feet (msf) of commercial uses). This alternative also would preclude planned residential development within the Entrada planning area (*e.g.*, 1,725 residential units). Under Alterative 1, the above socioeconomic benefits that would arise from development within the Project area, would be lost. No environmental justice issues would occur under this alternative, as there are no minority or low-income communities in the Project area. Therefore, compared to the proposed Project, Alternative 1 would result in greater socioeconomic impacts (*i.e.*, no new housing and no completed employment center). However, like the proposed Project, this alternative would not have any effect upon environmental justice impacts. Please refer to **Section 4.19**, Socioeconomics and Environmental Justice, of ~~this~~ the Draft EIS/EIR for a complete discussion of such impacts under Alternative 1.

5.2.20 Solid Waste Services

Because no RMDP facilities or SCP conservation activities would be authorized under this alternative, and because no upland development would be indirectly facilitated, Alternative 1 would not result in any

significant solid waste impacts. However, the existing and ongoing agricultural, grazing, oil leasing, and other activities in the Project area cause solid waste impacts in the Project area, but such impacts result from existing conditions under the No Action/No Project alternative, not from the proposed Project actions or activities. In addition, the existing modest solid waste impacts resulting from this alternative would be far less than the RMDP and SCP components of the proposed Project. Please refer to revised **Section 4.20**, Solid Waste Services, of ~~this~~ the Final EIS/EIR for a complete discussion of the solid waste impacts of Alternative 1.

5.2.21 Global Climate Change

Because no RMDP facilities or infrastructure would be authorized under this alternative, and because no upland development would be indirectly facilitated in the Specific Plan, VCC or Entrada planning areas, Alternative 1 would not result in the emission of greenhouse gases. Although existing uses in the Project area (e.g., agriculture, grazing, oil leasing) may continue to emit greenhouse gas emissions; such activities result from existing conditions under the No Action/No Project alternative, not from the proposed Project actions or activities. Alternative 1 would result in much fewer greenhouse gas emissions than the proposed Project; however, neither Alternative 1 nor Alternative 2 would result in any significant impacts to global climate change. Please refer to revised **Section 8.0**, Global Climate Change, of ~~this~~ the Final EIS/EIR for a complete discussion of the global climate change-related impacts of Alternative 1.

5.3 ALTERNATIVE 2 (PROPOSED PROJECT)

Under the proposed Project, the RMDP and SCP would be approved as proposed by the applicant, and the requested federal and state permits and authorizations would be granted. Three major bridges across the Santa Clara River and associated bank stabilization would be constructed, including the Commerce Center Driver Bridge (already approved by the Corps and CDFG in 1999), the Potrero Canyon Road Bridge, and the Long Canyon Road Bridge. Major tributary drainages would be regraded and realigned to facilitate and protect Specific Plan development. Several minor tributary drainages would be graded and converted to buried storm drain systems.

Five spineflower preserves would be established within the Specific Plan site and the Entrada planning area, totaling 167.6 acres and preserving 68.6% of the cumulative area occupied by spineflower in the Project area;[2] and no spineflower preserve would occur within the VCC planning area.

The alternative would facilitate Specific Plan, VCC, and Entrada development, including 22,610 residential units and 9.40 million square feet (msf) of commercial/industrial/business park floor area.

Please refer to revised **Section 2.0**, Project Description, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts of the proposed Project. For a summary comparison of impacts by alternative and issue area, please see **Subsection 5.10**~~9~~, below.

[2] The phrase "cumulative area occupied" is used in the SCP to mean the total area of mapped spineflower within the preserve between 2002 and 2007.

5.3.1 Surface Water Hydrology and Flood Control

Under Alternative 2, the floodplain area for the FEMA 100-year return event on the Santa Clara River would total approximately 1,270 acres within the Project area, a decrease of about 157 acres (11 percent) when compared to existing conditions. Under less severe storms, reductions in floodplain acreage would generally be less. From a flood control standpoint, the proposed Project has been designed to comply with DPW requirements, and flooding impacts have been eliminated by design. Mitigation measures also have been incorporated in the proposed Project to ensure that hydrology/flood control impacts remain less than significant. Please refer to revised **Section 4.1**, Surface Water Hydrology and Flood Control, of ~~this~~ the Final EIS/EIR for a complete discussion of the hydrology-related impacts of the proposed Project (Alternative 2).

5.3.2 Geomorphology and Riparian Resources

Under Alternative 2, the proposed Project design would preserve 126,434 linear feet of on-site drainages, preserving 52 percent of the total 242,049 linear feet of jurisdictional drainage within the RMDP study area. Mitigation measures have been incorporated in the proposed Project to ensure that geomorphology/riparian resource impacts remain less than significant. Please refer to revised **Section 4.2**, Geomorphology and Riparian Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the geomorphology-related impacts of the proposed Project (Alternative 2).

5.3.3 Water Resources

Under Alternative 2, development indirectly facilitated by the proposed Project would result in a combined water supply demand of 19,009 acre feet per year (afy) at build-out. Mitigation measures have been incorporated in the proposed Project to ensure that water supply/demand impacts remain less than significant. Please refer to revised **Section 4.3**, Water Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the water supply/demand impacts of the proposed Project (Alternative 2).

5.3.4 Water Quality

The surface water quality would be directly impacted by construction activities, which include removal of vegetation, grading, and trenching. Although these impacts would also occur under Alternatives 3 through 7, the intensity of the impacts would be reduced as these alternatives propose less development, as detailed in **Table 5.0-1**. However, the proposed Project and alternatives would be subject to regulatory requirements, included as water quality mitigation measures in this EIS/EIR, which would ensure that water quality standards are met and that such impacts remain less than significant. Please refer to revised **Section 4.4**, Water Quality, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts on water quality resulting from the proposed Project (Alternative 2).

5.3.5 Biological Resources

Under Alternative 2, the proposed RMDP and SCP would be approved, which would indirectly facilitate urban development within the Specific Plan site and the VCC and Entrada planning areas. Direct and indirect impacts of Alternative 2 would include permanent loss of approximately 39% of existing

vegetation communities and land covers within the Project Area (5,594 acres). Temporary habitat loss would disturb an additional 1.4% of the Project site (201 acres) under this alternative. California annual grassland, agricultural, developed, and disturbed areas would experience 58.9% of the permanent effects. This means that the most degraded land covers on site would bear the greatest proportion of Project-related impacts under this alternative. Approximately 1,524 acres of coastal scrub would also be affected, representing 27.2% of the impact area. Project-related disturbance of chaparral communities would be limited to approximately 457 acres, or 8.2% of the impact area. The Project would also disturb 95 acres of oak woodlands on site (1.7% of the impact area). No purple needlegrass communities would be affected. Riparian habitat constitutes approximately 6.9% of the Project area. Of the riparian habitat on site, the proposed Project would affect 225 acres, or 40% of the permanent impacts to land covers generally. Impacts to vegetation communities and land covers, while potentially significant, would be mitigated to less-than-significant levels on site; however, Alternative 2 would result in significant and unavoidable cumulative impacts to coastal scrub.

Under Alternative 2, the SCP would be approved as proposed by Newhall Land. Five preserves (Potrero Canyon, Grapevine Mesa, San Martinez Grande, Airport Mesa, and Entrada) totaling 168 acres would be established, monitored, and managed for 50 years. This acreage would include the 64 acres of existing spineflower conservation easements within the Project area. The conservation easements would become subject to the standards and requirements set forth in the SCP. Each preserve would consist of a polygon encompassing all the San Fernando Valley spineflower individuals within the stand, with an additional buffer area ranging from a minimum of 80 feet to over 300 feet in width. No activities would be allowed within the preserves or buffers that are inconsistent with spineflower management. Management of the spineflower preserves under each alternative would follow the SCP and include yearly monitoring as well as restoration and enhancement of degraded and/or damaged spineflower habitat. Proposed management measures include the installation of fencing and signage; limitations on activities near spineflower preserves (*e.g.*, road building), unauthorized access, and modifications of natural fuels; response strategies to wildfire events as presented in the Emergency Fire Response Plan; and regular consultation with the County and CDFG in connection with ongoing agricultural operations.

The five preserves established under Alternative 2 would include 13.88 acres of occupied spineflower habitat, which represents nearly 69% of the 20.24 acres of currently occupied habitat within the Project Area. The proposed SCP would authorize impacts to the remaining 6.354 acres of occupied spineflower habitat (31.6% of the total). Due to this substantial loss, Alternative 2 would result in significant and unavoidable impacts to San Fernando Valley spineflower. For further information regarding the effects of Alternative 2 on the San Fernando Valley spineflower, please refer to revised **Section 4.5**, Biological Resources, of ~~this~~ the Final EIS/EIR.

The proposed Project (Alternative 2) would result in potentially significant impacts to special status plant and wildlife species on site. While the majority of these impacts would be mitigated to a less-than-significant level through incorporation of the mitigation measures set forth in revised **Section 4.5**, Biological Resources, of ~~this~~ the Final EIS/EIR (see revised **Subsection 4.5.6**, Mitigation Measures), significant and unavoidable impacts to San Fernando Valley spineflower (discussed above), southwestern pond turtle, and San Emigdio blue butterfly would occur. These impacts would result from loss of, injury,

or mortality of individuals during construction activities, loss or degradation of habitat on site, and long-term secondary impacts such as habitat fragmentation.

As described above, the most common vegetation communities and land cover types within the Project area would be subject to the greatest proportion of permanent impacts under the proposed Project. These vegetation communities and land covers include chaparral, coastal scrub, California annual grasslands, and previously modified land covers such as agriculture, developed, and disturbed lands. Significant impacts to chaparral, coastal scrub, and California annual grassland communities at the Project level would be reduced to a less-than-significant level by mitigation measures provided in revised **Section 4.5**, Biological Resources. However, cumulative impacts to coastal scrub would remain significant and unavoidable due to extensive loss and fragmentation of this community in the Santa Clara River watershed. Special-status species with moderate to high mobility that use these common vegetation communities will have the greatest likelihood to escape Project-related disturbances and move to remaining habitat within or near the Project site. Examples would include large mammals, such as mule deer, and most upland birds. Due largely to the presence of the High Country SMA, River Corridor SMA, Salt Creek area, and the Spineflower Preserves, substantial wildlife habitat would remain in the Project area after build-out. Nevertheless, the overall biological carrying capacity of the site would be reduced proportionally by direct habitat loss and indirect disturbance factors related to ongoing human occupation and activities.

Project effects would be proportionally greater for species with limited mobility and/or limited availability of suitable habitat on site, as these species would be less able to avoid Project disturbances or relocate to alternative habitat areas. Such species include those that depend on riparian and marsh/bog habitats, as the distribution of these habitats on site is patchy outside the River Corridor. The proposed Project disturbs 7.3% and 21.4%, respectively, of existing marsh/bog and riparian communities on site. However, the mitigation measures set forth in revised **Section 4.5**, Biological Resources, of ~~this~~ the Final EIS/EIR would ensure that no net loss of these vegetation communities would occur on site.

For a complete description of the proposed Project's effects on special status plants and wildlife, please refer to **Subsection 4.5.5** of ~~this~~ the Final EIS/EIR. Also, **Table 4.5-75** provides a summary of significance findings for Project-related impacts to each special-status species and revised **Subsection 4.5.5.1** describes the analysis approach and methods used to reach impact determinations.

The proposed Project would have the potential to affect local and regional-scale wildlife movement patterns, due to the Project site's large size and location along the Santa Clara River. However, the proposed "South Coast Wildlands Open Space Connectivity and Linkage" habitat linkage located in the western edge of the Project area (the Salt Creek corridor, within the Specific Plan open space) would remain intact as a viable linkage for all terrestrial and avian wildlife guilds. The Santa Clara River corridor also would remain a viable linkage for aquatic and low-mobility terrestrial (*e.g.*, small mammals and reptiles) wildlife guilds, since the three proposed new bridges would not present a barrier to wildlife movement through the River corridor. Note, however, that the proposed Project would place constraints on the Castaic/Halsey Corridor, reducing somewhat its ability to function as a habitat linkage for large animals. Of the 17 other wildlife corridors within the Project site, seven would be rendered non-functional by the proposal, and six would have their suitability constrained by adjacent development and

the placement of 19 culverts within drainages. The existing SR-126 culverted crossing of Chiquito Creek, however, would be replaced with a bridge structure and the accumulated sediments removed, thus improving its function as a wildlife crossing. For a more complete discussion of the proposed Project's effects on wildlife movement, please refer to revised **Section 4.5**, Biological Resources, of ~~this~~ the Final EIS/EIR. Within that section, **Tables 4.5-23** and **4.5-74** summarizes the impacts and significance findings related to wildlife habitat linkages, movement corridors, and crossings.

5.3.6 Jurisdictional Waters and Streams

Under Alternative 2, the proposed Project would result in the installation of an estimated 105,207 feet of bank protection along the Santa Clara River and other tributary drainages located in the Project area, and an estimated 59,845 feet of existing drainages would be converted to storm drains. Absent mitigation, Alternative 2 would result in the net permanent loss of 20.5 ~~8.69~~ acres of wetlands and a net ~~loss~~ gain of 15.3 ~~1.45~~ acres of waters of the United States. Alternative 2 would result in the net increase of 47.7 acres of CDFG jurisdictional streams. In addition, Alternative 2 would result in a net gain of ~~35.68~~ 27.2 HARC-AW Score Units within the RMDP study area. Mitigation for the proposed Project's temporal losses of stream function would require creation of mitigation areas in the Santa Clara River mainstem and tributaries outside the Project area, as the acreage required would exceed that available on site. Please refer to revised **Section 4.6**, Jurisdictional Waters and Streams, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts on jurisdictional waters and streams resulting from the proposed Project (Alternative 2). The impacts of all seven alternatives on jurisdictional waters and streams are presented comparatively in **Table 5.0-3** (Corps) and **Table 5.0-4** (CDFG).

5.3.7 Air Quality

The Project-specific construction and operational emissions would be significant and unavoidable under Significance Criterion AQ-2 for VOC, NO_x, CO, PM10, and PM2.5. These emissions would exceed standards even after incorporation of feasible mitigation. The LST analysis shows that maximum 24-hour PM10 and PM2.5 concentrations and the maximum one-hour NO_2 concentrations would exceed the localized significance thresholds established by the SCAQMD during each of the modeled development years. However, the one-hour CO and eight-hour CO concentrations would not exceed their respective localized significance thresholds during any of the modeled development years. The estimated PM10 emissions already assume compliance with the requirements of SCAQMD Rule 403, which contain best available control measures for controlling fugitive dust from construction sites. No feasible mitigation measures exist that would provide a sufficient reduction in PM10, PM2.5, and NO_X emissions to meet the respective LST thresholds. Please refer to revised **Section 4.7**, Air Quality, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts on air quality resulting from the proposed Project (Alternative 2).

5.3.8 Traffic

Under Alternative 2, the average daily traffic (ADT) generated by the proposed Project is forecasted to be 409,000, and no on-site roadway segments would be deficient (all having a level of service of "D" or better). However, absent mitigation, this alternative would result in 14 deficient off-site roadway segments. Implementation of the mitigation measures set forth in this EIS/EIR, however, would reduce the proposed Project's traffic impacts to less than significant. Please refer to revised **Section 4.8**, Traffic,

of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts on traffic resulting from the proposed Project (Alternative 2).

5.3.9 Noise

Alternative 2 would result in both construction and operational noise impacts. All on-site operational noise impacts would be reduced to less than significant with implementation of the noise-related mitigation measures set forth in this EIS/EIR. However, off-site traffic noise impacts resulting from Project-related traffic and other traffic growth in the Project region would result in significant unavoidable noise impacts along ten roadway segments. Pile driving operations that would be required to construct the previously approved Commerce Center Drive bridge across the Santa Clara River would result in noise levels at the western portion of the Travel Village RV Park that exceed construction noise threshold standards established by the Los Angeles County Noise Ordinance. Mitigation measures adopted as part of the previously approved Specific Plan (Mitigation Measures SP-4.9-1 through SP-4.9-4) would minimize the effects of this short-term noise impact, but would not reduce the impact to a less-than-significant level. Therefore, short-term construction noise impacts associated with construction of the Commerce Center Drive bridge would be significant and unavoidable. Please refer to **Section 4.9**, Noise, of ~~this~~ the Draft EIS/EIR for a complete discussion of the impacts on noise resulting from the proposed Project (Alternative 2).

5.3.10 Cultural Resources

Under Alternative 2, there would be no direct impacts to known cultural resources as a result of construction of the proposed RMDP infrastructure associated with the proposed Project. However, two cultural resource sites could be indirectly affected, as the proposed Project would facilitate development of the previously approved residential, mixed-use, and nonresidential uses in the Specific Plan area, absent mitigation. With mitigation, the impacts would be reduced to less than significant. Please refer to revised **Section 4.10**, Cultural Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts on cultural resources resulting from the proposed Project (Alternative 2).

5.3.11 Paleontological Resources

Under Alternative 2, the potential for significant impacts to paleontological resources is high for both direct and indirect impacts, absent mitigation. However, the intensity of these potential impacts would be proportional to the amount of surface disturbance associated with each alternative. Alternative 2 would involve approximately 3,451.1 acres of development (residential, nonresidential, and public facilities). Please refer to revised **Section 4.11**, Paleontological Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts on paleontological resources resulting from the proposed Project (Alternative 2).

5.3.12 Agricultural Resources

Under Alternative 2, the development of urban areas, spineflower preserves, and open space would convert agricultural lands to nonagricultural uses. Although the amount of development would vary among the alternatives, the entire Project area would be converted to a combination of nonagricultural

uses (urban, preserves, and open areas) regardless of which alternative is implemented. Alternative 2 would include the conversion of about 879.5 acres of important farmlands (prime, unique or of statewide importance) to nonagricultural uses, which is a significant and unavoidable impact. The establishment of a spineflower preserve on the Entrada site would conflict with that site's current zoning designation. This conflict would be eliminated by a proposed zone change, however, implementation of the zone change cannot be implemented by the Project applicant. Therefore, this zoning conflict is considered to be a significant and unavoidable impact. Please refer to revised **Section 4.12**, Agricultural Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts on agricultural resources resulting from the proposed Project (Alternative 2).

5.3.13 Geology and Geologic Hazards

Alternative 2 would implement a new community within the Specific Plan area, VCC, and a portion of the Entrada planning area, which would result in significant geologic impacts absent mitigation. Although the risk of geologic hazards would exist regardless of which alternative is implemented, the intensity of the potential risk would be proportional to the population exposed. Alternative 2 would create an urban area to be inhabited by approximately 69,865 people. Mitigation measures, including removal, stabilization, and avoidance, would reduce the adverse geologic impacts to less than significant. Please refer to revised **Section 4.13**, Geology and Geologic Hazards, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts on geology and geologic hazards resulting from the proposed Project (Alternative 2).

5.3.14 Land Use

Alternative 2 would include implementation of the SCP, as required in the approved Specific Plan. Under Alternative 2, the proposed preserves on the Specific Plan site would be consistent with existing zoning. The Entrada planning area, which is proposed for urban development and a spineflower preserve, is currently zoned for agriculture. This zoning conflict is considered to be a significant and unavoidable impact. Please refer to **Section 4.14**, Land Use, of ~~this~~ the Draft EIS/EIR for a complete discussion of the land use impacts resulting from the proposed Project (Alternative 2).

5.3.15 Visual Resources

Alternative 2 would result in the construction of RMDP infrastructure, facilitating development in the Specific Plan area. Implementation of the proposed SCP under this alternative also would facilitate development on the Specific Plan, VCC, and a portion of the Entrada planning area. Site development would permanently alter the visual character of the Project area, and these changes would be visible to mobile viewing audiences traveling along I-5 and SR-126. As a result, impacts to visual resources are significant and unavoidable. Please refer to **Section 4.15**, Visual Resources, of ~~this~~ the Draft EIS/EIR for a complete discussion of the impacts on visual resources resulting from the proposed Project (Alternative 2).

5.3.16 Parks, Recreation, and Trails

Under Alternative 2, the parks and recreation acreages that would be developed under this alternative exceed requirements based on the post-development population; and, thus, no impacts related to parks and recreation would occur. Please refer to **Section 4.16**, Parks, Recreation, and Trails, of ~~this~~ the Draft EIS/EIR for a complete discussion of the parks and recreation impacts resulting from the proposed Project (Alternative 2).

5.3.17 Hazards, Hazardous Materials, and Public Safety

Under Alternative 2, construction activities, such as the temporary transport, storage, and use of potentially hazardous materials, would occur in the Project area. The new urban population of approximately 69,865 residents would place additional demand on emergency response services in the Project area. However, impacts would be mitigated to less than significant. Please refer to revised **Section 4.17**, Hazards, Hazardous Materials, and Public Safety, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts on hazards and hazardous materials resulting from the proposed Project (Alternative 2).

5.3.18 Public Services

Under Alternative 2, the post-development population of approximately 69,865 residents would place additional demands on public services in the Project area. To meet the needs of the increase in population, additional public services (*e.g.*, law enforcement, fire protection, medical services, libraries, and schools) would be needed in the Project area. Please refer to **Section 4.18**, Public Services, of ~~this~~ the Draft EIS/EIR for a complete discussion of the impacts on public services resulting from the proposed Project (Alternative 2).

5.3.19 Socioeconomics and Environmental Justice

Because no communities in the Project area qualify as minority- or low-income populations, no significant socioeconomic or environmental justice impacts would occur as a result of the proposed Project. Conversely, there would be a beneficial impact upon the socioeconomics in the Santa Clarita Valley area from implementation of the development within the Project area (22,610 residential units and 9.4 msf of commercial/industrial uses). Please refer to **Section 4.19**, Socioeconomics and Environmental Justice, of ~~this~~ the Draft EIS/EIR for a complete discussion of such impacts under the proposed Project (Alternative 2).

5.3.20 Solid Waste Services

Alternative 2 would result in the generation of solid waste, and the need for solid waste services, during both construction and operational phases. Project impacts would remain significant even after implementation of the mitigation measures set forth in this EIS/EIR due to landfill capacity shortfalls over the long term. Please refer to revised **Section 4.20**, Solid Waste Services, of ~~this~~ the Final EIS/EIR for a complete discussion of such impacts under the proposed Project (Alternative 2).

5.3.21 Global Climate Change

Alternative 2 would result in approximately ~~344,541~~269,053 tonnes of carbon dioxide equivalent emissions per year. As these emissions would not impede California's achievement of the greenhouse gas emission reduction target for year 2020, as codified in Assembly Bill 32, the proposed Project would not result in any significant global climate change-related impacts. Please refer to revised **Section 8.0**, Global Climate Change, of ~~this~~ the Final EIS/EIR for a complete discussion of the global climate change-related impacts of Alternative 2.

5.4 ALTERNATIVE 3 (ELIMINATION OF PLANNED POTRERO BRIDGE AND ADDITIONAL SPINEFLOWER PRESERVES)

The RMDP and SCP would be modified from the plans proposed by the applicant, and the requested federal and state permits and authorizations would be granted consistent with those modifications. Two bridges across the Santa Clara River and the associated bank stabilization would be constructed, including the Commerce Center Drive~~r~~ Bridge (already approved by the Corps and CDFG in 1999) and the Long Canyon Road Bridge. The Potrero Canyon Road Bridge would not be constructed under this alternative. Major tributary drainages would be regraded and realigned under this alternative; however, the channels would be wider than those of the proposed Project. The cismontane alkali marsh in lower Potrero Canyon would be preserved.

Additional spineflower preserve acreage would be established in the Specific Plan's Airport Mesa area and on Entrada. This alternative would provide a total of 221.8 acres of spineflower preserves and protect 77.1% of the cumulative area occupied by spineflower in the Project area.

Development in the SCP planning area (the Entrada and VCC planning areas) under Alternative 3 would be the same as provided under the proposed Project. This alternative would facilitate development within the Specific Plan, VCC, and Entrada, including 21,558 residential units and 9.33 msf of commercial/ industrial/ business park floor area. A complete description of the facilities proposed and urban development facilitated under this alternative is found in revised **Subsection 3.4.3** of ~~this~~ the Final EIS/EIR. For a tabular comparison of impacts by alternative and issue area, please see **Subsection 5.10~~9~~** below.

5.4.1 Surface Water Hydrology and Flood Control

Under Alternative 3, the floodplain area for the FEMA 100-year return event would be increased by 27.6 acres, resulting in a 100-year floodplain area of 1,298.0 acres within the Project area. This increase would constitute a 2.2 percent reduction in impact compared to the proposed Project. Due to this reduction, impacts of Alternative 3 on surface water hydrology and flood control would be substantially similar to those of the proposed Project (Alternative 2). From a flood control standpoint, the proposed Project and all alternatives have been designed to comply with DPW requirements, and flooding impacts have been eliminated by design. Mitigation measures also have been incorporated to ensure that hydrology/flood control impacts remain less than significant. Please refer to revised **Section 4.1**, Surface Water Hydrology and Flood Control, of ~~this~~ the Final EIS/EIR for a complete discussion of the hydrology-related impacts of Alternative 3.

5.4.2 Geomorphology and Riparian Resources

Under Alternative 3, site improvements would preserve 130,314 linear feet of on-site drainages, preserving 54 percent of the total 242,049 linear feet of jurisdictional drainages in the Project area. Alternative 3 would result in approximately two percent reduction in impacts on geomorphology and riparian resources when compared to the proposed Project; and, therefore, impacts would be substantially similar to those of the proposed Project. Please refer to revised **Section 4.2**, Geomorphology and Riparian Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the geomorphology-related impacts of Alternative 3.

5.4.3 Water Resources

Under Alternative 3, both the Alternative 3 RMDP and SCP components and the indirectly facilitated development would result in a water supply demand of 17,958 afy, a reduction of 1,951 afy when compared to the proposed Project. This represents a 10 percent reduction in water demand when compared to the proposed Project. Alternative 3, therefore, would result in slightly less impacts when compared to the proposed Project, absent mitigation. Please refer to revised **Section 4.3**, Water Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of impacts on water resources of Alternative 3.

5.4.4 Water Quality

The surface water quality would be directly impacted by construction activities, which include removal of vegetation, grading, and trenching. However, the proposed Project and the alternatives would be subject to regulatory requirements, included as water quality mitigation measures in this EIS/EIR, which would ensure that water quality standards are met and that such impacts remain less than significant. Impacts to water quality under Alternative 3, therefore, would be the same as those under the proposed Project. Please refer to revised **Section 4.4**, Water Quality, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts on water quality resulting from Alternative 3.

5.4.5 Biological Resources

Under Alternative 3, permanent Project-related loss of vegetation communities and land covers would be reduced by 5.0% compared to the proposed Project. This decrease would occur primarily within the riparian and bog/marsh vegetation communities on site. For example, Alternative 3 would disturb 50 fewer acres of riparian communities than would the proposed Project (175 acres versus 225 acres). Note also that, compared to the proposed Project, this alternative would increase temporary loss of vegetation communities and land covers by 24%, primarily within coastal scrub and California annual grassland vegetation and agricultural, developed, and disturbed land. For more information on the impacts of Alternative 3 on existing vegetation and land covers, please refer to **Tables 4.5-25** and **4.5-26** and revised **Subsection 4.5.5.2.3.2.2** of ~~this~~ the Final EIS/EIR.

Alternative 3 would add one additional spineflower preserve to those planned under the proposed Project, increasing the acreage within the preserves by 32%. Under Alternative 3 the acreage of occupied habitat protected would increase by 13% compared to the proposed Project, while the acres of impacted occupied

habitat would decrease by 28%. This alternative would result in a greater level of spineflower protection than the proposed SCP, with increased preservation of occupied habitat and less loss compared to the proposed Project. Impacts to spineflower, after mitigation, would be less than significant due to the increased amount of occupied and unoccupied spineflower habitat preserved. Within the preserves, spineflower management and monitoring actions would be the same as those described in the proposed SCP. For further information regarding the effects of Alternative 3 on the San Fernando Valley spineflower, please refer to revised **Section 4.5**, Biological Resources, of ~~this~~ the Final EIS/EIR.

Like the proposed Project, Alternative 3 would result in potentially significant impacts to special-status plant and wildlife species. These impacts would result from injury and mortality of individuals during construction, loss or degradation of habitat on site, and secondary effects. However, unlike the proposed Project, Alternative 3 would not result in any impacts to special-status species that would remain significant after mitigation. Impacts to the southwestern pond turtle would be less than significant under Alternative 3 because this alternative would reduce the loss of habitat in the River corridor and lower Potrero Canyon through removal of the proposed bridge across the river at Potrero Canyon Road. Impacts to the San Emigdio blue butterfly under this alternative would be less than significant because impacts to the colony in Potrero Canyon would be reduced through design changes; this colony would not be permanently fragmented as it would be under Alternative 2.

As with the proposed Project, Alternative 3 would cause the Project area to be converted from a rural to an urban landscape, with loss of upland vegetation communities and associated plant and animal species. The mitigation program set forth in revised **Section 4.5**, Biological Resources, of ~~this~~ the Final EIS/EIR would compensate for these losses by providing protected, managed habitat in perpetuity within the High Country SMA, River Corridor SMA, and Salt Creek area.

For a complete description of the effects of Alternative 3 on special status plants and wildlife, please refer to revised **Subsection 4.5.5** of ~~this~~ the Final EIS/EIR. Also, **Table 4.5-75** provides a summary of significance findings for Project-related impacts to each special-status species and revised **Subsection 4.5.5.1** describes the analysis approach and methods used to reach impact determinations.

Under Alternative 3, the effects to landscape habitat linkages would be the same as those that would occur under the proposed Project. The Salt Creek corridor would accommodate north-south wildlife movement for all species guilds, and the Santa Clara River corridor would remain viable for aquatic and low-mobility avian wildlife guilds since the two proposed new bridges would not present a barrier to wildlife movement through the corridor. Like the proposed Project, however, Alternative 3 contemplates build out of the VCC, which would have a constraining effect on the Castaic/Halsey Corridor. Of the 17 other wildlife corridors within the Project site, seven would be rendered non-functional by the three bridges and 16 culverts within drainages. Although bridges within wildlife corridors present less of an obstacle than culverts, the suitability of the affected corridors is still constrained by adjacent development. For a more complete discussion of the effects of Alternative 3 on wildlife movement, please refer to revised **Section 4.5**, Biological Resources, of ~~this~~ the Final EIS/EIR. Within that section, **Tables 4.5-23** and **4.5-74** summarizes the impacts and significance findings related to wildlife habitat linkages, movement corridors, and crossings.

In consideration of the above factors, and particularly because Alternative 3 would substantially reduce impacts to the Santa Clara River and Potrero Canyon by eliminating the proposed bridge across the river at Potrero Canyon Road, this alternative would have less impact on biological resources when compared with the proposed Project.

5.4.6 Jurisdictional Waters and Streams

Absent mitigation, Alternative 3 would result in the net permanent loss of 9.2 ~~7.02~~ acres of wetlands (~~21~~ 55 percent reduction compared to the proposed Project) and a gain of 67.4 ~~48.4~~ acres of waters of the ~~U.S.~~ United States; and a ~~126~~ 146.3 acre net gain of CDFG jurisdictional streams. In addition, this alternative would result in a net gain of ~~56.88~~ 84.2 HARC-AW Score Units within the RMDP, compared to a net gain of ~~35.68~~ 27.2 units under the proposed Project. Overall, Alternative 3 would result in less impact upon jurisdictional waters and streams than the proposed Project absent mitigation. Mitigation for temporal losses of stream function would not require creation of off-site mitigation areas under this alternative, as sufficient mitigation acreage would be available on site. Please refer to revised **Section 4.6**, Jurisdictional Waters and Streams, of ~~this~~ the Final EIS/EIR for a complete discussion of such impacts under Alternative 3. The impacts of all seven alternatives on jurisdictional waters and streams are presented comparatively in **Table 5.0-3** (Corps) and **Table 5.0-4** (CDFG).

5.4.7 Air Quality

Under Alternative 3, Project-specific construction and operational emissions would be significant and unavoidable, even after incorporation of all feasible mitigation measures, as described above for the proposed Project (Alternative 2). The development facilitated under Alternative 3 would result in slightly less air quality impacts when compared to the proposed Project (Alternative 2). Please refer to revised **Section 4.7**, Air Quality, of ~~this~~ the Final EIS/EIR for a complete discussion of the air quality impacts of Alternative 3.

5.4.8 Traffic

Under Alternative 3, the ADT is forecast at 399,000 (a 2.4 percent reduction compared to the proposed Project). With Alternative 3, no planned on-site roadway segments would be deficient. Similar to the proposed Project, Alternative 3 would result in 14 deficient off-site roadway segments, absent mitigation. This alternative would not include the Potrero Canyon Road Bridge across the Santa Clara River, thus slightly reducing the on-site circulation when compared to the proposed Project. Overall, under Alternative 3, the traffic impacts would be substantially similar to the proposed Project. Please refer to revised **Section 4.8**, Traffic, of ~~this~~ the Final EIS/EIR for a complete discussion of the traffic impacts of Alternative 3.

5.4.9 Noise

Construction noise and vibration impacts associated with this alternative would be slightly less than those associated with the proposed Project, primarily due to the reduction in urban development and elimination of the proposed Potrero Canyon Road Bridge across the Santa Clara River. However, pile driving operations that would be required to construct the previously approved Commerce Center Drive bridge

across the Santa Clara River would result in noise levels at the western portion of the Travel Village RV Park that exceed construction noise threshold standards established by the Los Angeles County Noise Ordinance. Mitigation measures adopted as part of the previously approved Specific Plan (Mitigation Measures SP-4.9-1 through SP-4.9-4) would minimize the effects of this short-term noise impact, but would not reduce the impact to a less-than-significant level. Therefore, short-term construction noise impacts associated with construction of the Commerce Center Drive bridge would be significant and unavoidable. Off-site traffic noise impacts resulting from Project-related traffic and other traffic growth in the region also would result in significant unavoidable noise impacts along ten roadway segments. Please refer to **Section 4.9**, Noise, of ~~this~~ the Draft EIS/EIR for a complete discussion of the noise impacts of Alternative 3.

5.4.10 Cultural Resources

Under Alternative 3, there would be no direct impacts to known cultural resources as a result of construction of the proposed RMDP infrastructure associated with the proposed Project. However, two cultural resource sites could be indirectly affected by facilitating development of the previously approved residential, mixed-use, and nonresidential uses in the Specific Plan area, absent mitigation. With mitigation, the impacts would be reduced to less than significant. Therefore, the potential impacts of Alternative 3 would be the same as those of the proposed Project. Please refer to revised **Section 4.10**, Cultural Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts on cultural resources of Alternative 3.

5.4.11 Paleontological Resources

Under Alternative 3, the potential for impacts to paleontological resources would be high for both direct and indirect impacts, absent mitigation. However, the intensity of these potential impacts would be proportional to the amount of surface disturbance associated with each alternative. Because Alternative 3 would involve approximately 263 fewer acres of development (residential, nonresidential, and public facilities) than the proposed Project, resulting in an eight percent decrease in developed acreage, the potential for impacts would decrease accordingly. Therefore, absent mitigation, impacts of Alternative 3 would be substantially similar to the proposed Project (Alternative 2). Please refer to revised **Section 4.11**, Paleontological Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the paleontological impacts of Alternative 3.

5.4.12 Agricultural Resources

Under Alternative 3, the development of urban areas, spineflower preserves, and open space would convert agricultural lands to nonagricultural uses. Although the amount of development would vary among the alternatives, the entire Project site would be converted to a combination of nonagricultural uses (urban, preserves, and open areas) regardless of which alternative is implemented, which is a significant and unavoidable impact. Establishment of a spineflower preserve on the Entrada site would conflict with that site's current zoning designation. This conflict would be eliminated by a proposed zone change, however, implementation of the zone change cannot be implemented by the Project applicant. This zoning conflict is considered to be a significant and unavoidable impact. The impacts of Alternative 3 on agricultural resources would be the same as those of the proposed Project (Alternative 2). Please refer to

revised **Section 4.12**, Agricultural Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the agricultural resources impacts of Alternative 3.

5.4.13 Geology and Geologic Hazards

Alternative 3 would implement a new community within the Specific Plan area, VCC, and a portion of the Entrada planning area, which would result in significant geologic impacts, absent mitigation. Although the risk of geologic hazards would exist regardless of which alternative is implemented, the intensity of the potential risk would be proportional to the population exposed. The risk to development by geologic hazards would be substantially similar to that under the proposed Project, absent mitigation. Mitigation measures would reduce the adverse geologic impacts to less than significant. Please refer to revised **Section 4.13**, Geology and Geologic Hazards, of ~~this~~ the Final EIS/EIR for a complete discussion of such impacts under Alternative 3.

5.4.14 Land Use

Alternative 3 would include implementation of the SCP, similar to the proposed Project (Alternative 2), as required in the approved Specific Plan. Proposed land uses under Alternative 3 would be consistent with existing zoning, except for the establishment of a spineflower preserve in the Entrada planning area, which is proposed for urban development. This zoning conflict is considered to be a significant and unavoidable impact. Because Alternative 3 would involve generally the same proposed land uses as the proposed Project, land use impacts related to zoning conflicts would be the same as those of the proposed Project. Please refer to **Section 4.14**, Land Use, of ~~this~~ the Draft EIS/EIR for a complete discussion of the land use impacts of Alternative 3.

5.4.15 Visual Resources

Alternative 3 would result in a slight reduction in RMDP infrastructure and slightly larger spineflower preserves in the Project area. Alternative 3 also would facilitate development in the Specific Plan, VCC, and a portion of the Entrada planning area, but to a lesser degree when compared to the proposed Project. Under Alternative 3, the visual impacts would include implementation of a new community, and such impacts would be the same as those of the proposed Project (Alternative 2). Please refer to **Section 4.15**, Visual Resources, of ~~this~~ the Draft EIS/EIR for a complete discussion of the impacts on visual resources of Alternative 3.

5.4.16 Parks, Recreation, and Trails

Under Alternative 3, the parks and recreation acreages that would be developed under this alternative exceed requirements based on the post-development population; and, thus, no impacts related to parks and recreation would occur (same as the proposed Project). Please refer to **Section 4.16**, Parks, Recreation, and Trails, of ~~this~~ the Draft EIS/EIR for a complete discussion of the parks and recreation impacts of Alternative 3.

5.4.17 Hazards, Hazardous Materials, and Public Safety

Under Alternative 3, construction activities, such as the temporary transport, storage and use of potentially hazardous materials, would be reduced by approximately eight percent when compared to the proposed Project, because Alternative 3 includes approximately eight percent less development. The demand on emergency response services would be proportional to the post-development population served. Under Alternative 3, the population at risk would be approximately 66,514 residents (a 4.5 percent reduction when compared to the proposed Project). This alternative would result in hazards/hazardous materials impacts, but those impacts that are substantially similar when compared to the proposed Project, absent mitigation. With mitigation, such impacts would be reduced to less-than-significant levels. Please refer to revised **Section 4.17**, Hazards, Hazardous Materials, and Public Safety, of ~~this~~ the Final EIS/EIR for a complete discussion of such impacts under Alternative 3.

5.4.18 Public Services

Implementation of Alternative 3 would result in build-out of the VCC planning area, and partial build-out of the Specific Plan area and Entrada planning area. Because the demand on public services would be proportional to the post-development population served, Alternative 3 would place approximately 4.5 percent less demand on law enforcement, fire protection, medical services, libraries, and schools when compared to the proposed Project. Overall, such impacts would be substantially similar to those of the proposed Project (Alternative 2). Please refer to **Section 4.18**, Public Services, of ~~this~~ the Draft EIS/EIR for a complete discussion of the public services impacts of Alternative 3.

5.4.19 Socioeconomics and Environmental Justice

Because no communities in the Project area qualify as minority- or low-income populations, no significant socioeconomic and environmental justice impacts would occur as a result of Alternative 3. Impacts under this alternative would be the same as those of the proposed Project (Alternative 2). Conversely, there would be a beneficial impact upon the socioeconomics in the Santa Clarita Valley area from implementation of the development within the Project area (21,558 residential units and 9.33 msf of commercial/industrial uses). Please refer to **Section 4.19**, Socioeconomics and Environmental Justice, of ~~this~~ the Draft EIS/EIR for a complete discussion of the impacts on socioeconomics and environmental justice of Alternative 3.

5.4.20 Solid Waste Services

Alternative 3 would result in the generation of solid waste, and the need for solid waste services, during both construction and operational phases. Project impacts would remain significant even after implementation of the mitigation measures set forth in this EIS/EIR due to landfill capacity shortfalls over the long term. Impacts under this alternative would be substantially similar when compared to the proposed Project (Alternative 2). Please refer to revised **Section 4.20**, Solid Waste Services, of ~~this~~ the Final EIS/EIR for a complete discussion of such impacts under Alternative 3.

5.4.21 Global Climate Change

Alternative 3 would result in approximately ~~330,436~~258,303 tonnes of carbon dioxide equivalent emissions per year. As these emissions would not impede California's achievement of the greenhouse gas emission reduction target for year 2020, as codified in Assembly Bill 32, Alternative 3 would not result in any significant global climate change-related impacts. When compared to the proposed Project, Alternative 3 would result in a substantially similar amount of greenhouse gas emissions. Please refer to revised **Section 8.0**, Global Climate Change, of ~~this~~ the Final EIS/EIR for a complete discussion of the global climate change-related impacts of Alternative 3.

5.5 ALTERNATIVE 4 (ELIMINATION OF PLANNED POTRERO BRIDGE AND ADDITION OF VCC SPINEFLOWER PRESERVE)

The RMDP and SCP would be modified from the plans proposed by the applicant, and the requested federal and state permits and authorizations would be granted consistent with those modifications. Two bridges across the Santa Clara River and the associated bank stabilization would be constructed, including the Commerce Center Driver Bridge (already approved by the Corps and CDFG in 1999) and the Long Canyon Road Bridge. The Potrero Canyon Road Bridge would not be constructed under this alternative. Major tributary drainages would be regraded and realigned under this alternative, but cismontane alkali marsh in lower Potrero Canyon would be preserved.

Additional spineflower preserve acreage would be established in the Specific Plan's Airport Mesa, Potrero Canyon, and Grapevine Mesa areas and on Entrada. A preserve also would be established within the VCC planning area. Alternative 4 would provide a total of 259.9 acres of spineflower preserves, and protect 82.6% of the cumulative area occupied by spineflower in the Project area.

This alternative would facilitate development within the Specific Plan and the Entrada planning area, including 21,846 residential units and 5.93 msf of commercial/industrial/business park floor area. No development would be facilitated within the VCC planning area.

A complete description of the facilities proposed and urban development facilitated under this alternative is found in revised **Subsection 3.4.4** of ~~this~~ the Final EIS/EIR. For a tabular comparison of impacts by alternative and issue area, please see **Subsection 5.10~~9~~** below.

5.5.1 Surface Water Hydrology and Flood Control

Under Alternative 4, the floodplain area for the FEMA 100-year return event would be increased by 27.6 acres, resulting in a 100-year floodplain area of 1,298.0 acres within the Project area. This increase would constitute a 2.2 percent reduction in impact when compared to the proposed Project. Due to this small reduction, impacts of Alternative 4 on surface water hydrology and flood control would be substantially similar to those of the proposed Project. From a flood control standpoint, the proposed Project and all alternatives have been designed to comply with DPW requirements, and flooding impacts have been eliminated by design. Mitigation measures also have been incorporated to ensure that hydrology/flood control impacts remain less than significant. Please refer to revised **Section 4.1**, Surface Water

Hydrology and Flood Control, of ~~this~~ the Final EIS/EIR for a complete discussion of the hydrology-related impacts of Alternative 4.

5.5.2 Geomorphology and Riparian Resources

Under Alternative 4, the proposed design would preserve 132,392 linear feet of on-site drainages, preserving 55 percent of the total 242,049 linear feet of jurisdictional drainages in the Project area. Alternative 4 would result in approximately a three percent reduction in impacts on geomorphology and riparian resources when compared to the proposed Project; and, therefore, impacts would be substantially similar to those of the proposed Project. Please refer to revised **Section 4.2**, Geomorphology and Riparian Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the geomorphology-related impacts of Alternative 4.

5.5.3 Water Resources

Under Alternative 4, both the Alternative 4 RMDP and SCP components and the indirectly facilitated development would result in a water supply demand of 17,296 afy, a reduction of 2,613 afy when compared to the proposed Project. This represents a 15 percent reduction in demand when compared to the proposed Project. Alternative 4, therefore, would result in slightly less impacts on water supply when compared to the proposed Project, absent mitigation. Please refer to revised **Section 4.3**, Water Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of impacts on water resources of Alternative 4.

5.5.4 Water Quality

The surface water quality would be directly impacted by construction activities, which include removal of vegetation, grading, and trenching. However, the proposed Project and the alternatives would be subject to regulatory requirements, included as water quality mitigation measures in this EIS/EIR, which would ensure that water quality standards are met and that such impacts remain less than significant. Impacts to water quality under Alternative 4, therefore, would be the same as those under the proposed Project. Please refer to revised **Section 4.4**, Water Quality, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts on water quality resulting from Alternative 4.

5.5.5 Biological Resources

Compared to the proposed Project, Alternative 4 would reduce permanent impacts to existing vegetation and land covers by approximately 9% primarily in the bog/marsh, riparian, and broad-leaf upland tree habitat types. Riparian impacts, for example, would be reduced from 225 acres (Alternative 2) to 159 acres (Alternative 4). The acreage of temporary vegetation communities and land covers loss would increase by 23% compared to the proposed Project; this increase would occur almost entirely within areas mapped as California annual grassland, agriculture, developed, and disturbed land. For more information on the impacts of Alternative 4 on existing vegetation and land covers, please refer to **Tables 4.5-25** and **4.5-26** and revised **Subsection 4.5.5.2.3.2.2** of ~~this~~ the Final EIS/EIR.

Alternative 4 would add five additional spineflower preserves to those planned under the proposed Project, increasing the acreage within the preserves by 55%. One of the additional preserves is within the VCC planning area, thus precluding build out of the VCC development. The acreage of occupied spineflower habitat protected under Alternative 4 would increase by nearly 20% compared to the proposed Project, and the acreage of impacted occupied habitat would decrease by 44%. In short, this alternative would result in a greater level of spineflower protection than the proposed SCP. The significance of impacts to spineflower, after mitigation, would be lowered to less than significant due to the increase in occupied and unoccupied spineflower habitat preserved. Within these preserves, spineflower management and monitoring actions would be the same as those described in the proposed SCP. For further information regarding the effects of Alternative 4 on the San Fernando Valley spineflower, please refer to revised **Section 4.5**, Biological Resources, of ~~this~~ the Final EIS/EIR.

Like the proposed Project, Alternative 4 would result in significant impacts to special-status plant and wildlife species. These impacts would result from injury and mortality of individuals due to construction activities, loss or degradation of habitat on site, and secondary effects. Impacts of Alternative 4 on most special-status species would not differ substantially from those of Alternative 3, and all such impacts would be reduced to a less-than-significant level. Impacts to the southwestern pond turtle would be less than significant under Alternative 4 because this alternative would reduce loss of habitat in the river corridor and lower Potrero Canyon through removal of the proposed bridge across the river at Potrero Canyon Road. Under this alternative, impacts to the San Emigdio blue butterfly would be less than significant because impacts to the colony in Potrero Canyon would be reduced through design changes that would avoid permanent fragmentation of the colony.

As with the proposed Project, Alternative 4 would cause the Project area to be converted from a rural to an urban landscape, with loss of upland vegetation communities and associated plant and animal species. The mitigation program set forth in revised **Section 4.5**, Biological Resources, of ~~this~~ the Final EIS/EIR would help to compensate for these losses by providing protected, managed habitat in perpetuity within the High Country SMA, River Corridor SMAs, and Salt Creek area.

For a complete description of the effects of Alternative 4 on special-status plants and wildlife, please refer to revised **Subsection 4.5.5** of ~~this~~ the Final EIS/EIR. Also, **Table 4.5-75** provides a summary of significance findings for Project-related impacts to each special-status species and revised **Subsection 4.5.5.1** describes the analysis approach and methods used to reach impact determinations.

Compared to the proposed Project, Alternative 4 would have fewer effects on landscape habitat linkages. This is because the proposed Project affects the Castaic/Halsey Corridor, while Alternative 4 does not because VCC would not be constructed. Like the proposed Project, Alternative 4 would allow the Salt Creek corridor to accommodate north-south wildlife movement for all species guilds, and the Santa Clara River corridor would remain viable for and low-mobility terrestrial wildlife guilds since the two proposed new bridges would not present a barrier to wildlife movement through the corridor. Of the 17 other wildlife corridors within the Project site, seven would be rendered non-functional by the proposal, and six would have their suitability constrained by adjacent development and the placement of three bridges and 16 culverts within drainages. Although bridges within wildlife corridors present less of an obstacle than culverts, the suitability of the affected corridors is still constrained by adjacent development. For a more

complete discussion of the effects of Alternative 4 on wildlife movement, please refer to revised **Section 4.5**, Biological Resources, of ~~this~~ the Final EIS/EIR. Within that section, **Tables 4.5-23** and **4.5-74** summarizes the impacts and significance findings related to wildlife habitat linkages, movement corridors, and crossings.

In consideration of the above factors, and particularly because Alternative 4 would avoid impacts to the Santa Clara River and Potrero Canyon by eliminating the proposed bridge across the river at Potrero Canyon Road, this alternative would have less impact on biological resources when compared with the proposed Project.

5.5.6 Jurisdictional Waters and Streams

Absent mitigation, Alternative 4 would result in the net permanent loss of ~~7.15~~ 9.4 acres of wetlands (~~18~~ 54 percent reduction compared to the proposed Project) and a gain of ~~13.6~~ 33.3 acres of waters of the United States ~~U.S.~~; and a ~~93~~-106.0-acre net gain of CDFG jurisdictional streams. In addition, this alternative would result in a net gain of ~~47.47~~ 74.7 HARC-AW Score Units within the RMDP, compared to a net gain of ~~35.68~~ 27.2 units under the proposed Project. Overall, Alternative 4 would result in less impact upon jurisdictional waters and streams than the proposed Project absent mitigation. Mitigation for temporal losses of stream function under Alternative 4 would require creation of mitigation areas in tributaries to the Santa Clara River outside the Project area, as the acreage of tributary mitigation required would exceed that available on site. Please refer to revised **Section 4.6**, Jurisdictional Waters and Streams, of ~~this~~ the Final EIS/EIR for a complete discussion of such impacts under Alternative 4. The impacts of all seven alternatives on jurisdictional waters and streams are presented comparatively in **Table 5.0-3** (Corps) and **Table 5.0-4** (CDFG).

5.5.7 Air Quality

Under Alternative 4, Project-specific construction and operational emissions would be significant and unavoidable, even after incorporation of all feasible mitigation measures, as described above for the proposed Project (Alternative 2). The development facilitated under Alternative 4 would result in slightly less air quality impacts when compared to the proposed Project (Alternative 2). Please refer to revised **Section 4.7**, Air Quality, of ~~this~~ the Final EIS/EIR for a complete discussion of the air quality impacts of Alternative 4.

5.5.8 Traffic

Under Alternative 4, the ADT is forecast at 369,000 (a 9.7 percent reduction compared to the proposed Project). With Alternative 4, no planned on-site roadway segments would be deficient. Alternative 4 would result in 10 deficient off-site roadway segments, absent mitigation. This alternative would not include the Potrero Canyon Road Bridge across the Santa Clara River, thus slightly reducing the on-site circulation when compared to the proposed Project. Overall, under Alternative 4, the traffic impacts would be substantially similar to those of the proposed Project. Please refer to revised **Section 4.8**, Traffic, of ~~this~~ the Final EIS/EIR for a complete discussion of the traffic impacts of Alternative 4.

5.5.9 Noise

Construction noise and vibration impacts associated with this alternative would be slightly less than those associated with the proposed Project, primarily due to the reduction in urban development and elimination of the proposed Potrero Canyon Road Bridge across the Santa Clara River. However, pile driving operations that would be required to construct the previously approved Commerce Center Drive bridge across the Santa Clara River would result in noise levels at the western portion of the Travel Village RV Park that exceed construction noise threshold standards established by the Los Angeles County Noise Ordinance. Mitigation measures adopted as part of the previously approved Specific Plan (Mitigation Measures SP-4.9-1 through SP-4.9-4) would minimize the effects of this short-term noise impact, but would not reduce the impact to a less-than-significant level. Therefore, short-term construction noise impacts associated with construction of the Commerce Center Drive bridge would be significant and unavoidable. Off-site traffic noise impacts resulting from Project-related traffic and other traffic growth in the region would result in significant unavoidable noise impacts along ten roadway segments. Please refer to **Section 4.9**, Noise, of ~~this~~ the Draft EIS/EIR for a complete discussion of the noise impacts of Alternative 4.

5.5.10 Cultural Resources

Under Alternative 4, there would be no direct impacts to known cultural resources as a result of construction of the proposed RMDP infrastructure associated with the proposed Project. However, two cultural resource sites could be indirectly affected by facilitating development of the previously approved residential, mixed-use, and nonresidential uses in the Specific Plan area, absent mitigation. With mitigation, the impacts would be reduced to less than significant. Therefore, the potential impacts of Alternative 4 would be the same as those of the proposed Project. Please refer to revised **Section 4.10**, Cultural Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts on cultural resources of Alternative 4.

5.5.11 Paleontological Resources

Under Alternative 4, the potential for impacts to paleontological resources would be high for both direct and indirect impacts, absent mitigation. However, the intensity of these potential impacts would be proportional to the amount of surface disturbance associated with each alternative. Because Alternative 4 would involve approximately 251 fewer acres of development (residential, nonresidential, and public facilities) than the proposed Project, resulting in an eight percent decrease in developed acreage, the potential for impacts would decrease accordingly. Therefore, absent mitigation, impacts of Alternative 4 would be substantially similar impact to those of the proposed Project (Alternative 2). Please refer to revised **Section 4.11**, Paleontological Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts on paleontological resources of Alternative 4.

5.5.12 Agricultural Resources

Under Alternative 4, the development of urban areas, spineflower preserves, and open space would convert agricultural lands to nonagricultural uses. Although the amount of development would vary among the alternatives, the entire Project site would be converted to a combination of nonagricultural uses

(urban, preserves, and open areas) regardless of which alternative is implemented. Therefore, the impacts of Alternative 4 on agricultural resources would be the same as those of the proposed Project (Alternative 2). Please refer to revised **Section 4.12**, Agricultural Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the agricultural resource impacts of Alternative 4.

5.5.13 Geology and Geologic Hazards

Alternative 4 would implement a new community within the Specific Plan area, VCC, and a portion of the Entrada planning area, which would result in significant geologic impacts absent mitigation. Although the risk of geologic hazards would exist regardless of which alternative is implemented, the intensity of the potential risk would be proportional to the population exposed. The risk to development by geologic hazards would be substantially similar to that under the proposed Project, absent mitigation. Mitigation measures would reduce the adverse geologic impacts to less than significant. Please refer to revised **Section 4.13**, Geology and Geologic Hazards, of ~~this~~ the Final EIS/EIR for a complete discussion of such impacts under Alternative 4.

5.5.14 Land Use

Alternative 4 would include implementation of the SCP, as required in the approved Specific Plan. Within the Specific Plan site, proposed land uses under Alternative 4 would be consistent with existing zoning. In the Entrada planning area, which is currently zoned for agriculture, urban development and a spineflower preserve are proposed in a configuration generally similar to Alternative 2 and would result in a significant unavoidable zoning conflict impact.. Under Alternative 4, the creation of a spineflower preserve within the VCC planning area would preclude any future commercial development in that planning area. This would result in a reduction in nonresidential uses when compared to the proposed Project, and conflict with Los Angeles County's previously approved development plans. Because of the zoning inconsistencies in the VCC planning area, impacts of Alternative 4 on land use would be greater than those of the proposed Project (Alternative 2). Please refer to **Section 4.14**, Land Use, of this EIS/EIR for a complete discussion of the land use impacts of Alternative 4.

5.5.15 Visual Resources

Alternative 4 would result in a slight reduction in RMDP infrastructure and larger spineflower preserves in the Project area, including the addition of a preserve in the VCC planning area. Alternative 4 would facilitate development in the Specific Plan site and Entrada planning area, but to a lesser degree when compared to the proposed Project. Build-out of the County-approved commercial development in the VCC planning area would not occur, as the proposed VCC spineflower preserve would preclude this development. Because the VCC planning area would not be developed under this alternative, no changes to the existing visual character of that site would result from implementation of Alternative 4. The visual impacts of Alternative 4 would include construction of a new urban community in an area currently occupied by agriculture and open space; but such impacts would be slightly less severe than those of the proposed Project (Alternative 2), but would remain significant and unavoidable. Please refer to **Section 4.15**, Visual Resources, of ~~this~~ the Draft EIS/EIR for a complete discussion of the impacts on visual resources of Alternative 4.

5.5.16 Parks, Recreation, and Trails

Under Alternative 4, the parks and recreation acreages that would be developed under this alternative exceed requirements based on the post-development population; and, thus, no impacts related to parks and recreation would occur (same as the proposed Project). Please refer to **Section 4.16**, Parks, Recreation, and Trails, of ~~this~~ the Draft EIS/EIR for a complete discussion of the parks and recreation impacts of Alternative 4.

5.5.17 Hazards, Hazardous Materials, and Public Safety

Under Alternative 4, construction activities, such as the temporary transport, storage, and use of potentially hazardous materials, would be reduced by approximately 4.5 percent when compared to the proposed Project. The demand on emergency response services would be proportional to the post-development population served. Under Alternative 4, the population at risk would reduce by 3.38 percent when compared to the Proposed Project, resulting in a substantially similar impact absent mitigation. With mitigation, such impacts would be reduced to less-than-significant levels. Please refer to revised **Section 4.17**, Hazards, Hazardous Materials, and Public Safety, of ~~this~~ the Final EIS/EIR for a complete discussion of such impacts under Alternative 4.

5.5.18 Public Services

Implementation of Alternative 4 would result in partial build-out of the Specific Plan site and Entrada planning area. The commercial development in the VCC planning area would not proceed due to a spineflower preserve in that planning area. Because the demand on public services would be proportional to the post-development population served, Alternative 4 would place approximately 3.38 percent less demand on law enforcement, fire protection, medical services, libraries, and schools when compared to the proposed Project. Overall, such impacts would be substantially similar to those of the proposed Project. Please refer to **Section 4.18**, Public Services, of ~~this~~ the Draft EIS/EIR for a complete discussion of the impacts on public services of Alternative 4.

5.5.19 Socioeconomics and Environmental Justice

Because no communities in the Project area qualify as minority- or low-income populations, no significant socioeconomic and environmental justice impacts would occur as a result of Alternative 4. Impacts under this alternative would be the same as those of the proposed Project (Alternative 2). Conversely, there would be a beneficial impact upon the socioeconomics in the Santa Clarita Valley area from implementation of the development within the Project area (21,846 residential units and 5.93 msf of commercial/industrial uses). Please refer to **Section 4.19**, Socioeconomics and Environmental Justice, of ~~this~~ the Draft EIS/EIR for a complete discussion of the impacts on socioeconomics and environmental justice of Alternative 4.

5.5.20 Solid Waste Services

Alternative 4 would result in the generation of solid waste, and the need for solid waste services, during both construction and operational phases. Project impacts would remain significant even after

implementation of the mitigation measures set forth in this EIS/EIR due to landfill capacity shortfalls over the long term. Impacts under this alternative would be substantially similar when compared to the proposed Project (Alternative 2). Please refer to revised **Section 4.20**, Solid Waste Services, of ~~this~~ the Final EIS/EIR for a complete discussion of such impacts under Alternative 4.

5.5.21 Global Climate Change

Alternative 4 would result in approximately ~~321,942~~246,310 tonnes of carbon dioxide equivalent emissions per year. As these emissions would not impede California's achievement of the greenhouse gas emission reduction target for year 2020, as codified in Assembly Bill 32, Alternative 4 would not result in any significant global climate change-related impacts. When compared to the proposed Project, Alternative 4 would result in slightly less emissions. Please refer to revised **Section 8.0**, Global Climate Change, of ~~this~~ the Final EIS/EIR for a complete discussion of the global climate change-related impacts of Alternative 4.

5.6 ALTERNATIVE 5 (WIDEN TRIBUTARY DRAINAGES AND ADDITION OF VCC SPINEFLOWER PRESERVE)

The RMDP and SCP would be modified from the plans proposed by the applicant, and the requested federal and state permits and authorizations would be granted consistent with those modifications. The three bridges across the Santa Clara River and the associated bank stabilization would be constructed as under the proposed Project (Alternative 2). Major tributary drainages would be regraded and realigned under this alternative, but would result in impact reductions in the Chiquito Canyon, San Martinez Grande Canyon, and Potrero Canyon drainages compared to the proposed Project (Alternative 2).

Additional spineflower preserve acreage would be established in the Specific Plan's Airport Mesa, Potrero Canyon, and Grapevine Mesa areas and on Entrada. A preserve also would be established within the VCC planning area. Alternative 5 would provide a total of 338.6 acres of spineflower preserves, and protect 84.3% of the cumulative area occupied by spineflower in the Project area.

This alternative would facilitate development within the Specific Plan and the Entrada planning area, including 21,155 residential units and 5.87 msf of commercial/industrial/business park floor area. No development would be facilitated within the VCC planning area.

A complete description of the facilities proposed and urban development facilitated under this alternative is found in revised **Subsection 3.4.5** of ~~this~~ the Final EIS/EIR. For a summary comparison of impacts by alternative and issue area, please see **Subsection 5.10~~9~~** below.

5.6.1 Surface Water Hydrology and Flood Control

Under Alternative 5, the floodplain area for the FEMA 100-year return event would be decreased by 19.5 acres, resulting in a 100-year floodplain area of 1,250.9 acres within the Project area. This decrease in the 100-year floodplain area would constitute a 1.5 percent increase in impact when compared to the proposed Project. Due to this small increase, impacts of Alternative 5 on surface water hydrology and flood control would be substantially similar to those of the proposed Project. From a flood control

standpoint, the proposed Project and all alternatives have been designed to comply with DPW requirements, and flooding impacts have been eliminated by design. Mitigation measures also have been incorporated to ensure that hydrology/flood control impacts remain less than significant. Please refer to revised **Section 4.1**, Surface Water Hydrology and Flood Control, of ~~this~~ the Final EIS/EIR for a complete discussion of the hydrology-related impacts of Alternative 5.

5.6.2 Geomorphology and Riparian Resources

Under Alternative 5, the proposed site design would preserve 132,820 linear feet of on-site drainages, preserving 55 percent of the total 242,049 linear feet of jurisdictional drainages in the Project area. Alternative 5 would result in approximately a three percent reduction in impacts on geomorphology and riparian resources when compared to the proposed Project; and, therefore, impacts would be substantially similar to those of the proposed Project (Alternative 2). Please refer to revised **Section 4.2**, Geomorphology and Riparian Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the geomorphology-related impacts of Alternative 5.

5.6.3 Water Resources

Under Alternative 5, both the Alternative 5 RMDP and SCP components and the indirectly facilitated development would result in a water supply demand of 16,417 afy, a reduction of 3,492 afy when compared to the proposed Project. This represents a 20 percent reduction in demand when compared to the proposed Project, absent mitigation. Please refer to revised **Section 4.3**, Water Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts on water resources of Alternative 5.

5.6.4 Water Quality

The surface water quality would be directly impacted by construction activities, which include removal of vegetation, grading, and trenching. However, the proposed Project and alternatives would be subject to regulatory requirements, included as water quality mitigation measures in this EIS/EIR, which would ensure that water quality standards are met and that such impacts remain less than significant. Impacts to water quality under Alternative 5, therefore, would be the same as those under the proposed Project (Alternative 2). Please refer to revised **Section 4.4**, Water Quality, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts on water quality resulting from Alternative 5.

5.6.5 Biological Resources

The impacts to existing vegetation and land covers under Alternative 5 would be very similar to those that would occur under Alternative 4: a 10.0% decrease in permanent loss and a 22.6% increase in temporary loss compared to the proposed Project. As with Alternative 4, the bog/marsh, riparian, and broad-leaf upland tree vegetation communities would experience the greatest reduction in loss. For example, Alternative 5 would disturb 161 acres of riparian and bog/marsh compared to 225 acres with the proposed Project. Under this alternative, most of the increased temporary habitat loss would occur within California annual grassland, agriculture, and developed and disturbed lands. For more information on the impacts of Alternative 5 on existing vegetation and land covers, please refer to **Tables 4.5-25** and **4.5-26** and revised **Subsection 4.5.5.2.3.2.2** of ~~this~~ the Final EIS/EIR.

Alternative 5 would add seven additional spineflower preserves to those planned under the proposed Project, and would enlarge the buffer areas as well, thus increasing the acreage within the preserves by 132% compared to the proposed Project. Like Alternative 4, this alternative proposes a spineflower preserve within the VCC planning area, thus precluding build out of the VCC development. The acreage of *occupied* spineflower habitat protected under Alternative 5 would increase by more than 23% compared to the proposed Project, and the acreage of impacted occupied habitat would decrease by 50%. As a result, this alternative would result in a greater level of spineflower protection than the proposed SCP. Impacts to spineflower, after mitigation, would be reduced to less than significant due to the increase in occupied and unoccupied spineflower habitat preserved. Within these preserves, spineflower management and monitoring actions would be the same as those described in the proposed SCP. For further information regarding the effects of Alternative 5 on the San Fernando Valley spineflower, please refer to revised **Section 4.5**, Biological Resources, of ~~this~~ the Final EIS/EIR.

Like the proposed Project and Alternatives 3 and 4, Alternative 5 would result in significant impacts to special-status plant and wildlife species due to injury and mortality of individuals from construction activities, loss or degradation of habitat on site, and secondary effects. The impacts of Alternative 5 on most special-status species would not differ substantially from those of Alternatives 3 and 4, and all such impacts would be mitigated to a less-than-significant level. Impacts to the southwestern pond turtle would be less than significant under Alternative 5 because, although this alternative contemplates construction of the bridge at Potrero Canyon Road, it disturbs less habitat in the Santa Clara River corridor and throughout Potrero Canyon than does the proposed Project, and would not preclude use of lower Potrero Canyon by the pond turtle. Under this alternative, impacts to the San Emigdio blue butterfly would be less than significant because impacts to the colony in Potrero Canyon would be reduced through design changes and the colony would not be permanently fragmented.

As with the proposed Project, Alternative 5 would cause the Project area to be converted from a rural to an urban landscape, with loss of upland vegetation communities associated plant and animal species. The mitigation program set forth in revised **Section 4.5**, Biological Resources, of ~~this~~ the Final EIS/EIR would compensate for these losses by providing protected, managed habitat in perpetuity within the High Country SMA, River Corridor SMA, and Salt Creek area.

For a complete description of the effects of Alternative 5 on special status plants and wildlife, please refer to revised **Subsection 4.5.5** of ~~this~~ the Final EIS/EIR. Also, **Table 4.5-75** provides a summary of significance findings for Project-related impacts to each special-status species and revised **Subsection 4.5.5.1** describes the analysis approach and methods used to reach impact determinations.

Under Alternative 5, the effects to landscape habitat linkages would be approximately the same as those that would occur under the proposed Project, but incrementally less due to the replacement of proposed culvert crossings with bridges. Also, unlike the proposed Project, Alternative 5 would have little to no effect on the Castaic/Halsey Corridor because VCC would not be constructed. The Salt Creek corridor would continue to accommodate north-south wildlife movement for all species guilds, and the Santa Clara River corridor would remain a viable linkage for aquatic and low-mobility terrestrial wildlife guilds, since the two proposed new bridges would not present a barrier to wildlife movement through the corridor. Of the 17 other wildlife corridors within the Project site, seven would be rendered non-functional by the

proposal, and six would have their suitability constrained by adjacent development and the placement of 7 bridges and 12 culverts within drainages. Although bridges within wildlife corridors present less of an obstacle than culverts, the suitability of the affected corridors is still constrained by adjacent development. For a more complete discussion of the effects of Alternative 5 on wildlife movement, please refer to revised **Section 4.5**, Biological Resources, of ~~this~~ the Final EIS/EIR. Within that section, **Tables 4.5-23** and **4.5-74** summarizes the impacts and significance findings related to wildlife habitat linkages, movement corridors, and crossings.

In consideration of the above factors, because Alternative 5 would avoid and protect substantially more spineflower occurrences site-wide and jurisdictional/riparian areas within Potrero Canyon, this alternative would have less impact on biological resources when compared with the proposed Project.

5.6.6 Jurisdictional Waters and Streams

Absent mitigation, Alternative 5 would result in a net loss of ~~7.84~~ 14.6 acres of wetlands (~~10~~ 29 percent reduction compared to the proposed Project) and an increase of 90.4~~79.4~~ acres of waters of the United States ~~U.S.~~; and a ~~150~~ 125.2-acre net gain of CDFG jurisdictional streams. In addition, this alternative would result in a net gain of ~~87.62~~ 114.7 HARC-AW Score Units within the RMDP, compared to a net gain of ~~35.68~~ 27.2 units under the proposed Project. Overall, Alternative 5 would result in less impact on jurisdictional waters and streams than the proposed Project absent mitigation. Mitigation for temporal losses of stream function under Alternative 5 would require creation of mitigation areas in the Santa Clara River mainstem outside the Project area, as the acreage of river mainstem mitigation required would exceed that available on site. Please refer to revised **Section 4.6**, Jurisdictional Waters and Streams, of ~~this~~ the Final EIS/EIR for a complete discussion of such impacts under Alternative 5. The impacts of all seven alternatives on jurisdictional waters and streams are presented comparatively in **Table 5.0-3** (Corps) and **Table 5.0-4** (CDFG).

5.6.7 Air Quality

Under Alternative 5, Project-specific construction and operational emissions would be significant and unavoidable, even after incorporation of all feasible mitigation measures, as described above for the proposed Project (Alternative 2). The development facilitated under Alternative 5 would result in slightly less air quality impacts when compared to the proposed Project (Alternative 2). Please refer to revised **Section 4.7**, Air Quality, of ~~this~~ the Final EIS/EIR for a complete discussion of the air quality impacts of Alternative 5.

5.6.8 Traffic

Under Alternative 5, the ADT is forecast at 361,000 (an 11.7 percent reduction when compared to the proposed Project). Under Alternative 5, no planned on-site roadway segments would be deficient. Alternative 5 would result in 7 deficient off-site roadway segments, absent mitigation. Under Alternative 5, the traffic impacts would be substantially similar to those of the proposed Project (Alternative 2). Please refer to revised **Section 4.8**, Traffic, of ~~this~~ the Final EIS/EIR for a complete discussion of the traffic impacts of Alternative 5.

5.6.9 Noise

Construction noise and vibration impacts associated with this alternative would be slightly less than those associated with the proposed Project, primarily due to the reduction in urban development. However, pile driving operations that would be required to construct the previously approved Commerce Center Drive bridge across the Santa Clara River would result in noise levels at the western portion of the Travel Village RV Park that exceed construction noise threshold standards established by the Los Angeles County Noise Ordinance. Mitigation measures adopted as part of the previously approved Specific Plan (Mitigation Measures SP-4.9-1 through SP-4.9-4) would minimize the effects of this short-term noise impact, but would not reduce the impact to a less-than-significant level. Therefore, short-term construction noise impacts associated with construction of the Commerce Center Drive bridge would be significant and unavoidable. Off-site traffic noise impacts resulting from Project-related traffic and other traffic growth in the Project region would result in significant unavoidable noise impacts along ten roadway segments. Please refer to **Section 4.9**, Noise, of ~~this~~ the Draft EIS/EIR for a complete discussion of the noise impacts of Alternative 5

5.6.10 Cultural Resources

Under Alternative 5, there would be no direct impacts to known cultural resources as a result of construction of the proposed RMDP infrastructure associated with the proposed Project. However, two cultural resource sites could be indirectly affected by facilitating development of the previously approved residential, mixed-use, and nonresidential uses in the Specific Plan area, absent mitigation. With mitigation, the impacts would be reduced to less than significant. Therefore, the potential impacts of Alternative 5 would be the same as those of the proposed Project. Please refer to revised **Section 4.10**, Cultural Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts on cultural resources of Alternative 5.

5.6.11 Paleontological Resources

Under Alternative 5, the potential for impacts to paleontological resources would be high for both direct and indirect impacts, absent mitigation. However, the intensity of these potential impacts would be proportional to the amount of surface disturbance associated with each alternative. Because Alternative 5 would involve approximately 339 fewer acres of development (residential, nonresidential, and public facilities) than the proposed Project, resulting in an 11 percent decrease in developed acreage, the potential for impacts would decrease accordingly. Therefore, absent mitigation, impacts of Alternative 5 would be slightly less to those of the proposed Project (Alternative 2). Please refer to revised **Section 4.11**, Paleontological Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts on paleontological resources of Alternative 5.

5.6.12 Agricultural Resources

Under Alternative 5, the development of urban areas, spineflower preserves, and open space would convert agricultural lands to nonagricultural uses. Although the amount of development would vary among the alternatives, the entire Project site would be converted to a combination of nonagricultural uses (urban, preserves, and open areas) regardless of which alternative is implemented. Therefore, the impacts

of Alternative 5 on agricultural resources would be the same as those of the proposed Project (Alternative 2). Please refer to revised **Section 4.12**, Agricultural Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of agricultural resource impacts of Alternative 5.

5.6.13 Geology and Geologic Hazards

Alternative 5 would implement a new community within the Specific Plan area, VCC, and a portion of the Entrada planning area, which would result in significant geologic impacts absent mitigation. Although the risk of geologic hazards would exist regardless of which alternative is implemented, the intensity of the potential risk would be proportional to the population exposed. The risk to development by geologic hazards would be slightly less than the proposed Project, absent mitigation. Please refer to revised **Section 4.13**, Geology and Geologic Hazards, of ~~this~~ the Final EIS/EIR for a complete discussion of such impacts under Alternative 5.

5.6.14 Land Use

Alternative 5 would include implementation of the SCP, as required in the approved Specific Plan. Within the Specific Plan site, proposed land uses under Alternative 5 would be consistent with existing zoning. Within the Entrada planning area, which is currently zoned for agriculture, urban development and a spineflower preserve are proposed in a configuration generally similar to that proposed under Alternative 2 (proposed Project), and would result in a significant unavoidable zoning conflict impact.. Within the VCC planning area, the creation of a spineflower preserve under Alternative 5 would preclude any future commercial development. This would result in a reduction in nonresidential uses compared to the proposed Project, and conflict with Los Angeles County's previously approved development plans. Because Alternative 5 would result in zoning inconsistencies in the VCC planning area, impacts of Alternative 5 on land use would be greater than those of the proposed Project (Alternative 2). Please refer to **Section 4.14**, Land Use, of ~~this~~ the Draft EIS/EIR for a complete discussion of the land use impacts of Alternative 5.

5.6.15 Visual Resources

Alternative 5 would result in a slight reduction in RMDP infrastructure and larger spineflower preserves in the Project area, including the addition of a preserve in the VCC planning area. Alternative 5 would facilitate development in the Specific Plan and a portion of the Entrada planning area, but to a lesser degree when compared to the proposed Project. As stated above, there would be no development, and resulting visual impacts in the VCC planning area due to the additional spineflower preserve. Under Alternative 5, the visual impacts would include implementation of a new community, and such impacts would be slightly less than those of the proposed Project (Alternative 2) but would remain significant and unavoidable. Please refer to **Section 4.15**, Visual Resources, of ~~this~~ the Draft EIS/EIR for a complete discussion of the impacts on visual resources of Alternative 5.

5.6.16 Parks, Recreation, and Trails

Under Alternative 5, the parks and recreation acreages that would be developed under this alternative exceed requirements based on the post-development population; and, thus, no impacts related to parks and

recreation would occur (same as the proposed Project). Please refer to **Section 4.16**, Parks, Recreation, and Trails, of ~~this~~ the Draft EIS/EIR for a complete discussion of the parks and recreation impacts of Alternative 5.

5.6.17 Hazards, Hazardous Materials, and Public Safety

Under Alternative 5, construction activities, such as the temporary transport, storage, and use of potentially hazardous materials, would be reduced by approximately 6.3 percent when compared to the proposed Project. The demand on emergency response services would be proportional to the post-development population served. Under Alternative 5, the population at risk would be reduced by 6.44 percent when compared to the proposed Project, resulting in a slightly lesser impact absent mitigation. With mitigation, such impacts would be reduced to less-than-significant levels. Please refer to revised **Section 4.17**, Hazards, Hazardous Materials, and Public Safety, of ~~this~~ the Final EIS/EIR for a complete discussion of such impacts under Alternative 5.

5.6.18 Public Services

Implementation of Alternative 5 would result in partial build-out of the Specific Plan site and Entrada planning area. The commercial development in the VCC planning area would not proceed due to a spineflower preserve in that planning area. Because the demand on public services would be proportional to the post-development population served, Alternative 5 would place approximately 6.44 percent less demand on law enforcement, fire protection, medical services, libraries, and schools, when compared to the proposed Project. Overall, such impacts would be slightly less than that of the proposed Project. Please refer to **Section 4.18**, Public Services, of ~~this~~ the Draft EIS/EIR for a complete discussion of the impacts on public services of Alternative 5.

5.6.19 Socioeconomics and Environmental Justice

Because no communities in the Project area qualify as minority- or low-income populations, no significant socioeconomic and environmental justice impacts would occur as a result of Alternative 5. Impacts under this alternative would be the same as those of the proposed Project (Alternative 2). Conversely, there would be a beneficial impact upon the socioeconomics in the Santa Clarita Valley area from implementation of the development within the Project area (21,155 residential units and 5.87 msf of commercial/industrial uses). Please refer to **Section 4.19**, Socioeconomics and Environmental Justice, of ~~this~~ the Draft EIS/EIR for a complete discussion of the impacts on socioeconomics and environmental justice of Alternative 5.

5.6.20 Solid Waste Services

Alternative 5 would result in the generation of solid waste, and the need for solid waste services, during both construction and operational phases. Project impacts would remain significant even after implementation of the mitigation measures set forth in this EIS/EIR due to landfill capacity shortfalls over the long term. Impacts under this alternative would be substantially similar when compared to the proposed Project (Alternative 2). Please refer to revised **Section 4.20**, Solid Waste Services, of ~~this~~ the Final EIS/EIR for a complete discussion of such impacts of Alternative 5.

5.6.21 Global Climate Change

Alternative 5 would result in approximately ~~312,420~~239,036 tonnes of carbon dioxide equivalent emissions per year. As these emissions would not impede California's achievement of the greenhouse gas emission reduction target for year 2020, as codified in Assembly Bill 32, Alternative 5 would not result in any significant global climate change-related impacts. When compared to the proposed Project, Alternative 5 would result in slightly less emissions. Please refer to revised **Section 8.0**, Global Climate Change, of ~~this~~ the Final EIS/EIR for a complete discussion of the global climate change-related impacts of Alternative 5.

5.7 ALTERNATIVE 6 (ELIMINATION OF PLANNED COMMERCE CENTER DRIVE BRIDGE AND MAXIMUM SPINEFLOWER EXPANSION/CONNECTIVITY)

The RMDP and SCP would be modified from the plans proposed by the applicant, and the requested federal and state permits and authorizations would be granted consistent with those modifications. Two bridges across the Santa Clara River and the associated bank stabilization would be constructed, including the Potrero Canyon Road Bridge (extended span similar to the proposed Project (Alternative 2) and Alternative 5) and the Long Canyon Road Bridge. The previously approved Commerce Center Drive bridge would not be constructed under this alternative. Major tributary drainages would be regraded and realigned under this alternative. However, all realigned channels would be wider under this alternative than under the proposed Project (Alternative 2), and the majority of proposed road crossings along the channels would be bridges as opposed to culverts.

This alternative would designate spineflower preserves on the applicant's property with known spineflower populations (Specific Plan, four preserves; Entrada, one preserve; and VCC, one preserve). Alternative 6 would significantly increase preserve acreage, and provide a total of 891.2 acres of spineflower preserves, protecting 88.5% of the cumulative area occupied by spineflower in the Project area.

This alternative would facilitate development within the Specific Plan and the Entrada planning area, including 20,212 residential units and 5.78 msf of commercial/industrial/business park floor area. No development would be facilitated within the VCC planning area.

A complete description of the facilities proposed and urban development facilitated under this alternative is found in revised **Subsection 3.4.6** of ~~this~~ the Final EIS/EIR. For a summary comparison of impacts by alternative and issue area, please see **Subsection 5.10~~9~~** below.

5.7.1 Surface Water Hydrology and Flood Control

Under Alternative 6, the floodplain area for the FEMA 100-year return event would be increased by 9.7 acres, resulting in a 100-year floodplain area of 1,172.2 acres within the Project area. This increase would constitute a 0.8 percent reduction in impact when compared to the proposed Project. Due to this small reduction, impacts of Alternative 6 on surface water hydrology and flood control would be substantially similar to those of the proposed Project. From a flood control standpoint, the proposed Project and all alternatives have been designed to comply with DPW requirements, and flooding impacts have been

eliminated by design. Mitigation measures also have been incorporated to ensure that hydrology/flood control impacts remain less than significant. Please refer to revised **Section 4.1**, Surface Water Hydrology and Flood Control, of ~~this~~ the Final EIS/EIR for a complete discussion of the hydrology-related impacts of Alternative 6.

5.7.2 Geomorphology and Riparian Resources

Under Alternative 6, the proposed design would preserve 147,153 linear feet of on-site drainages, preserving 61 percent of the total 242,049 linear feet of jurisdictional drainage in the Project area. Alternative 6 would result in approximately nine percent less impacts on geomorphology and riparian resources when compared to the proposed Project; and, therefore, impacts would be slightly less than those of the proposed Project. Please refer to revised **Section 4.2**, Geomorphology and Riparian Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the geomorphology-related impacts of Alternative 6.

5.7.3 Water Resources

Under Alternative 6, both the Alternative 6 RMDP and SCP components and the indirectly facilitated development would result in a water supply demand of 15,553 afy, a reduction of 4,356 afy when compared to the proposed Project. This represents a 27 percent reduction in demand when compared with the proposed Project. Alternative 6, therefore, would result in less impact when compared to the proposed Project, absent mitigation. Please refer to revised **Section 4.3**, Water Resources, of ~~this~~ the Final EIS/EIR for a discussion of the impacts on water resources of Alternative 6.

5.7.4 Water Quality

The surface water quality would be directly impacted by construction activities, which include removal of vegetation, grading, and trenching. However, the proposed Project and alternatives would be subject to regulatory requirements, included as water quality mitigation measures in this EIS/EIR, which would ensure that water quality standards are met and that such impacts remain less than significant. Impacts to water quality under Alternative 6, therefore, would be the same as those under the proposed Project (Alternative 2). Please refer to revised **Section 4.4**, Water Quality, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts on water quality resulting from Alternative 6.

5.7.5 Biological Resources

This alternative would result in a 19.5% decrease in permanent loss of vegetation communities and land covers compared to the proposed Project. For example, Alternative 6 would disturb 110 acres of riparian and bog and marsh communities, whereas the proposed Project would disturb 225 acres of these vegetation types. Alternative 6 would reduce substantially impacts to coastal scrub and broad-leaf upland tree vegetation types as well. Temporary habitat loss would be increased by 24 percent under this alternative, primarily in the coastal scrub and California annual grassland vegetation types and agricultural, developed, and disturbed land covers. For more information on the impacts of Alternative 6 on existing vegetation and land covers, please refer to **Tables 4.5-25** and **4.5-26** and revised **Subsection 4.5.5.2.3.2.2** of ~~this~~ the Final EIS/EIR.

This alternative focuses on providing the maximum amount of habitat connectivity within and among the proposed spineflower preserves. While Alternative 6 would establish six spineflower preserves (one more than in the proposed SCP), the buffer areas would be enlarged substantially, increasing the size of the preserves to 891 acres -- a 432% increase over the preserve area in the proposed Project. The preserves would be comprised of large, contiguous blocks of suitable spineflower habitat. The VCC development would not be constructed under this alternative, as one of the proposed preserves is within the VCC planning area. The acreage of occupied spineflower habitat protected under Alternative 6 would increase by 29% compared to the proposed SCP, and the acreage of impacted occupied habitat would decrease by 63%. This alternative would result in a much greater level of spineflower protection than the proposed SCP. Impacts to spineflower, after mitigation, would be reduced to less than significant under this alternative due to the increase in occupied and unoccupied spineflower habitat preserved. Within the preserves, spineflower management and monitoring actions would be the same as those described in the proposed SCP. For further information regarding the effects of Alternative 6 on the San Fernando Valley spineflower, please refer to revised **Section 4.5**, Biological Resources, of ~~this~~ the Final EIS/EIR.

Although Alternative 6 would result in significant impacts to special-status plants and wildlife, this alternative differs from the proposed Project in that the eastern portion of the Project area would be largely undeveloped. The previously approved bridge across the River at Commerce Center Drive would not be constructed, and the Airport Mesa spineflower preserve would be significantly expanded. Therefore, while impacts associated with general vegetation community loss and urbanization would occur under this alternative, the intensity and extent of those impacts would be less than under the proposed Project. Under this alternative, all significant impacts to special-status species -- including those to the San Fernando Valley spineflower, southwestern pond turtle, and San Emigdio blue butterfly -- would be mitigated to less-than-significant levels.

For a complete description of the effects of Alternative 6 on special-status plants and wildlife, please refer to revised **Subsection 4.5.5** of ~~this~~ the Final EIS/EIR. Also, **Table 4.5-75** provides a summary of significance findings for Project-related impacts to each special-status species, and revised **Subsection 4.5.5.1** describes the analysis approach and methods used to reach impact determinations.

Under Alternative 6, the effects to landscape habitat linkages would be approximately the same as those that would occur under the proposed Project, except that the Castaic/Halsey Corridor would be unaffected because VCC would not be constructed and many of the proposed culvert crossings would be replaced with bridges. The Salt Creek corridor would continue to accommodate north-south wildlife movement for all species guilds, and the Santa Clara River corridor would remain a viable linkage for aquatic and low-mobility terrestrial wildlife guilds since the two proposed new bridges would not present a barrier to wildlife movement through the corridor. Of the 17 other wildlife corridors within the Project site, seven would be rendered non-functional by the proposal, and six would have their suitability constrained by adjacent development and the placement of nine bridges and 12 culverts within drainages. Although bridges within wildlife corridors present less of an obstacle than culverts, the suitability of the affected corridors would still be constrained by adjacent development. Although some of the drainages in the eastern portion of the Project area would remain undeveloped under this alternative, the presence of existing adjacent development upstream of these areas precludes their effective use as wildlife corridors. For a more complete discussion of the effects of Alternative 6 on wildlife movement, please refer to

revised **Section 4.5**, Biological Resources, of ~~this~~ the Final EIS/EIR. Within that section, **Tables 4.5-23** and **4.5-74** summarizes the impacts and Significance findings related to wildlife habitat linkages, movement corridors, and crossings.

In consideration of the above factors, in particular the large blocks of contiguous habitat that would be preserved and managed within spineflower preserves, Alternative 6 would have substantially less impact on biological resources when compared with the proposed Project.

5.7.6 Jurisdictional Waters and Streams

Absent mitigation, Alternative 6 would result in the a permanent loss of ~~6.22~~ 9.5 acres of wetlands (~~28~~ 54 percent reduction in impact compared to the proposed Project) and an increase of ~~52.3~~ 59.2 acres of waters of the ~~U.S.~~ United States; and a ~~227~~ 182.6 acre gain of CDFG jurisdictional streams. In addition, this alternative would result in a net gain of ~~181.26~~ 128.5 HARC-AW Score Units within the RMDP, compared to a net gain of ~~35.68~~ 27.2 units under the proposed Project. Overall, Alternative 6 would result in much less impact on jurisdictional waters and streams than the proposed Project absent mitigation. Mitigation for temporal losses of stream function would not require creation of off-site mitigation areas under this alternative, as sufficient mitigation acreage would be available on site. Please refer to revised **Section 4.6**, Jurisdictional Waters and Streams, of ~~this~~ the Final EIS/EIR for a complete discussion of such impacts under Alternative 6. The impacts of all seven alternatives on jurisdictional waters and streams are presented comparatively in **Table 5.0-3** (Corps) and **Table 5.0-4** (CDFG).

5.7.7 Air Quality

Under Alternative 6, Project-specific construction and operational emissions would be significant and unavoidable, even after incorporation of all feasible mitigation measures, as described above for the proposed Project (Alternative 2). The development facilitated under Alternative 6 would result in slightly less air quality impacts when compared to the proposed Project (Alternative 2). Please refer to revised **Section 4.7**, Air Quality, of ~~this~~ the Final EIS/EIR for a complete discussion of the air quality impacts of Alternative 6.

5.7.8 Traffic

Under Alternative 6, the ADT is forecast at 350,000 (a 14.2 percent reduction compared to the proposed Project). With Alternative 6, only one on-site roadway segment would be deficient. Alternative 6 would result in 14 deficient off-site roadway segments, absent mitigation. This alternative would not include the Commerce Center Drive Bridge across the Santa Clara River, thus slightly reducing the on-site circulation compared to the proposed Project. Overall, under Alternative 6, the traffic impacts would be greater than those of the proposed Project. Please refer to revised **Section 4.8**, Traffic, of ~~this~~ the Final EIS/EIR for a complete discussion of the traffic impacts of Alternative 6.

5.7.9 Noise

Construction noise and vibration impacts associated with this alternative would be slightly less than those associated with the proposed Project, primarily due to the reduction in urban development and elimination

of the proposed Commerce Center Drive Bridge across the Santa Clara River. Significant unavoidable off-site traffic noise impacts along ten roadway segments would continue to occur under this alternative. Please refer to **Section 4.9**, Noise, of ~~this~~ the Draft EIS/EIR for a complete discussion of the noise impacts of Alternative 6.

5.7.10 Cultural Resources

Under Alternative 6, there would be no direct impacts to known cultural resources as a result of construction of the proposed RMDP infrastructure associated with the proposed Project. However, two cultural resource sites could be indirectly affected by facilitating development of the previously approved residential, mixed-use, and nonresidential uses in the Specific Plan area, absent mitigation. With mitigation, the impacts would be reduced to less than significant. Therefore, the potential impacts of Alternative 6 would be the same as those of the proposed Project. Please refer to revised **Section 4.10**, Cultural Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts on cultural resources of Alternative 6.

5.7.11 Paleontological Resources

Under Alternative 6, the potential for impacts to paleontological resources would be high for both direct and indirect impacts, absent mitigation. However, the intensity of these potential impacts would be proportional to the amount of surface disturbance associated with each alternative. Because Alternative 6 would involve approximately 684 fewer acres of development (residential, nonresidential, and public facilities) than the proposed Project, resulting in a 22 percent decrease in developed acreage, the potential for impacts would decrease accordingly. Therefore, absent mitigation, impacts of Alternative 6 would be slightly less than those of the proposed Project (Alternative 2). Please refer to revised **Section 4.11**, Paleontological Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts on paleontological resources of Alternative 6.

5.7.12 Agricultural Resources

Under Alternative 6, the development of urban areas, spineflower preserves, and open space would convert agricultural lands to nonagricultural uses. Although the amount of development would vary among the alternatives, the entire Project site would be converted to a combination of nonagricultural uses (urban, preserves, and open areas) regardless of which alternative is implemented. Therefore, the impacts of Alternative 6 on agricultural resources would be identical to those of the proposed Project (Alternative 2). Please refer to revised **Section 4.12**, Agricultural Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the agricultural resource impacts of Alternative 6.

5.7.13 Geology and Geologic Hazards

Alternative 6 would implement a new community within the Specific Plan area, VCC, and a portion of the Entrada planning area, which would result in significant geologic impacts, absent mitigation. Although the risk of geologic hazards would exist regardless of which alternative is implemented, the intensity of the potential risk would be proportional to the population exposed. The risk to development by geologic hazards would be slightly less than that of the proposed Project, absent mitigation. Mitigation

measures would reduce the adverse geologic impacts to less than significant. Please refer to revised **Section 4.13**, Geology and Geologic Hazards, of ~~this~~ the Final EIS/EIR for a complete discussion of such impacts under Alternative 6.

5.7.14 Land Use

Alternative 6 would include implementation of the SCP. Within the Specific Plan site, proposed land uses under Alternative 6 would be consistent with existing zoning. Within the Entrada planning area, which is currently zoned for agriculture, urban development and a spineflower preserve are proposed in a configuration generally similar to that proposed under Alternative 2 (proposed Project), and would result in a significant unavoidable zoning conflict impact. Within the VCC planning area, the creation of a spineflower preserve under Alternative 6 would preclude any future commercial development. This would result in a reduction in nonresidential uses compared to the proposed Project, and conflict with Los Angeles County's previously approved development plans. Because Alternative 6 would result in zoning inconsistencies in the VCC planning area, impacts of Alternative 6 on land use would be greater than those of the proposed Project (Alternative 2). Please refer to **Section 4.14**, Land Use, of ~~this~~ the Draft EIS/EIR for a complete discussion of the land use impacts of Alternative 6.

5.7.15 Visual Resources

Alternative 6 would result in a reduction in RMDP infrastructure and larger spineflower preserves in the Project area, including the addition of a preserve in the VCC planning area. Alternative 6 would facilitate development in the Specific Plan and a portion of the Entrada planning area, but to a lesser degree when compared to the proposed Project. As stated above, there would be no development, and resulting visual impacts in the VCC planning area due to the additional spineflower preserve. Under Alternative 6, the visual impacts would include implementation of a new community, and such impacts would be slightly less than those of the proposed Project (Alternative 2) but would remain significant and unavoidable. Please refer to **Section 4.15**, Visual Resources, of ~~this~~ the Draft EIS/EIR for a complete discussion of the impacts on visual resources of Alternative 6.

5.7.16 Parks, Recreation, and Trails

Under Alternative 6, the parks and recreation acreages that would be developed under this alternative exceed requirements based on the post-development population; and, thus, no impacts related to parks and recreation would occur (same as the proposed Project). Please refer to **Section 4.16**, Parks, Recreation, and Trails, of ~~this~~ the Draft EIS/EIR for a complete discussion of the parks and recreation impacts of Alternative 6.

5.7.17 Hazards, Hazardous Materials, and Public Safety

Under Alternative 6, construction activities, such as temporary transport, storage, and use of potentially hazardous materials, would be reduced by approximately 15 percent compared to the proposed Project. The demand on emergency response services would be proportional to the post-development population served. Under Alternative 6, the population at risk would reduce by 10.61 percent compared to the proposed Project, resulting in a slightly lesser impact absent mitigation. With mitigation, such impacts

would be reduced to less-than-significant levels. Please refer to revised **Section 4.17**, Hazards, Hazardous Materials, and Public Safety, of ~~this~~ the Final EIS/EIR for a complete discussion of such impacts under Alternative 6.

5.7.18 Public Services

Implementation of Alternative 6 would result in partial build-out of the Specific Plan area and Entrada planning area. The commercial development in the VCC planning area would not proceed due to a spineflower preserve in that planning area. Because the demand on public services would be proportional to the post-development population served, Alternative 6 would place approximately 10.6 percent less demand on law enforcement, fire protection, medical services, libraries, and schools when compared to the proposed Project. Overall, such impacts would be slightly less than that of the proposed Project. Please refer to **Section 4.18**, Public Services, of ~~this~~ the Draft EIS/EIR for a complete discussion of the impacts on public services of Alternative 6.

5.7.19 Socioeconomics and Environmental Justice

Because no communities in the Project area qualify as minority- or low-income populations, no significant socioeconomic and environmental justice impacts would occur as a result of Alternative 6. Impacts under this alternative would be the same as those of the proposed Project (Alternative 2). Conversely, there would be a beneficial impact upon the socioeconomics in the Santa Clarita Valley area from implementation of the development within the Project area (20,212 residential units and 5.78 msf of commercial/industrial uses). Please refer to **Section 4.19**, Socioeconomics and Environmental Justice, of ~~this~~ the Draft EIS/EIR for a complete discussion of the impacts on socioeconomics and environmental justice of Alternative 6.

5.7.20 Solid Waste Services

Alternative 6 would result in the generation of solid waste, and the need for solid waste services, during both construction and operational phases. Project impacts would remain significant even after implementation of the mitigation measures set forth in this EIS/EIR due to landfill capacity shortfalls over the long term. Impacts under this alternative would be substantially similar when compared to the proposed Project (Alternative 2). Please refer to revised **Section 4.20**, Solid Waste Services, of ~~this~~ the Final EIS/EIR for a complete discussion of such impacts under Alternative 6.

5.7.21 Global Climate Change

Alternative 6 would result in approximately ~~299,697~~229,301 tonnes of carbon dioxide equivalent emissions per year. As these emissions would not impede California's achievement of the greenhouse gas emission reduction target for year 2020, as codified in Assembly Bill 32, Alternative 6 would not result in any significant global climate change-related impacts. When compared to the proposed Project, Alternative 6 would result in slightly less emissions. Please refer to revised **Section 8.0**, Global Climate Change, of ~~this~~ the Final EIS/EIR for a complete discussion of the global climate change-related impacts of Alternative 6.

5.8 ALTERNATIVE 7 (AVOIDANCE OF 100-YEAR FLOODPLAIN, ELIMINATION OF TWO PLANNED BRIDGES, AND AVOIDANCE OF SPINEFLOWER)

The RMDP and SCP would be modified from the plans proposed by the applicant, and the requested federal and state permits and authorizations would be granted consistent with those modifications. Only one bridge across the Santa Clara River would be constructed, located at Long Canyon Road. The Potrero Canyon Road Bridge and the already approved Commerce Center Drive Bridge would not be constructed under this alternative. Bank stabilization along the Santa Clara River would be constructed outside the 100-year floodplain. Under this alternative, major tributary drainages would not be regraded or realigned. Bank stabilization would be constructed to protect development, but would be located outside the 100-year floodplain of these drainages. In addition, the Middle Canyon and Magic Mountain Canyon drainages, which are proposed for conversion to buried storm drains under the proposed Project (Alternative 2), would be preserved.

Alternative 7 was designed to maximize avoidance of the cumulative area occupied by spineflower within the Project area. This alternative would designate spineflower preserves with 300 feet of expansion area surrounding the cumulative area occupied spineflower locations, and provide a total of 557 acres of spineflower habitat preserves, protecting 98.2% of the cumulative area occupied by spineflower in the Project area.[3]

This alternative would facilitate development within the Specific Plan and the Entrada planning area, including 17,323 residential units and 3.82 msf of commercial/industrial/business park floor area. No development would be facilitated within the VCC planning area.

A complete description of the facilities proposed and urban development facilitated a complete description is found in revised **Subsection 3.4.7** of ~~this~~ the Final EIS/EIR. For a summary comparison of impacts by alternative and issue area, please see **Subsection 5.10~~9~~** below.

5.8.1 Surface Water Hydrology and Flood Control

Under Alternative 7, the floodplain area for the FEMA 100-year return event would be increased by 141.9 acres, resulting in a 100-year floodplain area of 1,412.3 acres within the Project area. This increase would constitute an environmental benefit, and impacts of Alternative 7 would be substantially less when compared to the proposed Project. From a flood control standpoint, the proposed Project and all alternatives have been designed to comply with DPW requirements, and flooding impacts have been eliminated by design. Mitigation measures also have been incorporated to ensure that hydrology/flood control impacts remain less than significant. Please refer to revised **Section 4.1**, Surface Water Hydrology and Flood Control, of ~~this~~ the Final EIS/EIR for a complete discussion of the hydrology-related impacts of Alternative 7.

[3] The term "expansion area" is used in the SCP to represent the area interior to the core that is not part of the cumulative area occupied. (See, *e.g.*, SCP, Table 3.0-34.)

5.8.2 Geomorphology and Riparian Resources

Under Alternative 7, the proposed design would preserve 209,809 linear feet of on-site drainages, preserving 87 percent of the total 242,049 linear feet of jurisdictional drainage in the Project area. Alternative 7 would result in approximately 35 percent reduction in impacts on geomorphology and riparian resources, and impacts would be much less compared to the proposed Project. Please refer to revised **Section 4.2**, Geomorphology and Riparian Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the geomorphology-related impacts of Alternative 7.

5.8.3 Water Resources

Under Alternative 7, both the Alternative 7 RMDP and SCP components and the indirectly facilitated development would result in a water supply demand of 10,590 afy, a reduction of 9,319 afy when compared to the proposed Project. Because this represents a 60 percent reduction in demand, Alternative 7 would result in much less impact on water resources when compared to the proposed Project, absent mitigation. Please refer to revised **Section 4.3**, Water Resources, of ~~this~~ the Final EIS/EIR for a discussion of the impacts on water resources of Alternative 7.

5.8.4 Water Quality

The surface water quality would be directly impacted by construction activities, which include removal of vegetation, grading, and trenching. However, the proposed Project and alternatives would be subject to regulatory requirements, included as water quality mitigation measures in this EIS/EIR, which would ensure that water quality standards are met and that such impacts remain less than significant. Impacts to water quality under Alternative 7, therefore, would be the same as those under the proposed Project. Please refer to revised **Section 4.4**, Water Quality, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts on water quality resulting from Alternative 7.

5.8.5 Biological Resources

Compared to the proposed Project, Alternative 7 would reduce permanent vegetation community and land cover loss on site by 34.4%. For riparian and bog/marsh communities, Alternative 7 would reduce impacts by 82.7%, from 225 acres to 39 acres. Impacts to upland vegetation communities also would be reduced. However, Alternative 7 would result in a 284 percent increase in the amount of temporary vegetation community loss compared to the proposed Project. This increase would occur in areas mapped as chaparral, coastal scrub, broad-leaf upland tree, and California annual grassland vegetation, and agricultural, developed, and disturbed land covers. For more information on the impacts of Alternative 7 on existing vegetation and land covers, please refer to **Tables 4.5-25** and **4.5-26** and revised **Subsection 4.5.5.2.3.2.2** of ~~this~~ the Final EIS/EIR.

Alternative 7 focuses on protecting all currently known spineflower occurrences on the Project site. The alternative would designate 28 spineflower preserves, delineated by applying 300-foot buffer areas around all known habitat occupied by spineflower. These preserves are individually smaller than the blocks proposed in Alternative 6 and are not contiguous. Alternative 7 would provide a total of 557 acres of spineflower preserves (a 232% increase compared to the proposed SCP), protecting 98.2% of the

cumulative habitat occupied by spineflower on site (a 43% increase compared to the proposed SCP). Only 0.36 acre of occupied spineflower habitat would be lost under this alternative, 94% less than what would be lost under the proposed Project. This alternative would result in a much greater level of spineflower protection, with greatly increased protection of occupied habitat and only a fraction of the loss compared to the proposed Project. This alternative would result in a much greater level of spineflower protection than the proposed SCP, with increased protection of occupied habitat and less than two percent spineflower take site-wide. Impacts to spineflower, after mitigation, would be reduced to less than significant under this alternative due to the increase in occupied and unoccupied spineflower habitat preserved. Within the preserves, spineflower management and monitoring actions would be the same as those described in the proposed SCP. For further information regarding the effects of Alternative 7 on the San Fernando Valley spineflower, please refer to revised **Section 4.5**, Biological Resources, of ~~this~~ the Final EIS/EIR.

Alternative 7 would result in potentially significant impacts to special-status plants and wildlife; however, this alternative differs from the proposed Project in that the amount of urban development facilitated would be reduced by approximately 23%. Therefore, while impacts associated with general habitat loss and urbanization would occur under this alternative, the intensity and extent of those impacts would be substantially less than under the proposed Project. Additionally, avoidance of all mapped 100-year floodplain areas would greatly lessen impacts to aquatic, semi-aquatic, and riparian species compared to the proposed Project. Under this alternative, all impacts to special-status species -- including San Fernando Valley spineflower, southwestern pond turtle, and San Emigdio blue butterfly -- would be reduced to less-than-significant levels.

For a complete description of the effects of Alternative 7 on special-status plants and wildlife, please refer to revised **Subsection 4.5.5** of ~~this~~ the Final EIS/EIR. Also, **Table 4.5-75** provides a summary of significance findings for Project-related impacts to each special-status species, and revised **Subsection 4.5.5.1** describes the analysis approach and methods used to reach impact determinations.

Under Alternative 7, the effects to landscape habitat linkages would be approximately the same as those that would occur under the proposed Project, except that the Castaic/Halsey Corridor would be unaffected because VCC would not be constructed and most of the Project's proposed culvert crossings would be replaced with bridges. The Salt Creek corridor would continue to accommodate north-south wildlife movement for all species guilds, and the Santa Clara river corridor would remain a viable linkage for aquatic and low-mobility terrestrial wildlife guilds, since the two proposed new bridges would not present a barrier to wildlife movement through the corridor. Of the 17 other wildlife corridors within the Project site, seven would be rendered non-functional by the proposal, and six would have their suitability constrained by adjacent development and the placement of nine bridges and 12 culverts within drainages. Although bridges would still be constrained by adjacent development. Although some of the drainages in the eastern portion of the Project area would remain undeveloped under this alternative, the presence of existing adjacent development upstream of these areas precludes their effective use as wildlife corridors. For a more complete discussion of the effects of Alternative 7 on wildlife movement, please refer to revised **Section 4.5**, Biological Resources, of ~~this~~ the Final EIS/EIR. Within that section, **Tables 4.5-23** and **4.5-74** summarizes the impacts and significance findings related to wildlife habitat linkages, movement corridors, and crossings.

In consideration of the above factors, especially the avoidance of all mapped floodplains and nearly all spineflower populations, Alternative 7 would have substantially less impact on biological resources when compared with the proposed Project.

5.8.6 Jurisdictional Waters and Streams

Absent mitigation, Alternative 7 would result in a permanent loss of ~~1.09~~ 3.2 acres of wetlands (an ~~87~~ 84 percent reduction in impacts compared to the proposed Project) and an increase of ~~94.5~~ 99.0 acres of waters of the ~~U.S.~~ United States and a ~~551~~625.1 acre net gain of CDFG jurisdictional streams. In addition, this alternative would result in a net gain of ~~407.18~~ 434.3 HARC-AW Score Units within the RMDP, compared to a net gain of ~~35.68~~ 27.2 units under the proposed Project. Overall, Alternative 7 would result in much less impact on jurisdictional waters and streams when compared to the proposed Project absent mitigation. Mitigation for temporal losses of stream function would not require creation of off-site mitigation areas under this alternative, as sufficient mitigation acreage would be available on site. Please refer to revised **Section 4.6**, Jurisdictional Waters and Streams, of ~~this~~ the Final EIS/EIR for a complete discussion of such impacts under Alternative 7. The impacts of all seven alternatives on jurisdictional waters and streams are presented comparatively in **Table 5.0-3** (Corps) and **Table 5.0-4** (CDFG).

5.8.7 Air Quality

Under Alternative 7, Project-specific construction and operational emissions would be significant and unavoidable, even after incorporation of all feasible mitigation measures, as described above for the proposed Project (Alternative 2). The development facilitated under Alternative 7 would result in slightly less air quality impacts when compared to the proposed Project (Alternative 2). Please refer to revised **Section 4.7**, Air Quality, of ~~this~~ the Final EIS/EIR for a complete discussion of the air quality impacts of Alternative 7.

5.8.8 Traffic

Under Alternative 7, the ADT is forecast at 266,000 (a 35 percent reduction when compared to the proposed Project). With Alternative 7, no planned on-site roadway segments would be deficient. Alternative 7 would result in 8 deficient off-site roadway segments, absent mitigation. This alternative would not include the bridges across the Santa Clara River at Commerce Center Drive and Potrero Canyon Road, significantly reducing the on-site circulation when compared to the proposed Project. Overall, under Alternative 7, the traffic impacts would be greater than those of the proposed Project. Please refer to revised **Section 4.8**, Traffic, of ~~this~~ the Final EIS/EIR for a complete discussion of the traffic impacts of Alternative 7.

5.8.9 Noise

Construction noise and vibration impacts associated with this alternative would be less than Alternative 2, particularly with respect to pile driving and vibration, because the bridges across the Santa Clara River at Commerce Center Drive and Potrero Canyon Road would not be constructed under this alternative. Because substantially fewer residents would be exposed to noise impacts under this alternative, impacts

of Alternative 7 would be considered much less than those of the proposed Project, however, significant unavoidable off-site traffic noise impacts along ten roadway segments would continue to occur. Please refer to **Section 4.9**, Noise, of ~~this~~ the Draft EIS/EIR for a complete discussion of the noise impacts of Alternative 7.

5.8.10 Cultural Resources

Under Alternative 7, there would be no direct impacts to known cultural resources as a result of construction of the proposed RMDP infrastructure associated with the proposed Project. However, two cultural resource sites could be indirectly affected by facilitating development of the previously approved residential, mixed-use, and nonresidential uses in the Specific Plan area, absent mitigation. With mitigation, the impacts would be reduced to less than significant. Therefore, the potential impacts of Alternative 7 would be the same as those of the proposed Project. Please refer to revised **Section 4.10**, Cultural Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts on cultural resources of Alternative 7.

5.8.11 Paleontological Resources

Under Alternative 7, the potential for impacts to paleontological resources would be high for both direct and indirect impacts, absent mitigation. However, the intensity of these potential impacts would be proportional to the amount of surface disturbance associated with each alternative. Because Alternative 7 would involve approximately 1,486 fewer acres of development (residential, nonresidential, and public facilities) than the proposed Project, resulting in a 51 percent decrease in developed acreage, the potential for impacts would decrease accordingly. Therefore, absent mitigation, impacts of Alternative 7 would much less than those of the proposed Project (Alternative 2). Please refer to revised **Section 4.11**, Paleontological Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts on paleontological resources of Alternative 7.

5.8.12 Agricultural Resources

Under Alternative 7, the development of urban areas, spineflower preserves, and open space would convert agricultural lands to nonagricultural uses. Although the amount of development would vary among the alternatives, the entire Project site would be converted to a combination of nonagricultural uses (urban, preserves, and open areas) regardless of which alternative is implemented. Therefore, the impacts of Alternative 7 on agricultural resources would be the same as those of the proposed Project. Please refer to revised **Section 4.12**, Agricultural Resources, of ~~this~~ the Final EIS/EIR for a complete discussion of the agricultural resource impacts of Alternative 7.

5.8.13 Geology and Geologic Hazards

Alternative 7 would implement a new community within the Specific Plan area, VCC, and a portion of the Entrada planning area, which would result in significant geologic impacts, absent mitigation. Although the risk of geologic hazards would exist regardless of which alternative is implemented, the intensity of the potential risk would be proportional to the population exposed. The risk to development by geologic hazards would be less than that under the proposed Project, absent mitigation. Mitigation

measures would reduce the adverse geologic impacts to less than significant. Please refer to revised **Section 4.13**, Geology and Geologic Hazards, of ~~this~~ the Final EIS/EIR for a complete discussion of the impacts on geology and geologic hazards of Alternative 7.

5.8.14 Land Use

Implementation of Alternative 7 would facilitate development of the Specific Plan site, however, Alternative 7 would reduce previously approved residential development on the Specific Plan site by 21 percent when compared to the proposed Project. The Specific Plan has received local land use approvals and was found to be consistent with applicable land use plans and policies. As described above, Alternative 7 would not be consistent with an objective of the Specific Plan related to accommodating a jobs/housing balance, which would result in a significant and unavoidable land use impact under Significance Threshold 2. In addition, if implemented, Alternative 7 may require an amendment to the Specific Plan because the alternative calls for avoidance of development within the 100-year floodplain, elimination of two planned bridges, which would impact the approved Specific Plan circulation and land use patterns, and avoidance of impacts to the spineflower within the Specific Plan site. If a Specific Plan amendment were required to implement Alternative 7, then Los Angeles County would need to approve such an amendment, which is outside the control of the applicant. Therefore, Alternative 7 has the potential to result in a significant and unavoidable conflict with the land use requirements of the approved Specific Plan.

Within the Entrada planning area, which is currently zoned for agriculture, urban development and a spineflower preserve are proposed in a configuration generally similar to that proposed under Alternative 2, except that Alternative 7 proposes a larger preserve. The preserve would conflict with the site's existing agricultural zoning and result in a significant unavoidable zoning conflict impact.

Within the VCC planning area, the creation of a spineflower preserve under Alternative 7 would preclude any future commercial development. This would result in a reduction in nonresidential uses compared to the proposed Project, and conflict with Los Angeles County's previously approved development plans. Because Alternative 7 would result in zoning inconsistencies within the Specific Plan site and VCC planning area, impacts of Alternative 7 on land use would be greater than those of the proposed Project (Alternative 2). Please refer to **Section 4.14**, Land Use, of ~~this~~ the Draft EIS/EIR for a complete discussion of the land use impacts of Alternative 7.

5.8.15 Visual Resources

Alternative 7 would result in a slight reduction in RMDP infrastructure and larger spineflower preserves in the Project area, including the addition of a preserve in the VCC planning area. Alternative 7 would facilitate development in the Specific Plan and a portion of the Entrada planning area, but to a lesser degree when compared to the proposed Project; however, significant unavoidable impacts to visual resources would continue to occur. As stated above, there would be no development, and resulting visual impacts in the VCC planning area due to the additional spineflower preserve. Under Alternative 7, the visual impacts would include implementation of a new community, and such impacts would be slightly less than those of the proposed Project (Alternative 2). Please refer to **Section 4.15**, Visual Resources, of ~~this~~ the Draft EIS/EIR for a complete discussion of the impacts on visual resources of Alternative 7.

5.8.16 Parks, Recreation, and Trails

Under Alternative 7, the parks and recreation acreages that would be developed under this alternative exceed requirements based on the post-development population; and, thus, no impacts related to parks and recreation would occur (same as the proposed Project). Please refer to **Section 4.16**, Parks, Recreation, and Trails, of ~~this~~ the Draft EIS/EIR for a complete discussion of the parks and recreation impacts of Alternative 7.

5.8.17 Hazards, Hazardous Materials, and Public Safety

Under Alternative 7, construction activities, such as the temporary transport, storage, and use of potentially hazardous materials, would be reduced by approximately 35.4 percent when compared to the proposed Project. The demand on emergency response services would be proportional to the post-development population served. Under Alternative 7, the population at risk would reduce by 23.38 percent when compared to the proposed Project. However, because Alternative 7 would provide only one point of access to the site across the Santa Clara River (the proposed bridge at Long Canyon Road), access across the river would be impaired in the event of an emergency or evacuation. Thus, the impact would remain significant after mitigation, and the impacts of Alternative 7 relative to public safety and hazards would be greater than those of the proposed Project (Alternative 2). Please refer to revised **Section 4.17**, Hazards, Hazardous Materials, and Public Safety, of ~~this~~ the Final EIS/EIR for a complete discussion of such impacts under Alternative 7.

5.8.18 Public Services

Implementation of Alternative 7 would result in partial build-out of the Specific Plan site and Entrada planning area. The commercial development in the VCC planning area would not proceed due to a spineflower preserve in that planning area. Because the demand on public services would be proportional to the post-development population served, Alternative 7 would place approximately 23.4 percent less demand on law enforcement, fire protection, medical services, libraries, and schools when compared to the proposed Project. Overall, such impacts would be less than that of the proposed Project. Please refer to **Section 4.18**, Public Services, of ~~this~~ the Draft EIS/EIR for a complete discussion of the impacts on public services of Alternative 7.

5.8.19 Socioeconomics and Environmental Justice

Because no communities in the Project vicinity qualify as minority- or low-income populations, no direct, indirect, or secondary socioeconomic and environmental justice impacts would occur as a result of Alternative 7. Impacts under this alternative would be the same as those of the proposed Project. Please refer to **Section 4.19**, Socioeconomics and Environmental Justice, of ~~this~~ the Draft EIS/EIR for a complete discussion of the impacts on socioeconomics and environmental justice of Alternative 7.

5.8.20 Solid Waste Services

Alternative 7 would result in the generation of solid waste, and the need for solid waste services, during both construction and operational phases. Project impacts would remain significant even after

implementation of the mitigation measures set forth in this EIS/EIR due to landfill capacity shortfalls over the long term. Impacts under this alternative would be substantially similar when compared to the proposed Project (Alternative 2). Please refer to revised **Section 4.20**, Solid Waste Services, of ~~this~~ the Final EIS/EIR for a complete discussion of such impacts under Alternative 7.

5.8.21 Global Climate Change

Alternative 7 would result in approximately ~~245,369~~187,255 tonnes of carbon dioxide equivalent emissions per year. As these emissions would not impede California's achievement of the greenhouse gas emission reduction target for year 2020, as codified in Assembly Bill 32, Alternative 7 would not result in any significant global climate change-related impacts. When compared to the proposed Project, Alternative 7 would result in much less emissions. Please refer to revised **Section 8.0**, Global Climate Change, of ~~this~~ the Final EIS/EIR for a complete discussion of the global climate change-related impacts of Alternative 7.

5.9 DRAFT LEDPA (ELIMINATION OF PLANNED POTRERO BRIDGE, ADDITIONAL SPINEFLOWER PRESERVE ACREAGE, AND LARGER RIPARIAN AREAS IN TRIBUTARY DRAINAGES)

Under the Draft LEDPA the RMDP and SCP would be modified from the plans proposed by the applicant, and the requested federal and state permits and authorizations would be granted consistent with those modifications. The Draft LEDPA, shown in **Figure 3.0-53**, is a modified version of Draft EIS/EIR Alternative 3 that includes additional avoidance of waters of the United States, along the Santa Clara River and tributaries, increased spineflower preserve acreage in the Potrero, San Martinez Grande, Grapevine Mesa, and Airport Mesa areas, based on input received from CDFG, and larger riparian corridors within five major tributaries.

Under the Draft LEDPA, like Alternative 3, two of the three bridges crossing the Santa Clara River and the associated bank stabilization would be constructed (Commerce Center Drive bridge and the Long Canyon Road bridge); however, the Potrero Canyon Road bridge would not be constructed, reducing impacts to jurisdictional waters and wetlands in the Santa Clara River and lower Potrero Canyon. In addition, like Alternative 3, a 19-acre compensatory wetland mitigation area would be implemented in lower Potrero Canyon, contiguous with the existing lower mesic meadow (cismontane alkali marsh).

In two major tributary drainages, Long Canyon and Potrero Canyon, most of the existing drainages would be filled and modified so that there would not be a loss of Corps jurisdiction. In the three other major tributary drainages, Lion Canyon, San Martinez Grande Canyon, and Chiquito Canyon, the Draft LEDPA would incorporate limited channel grading to expand the drainage and adjacent riparian areas and realign their banks. The remainder of the jurisdictional areas in Lion, San Martinez Grande and Chiquito Canyon would be avoided. Overall, of the 660.1 acres of waters of the United States on the Project site, implementation of the Draft LEDPA would result in the permanent fill of 66.3 acres of waters of the United States (29 percent reduction in acreage compared to the proposed Project). The Draft LEDPA would temporarily disturb an additional 1.1 acres when compared to Alternative 3 (2 percent less than the proposed Project). The mitigation associated with the Draft LEDPA would ensure a no net loss of acreage and functions and values of waters of the United States. For purposes of CDFG's streambed

jurisdiction under Fish & Game Code section 1600, *et seq*., the Draft LEDPA would reduce related jurisdictional impacts by 34.4 acres compared to the proposed Project.

The Draft LEDPA would increase the acreage within the spineflower preserves from 167 acres to 247 acres. Under the Draft LEDPA, the acreage of occupied spineflower habitat protected would increase from 13.88 acres under the proposed Project to 13.97 acres, while the area of impacted occupied habitat would be decreased from 6.36 acres to 5.87 acres. The Draft LEDPA would result in a greater level of spineflower protection than the proposed SCP, with increased preservation of occupied habitat and less loss when compared to the proposed Project.

The Draft LEDPA would facilitate development within the RMDP planning area (*i.e*., Specific Plan area), including 19,812 residential units and 5.41 msf of commercial/industrial/ business park floor area. Development in the SCP planning area (the Entrada and VCC planning areas) under the Draft LEDPA would be the same as provided under both the proposed Project and Alternative 3. Thus, in total, the Draft LEDPA, which would facilitate development within the Specific Plan site and not change the development within Entrada and VCC, would result in 21,537 dwelling units and 9.26 msf of commercial uses on the entire Project site. When compared to the proposed Project, the Draft LEDPA results in 1,073 fewer total dwelling units, and a reduction of 0.14 msf of commercial uses.

The Draft EIS/EIR evaluated a range of alternatives to the proposed Project, including Alternative 3 (Elimination of Planned Potrero Bridge and Additional Spineflower Preserve), which considered the development of 21,558 dwelling units and 9.33 msf of commercial square feet on the Project site. With these development characteristics, Alternative 3 is similar to the overall development characteristics of the Draft LEDPA; however, the Draft LEDPA would provide 621 fewer residential units and 0.07 fewer msf of commercial uses than Alternative 3.

Below is a comparative evaluation by environmental category of the Draft LEDPA. In general, as discussed below, the Draft LEDPA's impacts are the same as Alternative 3 with respect to water quality; traffic; cultural resources; agricultural resources; visual resources; parks, recreation and trails; and socioeconomics and environmental justice. The Draft LEDPA and Alternative 3 have slightly less impacts compared to the proposed Project (Alternative 2) with respect to water resources; biological resources; jurisdictional waters and streams; air quality; and noise. The Draft LEDPA and Alternative 3 also have substantially similar impacts when compared to the proposed Project (Alternative 2) with respect to surface water hydrology and flood control; geomorphology and riparian resources; paleontological resources; geology and geologic hazards; land use; hazards, hazardous materials, and public safety; public services; solid waste services; and global climate change.

5.9.1 Surface Water Hydrology and Flood Control

The Draft EIS/EIR determined that implementation of the proposed Project would reduce the Santa Clara River floodplain area during a 100-year storm from 407.6 acres under existing conditions to 1,283.8 acres, a reduction of 123.8 acres. Development of the Project site under Alternative 3 would reduce the Santa Clara River floodplain area during a 100-year storm event from 1,407.6 acres to 1,298.0 acres, a reduction of 109.6 acres. Therefore, when compared to the proposed Project, Alternative 3 would provide 14.2 additional acres of floodplain area. The Draft LEDPA 100-year floodplain area would be similar to

the floodplain area provided by Alternative 3. The EIS/EIR determined that the proposed Project and Alternatives 3-7 would be designed to comply with Los Angeles County Department of Public Works requirements, and as a result, flooding impacts would not result in a significant environmental impact. To ensure that significant flood-related impacts do not occur, the EIS/EIR recommended mitigation measures for the proposed Project and each of the Alternatives. The Draft LEDPA also would be required to comply with County of Los Angeles requirements and be subject to the recommended mitigation measures provided by the EIS/EIR. The adopted design requirements and the recommended mitigation measures would reduce potential flood-related impacts of the Draft LEDPA to a less-than-significant level. Please refer to revised **Section 4.1**, Surface Water Hydrology and Flood Control, of the Final EIS/EIR for a complete discussion of the hydrology-related impacts under Alternative 3, which is the alternative most similar to the Draft LEDPA.

5.9.2 Geomorphology and Riparian Resources

The Draft LEDPA would preserve 131,769 linear feet of on-site drainages, which is 54 percent of the total 242,049 linear feet of jurisdictional drainages on the Project site. In total, the Draft LEDPA would modify 54,001 feet of on-site tributaries; convert 56,291 linear feet of tributary channel to buried storm drain; install 69,913 linear feet of bank stabilization; and provide three bridges and 13 culvert tributary road crossings. For comparative purposes, the tributary modification characteristics of Draft EIS/EIR Alternatives 2 and 3 are summarized in the table provided below. The comparison indicates that the amount of drainage to be preserved under the Draft LEDPA would be increased, and the amount of tributary to be converted to buried storm drain would be decreased when compared to Alternatives 2 and 3. Other modifications to tributaries resulting from implementation of the Draft LEDPA would fall within the range of modifications evaluated for Alternatives 2 and 3. The analysis of geomorphology and riparian resources provided in the Draft EIS/EIR concluded that impacts of Alternatives 2 and 3 would be reduced to a less-than-significant level with implementation of proposed mitigation measures. Therefore, the impacts of the Draft LEDPA also would be reduced to a less-than-significant level with implementation of the recommended mitigation measures. Please refer to revised **Section 4.2**, Geomorphology and Riparian Resources, of the Final EIS/EIR for a complete discussion of the geomorphology-related impacts under Alternative 3, which is the alternative most similar to the Draft LEDPA.

	EIS/EIR Alt 2	**EIS/EIR Alt 3**	**Draft LEDPA**
Tributary drainage preserved (lf)	126,434	130,314	131,769
Tributary drainage modified (lf)	55,770	51,725	54,001
Tributary drainage converted to buried storm drain (lf)	59,845	60,010	56,291
Tributary bank stabilization (lf)	75,428	67,868	69,913
Tributary road crossings (bridges/culverts)	0/15	3/12	3/13

5.9.3 Water Resources

The Draft LEDPA, which would facilitate development within the Specific Plan site and not change the development within Entrada and VCC, would result in 21,537 dwelling units and 9.26 msf of commercial uses on the entire Project site. When compared to the proposed Project, the Draft LEDPA results in 1,073 fewer total dwelling units, and a reduction of 0.14 msf of commercial uses. This reduction in residential and commercial development would result in a corresponding reduction in water demand. The water demand of the Draft LEDPA would be similar to the water demand estimated for Draft EIS/EIR Alternative 3, which would provide a similar level of residential and commercial development on the Project site. The estimated annual water demand of the Draft LEDPA and Alternative 3 would be approximately 17,958 acre-feet, which is approximately 1,951 acre-feet less than the water demand of the proposed Project. The evaluation of water demand impacts provided in the Draft EIS/EIR indicates that the water supply requirements of the proposed Project and Alternative 3 would be adequately met using available water supplies including groundwater sources, Nickel water, and recycled water. Therefore, adequate water supplies would be available to serve development with implementation of the Draft LEDPA. Please refer to revised **Section 4.3**, Water Resources, of the Final EIS/EIR for a complete discussion of water resources impacts under Alternative 3, which is the alternative most similar to the Draft LEDPA.

5.9.4 Water Quality

The EIS/EIR determined that the short and long-term water quality impacts of the proposed Project and Alternative 3-7 would be less than significant after implementation of proposed Project design features, source control and treatment strategies, compliance with the MS4 permit, compliance with the Los Angeles County Standard Urban Stormwater Mitigation Plan (SUSMP) requirements, and implementation of mitigation measures provided in the Draft EIS/EIR. Impacts to water quality resulting from development with implementation of the Draft LEDPA would be generally similar to the impacts identified for the proposed Project and Alternative 3, and would be reduced to a less-than-significant level with implementation of identified Project design and regulatory requirements, and mitigation measures. Please refer to revised **Section 4.4**, Water Quality, of the Final EIS/EIR for a complete discussion of the water quality impacts under Alternative 3, which is the alternative most similar to the Draft LEDPA.

5.9.5 Biological Resources

Compared to the proposed Project (Alternative 2), the Draft LEDPA would reduce permanent impacts to existing vegetation and land covers by 675.9 acres (or approximately 12.1 percent). This decrease would occur across every general physiognomic category except California walnut woodland and native grassland, which would have the same impact compared to Alternative 2. The permanent impacts for the Draft LEDPA would be decreased by 43.4 acres (or 9.5 percent) for chaparral; 317.9 acres (or 9.7 percent) California annual grassland, agriculture, and developed or disturbed land; 213.1 acres (or 14.0 percent) for coastal scrub; 19.5 acres (or 20.6 percent) for broad leafed upland trees; 73.8 acres (or 35.2 percent) for riparian and bottomland habitat; and 8.9 acres (or 59.3 percent) for bog and marsh. Note also that, compared to the proposed Project, the Draft LEDPA would increase temporary loss of vegetation communities and land covers by 40.0 acres (or 16.7 percent), primarily within California annual grassland vegetation, and agricultural, developed, and disturbed land.

Compared to Alternative 3, the Draft LEDPA would reduce permanent impacts to existing vegetation and land covers by 373.6 acres (or approximately 7.1 percent). This decrease would occur across every general physiognomic category except California walnut woodland and native grassland, which would have the same impact compared to Alternative 3. The permanent impacts for the Draft LEDPA would be decreased by 29.2 acres (or 6.6 percent) for chaparral; 179.4 acres (or 5.7 percent) California annual grassland, agriculture, and developed or disturbed land; 133.0 acres (or 9.2 percent) for coastal scrub; 0.5 acres (or 0.7 percent) for broad leafed upland trees; 29.7 acres (or 17.9 percent) for riparian and bottomland habitat; and 2.8 acres (or 31.5 percent) for bog and marsh. Note also that, compared to the Alternative 3, the Draft LEDPA would decrease temporary loss of vegetation communities and land covers by 8.5 acres (or 3.4 percent) across every general physiognomic category except California walnut woodland and native grassland, which would have the same impact compared to Alternative 3.

For further information regarding the Draft LEDPA's impacts on existing vegetation and land covers, please refer to (New) **Table 5.9.5-1**. As shown, the Draft LEDPA's impacts are similar to Alternative 3.

The Draft LEDPA would increase the acreage within the spineflower preserves from 167 acres to 247 acres. Under the Draft LEDPA, the acreage of occupied spineflower habitat protected would increase from 13.88 acres under the proposed Project to 13.97 acres, while the area of impacted occupied habitat would be decreased from 6.36 acres to 5.87 acres. The Draft LEDPA would result in a greater level of spineflower protection than the proposed SCP, with increased preservation of occupied habitat and less loss when compared to the proposed Project. Impacts to spineflower, after mitigation, would be less than significant due to the increased amount of occupied and unoccupied spineflower habitat preserved. Within the preserves, spineflower management and monitoring actions would be the same as those described in the proposed SCP. For further information regarding the effects of the Draft LEDPA on the San Fernando Valley spineflower, which is similar to Alternative 3, please refer to revised **Section 4.5**, Biological Resources of the Final EIS/EIR.

(New) Table 5.9.5-1
Comparison of Impacts to General Vegetation and Land Cover Types

General Physiognomic and Physical Location[1]	Total in Project Area (acres)	Draft LEDPA RMDP Direct		Draft LEDPA Specific Plan Indirect	Alternative 2	Alternative 3	Draft LEDPA
		Perm. (acres)	Temp. (acres)	Perm. (acres)	Permanent Impacts (acres)	Permanent Impacts (acres)	Permanent Impacts (acres)
Chaparral	2,121.3	32.1	1.6	381.4	**456.9**	**442.7**	**413.5**
Scrub	4,134.7	35.4	4.1	1,275.6	**1,524.1**	**1,444.0**	**1,311.0**
Native grassland	0.6	0.0	0.0	0.0	**0.0**	**0.0**	**0.0**
Bog and marsh	22.0	6.1	2.4	0.0	**15.0**	**8.9**	**6.1**
Riparian and bottomland habitat	1,044.4	82.7	85.8	53.4	**209.9**	**165.8**	**136.1**
Broad leafed upland tree dominated	1,467.5	13.9	1.6	61.3	**94.7**	**75.7**	**75.2**
California walnut woodland	27.2	0.1	0.0	0.0	**0.1**	**0.1**	**0.1**
California annual grassland, agriculture, developed, or disturbed	4,833.1	240.5	145.9	2,734.4	**3,292.8**	**3,154.3**	**2,974.9**
Total	**13,650.7**	**410.8**	**241.4**	**4,506.1**	**5,592.8**	**5,290.5**	**4,916.9**

Notes: General physiognomic and physical location classifications are from the "List of California Terrestrial Natural Communities Recognized by the California Natural Diversity Database" (CDFG 2003).

Source: Dudek 2010

Similar to the proposed Project, the Draft LEDPA would result in potentially significant impacts to special-status plant and wildlife species. These impacts would result from injury and mortality of individuals during construction, loss or degradation of habitat on site, and secondary effects. However, unlike the proposed Project, the Draft LEDPA would not result in impacts to special-status species that would remain significant after mitigation. Impacts to the southwestern pond turtle would be less than significant with mitigation incorporated because the Draft LEDPA would reduce the loss of habitat in the River corridor and lower Potrero Canyon by omitting the proposed Potrero Canyon Road bridge. Impacts to the San Emigdio blue butterfly would be less than significant with mitigation incorporated because impacts to the colony in Potrero Canyon would be reduced by design changes that would not cause the colony to be permanently fragmented as it would be under Alternative 2.

As with the proposed Project, the Draft LEDPA would cause the Project area to be converted to an urban landscape, with loss of upland vegetation communities and associated plant and animal species. The mitigation program set forth in revised **Section 4.5**, Biological Resources, of the Final EIS/EIR would compensate for these losses by providing protected, managed habitat in perpetuity within the High Country SMA/SEA 20, the River Corridor SMA/SEA 23, and the Salt Creek area. The effects of the Draft LEDPA on special-status plants and wildlife are similar to Alternative 3; therefore, please refer to **Subsection 4.5.5** of the Final EIS/EIR for comparable data.

Under the Draft LEDPA, the effects to landscape habitat linkages would be similar to those under the proposed Project. The Salt Creek corridor would accommodate north–south wildlife movement for all species guilds, and the Santa Clara River corridor would remain viable for aquatic and low-mobility avian wildlife guilds since the two proposed bridges would not present a barrier to wildlife movement through the corridor. Unlike the proposed Project, the Draft LEDPA does not include build-out of the VCC, which would have a constraining effect on the Castaic/Halsey Corridor. Although bridges within wildlife corridors present less of an obstacle than culverts, the suitability of the affected corridors is still constrained by adjacent development. The Draft LEDPA would result in adverse but not significant impacts to wildlife landscape habitat linkages and on-site wildlife crossings. Wildlife corridor movement constraints of the proposed Project and the Draft LEDPA would be reduced to a less-than-significant level with implementation of proposed mitigation measures. For a more complete discussion of the effects of the Draft LEDPA, which is similar to Alternative 3, on wildlife movement, please refer to revised **Section 4.5**, Biological Resources, of the Final EIS/EIR. Within that section, **Tables 4.5-23** and **4.5-74** summarize comparable impacts and significance findings related to wildlife habitat linkages, movement corridors, and crossings.

In consideration of the above factors, and particularly because the Draft LEDPA would substantially reduce impacts to the Santa Clara River and Potrero Canyon by eliminating the proposed bridge across the River at Potrero Canyon Road, this alternative would have less impact on biological resources when compared with both the proposed Project and Alternative 3.

5.9.6 Jurisdictional Waters and Streams

The analysis provided in the Draft EIS/EIR concluded that impacts to the jurisdictional waters and streams of the Santa Clara River and its on-site tributaries resulting from implementation of the proposed Project and Alternative 3-7 would be reduced to a less-than-significant level with the proposed mitigation

measures. The Draft LEDPA would result in development on the Project site that is similar to the development proposed under Draft EIS/EIR Alternative 3. For comparative purposes, overall impacts to waters and streams resulting from Alternative 2 and Alternative 3/Draft LEDPA are summarized in the table provided below.

This comparison indicates that when compared to existing conditions, Alternative 3/Draft LEDPA would result in the net permanent loss of 7.7 acres of wetlands and a gain of 95.6 acres of waters of the United States. In addition, Alternative 3/Draft LEDPA would result in a net gain of 185.3 HARC-AW Score Units when compared to existing conditions. As compared to the proposed Project, Alternative 3/Draft LEDPA would provide 80.4 additional acres of Corps jurisdiction, 12.8 acres fewer impacts to jurisdictional wetlands, and increase the Project site's overall HARC AW score by 158.2 units above the proposed Project. Under Alternative 3/Draft LEDPA, mitigation for temporal losses of stream function would not require creation of off-site mitigation areas, as sufficient mitigation acreage would be available on site. Off-site mitigation for temporal losses of stream function would be required for the proposed Project (Alternative 2). Please refer to revised **Section 4.6**, Jurisdictional Waters and Streams, of the Final EIS/EIR for a complete discussion of impacts to jurisdictional waters/streams under Alternative 3, which is the alternative most similar to the Draft LEDPA.

	Existing Condition (Ac)	EIS/EIR Alt 2 (Ac) (change compared to existing conditions)	EIS/EIR Alt 3/Draft LEDPA (Ac) (change compared to existing conditions)
Waters, including wetlands (acres)	660.1	675.5 [+15.3]	727.5 / 755.8 [+67.4 / +95.7]
Wetlands (acres)	276.9	256.0 [-20.5]	267.7 / 269.3 [-9.2 / -7.7]
HARC AW total score (change from existing conditions)	0	+27.1	+84.0 / +185.3

5.9.7 Air Quality

The analysis provided in the Draft EIS/EIR concluded that the proposed Project and Alternatives 3-7 would result in significant unavoidable short-term construction-related air emission impacts. Each Project alternative also would result in significant and unavoidable long-term operation emissions. When compared to the proposed Project, the Draft LEDPA would provide 1,073 fewer total dwelling units, and a reduction of 0.14 msf of commercial uses. This reduction in development would incrementally reduce short- or long-term air quality impacts, but not to a less-than-significant level. Therefore, similar to the proposed Project and each of the project alternatives, the short- and long-term air quality impacts of the Draft LEDPA would be significant and unavoidable, even after incorporation of all feasible mitigation measures. Please refer to revised **Section 4.7**, Air Quality, of the Final EIS/EIR for a complete discussion of the air quality impacts under Alternative 3, which is the alternative most similar to the Draft LEDPA.

5.9.8 Traffic

The EIS/EIR determined that the traffic impacts of the proposed Project and Alternative 3-7 would be reduced to a less-than-significant level with implementation of proposed mitigation measures. The analysis provided in the Draft EIS/EIR indicates that the proposed Project would generate approximately 408,718 average daily trips, and that Alternative 3 would generate approximately 398,822 average daily trips. The reduction in vehicle trips occurs because Alternative 3 would provide fewer residences and a reduction in commercial square footage when compared to the proposed Project.

The development characteristics of the Draft LEDPA and Alternative 3 are similar; therefore, the Draft LEDPA and Alternative 3 would have similar traffic generation characteristics. In addition, the Project site roadway network and circulation patterns under the Draft LEDPA and Alternative 3 would be similar because both development scenarios would include bridges over the Santa Clara River at Commerce Center Drive and at Long Canyon, and both alternatives would omit the Potrero Canyon Road bridge across the River. Therefore, similar to the EIS/EIR analysis of traffic impacts for Alternative 3, the traffic impacts of the Draft LEDPA would be reduced to a less-than-significant level with implementation of identified mitigation measures. Please refer to revised **Section 4.8**, Traffic, of the Final EIS/EIR for a complete discussion of the traffic impacts of Alternative 3, which is the alternative most similar to the Draft LEDPA.

5.9.9 Noise

The analysis provided in the Draft EIS/EIR concluded that short-term construction noise impacts resulting from implementation of the proposed Project and Alternative 3-7 would occur primarily due to pile driving for bridge construction and from other construction-related activities such as the operation of earth-moving equipment. Similar to the proposed Project and Alternative 3, the Draft LEDPA would result in a significant and unavoidable short-term noise impact associated with pile driving necessary to construct the Commerce Center Drive bridge. This impact would affect the western portion of the Travel Village RV Park, where construction noise threshold standards established by the Los Angeles County Noise Ordinance would be exceeded. Mitigation measures adopted as part of the previously approved Specific Plan would minimize the effects of this short-term noise impact, but would not reduce the impact to a less-than-significant level.

Traffic generated by the proposed Project and the alternatives to the Project would result in significant and unavoidable long-term traffic noise impacts along specified roadways located in the Project area. The reduction in residential and commercial site development under the Draft LEDPA would incrementally reduce project-generated traffic and result in a corresponding decrease in off-site traffic noise impacts. However, the traffic noise reductions under the Draft LEDPA would not be sufficient to avoid the significant and unavoidable traffic noise impacts of the proposed Project or the impacts of the Project alternatives. Therefore, the Draft LEDPA also would result in significant and unavoidable long-term traffic noise impacts. Similar to the proposed Project and Alternative 3, other long-term noise impacts associated with the Draft LEDPA would be reduced to a less-than-significant level with implementation of mitigation measures identified in the Draft EIS/EIR. Please refer to **Section 4.9**, Noise, of the Draft EIS/EIR for a complete discussion of the noise impacts of Alternative 3, which is the alternative most similar to the Draft LEDPA.

5.9.10 Cultural Resources

Implementation of the Draft LEDPA would result in the development of RMDP infrastructure similar to the facilities identified in the Draft EIS/EIR for Alternative 3. The evaluation of cultural resource impacts provided in the Draft EIS/EIR determined that the construction of infrastructure facilities under Alternative 3 would not result in significant impacts to known cultural resources. The EIS/EIR also determined that subsequent urban development on the Project site under Alternative 3 would have the potential to result in significant impacts to two known cultural resource sites, and have the potential to impact previously undetected cultural resources. With implementation of proposed mitigation measures, however, the potential for impacts to known and previously undetected cultural resources would be reduced to a less-than-significant level. The development characteristics of the Draft LEDPA would be similar to Alternative 3, and the potential for Alternative 3 to result in significant impacts to cultural resources would be reduced to a less-than-significant level with implementation of proposed mitigation measures. Therefore, the potential impacts of Draft LEDPA also would be reduced to a less-than-significant level by the proposed mitigation measures. Please refer to revised **Section 4.10**, Cultural Resources, of the Final EIS/EIR for a complete discussion of cultural resources impacts under Alternative 3, which is the alternative most similar to the Draft LEDPA.

5.9.11 Paleontological Resources

The Draft LEDPA would result in development characteristics similar to Draft EIS/EIR Alternative 3. The EIS/EIR determined that grading operations in specified geologic formations under Alternative 3 would have a moderate to high potential for both direct and indirect impacts to paleontological resources. This impact, however, would be reduced to a less-than-significant level with implementation of proposed mitigation measures. Therefore, the potential impacts of Draft LEDPA also would be reduced to a less-than-significant level by the proposed mitigation measures. Please refer to revised **Section 4.11**, Paleontological Resources, of the Final EIS/EIR for a complete discussion of the paleontological impacts under Alternative 3, which is the alternative most similar to the Draft LEDPA.

5.9.12 Agricultural Resources

The EIS/EIR determined that the proposed Project and Alternatives 3-7 would convert soils located on the Project site that have been designated as prime, unique, and of statewide importance to non-agricultural uses. The conversion of these agricultural soils would result in a significant and unavoidable impact. In addition, all existing agricultural operations located on the Project site would be discontinued over time with development of the Specific Plan. The Draft LEDPA would result in the conversion of important agricultural soils to non-agricultural uses, and also result in the removal of agricultural operations from the Specific Plan site. The significant and unavoidable impacts of the Draft LEDPA would be similar to the impacts of the proposed Project and Alternative 3. Please refer to revised **Section 4.12**, Agricultural Resources, of the Final EIS/EIR for a complete discussion of the agricultural resources impacts under Alternative 3, which is the alternative most similar to the Draft LEDPA.

5.9.13 Geology and Geologic Hazards

Similar to the proposed Project, the Draft LEDPA would result in urban development on the Project site, and the development would be subject to significant geologic hazard impacts. The Draft LEDPA would have development characteristics similar to those of Draft EIS/EIR Alternative 3, and the geologic hazard impacts associated with that alternative would be reduced to a less-than-significant level with the implementation of existing building requirements and proposed mitigation measures. Therefore, geologic hazard impacts of the Draft LEDPA also would be reduced to a less-than-significant level with implementation of identified mitigation measures. Please refer to revised **Section 4.13**, Geology and Geologic Hazards, of the Final EIS/EIR for a complete discussion of the geologic impacts under Alternative 3, which is the alternative most similar to the Draft LEDPA.

5.9.14 Land Use

Similar to the proposed Project, the Draft LEDPA would result in the development of urban uses and implementation of a Spineflower Conservation Plan on the Project site. Urban development and the spineflower preserves would be similar to the characteristics of Alternative 3, however, the Draft LEDPA would provide 621 fewer residential units than Alternative 3, and result in a 0.07 msf reduction in commercial square footage. The Draft LEDPA would provide a total of 247 acres of spineflower preserve area, compared to 221 acres under Alternative 3.

Land uses that would be established with implementation of the Draft LEDPA would be similar to those associated with Alternative 3 and be consistent with existing zoning designations, except for the establishment of a spineflower preserve in the Entrada planning area. Similar to Alternative 3, the preserve proposed for the Entrada planning area would conflict with that site's current agricultural zoning, which would result in a significant and unavoidable land use impact. Please refer to **Section 4.14**, Land Use, of the Draft EIS/EIR for a complete discussion of the land use impacts under Alternative 3, which is the alternative most similar to the Draft LEDPA.

5.9.15 Visual Resources

The proposed Project and Alternatives 3-7 would result in significant and unavoidable impacts to visual resources resulting from the development of bridges over the Santa Clara River and the conversion of the Project site to urban land uses. Similar to Alternative 3, the Draft LEDPA would result in the development of bridges across the Santa Clara River at Long Canyon and Commerce Center Drive. The visual impacts of on-site bridge development resulting from Alternative 3 and the Draft LEDPA would be reduced somewhat when compared to the impacts of the proposed Project, as the Project also would include the development of a new bridge over the Santa Clara River at Potrero Canyon. Although Alternative 3 and the Draft LEDPA would reduce the number of new bridges across the River, the visual resource impact of the Draft LEDPA and Alternative 3 would remain significant and unavoidable. The Draft LEDPA also would result in urban development on the Project site similar to the development characteristics of Alternative 3. Despite the reduction in development when compared to the proposed Project, the Draft EIS/EIR determined that the visual impacts of Alternative 3 would result in a significant and unavoidable impact. The visual resource impacts of the Draft LEDPA would be similar to the impacts of Alternative 3, and result in a significant and unavoidable visual resource impact. Please refer

to **Section 4.15**, Visual Resources, of the Draft EIS/EIR for a complete discussion of the visual resources impacts under Alternative 3, which is the alternative most similar to the Draft LEDPA.

5.9.16 Parks, Recreation, and Trails

Under the Draft LEDPA, the parks and recreation facilities provided on the Project site would be similar to the facilities proposed for Alternative 3. The analysis provided in the Draft EIS/EIR concluded that the proposed Project and Alternative 3 would not result in significant park, recreation and trail impacts because the facilities to be provided on the Project site would exceed County standards. Please refer to **Section 4.16**, Parks, Recreation, and Trails, of the Draft EIS/EIR for a complete discussion of the parks and recreation impacts under Alternative 3, which is the alternative most similar to the Draft LEDPA.

5.9.17 Hazards, Hazardous Materials, and Public Safety

Under the Draft LEDPA, construction activities such as the transport, storage, and use of hazardous materials would have the potential to result in short-term impacts that are generally similar to impacts that would result from the proposed Project and Alternative 3. The Draft LEDPA also would result in a demand for emergency response services similar to the requirements of Alternative 3. With implementation of mitigation measures identified in the Draft EIS/EIR, hazard-related impacts of the proposed Project, Alternative 3, and the Draft LEDPA would be reduced to a less-than-significant level. Please refer to revised **Section 4.17**, Hazards, Hazardous Materials, and Public Safety, of the Final EIS/EIR for a complete discussion of such impacts under Alternative 3, which is the alternative most similar to the Draft LEDPA.

5.9.18 Public Services

Similar to the proposed Project, Alternative 3 and the Draft LEDPA would result in build-out of the VCC planning area, and partial build-out of the Specific Plan and Entrada planning areas. The resulting urban development and corresponding demand for public services such as law enforcement, fire protection, medical services, libraries, and schools would be similar to the impacts identified for Alternative 3. The evaluation of public service impacts provided in the Draft EIS/EIR concluded that the impacts of the proposed Project and the impacts of Alternative 3 would be reduced to a less-than-significant level with implementation of proposed mitigation measures. The development characteristics of the Draft LEDPA would be similar to Alternative 3; therefore, the public service impacts of the Draft LEDPA also would be reduced to a less-than-significant level with implementation of the identified mitigation measures. Please refer to **Section 4.18**, Public Services, of the Draft EIS/EIR for a complete discussion of the public services impacts under Alternative 3, which is the alternative most similar to the Draft LEDPA.

5.9.19 Socioeconomics and Environmental Justice

No communities in the Project area qualify as minority- or low-income populations; and therefore, no significant socioeconomic and environmental justice impacts would occur as a result of implementing the proposed Project, Alternatives 3-7, or the Draft LEDPA. Please refer to **Section 4.19**, Socioeconomics and Environmental Justice, of the Draft EIS/EIR for a complete discussion of the socioeconomics and

environmental justice impacts under Alternative 3, which is the alternative most similar to the Draft LEDPA.

5.9.20 Solid Waste Services

The analysis provided in the Draft EIS/EIR concluded that short- and long-term waste generation by the proposed Project and Alternatives 3-7 would result in a significant and unavoidable solid waste disposal impact. The solid waste generation and disposal characteristics of the Draft LEDPA would be similar to the waste generation/disposal proposed under Alternative 3. As a result, the Draft LEDPA also would result in a significant and unavoidable impact to solid waste services. Please refer to revised **Section 4.20**, Solid Waste Services, of the Final EIS/EIR for a complete discussion of such impacts under Alternative 3, which is the alternative most similar to the Draft LEDPA.

5.9.21 Global Climate Change

Due to similar development characteristics, Draft EIS/EIR Alternative 3 and the Draft LEDPA would result in approximately 258,303 tonnes of carbon dioxide equivalent emissions per year. The Draft EIS/EIR concluded that the emissions associated with the implementation of Alternative 3 would not impede California's achievement of the greenhouse gas emission reduction target for year 2020, as codified in the Global Warming Solutions Act of 2006 (AB 32). Therefore, emissions of carbon dioxide and other greenhouse gases by the Draft LEDPA, which would be similar to the emissions identified under Alternative 3, would not result in a significant climate change impact. Please refer to revised **Section 8.0**, Global Climate Change, of the Final EIS/EIR for a complete discussion of the global climate change-related impacts under Alternative 3, which is the alternative most similar alternative to the Draft LEDPA.

5.10 REVISED IMPACTS SUMMARY

For comparative purposes, the information previously presented in this section is provided in tabular form in (Revised) **Table 5.0-5**, below. The revised table contains symbols that illustrate the level of impact of each alternative, including the Draft LEDPA, compared to the proposed Project. The symbols range from "much greater impact" to "much less impact." Although numeric thresholds have been assigned to each symbol, the thresholds are based on a reasonableness standard and not on a precise mathematical determination.

(Revised) Table 5.0-5
Comparison Of Alternatives

	Impacts	No Project	Proposed Project	Alternative 3	Alternative 4	Alternative 5	Alternative 6	Alternative 7	Draft LEDPA	Impacts Less Than Significant After Incorporation of EIS/EIR Mitigation?
4.1	Hydrology	○	●	◎	◎	◎	◎	◉	◎	Yes, all alternatives
4.2	Geomorphology and Riparian Resources	✹	●	◎	◎	◎	◉	○	◎	Yes, all alternatives
4.3	Water Resources	○	●	◉	◉	◉	⊙	○	◉	Yes, all alternatives
4.4	Water Quality	○	●	●	●	●	●	●	●	Yes, all alternatives
4.5	Biological Resources	○	●	◉	◉	◉	⊙	○	◉	No, for Alternative 2
4.6	Jurisdictional Waters and Streams	○	●	◉	⊙	⊙	⊙	○	◉	Yes, all alternatives
4.7	Air Quality	○	●	◉	◉	◉	⊙	○	◉	No, all alternatives
4.8	Traffic	○	●	●	◉	○	✹	✹	●	Yes, all alternatives
4.9	Noise	○	●	◉	◉	◎	⊙	○	◉	No, all alternatives
4.10	Cultural Resources	○	●	●	●	●	●	●	●	Yes, all alternatives
4.11	Paleontological Resources	○	●	◎	◎	◉	⊙	○	◎	Yes, all alternatives
4.12	Agricultural Resources	○	●	●	●	●	●	●	●	No, all alternatives
4.13	Geology and Geologic Hazards	○	●	◎	◎	◉	◉	⊙	◎	Yes, all alternatives
4.14	Land Use	✦	●	◎	✹	✹	✦	✦	◎	No, all alternatives
4.15	Visual Resources	○	●	●	◎	◉	⊙	○	●	No, all alternatives
4.16	Parks, Recreation, and Trails	○	●	●	◎	◎	◎	◎	●	Yes, all alternatives
4.17	Hazards, Hazardous Materials, and Public Safety	○	●	◎	◎	◉	◉	✹	◎	No for Alternative 7 only
4.18	Public Services	○	●	◎	◎	◉	◉	⊙	◎	Yes, all alternatives
4.19	Socioeconomics and Environmental Justice	○	●	●	●	●	●	●	●	Yes, all alternatives
4.20	Solid Waste	○	●	◎	◉	◉	⊙	○	◎	No, all alternatives
8.0	Global Climate Change	○	●	◎	◉	◉	◉	○	◎	Yes, all alternatives

Notes:
✦ Much Greater Impact than proposed Project
✹ Greater Impact than proposed Project
● Same Impact as proposed Project (±.01%)
◎ Substantially Similar Impact When Compared to the proposed Project (±.01 – 5%)
◉ Slightly Less Impact Compared to the proposed Project (5.1 -14.9% Reduction)
⊙ Less Impact Compared to the proposed Project (15 - 25% Reduction)
○ Much Less Impact Compared to the proposed Project (> 25% Reduction)
● Not applicable, as the proposed Project cannot be compared to itself
Source: URS (2008).

5.11 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an environmentally superior alternative. The determination of an environmentally superior alternative is based on consideration of how the alternative either avoids or reduces significant impacts to the environment. Because Alternative 1 (the "No Action/No Project" alternative) would involve no development on the Project site, thereby avoiding all potential impacts of the proposed Project, this alternative would be the environmentally superior alternative.

Section 15126.6, subdivision (e)(2), of the State CEQA Guidelines states that, "[i]f the environmentally superior alternative is the no Project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." Among the other alternatives, Alternative 7 is considered the environmentally superior alternative because it would result in the lowest level of environmental impacts across the majority of environmental resource categories. The relative impacts of all eight alternatives are presented in **Table 5.0-1**. This table illustrates that Alternative 7 has the lowest level of environmental impact in nearly all of the environmental resource categories.

5.12 ENVIRONMENTALLY PREFERABLE ALTERNATIVE AND PREFERRED ALTERNATIVE

Under the CEQ regulations, a federal agency is required to identify an environmentally preferable alternative in its Record of Decision (ROD), 40 C.F.R. § 1505.2, subdivision (b), and the Corps' preferred alternative in the Final EIS/EIR, 40 C.F.R. § 1502.14, subdivision (e). The Corps may not issue its ROD until thirty days after notice of the Final EIS/EIR is published in the Federal Register. (40 C.F.R. § 1506.10, subd. (b).)

To ensure that the public is fully informed about the Corps' views, the Final EIS/EIR identifies both the Corps' Environmentally Preferable Alternative and Preferred Alternative. Prior to issuing the ROD, the Corps will, among other things, conduct additional review of the information in the administrative record, make its findings under the CWA section 404(b)(1) Guidelines, comply with the CWA section 404, subdivision (q) procedures, consider the findings of the USFWS under Section 7 of the ESA, and review any comments received on the Final EIS/EIR. The Corps will then make a final decision on whether to issue or deny the CWA section 404 permit. Consequently, the Corps' identification of the Preferred Alternative is not the final permit decision.

Environmentally Preferable Alternative. Under the NEPA analysis, the Corps ranks Alternative 1 (the No Action/No Project alternative) as the environmentally preferable alternative because it has the fewest overall environmental impacts, including avoidance of all discharges of fill material in waters of the United States. Although Alternative 1 would result in fewer unavoidable significant adverse impacts or mitigated impacts than the proposed Project or Alternatives 3 through 7 and the Draft LEDPA, it would not meet the purpose and need under NEPA.

Preferred Alternative. Because the proposed Project involves discharges of fill material into waters of the United States, the Corps is required to comply with USEPA's CWA section 404(b)(1) Guidelines (Guidelines) promulgated at 40 C.F.R. Part 230. The Guidelines prohibit the Corps from issuing a permit unless it is the least environmentally damaging practicable alternative (LEDPA), and "practicable" is

defined in terms of cost, logistics, and technology in light of the overall project purpose. In order to comply with the Guidelines, the Corps typically analyzes alternatives that reduce impacts to aquatic resources through alternative configurations, locations, construction methods, sizes, *etc*. The Guidelines provide that for actions subject to NEPA, the analysis of alternatives required for NEPA environmental documents will in most cases provide the information for the evaluation of alternatives under the Guidelines. On occasion, the NEPA document may not have considered the alternatives in sufficient detail to respond to the requirements of the Guidelines and, therefore, it is necessary to provide the additional information. Further, the Guidelines require an applicant for a Department of the Army permit to take all appropriate and practicable steps to first avoid and then minimize adverse impacts to aquatic resources, and then compensate for unavoidable adverse impacts remaining after all appropriate and practicable minimization has been undertaken. The Corps has prepared a draft 404(b)(1) alternatives analysis and has included it in **Appendix F1.0** to the Final EIS/EIR. (A final 404(b)(1) alternatives analysis will be provided with the Record of Decision.) The Corps' draft 404(b)(1) alternatives analysis draws on the analysis in the Draft EIS/EIR and evaluates further avoidance and/or minimization of Corps jurisdiction based on the sequenced approach under the Guidelines and as a result of comments received on the Draft EIS/EIR.

Based on the assessment in the draft 404(b)(1) alternatives analysis, the Corps has identified a Draft LEDPA. The Draft LEDPA shares a configuration with Alternative 3 as considered in the Draft EIS/EIR, but incorporates modifications to further reduce impacts. Under the Draft LEDPA, two of the three bridges crossing the Santa Clara River and the associated bank stabilization would be constructed (Commerce Center Drive bridge and the Long Canyon Road bridge). The Draft LEDPA would not construct Potrero Canyon Road bridge, reducing impacts to jurisdictional waters and wetlands in the Santa Clara River and lower Potrero Canyon compared to both the proposed Project and Alternative 3. In addition, a 19-acre compensatory wetland mitigation area would be implemented in lower Potrero Canyon, contiguous with the existing lower mesic meadow (cismontane alkali marsh). Two major tributary drainages (Long Canyon and Potrero Canyon) would be regraded and realigned under this alternative; however, the channels would be wider than those of the proposed Project and Alternative 3. In the three other major tributary drainages (Lion Canyon, San Martinez Grande Canyon, and Chiquito Canyon), the Draft LEDPA would incorporate additional areas of preserved jurisdiction with limited channel grading to expand the drainage and adjacent riparian areas and realign their banks to accommodate adjoining infrastructure and development area.

The Draft LEDPA's impacts are the same as Alternative 3 with respect to water quality; traffic; cultural resources; agricultural resources; visual resources; parks, recreation and trails; and socioeconomics and environmental justice. The Draft LEDPA and Alternative 3 have slightly less impacts compared to the proposed Project (Alternative 2) with respect to water resources; biological resources; jurisdictional waters and streams; air quality; and noise. The Draft LEDPA and Alternative 3 also have substantially similar impacts when compared to the proposed Project (Alternative 2) with respect to surface water hydrology and flood control; geomorphology and riparian resources; paleontological resources; geology and geologic hazards; land use; hazards, hazardous materials, and public safety; public services; solid waste services; and global climate change.

Compared to the proposed Project, the Draft LEDPA reduces impacts to jurisdictional areas by approximately 25 percent and expands the spineflower preserves within the RMDP area. Permanent impacts to waters of the United States would be reduced from approximately 93.3 acres to 66.3 acres, resulting in approximately 90 percent avoidance of permanent impacts to waters of the United States in the RMDP site (the RMDP site supports a total of approximately 660.1 acres of waters of the United States, including wetlands). The Draft LEDPA would also provide larger riparian corridors within the five major tributaries in the RMDP area and would expand the spineflower preserves within the RMDP area.

The Draft LEDPA would increase the acreage within the spineflower preserves from 167 acres to 247 acres. Under the Draft LEDPA, the acreage of occupied spineflower habitat protected would increase from 13.88 acres under the proposed Project to 13.97 acres, while the area of impacted occupied habitat would be decreased from 6.36 acres to 5.87 acres. The Draft LEDPA would result in a greater level of spineflower protection than the proposed SCP, with increased preservation of occupied habitat and less loss when compared to the proposed Project.

The Draft LEDPA's specific, minor variations to Alternative 3, and the associated analysis of the reduced impacts, are described in detail in **Subsection 5.9**, above. The Corps' draft 404(b)(1) alternatives analysis, which is found in **Appendix F1.0** of the Final EIS/EIR, also contains an overview of the Draft LEDPA, as well as an environmental analysis of the Draft LEDPA in the context of the Guidelines.

The Corps has selected the Draft LEDPA as its Preferred Alternative. Based on the current analysis, the Preferred Alternative accomplishes the overall project purpose while avoiding special aquatic sites to the extent practicable taking into account costs, logistics and technology, without having any other adverse environmental impacts, and has less overall impacts to aquatic resources as compared to any of the other alternatives identified as practicable in the analysis.

For additional information concerning the differences between the various alternatives, please see revised **Section 3.0** of the Final EIS/EIR.

~~5.10 ENVIRONMENTALLY SUPERIOR ALTERNATIVE~~

~~CEQA requires the identification of an environmentally superior alternative. The determination of an environmentally superior alternative is based on consideration of how the alternative either avoids or reduces significant impacts to the environment. Because Alternative 1 (the "No Action/No Project" alternative) would involve no development on the Project site, thereby avoiding all potential impacts of the proposed Project, this alternative would be the environmentally superior alternative.~~

~~Section 15126.6, subdivision (e)(2), of the State CEQA Guidelines states that, "[i]f the environmentally superior alternative is the no Project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." Among the other alternatives, Alternative 7 is considered the environmentally superior alternative because it would result in the lowest level of environmental impacts across the majority of environmental resource categories. The relative impacts of all seven alternatives are presented in **Table 5.0-1**. This table illustrates that Alternative 7 has the lowest level of environmental impact in nearly all of the environmental resource categories.~~

~~5.11 PREFERRED ALTERNATIVE~~

~~The Council on Environmental Quality (CEQ) regulations for implementing NEPA (40 C.F.R. §1502.14, subd. (e)) require that a draft EIS identify the lead agency's preferred alternative or alternatives, if one or more exists. The Corps has not yet identified a preferred alternative among the alternatives evaluated; and, therefore, no preferred alternative is identified in this Draft EIS/EIR. A preferred alternative will be selected following receipt and consideration of public comments on this EIS/EIR, and will be identified in the Final EIS/EIR as required by the CEQ regulations.~~