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DRAFT ENVIRONMENTAL IMPACT REPORT

LAFCO 3076



# ALTERNATIVES

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# 6.0 ALTERNATIVES

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## 6.1 INTRODUCTION

In accordance with the California Environmental Quality Act (CEQA), this section analyzes alternatives to the proposed Project that would reduce or avoid environmental impacts. Specifically, Section 15126.6(a) of the *CEQA Guidelines* states that an Environmental Impact Report (EIR) shall "...describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." This section analyzes a total of three project alternatives, consisting of: 1) "No Project" Alternative; 2) "Alternative Site" Alternative; and 3) "Environmentally Superior" Alternative.

As discussed previously, CEQA's primary purpose for requiring an alternatives analysis is to explore ways to mitigate (avoid, reduce and/or offset) the significant impacts of a Project. As set forth throughout this EIR, LAFCO has not identified any significant environmental impacts of the Project. Therefore, this Alternatives section is more of a procedural requirement than a tool to reduce Project impacts.

## 6.2 CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REQUIREMENTS

This section has been prepared in consideration of the following guidelines for discussing alternatives to a proposed project:

- Because the EIR must identify ways to mitigate or avoid significant effects of the Project on the environment, "the discussion of alternatives shall focus on alternatives to the Project or its location which are capable of avoiding or substantially lessening any significant effects of the Project, even if these alternatives would impede to some degree the attainment of the Project objectives, or would be more costly." [*CEQA Guidelines* Section 15126.6(b)];
- The range of potential alternatives to the proposed Project shall include those that could feasibly accomplish most of the basic objectives of the Project and could avoid or substantially lessen one or more of the significant effects. If there is a specific proposed project or a preferred alternative, explain why the other alternatives were rejected in favor of the proposal if they were considered in developing the proposal. "The EIR shall also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination." [*CEQA Guidelines* Section 15126.6(c)];

- The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project. If an alternative would cause one or more significant effects in addition to those that would be caused by the Project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the Project as proposed. [*CEQA Guidelines* Section 15126.6(c)];
- “The specific alternative of "no project" "shall be evaluated along with its impact.” The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed Project with the impacts of not approving the proposed project." [*CEQA Guidelines* Section 15126.6(e)(1).] The *CEQA Guidelines* also stipulate that the "no project" analysis shall discuss the existing conditions at the time the Notice of Preparation is published...as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services" [*CEQA Guidelines* Section 15126.6(e)(2)];
- If the environmentally superior alternative is the No Project Alternative, the EIR shall also identify the environmentally superior alternative among the other alternatives. [*CEQA Guidelines* Section 15126.6(e)(2)];
- Under the *CEQA Guidelines* Section 15126.6(c), the range of alternatives required in an EIR is governed by a "rule of reason" that requires an EIR to set forth only those alternatives necessary to permit a reasoned choice. “The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.” [*CEQA Guidelines* Section 15126.6(f)].

### 6.3 OVERVIEW OF THE ALTERNATIVES SELECTION PROCESS

The alternatives selection process involved the following sequence of steps:

- Identification of the Project objectives;
- Identification of the potentially significant impacts of the Project;
- Development of a broad list of alternatives;
- Development of evaluation criteria for feasibility;
- Evaluation of alternatives; and,
- Identification of those alternatives that passed the evaluation and explanation of why alternatives were determined infeasible.

#### 6.3.1 PROJECT OBJECTIVES

The objectives of the proposed Project are as follows:

- To provide for more efficient water resource operations within San Bernardino Valley, consistent with the findings of LAFCO 2919. This includes elimination of the Groundwater Assessment currently levied and collected by the Conservation District, a

net reduction in staff, while providing for the same or similar services currently provided by the Conservation District.

- To place all revenue, ongoing and one-time, in a segregated Basin Management Account to fund basin management related activities.
- To have Valley District implement an efficient transition plan in accordance with the goals of the consolidation.
- To create an Advisory Board comprised of all current the Conservation District Board Members to ensure access to and benefit from their knowledge and experience.

### 6.3.2 SIGNIFICANT PROJECT IMPACTS

As discussed in Section 4.0, LAFCO has not identified any substantial evidence that would suggest a potential significant environmental impact may result from LAFCO 3076. Therefore, this section provides a discussion for CEQA-mandated elements of an alternatives analysis, with specific attention to alternatives identified during the NOP process and through correspondence with interested parties. Of relevance to LAFCO 3076 is an alternative's relationship to findings that LAFCO is required to make in conformance with LAFCO policy and State law, including:

- 1) Consistency with existing spheres of influence;
- 2) Consistency with County and City General Plans;
- 3) Ability to maintain or improve existing levels of service;
- 4) Effects upon other public agencies;
- 5) Consistency with current municipal service reviews; and
- 6) Benefits to the residents and businesses within the reorganization area;

## 6.4 ALTERNATIVES CONSIDERED BUT REJECTED

### 6.4.1 "Alternative Site" Alternative

Due to the nature of the Project, identification or selection of an alternative site would be an infeasible and inapplicable option. The boundaries of both Valley District and the Conservation District are specific to each District, and they exist as two separately defined entities each affecting their respective geographic areas. As this alternative would be infeasible, and would not meet any of the objectives established for the Project, the "Alternative Site" Alternative is rejected, and no further environmental analysis is required.

### 6.4.2 Santa Ana River Water Right Applications for Supplemental Water Supply EIR

The EIR prepared for the Santa Ana River Water Rights project evaluates the potential environmental impacts from the San Bernardino Valley Municipal Water District (Valley District) and Western Municipal Water District of Riverside County (WMWD) joint applications with the State Water Resources Board to divert a maximum of 200,000 acre feet per year of water from the Santa Ana River to the local area in order to provide an increase in water supply reliability by reducing dependence on imported water via the CWP and meet future demand needs through a long-term water supply and operational flexibility.

Alternatives proposed in the EIR for the Santa Ana River Water Rights Project included four alternatives related to future water supply to the area.

- The No Project Alternative would result in an increase in dependence of the both the Valley District and WMWD on imported water and groundwater resources.
- The New Local Water Supplies Alternative would provide three new types of water supplies, including brackish groundwater desalination, regional water recycling, and ground water extraction, to the area in lieu of diversions of Santa Ana River water. This alternative would require the construction of new conveyance facilities to distribute recycled water to customers, resulting in increased environmental impacts.
- The Enhanced Conservation Alternative would provide a similar amount of water as the Santa Ana River Water Rights project, however, would primarily be implemented in the Valley District service area.
- The New Imported Water Supply Alternative would result in the development of new imported water sources, the acquisition and transfer of existing water sources for use by the Valley District/WMWD or a combination of both. This alternative would result in fewer direct environmental impacts, however, additional impacts in other resource areas.

These alternatives were rejected from consideration as they did not meet the Santa Ana River Water Rights project primary goals and objectives of providing the additional facilities to improve water management operational flexibility, while increase the water supply reliability and reducing the dependence on imported supplies, resulted in similar environmental impacts, or were not feasible. A summary of the SAR Water Rights Final EIR is provided in Appendix E of this EIR. LAFCO 3076 does not preclude or facilitate the proposed water right applications. Furthermore, as previously noted, the Conservation District is on record supporting Valley District's water right applications (April 13, 2007 letter to SWRCB).

## 6.5 ALTERNATIVES CONSIDERED

The following alternatives to the proposed Project that were evaluated as required by CEQA:

- "No Project" Alternative;
- "Expansion of Water Conservation District Boundaries" Alternative; and,
- "Environmentally Superior" Alternative.

Each of these alternatives are described and evaluated below.

### 6.5.1 "No Project" Alternative

Under the "No Project" Alternative, the proposed Project would not be approved and the Conservation District would not be consolidated with Valley District. Both the Conservation District and Valley District would continue operating under current conditions, and each District would have the same authority and responsibilities as are currently held; refer to Section 3.0, *Project Description*, for a list of services provided and authority given to each District.

The "No Project" Alternative would conflict with approved LAFCO Action Resolution No. 2893, which reduced the sphere of influence for the San Bernardino Valley the Conservation District to zero, with added direction to pursue the consolidation of the Conservation District with Valley District. The No Project Alternative would conflict with LAFCO's 2005 Municipal Service Review

of Conservation District, which resulted in initiating the LAFCO 2919 process and eventual adoption of a zero sphere of influence.

The "No Project" Alternative is not considered to be a feasible alternative because it fails to meet any of the proposed project objectives. As Valley District and the Conservation District would not be consolidated under the No Project Alternative, none of the project objectives would be achieved. Furthermore, the "No Project" Alternative would not provide for more efficient water resource operations within San Bernardino Valley, consistent with the findings of LAFCO 2919. As the project is not anticipated to result in any significant environmental impacts, the No Project Alternative would not substantially lessen or avoid any significant project impacts.

For the reasons identified above, and because the "No Project" Alternative does not accomplish any of the Project's objectives, no further environmental analysis is required.

### **6.5.2 "Expansion of Water Conservation District Boundaries" Alternative**

Under the "Expansion of Water Conservation District Boundaries" Alternative, the proposed Project would not be approved and the Conservation District would not be consolidated with Valley District. Both the Conservation District and Valley District would continue operating under current conditions, and each District would have the same authority and responsibilities as are currently held; refer to Section 3.0, *Project Description*, for a list of services provided and authority given to each District.

During the review of LAFCO 2919, the Commission requested a position from the WCD as to the possibility of expanding its sphere of influence to encompass the area of the Bunker Hill basin. The response in August 2005 was that it did not support such a change which would have allowed for the expansion of the physical boundaries of the agency through annexation proceedings. Following further consideration, including an Advisory Committee, on March 15, 2006, the San Bernardino Local Agency Formation Commission (LAFCO) approved Resolution No. 2893 that made certain determinations on LAFCO Action 2919 which established a zero sphere of influence for the Conservation District, with the direction that the consolidation of the Conservation District with Valley District be pursued as the most cost-effective governmental structure. This issue has been extensively evaluated by LAFCO and a multi-agency advisory committee, resulting in a majority recommendation for (and adoption of) a zero sphere of influence for the Conservation District. As such, expansion of the Conservation District to be contiguous with the San Bernardino Basin would conflict with Resolution No. 2893. In addition, as discussed in LAFCO 2919 proceedings (see Appendix C of this EIR), Valley District can provide the services being offered by Conservation District at substantial savings to affected groundwater users, without levying the groundwater assessment. As the project is not anticipated to result in any significant environmental impacts, selection of this alternative would not substantially lessen or avoid any significant impacts.

The "Expansion of Water Conservation District Boundaries" Alternative would conflict with approved LAFCO Action Resolution No. 2893, which reduced the sphere of influence for the San Bernardino Valley the Conservation District to zero, with added direction to pursue the consolidation of the Conservation District with Valley District. The Expansion of Water Conservation District Boundaries Alternative would conflict with LAFCO's 2005 Municipal Service Review of Conservation District, which resulted in initiating the LAFCO 2919 process and eventual adoption of a zero sphere of influence.. Furthermore, the "Expansion of Water Conservation District Boundaries" Alternative would not provide for more efficient water resource operations within San Bernardino Valley, consistent with the findings of LAFCO 2919.

For the reasons identified above, and because the “Expansion of Water Conservation District Boundaries” Alternative does not accomplish any of the Project’s objectives, no further environmental analysis is required.

Various “partial consolidations” could be evaluated, although they are not proposed by Valley District nor are they under consideration by LAFCO, as they would not achieve the Project objectives. For example, a partial consolidation could include reconfiguring the Conservation District’s service area to be coterminus with the Wash Plan boundary (a net reduction in service area from 77.9 square miles to approximately 6.98 square miles). The Conservation District could retain land, leases and facilities within the Wash Plan boundary, as well as its operational headquarters, resulting in reduced groundwater tax revenues, but retaining the revenue from mining leases and other assets within the Wash Plan boundary. This alternative has not been proposed by Valley District or Conservation District, may be financially infeasible if reduced revenues are insufficient to support Conservation District activities, would not achieve the Project objective of consolidating the two agencies to realize long-term operational efficiencies and cost savings benefits, and may require a vote of Consolidation District residents. As the Project has not been identified as having significant impacts, this alternative is not under consideration.

### **6.5.3 Environmentally Superior Alternative**

CEQA requires the identification of an “environmentally superior” alternative to the proposed Project (Section 15126.6). An environmentally superior alternative is one that, when compared to the proposed Project, reduces one or more significant environmental effects, thereby reducing potential impacts on resources.

Because no significant impacts were identified through the EIR analysis as the result of Project implementation, no feasible alternative was identified that would reduce potential impacts to less than that identified for the proposed Project. As such, none of the alternatives considered herein are considered to be “environmentally superior” to the proposed Project.