

6.0 Project Alternatives



6.0 PROJECT ALTERNATIVES

1. INTRODUCTION

CEQA Guidelines Section 15163(b) states that a Supplemental EIR (SEIR) need contain only the information necessary to make the previous EIR adequate for the project as revised. Generally, the SEIR is required to evaluate only the changes in the project, changes in circumstances, or new information that led to the preparation of the supplement to the EIR.

This SEIR incorporates by reference and relies on the range of alternatives and associated analysis provided in the State-certified EIR.¹ The State-certified Final EIR Alternatives analysis was included in Final EIR Chapter 5 and is available online at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=21421>. As discussed further below, the State-certified EIR considered a number of on-site and off-site alternatives to the originally proposed project, including a no project alternative and six “build” alternatives.

The Modified Project involves refinements to the land use allocation for Entrada South and Project design measures that change the ratio of residential to non-residential uses and enhance environmental protections in both the Entrada South and VCC Planning Areas. These modifications do not change the analysis of alternatives provided in the State-certified EIR, as summarized below. However, in accordance with CEQA, a new no project alternative is addressed herein: the No Modified Project Alternative. CEQA Guidelines Section 15126.6(e) requires the analysis of a no project alternative, and CEQA

¹ *The State-certified EIR considered alternatives pursuant to CEQA Guidelines Section 15126.6, which requires an assessment of a reasonable range of alternatives to a project. Under CEQA, the alternatives must meet most of the objectives and avoid or substantially lessen potentially significant environmental impacts associated with the project. CEQA also requires that an EIR assess the No Project alternative, providing an assessment to what would reasonably be expected to occur if the project were not implemented. Section 15126.6 (b) of the CEQA Guidelines emphasizes that the selection of project alternatives should be based primarily on the ability of an alternative to reduce significant impacts associated with the proposed project, “even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” According to CEQA Guidelines Section 15126.6 (f), an EIR need not consider every conceivable alternative to a project, but rather the range of alternatives should be guided by a “rule of reason,” such that only those alternatives necessary to permit a reasoned choice are analyzed.*

Guidelines Section 15126.6(f)(2) requires an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the no project alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives considered.

2. ALTERNATIVES ANALYZED IN THE STATE-CERTIFIED EIR

The State-certified EIR prepared for the Newhall Ranch Resource Management and Development Plan and Spineflower Conservation Plan (RMDP/SCP) project analyzed seven alternatives—a no project alternative and six “build” alternatives, including a Draft Least Environmentally Damaging Practicable Alternative (LEDPA) pursuant to the National Environmental Policy Act (NEPA). A summary of the alternatives previously analyzed in the State-certified EIR is provided below. Within the State-certified EIR, Alternative 2 represented the proposed project.

- **State-Certified EIR—Alternative 1 (No Action/No Project).** Under this alternative, none of the RMDP infrastructure or facilitated development would occur, none of the proposed spineflower preserves would be established, and none of the open space or facilitated development (e.g., buildout of residential and commercial development) within the proposed project area would occur as contemplated by the proposed project.
- **State-Certified EIR—Alternative 3 (Elimination of Planned Potrero Bridge and Additional Spineflower Preserves).** This alternative considered a variation of the proposed project (Alternative 2). Under this alternative, two bridges across the Santa Clara River and associated bank stabilization would be constructed, including the Commerce Center Driver bridge (already approved by the U.S. Army Corps of Engineers [Corps] and the California Department of Fish and Wildlife [CDFW, formerly 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 within the Entrada South Planning Area. This alternative would provide a total of 221.8 acres of spineflower preserves and protect 77.5 percent of the cumulative area occupied by spineflower in the project area. This alternative would facilitate development within the Specific Plan area, VCC Planning Area, and Entrada South Planning Area, including 21,558 residential units and 9.33 million square feet (msf) of commercial/industrial/ business park floor area.

- **State-Certified EIR—Alternative 4 (Elimination of Planned Potrero Bridge and Addition of VCC Spineflower Preserve).** This alternative considered a variation of the proposed project (Alternative 2). Under this alternative, two bridges across the Santa Clara River and the associated bank stabilization would be constructed, including the Commerce Center Drive bridge (already approved by the Corps and CDFW [formerly 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 within the Entrada South Planning Area. A preserve also would be established within the VCC Planning Area. This alternative would provide a total of 259.9 acres of spineflower preserves and protect 82.5 percent of the cumulative area occupied by spineflower in the project area. This alternative would facilitate development within the Specific Plan area and the Entrada South 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.
- **State-Certified EIR—Alternative 5 (Widen Tributary Drainages and Addition of VCC Spineflower Preserve).** Three bridges across the Santa Clara River and associated bank stabilization would be constructed under Alternative 5, as under 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 Alternative 2. Additional spineflower preserve acreage would be established in the Specific Plan's Airport Mesa, Potrero Canyon, and Grapevine Mesa areas and within the Entrada South Planning Area. A preserve also would be established within the VCC Planning Area. This alternative would provide a total of 338.6 acres of spineflower preserves and protect 84.2 percent of the cumulative area occupied by spineflower in the project area. This alternative would facilitate development within the Specific Plan area and the Entrada South 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.
- **State-Certified EIR—Alternative 6 (Elimination of Planned Commerce Center Drive Bridge and Maximum Spineflower Expansion/Connectivity).** This alternative considered a variation of the proposed project (Alternative 2). Under this alternative, two bridges across the Santa Clara River and associated bank stabilization would be constructed, including the Potrero Canyon Road bridge (extended span similar to the 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 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 area—four preserves; Entrada South Planning Area—one preserve; and VCC Planning Area—one preserve). This alternative would significantly increase preserve acreage and provide a total of 891.2 acres of spineflower preserves, protecting 88.5 percent of the cumulative area occupied by spineflower in the project area. This alternative would facilitate development within the Specific Plan area and the Entrada South 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.

- **State-Certified EIR—Alternative 7 (Avoidance of 100-Year Floodplain, Elimination of Two Planned Bridges, and Avoidance of Spineflower).** This alternative considered a variation of the proposed project (Alternative 2). Under this alternative, only one bridge across the Santa Clara River would be constructed, located at Long Canyon Road. The Potrero Canyon Road bridge and the previously 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 Alternative 2, would be preserved. Alternative 7 was designed to achieve maximal 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 660.6 acres of spineflower preserves, protecting 98.2 percent of the cumulative area occupied by spineflower in the project area. This alternative would facilitate development within the Specific Plan area and the Entrada South 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.
- **State-Certified EIR—Draft LEDPA pursuant to NEPA (Elimination of Planned Potrero Bridge, Additional Spineflower Preserve Acreage, and Larger Riparian Areas in Tributary Drainages).** Because the State-certified EIR was also an environmental impact statement (EIS) prepared pursuant to NEPA, it also identified the LEDPA. The Draft LEDPA was a modified version of Alternative 3 that included additional avoidance of jurisdictional waters along the Santa Clara River and tributaries; increased spineflower preserve acreage in the Potrero, San Martinez Grande, Grapevine Mesa, and Airport Mesa areas; and larger riparian corridors within five major tributaries. The development facilitated within the Entrada and VCC Planning Areas would be the same under the Draft

LEDPA as under the proposed project. This alternative also would involve spineflower preserve acreage of 247 acres, including 27.02 acres within the Entrada South Planning Area, thereby protecting 70.4 percent of the cumulative area occupied by spineflower in the project area. In addition, two of the three bridges crossing the Santa Clara River and the associated bank stabilization would be constructed, the majority of two existing drainages would be filled and modified so there would be no loss of Corps jurisdiction, and limited channel grading would occur in three other major tributary drainages in order to expand the drainages and adjacent riparian areas and realign their banks.

As evaluated in the State-certified EIR, development of the alternatives outlined above would result in equal or reduced impacts across most impact categories compared to the RMDP/SCP project (Alternative 2). The State-certified EIR identified Alternative 7 (Avoidance of 100-Year Floodplain, Elimination of Two Planned Bridges, and Avoidance of Spineflower) as the environmentally superior alternative because it would result in the lowest level of environmental impacts across the majority of environmental resource categories.² The State-certified EIR also identified the Draft LEDPA (Elimination of Planned Potrero Bridge, Additional Spineflower Preserve Acreage, And Larger Riparian Areas In Tributary Drainages) as the federally preferred alternative under NEPA because the Clean Water Act (CWA) Guidelines prohibit the Corps from issuing a permit unless it is the least environmentally damaging practicable alternative. Table 5.0-5 of the State-certified EIR presented the comparative impacts of all of the analyzed alternatives.

The State-certified EIR also evaluated three off-site alternatives (or alternative sites), which were selected from an initial list of 23 potential alternative locations, as well as a “total avoidance” alternative that assumed the requested CWA Section 404 permit would not be issued and therefore involved only the development within the Specific Plan area located outside of the jurisdictional area of the Corps. Each of these alternatives were rejected from further analysis for reasons set forth in the State-certified EIR, including insufficient land size, conflicts with other approved development entitlements, other locational concerns, increased environmental impacts compared to the proposed project (Alternative 2), and/or inability to meet the objectives/purpose and need of Alternative 2. These off-site alternatives are described in greater detail below:

- **State-Certified EIR—Temescal Ranch Alternative.** This alternative considered construction of the project at the Temescal Ranch alternative site. The Temescal Ranch alternative site is approximately 7,580 acres in size and is located in unincorporated Ventura County, northeast of the community of Piru. Lake Piru extends through the northern third of the property. The Piru recreational area

² See *State-certified EIR*, p. 5.0-71.

with lake access is located on the western side of the lake. The Santa Felicia Dam extends across the southern extent of the lake. Piru Canyon and Piru Creek traverse the central portion of the property, extending from the dam to the property's southern boundary.

- **State-Certified EIR—Hathaway Ranch Alternative.** This alternative considered construction of the project at the Hathaway Ranch alternative site. Hathaway Ranch is approximately 5,988 acres in size and is located in unincorporated Los Angeles County, generally between the Ventura County line on the west and I-5 on the east, and Hasley Canyon on the south and the Angeles National Forest on the north. Hathaway Ranch is located approximately five miles north of the project area. Topography on the Hathaway Ranch site is highly variable, with elevations ranging from approximately 1,100 feet above mean sea level (amsl) to over 2,500 amsl; very little flat land exists on this site.
- **State-Certified EIR—Newhall-Ventura Alternative.** This alternative considered construction of the project at the Newhall-Ventura alternative site. The Newhall-Ventura alternative site is located in unincorporated Ventura County, adjacent to the western boundary of the project area. The alternative site is approximately 15,000 acres in size. This irregularly shaped site is generally bound by State Route 126 (SR-126) on the north, the Santa Susana Mountains on the south, Los Angeles County on the east, and extends approximately two miles west of the community of Piru. The northwest portion of the Newhall-Ventura alternative site encompasses a portion of the Santa Clara River floodplain and extends north of SR-126. Topography on the site is highly variable, with elevations ranging from approximately 630 feet amsl in the Santa Clara River Valley to approximately 3,000 feet amsl in the Santa Susana Mountains. Lands in the river valley are generally level, with elevations rising to the south in the mountains.

As evaluated in the State-certified EIR, project development within any of the three off-site alternative locations (i.e., Hathaway Ranch, Temescal Ranch, Newhall-Ventura) would result in equal or greater impacts relative to a majority of the impact categories and would have a greater potential to result in growth-inducing impacts because none of the sites currently support infrastructure like that required to facilitate development of the project. Once that infrastructure is developed, it is likely that additional commercial and residential development would arise along new roads and utility corridors. As a result, it is anticipated that areas that are currently rural in nature would be incrementally urbanized when compared to the planned development facilitated by the project within the RMDP/SCP Project Site.

Following the release of the State-certified Final EIR and based on public comments received, CDFW (formerly CDFG) proposed modifications to the Draft LEDPA alternative to further reduce environmental impacts to biological resources and jurisdictional waters. Specifically, this alternative proposed two additional spineflower preserves and avoidance

of riparian jurisdictional resources and federally-protected wetlands in Potrero Canyon. This alternative was nearly identical to the original Draft LEDPA as it relates to the overall development footprint and did not change the development facilitated in the Entrada South and VCC Planning Areas. CDFW approved this alternative (which thus became the 2017 Project) because it would result in reduced environmental impacts when compared to the Draft LEDPA alternative. Although the final 2017 Project included enhanced environmental protections compared to the original proposed project (Alternative 2), the 2017 Project did not change the facilitated development within the Entrada South or VCC Planning Areas that was assumed for Alternative 2.

3. ANALYSIS FORMAT

The CEQA Guidelines state that the discussion of project alternatives must focus on those alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the proposed project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.³ The CEQA Guidelines further direct that the range of alternatives required in an EIR is governed by a “rule of reason,” such that only those alternatives necessary to permit a reasoned choice are addressed.⁴ In selecting project alternatives for analysis, potential alternatives must be feasible. CEQA Guidelines Section 15126.6(f)(1) states that:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries [...], and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site [...].

Furthermore, according to CEQA Guidelines Section 15126.6(c), an alternative must be evaluated to determine whether the Project objectives, identified in **Section 3.0**, Project Description, of this SEIR, would be substantially attained by the alternative.

Table 6.0-1, Summary of Proposed Modifications Compared to Alternatives Previously Analyzed, on page 6.0-9 analyzes whether the modifications associated with the Modified Project would result in changes to the analysis or conclusions related to the build alternatives evaluated in the State-certified EIR. The analysis contained in this SEIR demonstrates that the Modified Project would not result in any new or substantially more

³ CEQA Guidelines Section 15126.6(b).

⁴ CEQA Guidelines Section 15126.6(f).

severe significant impacts compared to the 2017 Project and thus would not result in any new or more severe significant impacts beyond those previously identified in the State-certified EIR. Because CEQA requires that alternatives be designed to reduce or eliminate significant impacts, in the absence of new or more severe significant impacts, no new alternatives to the Modified Project need to be evaluated in this SEIR. Nevertheless, in accordance with CEQA Guidelines Section 15126.6(e), the No Modified Project Alternative is discussed below.

**Table 6.0-1
Summary of Proposed Modifications Compared to Alternatives Previously Analyzed**

RMDP/SCP Alternatives	State-Certified EIR Analysis	Modified Project Comparison
No Action/No Project Alternative—No development alternative	The State-certified EIR considered a “no development” no project alternative. Under this no project alternative, no facilitated development of the Entrada and VCC Planning Areas would occur.	The minor modifications associated with the Modified Project with the Entrada South and VCC Planning Areas would not change the analysis of this alternative as provided in the State-certified EIR, as this alternative would eliminate the facilitated development. The minor modifications associated with the Modified Project would not alter the basis of that analysis. However, since the 2017 approvals, state legislation has further limited public agency discretion to deny housing projects. (Government Code § 66300(b)(l)(A).)
Alternative 3—Elimination of Planned Potrero Bridge and Additional Spineflower Preserves	The State-certified EIR concluded that this alternative would reduce impacts compared with the proposed RMDP/SCP project (Alternative 2).	The minor modifications associated with the Modified Project with the Entrada South and VCC Planning Areas would not change the analysis of this alternative as provided in the State-certified EIR, as this alternative proposes modifications to aspects of the 2017 Project that do not affect the development facilitated in the Entrada South and VCC Planning Areas; therefore, the minor modifications associated with the Modified Project would not alter the basis of that analysis.
Alternative 4—Elimination of Planned Potrero Bridge and Addition of VCC Spineflower Preserve	The State-certified EIR concluded that this alternative would reduce impacts compared with the Alternative 2, with the exception of land use impacts.	The minor modifications associated with the Modified Project with the Entrada South and VCC Planning Areas would not change the analysis of this alternative as provided in the State-certified EIR, as this alternative proposes modifications to aspects of the 2017 Project that would not affect the development facilitated in the Entrada South and VCC Planning Areas; therefore, the minor modifications associated with the Modified Project would not alter the basis of that analysis.
Alternative 5—Widen Tributary Drainages and Addition of VCC Spineflower Preserve	The State-certified EIR concluded that this alternative would reduce impacts compared with Alternative 2, with the exception of land use impacts.	The minor modifications associated with the Modified Project with the Entrada South and VCC Planning Areas would not change the analysis of this alternative as provided in the State-certified EIR, as this alternative proposes modifications to aspects of the 2017 Project that do not affect the development facilitated in the Entrada South and VCC Planning Areas; therefore, the minor modifications associated with the Modified Project would not conflict with the

Table 6.0-1 (Continued)
Summary of Proposed Modifications Compared to Alternatives Previously Analyzed

RMDP/SCP Alternatives	State-Certified EIR Analysis	Modified Project Comparison
		components proposed therein and would not alter the basis of that analysis..
Alternative 6—Elimination of Planned Commerce Center Drive Bridge and Maximum Spineflower Expansion/Connectivity	The State-certified EIR concluded that this alternative would reduce impacts compared with Alternative 2, with the exception of traffic and land use impacts.	The minor modifications associated with the Modified Project with the Entrada South and VCC Planning Areas would not change the analysis of this alternative as provided in the State-certified EIR as this alternative proposes modifications to aspects of the 2017 Project that would not affect the development facilitated in the Entrada South and VCC Planning Areas; therefore, the minor modifications associated with the Modified Project would not conflict with the components proposed therein and would not alter the basis of that analysis.
Alternative 7—Avoidance of 100-Year Floodplain, Elimination of Two Planned Bridges, and Avoidance of Spineflower	The State-certified EIR concluded that this alternative would reduce impacts compared with Alternative 2, with the exception of traffic, land use, and hazards impacts	The minor modifications associated with the Modified Project with the Entrada South and VCC Planning Areas would not change the analysis of this alternative as provided in the State-certified EIR, as this alternative proposes modifications to aspects of the 2017 Project that would not affect the development facilitated in the Entrada South and VCC Planning Areas; therefore, the minor modifications associated with the Modified Project would not conflict with the components proposed therein, and would not alter the basis of that analysis.
Draft LEDPA—Elimination of Planned Potrero Bridge, Additional Spineflower Preserve Acreage, and Larger Riparian Areas in Tributary Drainages	The State-certified EIR concluded that this alternative would reduce impacts compared with Alternative 2. This alternative was identified as the LEDPA for purposes of NEPA.	The minor modifications associated with the Modified Project with the Entrada South and VCC Planning Areas would not change the analysis of this alternative as provided in the State-certified EIR, as this alternative proposes modifications to aspects of the 2017 Project that would not affect the development facilitated in the Entrada South and VCC Planning Areas; therefore, the minor modifications associated with the Modified Project would not conflict with the components proposed therein and would not alter the basis of that analysis.
<p>Source: RMDP/SCP EIS/EIR, 2017; and Eyestone Environmental, 2024.</p>		

4. DESCRIPTION AND DISCUSSION OF THE NO MODIFIED PROJECT ALTERNATIVE

Under CEQA Guidelines Section 15126.6(e)(3)(B), the no project alternative may discuss “predictable actions by others, such as the proposal of some other project” if disapproval of the project under consideration were to occur. CEQA Guidelines Section 15126.6(e)(3)(C) further states that the no project alternative should reflect “what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.” Based on this guidance, the No Modified Project Alternative is analyzed herein and assumes the Project Site would be developed with uses consistent with the 2017 Project.

Under the land use and zoning parameters in accordance with the State-certified EIR, the Project Site could be built out with a mix of residential, commercial, open space/recreational, and institutional uses, with appropriate supportive amenities, consistent with development of other properties in the Project vicinity. The No Modified Project Alternative would provide 151 more new residential units and 280,000 square feet less commercial floor area within Entrada South as compared to the Modified Project. The intensity of development would be similar and generally occur within the same development footprint. In addition, similar to the Modified Project, the No Modified Project Alternative would include appropriate amenities to support the residential and commercial uses.

Under the No Modified Project Alternative, as with the Modified Project, primary access to the Project Site would be via Magic Mountain Parkway and Westridge Parkway. On-site infrastructure improvements also would include an internal network of roadways and trails, drainage and water quality improvements, dry utilities systems, a potable water system, a recycled water system, and a sanitary sewer system, similar to the Modified Project.

Under the No Modified Project Alternative, as with the Modified Project, a Spineflower Preserve would be implemented on-site and maintained pursuant to the Spineflower Conservation Plan component of the RMDP/SCP project under both the No Modified Project Alternative and the Modified Project. The SCP has been funded and is currently being implemented.

Under No Modified Project Alternative, as with the Modified Project, prior to building construction, the existing uses on-site would be removed, and grading would create level development pads, stabilize any slopes in areas of adverse geologic structure, and modify the tributary drainage courses to support proposed development and infrastructure. The

overall square footage of building development within the Entrada South and VCC Planning Areas would be approximately the same when comparing the No Modified Project Alternative with the Modified Project. Therefore, the intensity and duration of construction would be similar under the No Modified Project Alternative.

As noted above, for the Entrada South and VCC Planning Areas, the No Modified Project Alternative is substantially similar to Alternative 2 (proposed Project) in the State-certified EIR. Although the final 2017 Project included enhanced environmental protections compared to Alternative 2, the 2017 Project did not change the facilitated development within the Entrada South or VCC Planning Areas that was assumed for Alternative 2. Accordingly, for the majority of topics covered in the SEIR, the No Modified Project Alternative's impacts would be similar to the Modified Project. However, the Modified Project includes enhanced environmental protections related to the protection and restoration of portions of the Unnamed Canyon 2 drainage channel and increased environmental protections to wetlands and related biological resources by reducing permanent impacts to Hasley Creek and Castaic Creek. Therefore, the No Modified Project Alternative would result in greater permanent direct impacts to habitat than the Modified Project and would also result in a slight increase the amount and extent of impermeable or impervious features within the Project Site as compared with the Modified Project. As such, the No Modified Project Alternative would result in greater impacts with respect to biological resources and hydrology than the Modified Project.

5. RELATIONSHIP OF THE NO MODIFIED PROJECT ALTERNATIVE TO THE PROJECT OBJECTIVES

The No Modified Project Alternative assumes the Project Site would be developed with uses consistent with those evaluated for the 2017 Project in the State-certified EIR, which are generally similar to those of the Modified Project. As such, the No Modified Project Alternative would generally meet the Modified Project's underlying purpose to implement the development and resource management activities facilitated by the 2017 Project in the Entrada South and VCC Planning Areas while preserving and enhancing on-site natural resources; and to result in a mixed-use community that provides housing, non-residential commercial and industrial/business/office park uses, recreational areas, public facilities, and economic opportunities. However, as discussed further below, the No Modified Project Alternative would not preserve and enhance on-site natural resources to the same extent as the Modified Project. Additionally, the No Modified Project Alternative would meet many of the specific objectives that support the Modified Project's underlying purpose to the same extent as the Modified Project.

In particular, the No Modified Project Alternative would meet the Modified Project objectives to create a complete mixed-use community, integrate Project development and infrastructure with the surrounding communities, avoid leapfrog development, and promote

sustainable development by implementing the State-certified EIR greenhouse gas (GHG) mitigation program to achieve net zero GHG emissions. The No Modified Project Alternative also would meet the objectives to accommodate regional growth projected by SCAG and implement the vision of the Santa Clarita Valley Area Plan: One Valley One Vision 2012 (Area Plan). The No Modified Project Alternative would likewise meet the Modified Project's objective regarding implementation of the Newhall Ranch RMDP/SCP, as the Project Applicant would be required to comply with and carry out the resource conservation, management, and permitting responsibilities associated with the Newhall Ranch RMDP/SCP project, including those within the Project Site. Furthermore, the No Modified Project Alternative would meet the objectives to: provide a range of housing types and employment opportunities to accommodate projected growth and generate employment opportunities; create a new master planned development that promotes walkability, connectivity, and safety; and continue building out the previously approved, partially completed Valencia Commerce Center industrial/business park center. However, the No Modified Project Alternative would not meet the Modified Project objective to reduce permanent impacts to on-site drainage channels compared to the 2017 Project as analyzed in the State-certified EIR.

Overall, the No Modified Project Alternative would meet most of the Project objectives and the Modified Project's underlying purpose. However, the Modified Project includes environmental protections that are more substantial than those provided under the No Modified Project Alternative. As such, the No Modified Project Alternative would not achieve the following environmental benefits of the Modified Project:

- **Increased environmental protections to wetlands and related biological resources within the Entrada South Planning Area:** The Modified Project would enhance and restore portions of a drainage channel referred to as Unnamed Canyon 2. This environmentally beneficial modification is not included in the No Modified Project Alternative, which would therefore result in decreased open space, restored drainage areas, and habitat for species as compared to the Modified Project.
- **Increased environmental protections to wetlands and related biological resources within the VCC Planning Area:** The Modified Project would reduce permanent impacts to Hasley Creek and Castaic Creek (such areas may be temporarily impacted during construction, as analyzed in the State-certified EIR, but would be restored and revegetated after construction based on the Modified Project design), which traverse the VCC Planning Area, including a reduction of permanent impacts to certain vegetation communities and jurisdictional stream habitat. This environmentally beneficial modification is not included in the No Modified Project Alternative, which would therefore result in decreased open space, restored drainage areas, and habitat for species as compared to the Modified Project.

In summary, development of the Project Site would result in greater impacts under the No Modified Project Alternative than under the Modified Project.

6.0 PROJECT ALTERNATIVES

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Under CEQA Guidelines Section 15126.6(e)(2), an Environmentally Superior Alternative was considered among the alternatives evaluated in this SEIR. As described above, the No Modified Project Alternative would result in similar but slightly greater impacts compared with the Modified Project in some topic areas. Pursuant to CEQA Guidelines Section 15126.6(c), the No Modified Project Alternative would not “avoid or substantially lessen one or more of the significant effects” of the Modified Project because the Modified Project is not expected to result in any new significant impacts or substantially increase the severity of previously identified significant impacts for the 2017 Project as analyzed in the State-certified EIR. Further, the No Modified Project Alternative would not include the enhanced environmental protections included in the Modified Project, particularly benefits to wetlands, biological resources, and energy. For more discussion on impacts to biological resources and energy, please refer to sections 5.2 Biological Resources and 5.2 Air Quality, respectively, of this SEIR. Therefore, the Modified Project is the Environmentally Superior Alternative compared to the No Modified Project Alternative. Please also see Chapter 5 of the State-certified EIR for discussion of the environmentally superior alternative from Alternatives 1 through 7 and the LEDPA.

The State-certified EIR identified Alternative 7 as the environmental superior alternative. Alternative 7 would result in the lowest level of environmental impacts across the majority of environmental resource categories. Alternative 7 would avoid development in the 100-year floodplain and 98.2 percent of the cumulative area occupied by the spineflower. Alternative 7 would also eliminate two bridges across the Santa Clara River at Potrero Canyon Road and Commerce Center Drive. This alternative would facilitate development within the Specific Plan and the Entrada South 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. This alternative reduced the environmental impact across 14 of the CEQA analysis categories. However, Alternative 7 would result in greater impacts in Land Use, Traffic; and Hazards, Hazardous Materials, and Public Safety. The greater impacts with respect to Traffic and Hazards stem from the elimination of the two bridges and the greater impacts with respect to Land Use are the result of inconsistencies with the Specific Plan and Los Angeles County’s approved development plans.