

# ALTERNATIVES SCREENING DOCUMENT

## Introduction

This report is a screening document to provide reasons for the deletion of two alternatives to the MSHCP from further analysis in the EIR/EIS.

## National Environmental Policy Act and California Environmental Quality Act

The MSHCP EIR/EIS has been prepared under the auspices of the National Environmental Quality Act (NEPA) and the California Environmental Quality Act (CEQA). Both laws require the preparation of a detailed environmental study to evaluate the environmental effects of proposed governmental activities. In addition, both laws establish multi-step procedures for evaluating projects and preparing environmental impact assessment documents.

According to NEPA, the evaluation of alternatives is governed by the “rule of reason” under which an EIS must consider a reasonable range of options that could accomplish the project objectives. If alternatives have been eliminated from detailed study, the EIS must briefly discuss the reason for their elimination (40 Code of Federal Regulations [CFR] 1502.14[a]; Forty Questions No. 1[a]). Reasonable alternatives are those that may be feasibly carried out based on technical and economic factors.

As for CEQA, the range of alternatives required in an EIR is also governed by a “rule of reason” that requires an EIR to set forth only those alternatives necessary to permit a reasoned choice. If a Lead Agency (Riverside County) finds an alternative to be infeasible, reasons for that finding must be explained. In determining whether alternatives are feasible, Lead Agencies are guided by the general definition of feasibility found in CEQA Guidelines Section 15364: “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. In accordance with CEQA Guidelines Section 15126.6[f], the Lead Agency should consider site suitability, economic viability, availability of infrastructure, general plan consistency, other regulatory limitations, jurisdictional boundaries, and proponent’s control over alternative sites in determining the range of alternatives to be evaluated in an EIR. Alternatives considered per CEQA must also meet the basic project objectives. An EIR must briefly describe the rationale for selection and rejection of alternatives and the information that the Lead Agency relied upon in making the selection. It should also identify any alternatives that were considered by the Lead Agency but were rejected as infeasible during the scoping process and briefly explain the reason for their exclusion (*Guidelines* Section 15126[d][2]).

## Goals and Objectives of the Multiple Species Habitat Conservation Plan

The MSHCP that is analyzed in the EIR/EIS allows for maintenance of biological diversity and ecosystem processes while allowing future economic growth. Preservation of a quality of life characterized by well-managed and planned growth integrated with an open space system is also a goal of the MSHCP. The Riverside County Board of Supervisors adopted policy directions regarding this goal on December 19, 2000. The overall goals are the following:

- In the MSHCP Area, conserve Covered Species and their habitats.
- Improve the future economic development in the County by providing an efficient, streamlined regulatory process through which development can proceed in an efficient way. The proposed MSHCP and the General Plan would provide the County with a clearly articulated blueprint describing where future development should and should not occur.
- Provide for permanent open space, community edges, and recreational opportunities, which contribute to maintaining the community character of western Riverside County.

The following were identified as the Project Objectives:

1. Assemble a criteria-based reserve that will assist in the conservation of covered species while allowing flexibility in the assembly and location of the reserve.
2. To the maximum extent possible, streamline development authorizations under the federal and State Endangered Species Acts.
3. Through regional habitat planning, conserve habitat in functional blocks, rather than on a piecemeal ad hoc basis.
4. Provide incidental take authorization for the transportation, infrastructure, housing and employment base needed to accommodate projected growth in western Riverside County.
5. Coordinates and maximizes the value of expenditures of limited public and private funds in such a manner that assures assembly and maintenance of a reserve system that conserves the covered species pursuant to state and federal law.
6. Develop a fee-based funding plan that will generate sufficient revenue to contribute to the reserve's funding needs.
7. To the maximum extent practicable, eliminate surprises by providing certainty to permittees and third parties that the take authorization will cover additional species that may be listed while the permits are in effect.

8. To the extent legally possible, provide assurances that private parties will not be required to mitigate biological impacts except as specified in the Plan.
9. Expand the conservation value of existing public and quasi-public resources for the benefit of covered species.
10. Comply with all applicable federal and State laws and constitutional requirements.

The MSHCP would function as a large-scale Habitat Conservation Plan (HCP) and Natural Community Conservation Plan (NCCP), and would reduce the number, cost, and complexity of consultations with the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Game (CDFG) regarding federal and State listed species. This would lower the costs associated with development, and, by providing a large-scale multiple species HCP, would improve the effectiveness of managing listed species.

### Descriptions of Alternatives Considered But Not Carried Forward for Analysis in the EIR/EIS

The following sections briefly describe the alternatives that were screened out from further analysis in the MSHCP EIR/EIS. These alternatives are the Modified Reserve Configuration Alternative and the Narrow Endemic Plant Species Alternative. **Table 1** summarizes the species that are conserved with each alternative and the number of acres that would be set aside from private lands, adding to public and quasi-public lands, to make up the reserve configurations.

**Table 1 - Species Protected and Private Lands Conserved**

<b>Factor</b>	<b>Modified Reserve Configuration Alternative</b>	<b>Narrow Endemic Plant Species Alternative</b>
Number of Species “Protected”	146	54
Private Lands Conserved	218,600	Unknown
Public/Quasi-Public Lands Conserved	347,000	347,000
<b>Total Acres Conserved</b>	<b>565,600</b>	<b>Unknown*</b>

Note: Acreage conserved under the Narrow Endemic Plant Alternative would depend on the results of surveys for endemic plant species. Thus, an acreage estimate for private land conservation is not available.

**Modified Reserve Configuration Alternative.** This alternative seeks to promote the viability and recovery of western Riverside County ecosystems and habitats, and the species dependent upon them. Additionally, this alternative seeks to reduce the need for the potential listing of species in the future. Like the proposed Plan, this alternative also focuses generally on the following broad-based NCCP biological tenets:

- Conserve focus species and their habitats throughout the proposed Plan Area;

- Conserve large habitat blocks;
- Conserve habitat diversity;
- Keep reserves contiguous and connected; and
- Protect reserves from encroachment and invasion by non-native species.

The Modified Reserve Configuration Alternative provides for the most conservation of the alternatives and the Proposed Action. It seeks to conserve up to 146 species and 218,600 acres of habitat on private lands within the MSHCP Planning Area. The number of species to be conserved remains the same: 32 listed and proposed species, and 115 sensitive species.

The Modified Reserve Configuration Alternative conserves 347,000 acres of existing public/quasi-public lands. In addition, the Modified Reserve Configuration Alternative also would conserve 218,600 acres of private lands. The 218,600 acres include the 153,000 acres proposed for conservation with the Proposed Action plus 65,400 acres of additional conservation on private lands. The additional 65,400 acres of private lands are largely comprised of lands designated as critical habitat for listed, threatened, or endangered species or areas supporting sensitive soils. These additional areas are discussed further in this report under the heading, *Reserve Configurations*. This alternative focuses on the NCCP biological tenets.

**Narrow Endemic Plant Species Alternative.** This alternative would focus on the conservation of narrow endemic species. The term *endemic species* refers to a species that is native to a particular geographic area. Endemic does not imply rarity or endangerment; rather, it refers to geographic distribution. A very narrowly distributed species is found only within a small geographic area (e.g., the San Jacinto Valley crownscale [*Atriplex coronata* var. *notatior*] is endemic [found only] in western Riverside County).

The term *narrow endemic species* has been used in conservation planning to refer to a species that is restricted to a relatively small geographic area and for which conservation planning decisions would have a substantial effect on the status of the species. Plant species that are the focus of this alternative are listed in **Table 2**. It is anticipated that under this alternative, conservation areas for narrow endemic plants would overlap similar areas identified for conservation in the Modified Reserve Configuration Alternative.

Protocol surveys would be constructed for narrow endemic plants during the appropriate season. If populations of narrow endemic plants were observed, avoidance and minimization measures would be undertaken in the design of individual projects.

**Table 2 - Narrow Endemic Plant Species Protected under the Narrow Endemic Species Alternative**

Scientific Name	Common Name	Notes
<b>Plant Species Endemic to the Plan Area</b>		
<i>Allium munzii</i>	Munz's onion	Area 1
<i>Arabis johnstoni</i>	Johnston's rock cress	Generally confined to Forest Service lands
<i>Atriplex coronata</i> var. <i>notatior</i>	San Jacinto Valley crownscale	Areas 2, 3, and 4
<i>Atriplex parishii</i>	Parish's brittlescale	Areas 2, 3, 4, and 5
<i>Calochortus palmeri</i> var. <i>munzii</i>	Munz's mariposa lily	Generally confined to Forest Service lands
<i>Ceanothus ophiochilus</i>	Vail Lake ceanothus	Area 6
<i>Galium angustifolium</i> ssp. <i>jacinticum</i>	San Jacinto Mountains bedstraw	Generally confined to Forest Service lands
<b>Plant Species for which Plan Area is Critical to Conservation (not Endemic to Plan Area)</b>		
<i>Ambrosia pumila</i>	San Diego ambrosia	Areas 1 and 2
<i>Atriplex serenana</i> var. <i>davidsonii</i>	Davidson's saltscale	Areas 2, 3, and 4
<i>Berberis nevini</i>	Nevin's barberry	Area 6
<i>Brodiaea filifolia</i>	thread-leaf brodiaea	Areas 2 and 3
<i>Dodecahema leptoceras</i>	slender-horned spineflower	Area 1
<i>Dudleya multicaulis</i>	many-stemmed dudleya	Area 1
<i>Eriastrum densifolium</i> ssp. <i>sanctorum</i>	Santa Ana River woollystar	Santa Ana River
<i>Hemizonia pungens</i> ssp. <i>laevis</i>	smooth tarplant	Area 3, Salt Creek
<i>Lasthenia glabrata</i> spp. <i>apus</i>	Coulter's goldfield	Areas 2 and 3
<i>Lepechinia cordifolia</i>	heart-leaf pitcher-sage	Generally confined to Forest Service lands
<i>Myosurus minimus</i> ssp. <i>apus</i>	little mousetail	Area 4
<i>Navarretia fossalis</i>	spreading navarretia	Areas 2, 3, 4, and 5
<i>Orcuttia californica</i>	California Orcutt grass	Areas 4 and 5
<i>Satureja chandleri</i>	San Miguel savory	Santa Rosa Plateau, Steele Rock
<i>Trichocoronis wrightii</i> var. <i>wrightii</i>	Wright's trichocoronis	Areas 2 and 3

For many of the plant species being considered for conservation under the proposed MSHCP, the existing available distribution data are limited. If coverage of these species were sought in the selected alternative for the proposed MSHCP, the need to conduct surveys would apply to these species, as well as to the narrow endemic species. The Narrow Endemic Plant Species Alternative would conserve 37 plant species, including all of the listed and proposed plant species, and would also conserve 17 animal species.

## Vegetation Communities

The reserve configuration consists of the boundaries within which conservation would be achieved. **Table 3** provides a summary by vegetation communities of acreages potentially affected with the Modified Reserve Configuration Alternative. The Narrow Endemic Plant Species Alternative is a survey-based alternative, and does not consist of defined conservation areas.

Anticipated impacts to coastal sage scrub, desert scrubs, grassland, meadows, and marshes with this alternative would result in substantial reductions of sensitive vegetation communities within the MSHCP Plan Area. The impacts to these vegetation communities would also have substantial adverse effects on listed, sensitive, or special status species that occupy and utilize these vegetation communities.

**Table 3 - Percentage of Vegetation Communities Subject to Take-Authorized Development with the Modified Reserve Configuration Alternative**

Vegetation Type	Modified Reserve Configuration Alternative
Agriculture	82%
Chaparral	40%
Coastal Sage Scrub	32%
Desert Scrub	67%
Grassland	69%
Meadows and Marshes	79%
Montane Coniferous Forest	30%
Peninsular Juniper Woodland and Scrub	10%
Playas and Vernal Pools	16%
Riparian Scrub, Woodland, Forest	36%
Riversidean Alluvial Fan Sage Scrub	28%
Unknown	7%
Water	38%
Woodlands and Forests	30%

Notes: <sup>1</sup> Totals exclude developed/disturbed land because no additional impact to biological resources would occur in these areas as a result of implementation of the Modified Reserve Configuration Alternative. The Narrow Endemic Alternative was not included, as no specific configuration of private lands to be conserved is available.

In general, the Modified Reserve Configuration Alternative has the highest level of conservation of vegetation communities of all the considered alternatives. All other alternatives considered in the MSHCP analysis are scaled-down variations of the Proposed Action. The Narrow Endemic Plant Species Alternative is difficult to analyze, as it does not specify the amount of on-the-ground conservation (as all of the locations of narrow endemic plants have not been discovered), but rather dictates a process for implementation.

## Reserve Configurations

The Modified Reserve Configuration Alternative is made up of existing reserve areas (Public/Quasi-Public Lands), including lands managed by the U.S. Forest Service and the BLM) and additional reserve areas. The Modified Reserve Configuration Alternative contains different types of components in its reserve makeup. These include core reserve areas, linkages, constrained linkages, and other areas (which include vernal pools, waterfowl preservation areas, narrow endemic habitat, and Delhi sands flower-loving fly habitat). The Narrow Endemic Plant Species Alternative only includes existing reserve areas and narrow endemic plant habitat (locations to be determined by surveys).

The Modified Reserve Configuration Alternative sets aside a great deal more private land for conservation than the alternatives considered in the MSHCP. Conservation would occur in additional areas to include Quino checkerspot butterfly (*Euphydryas editha quino*) habitat linkages, as well as areas designated as Critical Habitat for other federally-listed species.

The Modified Reserve Configuration Alternative is a broad-brush approach to conserving as many species as possible by maximizing land conservation. The Narrow Endemic Plant Species Alternative focuses on narrow endemic plant species and does not provide adequate protection of listed animal species.

## Conservation Benefits of the Modified Reserve Configuration Alternative

**Species List.** The Modified Reserve Configuration Alternative protects more species than any of the alternatives, with the exception of the Proposed Action. Some species not conserved have a generally broad distribution throughout the region, and still others do not commonly occur in the region. The Modified Reserve Configuration Alternative includes large areas of habitat in the private land reserves (approximately 40 percent more than the Proposed Action), which would otherwise not be necessary to conserve listed and proposed species.

**Vegetation Communities.** The Proposed Action and the Modified Reserve Configuration Alternative generally have very similar percentages of take. In general, these two alternatives switch from one to the other for the least impact on vegetation communities; however, three vegetation communities differ by more

than 10 percent. The two alternatives differ for coastal sage scrub by 16 percent, peninsular juniper woodland and scrub by 34 percent, and water by 23 percent.

The Modified Reserve Configuration Alternative and the Proposed Action have similar degrees of conservation in nearly all vegetation categories. The primary difference in vegetation communities conserved is in the case of coastal sage scrub and water. Water bodies and wetlands are protected pursuant to Section 404 of the Clean Water Act, and analysis for impacts to water would be required regardless of whether the area were within an MSHCP conserved area. Thus, differences in the amount of water area conserved are not significant.

Coastal Sage Scrub is the third-largest constituent of the Plan Area. At 156,000 acres, it is less than Chaparral (435,000 acres) and Agriculture (169,000 acres). The Proposed Action would focus on conserving high quality coastal sage scrub habitat. While the Modified Reserve Configuration Alternative conserves a greater quantity of this habitat type, it includes medium- and low-quality habitat as well. By focusing on high-quality coastal sage scrub, the Proposed Action would better balance the needs of developers with the need for conservation.

Thus, the Modified Reserve Configuration Alternative does not represent a viable alternative, as it does not effectively balance the needs of conservation (Biological Goal) with the need to accommodate future growth within the Plan Area (Economic Goal).

**Reserve Configuration.** Reserve configurations vary among alternatives. The reserve area elements included the Modified Reserve Configuration Alternative are large areas. The Proposed Action has reserve area elements in the same general locations as the Modified Reserve Configuration Alternative, conserving the same resources, but the elements in the Proposed Action are more focused on the essential areas, while limiting conservation of lower-quality and privately owned areas.

## **Reasons for Not Carrying Forward the Screened Alternatives in the EIR/EIS for Analysis**

### **Modified Reserve Configuration Alternative**

**Growth in Riverside County.** According to projections made by the Southern California Association of Governments (SCAG), in 2020, Riverside County will be home to approximately 2.8 million people, who will occupy approximately 918,000 dwelling units (Hoffman, 2001). This represents a doubling of the present population and housing stock of Riverside County. Other studies by the California Department of Finance estimate that the County will continue to grow to 3.5 million people by 2030 and 4.5 million people by 2040. These population figures include residents that live within unincorporated areas as well as those that live within the boundaries of the 24 incorporated cities within the County. Projections contained in the 2002 *Riverside County General Plan* indicate that approximately

1.67 million persons would reside within the unincorporated areas of the County in nearly 558,000 dwelling units in 2040.

One of the functions of the Western Riverside County MSHCP is to streamline the permitting process for development, helping to accommodate this growth. Another function is to guide development into areas that will be the least environmentally damaging, on a regional, ecosystem-based scale. By setting aside the most sensitive areas for conservation, and removing some of the obstacles to development in the less environmentally sensitive areas, the Western Riverside County MSHCP serves to accommodate the projected growth within the County.

The Modified Reserve Configuration Alternative conserves 65,000 acres (over 40 percent) more than the Proposed Action. The additional lands conserved in the Modified Reserve Configuration Alternative represent existing vacant land, which may provide habitat for species, or could be used for development to accommodate growth. Much of this area is designated as Community Development in the *2002 Riverside County General Plan*. The loss of 65,000 acres of potentially developable private lands represents the loss of up to:

- 227,500 low-density residential units;
- 1,105,000 high-density residential units;
- 1,190,000,000 square feet of industrial/business park use; and
- 79,280,000 square feet of commercial development.

Furthermore, the Proposed Action was developed alongside the Riverside County General Plan, to minimize the amount of conservation land classified as “Community Development” in the County General Plan. The additional acreage included in the Modified Reserves Alternative would include a much higher proportion of land not designated for conservation in the County General Plan, and thus would likely have a higher cost of acquisition. One of the primary funding sources for the MSHCP is the “Local Development Mitigation Fees”. Mitigation Fees are anticipated to generate approximately \$540 million over a 25-year period. The Modified Reserves Alternative would take out 65,000 acres of land for potential development and; therefore, reduce the amount of Local Development Mitigation Fees that could be potentially collected and used towards the purchase and management of reserve lands. In other words, this alternative would require a greater number of acres to be conserved and reduces the number of acres of potential future development; therefore, reducing the availability of local funds.

**Conservation of Additional Acreage.** There are several costs associated with the conservation of private land. These include acquisition, potential restoration to improve habitat quality, and habitat maintenance and monitoring to ensure that the areas are not being degraded. The Western Riverside County MSHCP contains a preliminary plan for managing the reserve areas. Additional conserved areas could result in a disproportionately higher cost, as these areas would occur in locations

designated as Community Development in the *2002 Riverside County General Plan*, and would thus be more difficult to acquire from willing sellers. Therefore, an addition of 65,000 acres over the Proposed Action would represent at least a 40 percent increase in cost, although, as noted, this cost would likely be higher. This additional area would also likely result in the need for additional staff to monitor and maintain the areas, resulting in additional long-term expenses.

### **Narrow Endemic Plant Species Alternative**

The Narrow Endemic Plant Species Alternative was developed to depict a conservation scenario that would address narrow endemic species (a species that is restricted to a relatively small geographic area and for which conservation planning decisions would have a substantial effect on the status of the species). This alternative would focus conservation efforts towards 54 species within existing reserves (approximately 347,000 acres) and additional private land (acreage of this additional area is unquantified, as additional survey data is needed). This alternative would also conserve the species already preserved by existing regulations. However, it would not provide sufficient conservation of most listed and proposed species. Thus, the Narrow Endemic Plant Species Alternative would not meet the goals and objectives of the project that involve providing for the conservation of all presently listed and proposed plant and animal species, to facilitate the acquisition of incidental take permits from USFWS and CDFG. This alternative also fails to conserve land in functional habitat blocks.

### **Conclusion**

**Modified Reserve Configuration Alternative.** After analyzing the potential beneficial and detrimental effects of the alternatives, the Wildlife Agencies and the County of Riverside determined that for the Modified Reserve Configuration Alternative, the potential conservation benefits were insufficient to outweigh the loss of land to development. The goals and objectives of the MSHCP would not be met; thus, the alternative was dropped from further consideration and analysis in the Western Riverside County MSHCP EIR/EIS.

The Modified Reserve Configuration Alternative would have increased the number of acres to be conserved by 65,000 acres even though the amount of habitat included in the Project is sufficient to adequately conserve all of the Covered Species. Thus, the Modified Reserve Configuration Alternative would have greatly increased the cost of the project (by the fair market value of those 65,000 acres) without significantly increasing the habitat value of the reserve. The Modified Reserve Configuration Alternative would conflict with Project Objectives because it would not be economically efficient and it would not limit the expenditure of public and private funds to the amount necessary to maintain a reserve that can adequately conserve the Covered Species. Moreover, because the Modified Reserve Configuration Alternative would require the purchase of an additional 65,000 acres of private lands, it is economically infeasible and it conflicts with the Project

Objective requiring that the preferred alternative include a fee-based funding program that will generate sufficient revenue to contribute to the reserve's funding needs. Based on these considerations, the Modified Reserve Configuration Alternative was screened out from further consideration as an alternative to the Proposed Project.

**Narrow Endemic Plant Species Alternative.** For many of the plant species being considered for conservation under the proposed MSHCP, the existing available distribution data are limited. If coverage of these species were sought in the selected alternative for the proposed MSHCP, the need to conduct surveys would apply to these species, as well as to the narrow endemic plant species.

The Narrow Endemic Plant Species Alternative conflicts with Project Objectives. Because it covers only 22 species, the Narrow Endemic Plant Species Alternative does not provide the maximum possible certainty that the Take Authorization will cover additional species that may be listed while the Permits are in effect. Also, the Narrow Endemic Plant Species Alternative will not streamline development authorization under FESA and CESA to the maximum extent practicable. Likewise, the Narrow Endemic Plant Species Alternative would not provide assurances that, to the extent legally possible, private parties will not be required to mitigate impacts under FESA and CESA except as required in the Plan. The Narrow Endemic Plant Species Alternative is also infeasible due to economic and other considerations. Thus, the Narrow Endemic Species Alternative was screened out from further consideration as an alternative to the Plan. However, elements from this alternative to protect endemic plant species were incorporated into the Proposed Action as additional survey requirements.

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## References and Acronyms

### References

County of Riverside

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### Acronyms

BLM	Bureau of Land Management
CDFG	California Department of Fish and Game
CESA	California Endangered Species Act
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
FESA	Federal Endangered Species Act
HCP	Habitat Conservation Plan
MSHCP	Multiple Species Habitat Conservation Plan
NCCP	Natural Communities Conservation Plan
NEPA	National Environmental Policy Act
SCAG	Southern California Association of Governments
USFS	United States Forest Service
USFWS	United States Fish and Wildlife Service