

7. Alternatives to the Proposed Project

7.1 INTRODUCTION

7.1.1 Purpose and Scope

The California Environmental Quality Act (CEQA) requires that an environmental impact report include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Guidelines § 15126.6[a]). As required by CEQA, this chapter identifies and evaluates potential alternatives to the proposed project.

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

- “[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” (15126.6[b])
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact.” (15126.6[e][1])
- “The no project analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” (15126.6[e][2])
- “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.” (15126.6[f])
- “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries..., and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)” (15126.6[f][1]).
- “Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.” (15126.6[f][2][A])

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- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.” (15126.6[f][3])

For each development alternative, the analysis will:

- Describe the alternative.
- Analyze the impact of the alternative as compared to the proposed project.
- Identify the impacts of the project that would be avoided or lessened by the alternative.
- Assess whether the alternative would meet most of the basic project objectives.
- Evaluate the comparative merits of the alternative and the project.

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

7.1.2 Project Objectives

As described in Section 3.2, the following objectives have been established for the proposed project and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts.

1. Promote the remediation and reuse of contaminated brownfield sites within the City, with priority given to those near environmental justice populations.
2. Adopt a Specific Plan that allows for high-cube logistics warehouse uses, e-commerce centers, research and development uses, and retail uses that would encourage private capital investment sufficient to both remediate the entire project site in accordance with DTSC requirements and to develop the project .
3. Facilitate job growth and capitalize on predictable and marketable future development opportunities that provide the City with economic benefits through employment, tax revenues, and infrastructure improvements.
4. Locate industrial, warehousing, and service-commercial uses to areas readily accessible from major highways or rail traffic, and sufficiently separated and buffered to protect residential uses.

7.1.3 Significant Impacts of the Project

As discussed above, a primary consideration in defining project alternatives is their potential to reduce or eliminate significant impacts compared to the proposed project. Chapter 3, *Project Description*, details two project alternatives (Alternative 1, including 200,000 SF Business Park and no retail use; and Alternative 2, including 150,000 SF Business Park and 25,000 SF retail use) and also describes Access Alternatives (designated as 1A and 2A) for each of these alternatives. The Access Alternatives would eliminate the railroad spur crossing in the event that this right-of-way cannot be obtained. This section compares project alternatives impacts to the “worst case” Alternative (1 or 2) and access scenario (1A or 2A) for project-related impacts.

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The impact analysis in Chapter 5 of this EIR concludes that implementation of the proposed project would result in the following significant impacts.

7.1.3.1 SIGNIFICANT UNAVOIDABLE IMPACTS

Air Quality

Impact AQ-1. Operation of the proposed project would conflict with or obstruct implementation of the applicable air quality plan.

Impact AQ-2. Construction activities associated with the proposed project could generate short-term emissions in exceedance of SCAQMD'S regional construction significance thresholds for VOC and NO_x. Operation activities associated with the proposed project could generate long-term emissions in exceedance of SCAQMD'S regional construction significance thresholds for VOC, NO_x, and PM₁₀.

Greenhouse Gas

Impact GHG-1. The proposed project would generate a net increase in GHG emissions that would have a significant impact on the environment. Moreover, more than 89 percent of all operational-source emissions (by weight) would be generated by project mobile sources (traffic). Neither the project applicant nor the lead agency (City of Jurupa Valley) can substantively or materially affect reductions in project mobile-source emissions beyond the regulatory requirements.

Impact GHG-2. While the project is consistent with applicable Scoping Plan goals and policies and incorporates project design features that would further minimize GHG emissions, it would exceed the numeric threshold and result in a cumulatively considerable impact with respect to GHG emissions

Transportation and Traffic

Impact T-1, Existing Plus Project Conditions, Opening-Year (2020) Conditions, and Horizon Year (2035) Conditions. The proposed project is forecast to result in less than significant traffic impacts under the "Existing Plus Project," the "Near Term (2020)," and the "Horizon Year 2035" conditions at some of the study intersections and segments with improvements and mitigation measures. However, several of the improvements are not fully funded and/or are under another agency's jurisdiction. Since there is no certainty that these improvements would be implemented, impacts would remain significant and unavoidable at some intersections as identified below.

An impact is considered significant if the project-related traffic causes an intersection to move from an acceptable level of service to an unacceptable level of service (LOS D to LOS E). A significant impact would also occur where an intersection is already operating at a deficient LOS E or worse, and the proposed project adds additional delay to the intersection. The proposed project would result in significant and unavoidable impacts to the following intersections:

Alternatives 1 and 2

- No.1 – Cedar Avenue/I-10 WB ramps, County of San Bernardino

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- No. 2 – Cedar Avenue/I-10 EB ramps, County of San Bernardino
- No. 22 – Hall Avenue/ El Rivino Road, City of Jurupa Valley
- No. 33 – Market Street/SR60 EB ramps, Caltrans
- No. 5 – Cedar Avenue/Jurupa Avenue, County of San Bernardino
- No. 24 – Agua Mansa Road/El Rivino Road, County of San Bernardino
- No. 36 – Riverside Avenue/Slover Avenue, City of Rialto

Alternatives 1A and 2A

- Same as for Alternative 1 and 2 with the exception of Intersection No. 33 for which impacts would not be significant.

Significant and unavoidable impacts also occur at the following roadway segments:

Alternative 1

- Market Street between Hall Avenue and Rivera Street (City of Jurupa Valley and City of Riverside)
- Agua Mansa Road between Hall Street and El Rivino Road (City of Jurupa Valley and County of San Bernardino)

Alternative 2

- El Rivino between Cedar Avenue and Cactus Avenue (City of Jurupa Valley, City of Rialto, and County of San Bernardino)
- Market Street between Hall Avenue and Rivera Street (City of Jurupa Valley and City of Riverside)
- Agua Mansa Road between Hall Street and El Rivino Road (City of Jurupa Valley and County of San Bernardino)

Alternatives 1A and 2A

- El Rivino between Cedar Avenue and Cactus Avenue (City of Jurupa Valley, City of Rialto, and County of San Bernardino)
- Market Street between Hall Avenue and Rivera Street (City of Jurupa Valley and City of Riverside)
- Agua Mansa Road between Hall Street and El Rivino Road (City of Jurupa Valley and County of San Bernardino)

Impact T-1, CMP Facilities. The project would generate traffic volumes that would cumulatively contribute to traffic congestion that exceeds the service standards of the San Bernardino County congestion management agency, Riverside County congestion management agency, and Caltrans.

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7.1.3.2 IMPACTS SIGNIFICANT UNTIL MITIGATED

The proposed project would result in the following significant impacts prior to implementation of mitigation measures. The recommended measures would mitigate these impacts to less than significant.

Biological Resources

Impact BIO-1. Project development could impact several sensitive animal species.

Impact BIO-2. Project development would impact up to 0.332 acre of riparian woodland.

Impact BIO-3. Development of the proposed project would impact up to 0.322 acre of potentially jurisdictional waters and wetlands.

Impact BIO-4. Development of the proposed project would impact vegetation that could be used by nesting birds.

Impact BIO-5. Project development could conflict with City of Jurupa Valley General Plan policies protecting riparian habitats, significant trees, and other vegetation.

Impact BIO-6. Project development could conflict with the provisions of the Western Riverside County Multiple-Species Habitat Conservation Plan.

Cultural Resources

Impact CR-1. Eligible historic resources would be impacted by development of the proposed project.

Impact CR-2. Potentially undiscovered archaeological resources could be impacted by project development.

Geology and Soils

Impact GEO-3. The site contains collapsible soils that may be exacerbated by development of the proposed project.

Impact GEO-4. Expansive soils onsite may cause geologic hazards to workers and visitors.

Impact GEO-6. Previously undiscovered paleontological resources may be accidentally encountered during project implementation.

Hazards and Hazardous Materials

Impact HAZ-1. The proposed project may create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Impact HAZ-2. The proposed project may create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

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Impact HAZ-4. The proposed project is located on a site which is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, could create a significant hazard to the public or the environment.

Tribal Cultural Resources

Impact TCR-1. The proposed project could cause an adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).

Impact TCR-2. The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency to be significant pursuant to criteria in Public Resources Code section 5024.1(c).

7.2 ALTERNATIVES CONSIDERED AND REJECTED

7.2.1 Alternative Development Areas

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines Section 15126.6[f][2][A]). Key factors in evaluating the feasibility of potential offsite locations for EIR project alternatives include:

- If it is in the same jurisdiction.
- Whether development as proposed would require a General Plan Amendment.
- Whether the project applicant could reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent). (CEQA Guidelines Section 15126.6[f][1])

The intent of the Mira Loma Warehouse and Distribution Center Overlay (MLO) in the northwest section of the City (see Figure 3-1, *Regional Location*) is to limit the location of logistics and similar supply-chain uses to this area. The primary industrial, warehousing use of the proposed project, therefore, would not require a General Plan Amendment if proposed within this boundary. The MLO consists primarily of large logistics warehouses with storage, loading, and shipping facilities and industrial/manufacturing properties. However, there is currently no vacant land available in the MLO large enough to accommodate the proposed project. The two largest vacant plots in the MLO are 60 acres and 50 acres. Neither site would accommodate a project approaching the scale of the proposed project or achieve the clean-up of the brownfield Site. Moreover, the 60-acre site, on the northwest corner of SR-60 and Etiwanda Avenue, has already been approved for the Space Center Industrial project.

A logical alternate location for the project within the City was not identified. The project applicant does not own or control any other property, and even if another site could be acquired, it would be unlikely to present

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an opportunity to eliminate the significant and unavoidable impacts to air quality, greenhouse gas emissions, and transportation associated with the proposed project and to remediate a brownfield site. These operational impacts would occur at any selected alternative site in the City.

It was determined, therefore, that it is unlikely that there is an alternative project site that could meet the objectives of the proposed project and reduce significant impacts of the project as proposed. This alternative has therefore been rejected from further consideration.

7.2.2 Alternative Land Use

The following alternative land uses for the project site were reviewed for their potential to reduce or eliminate the significant impacts associated with the project as proposed while attaining most of the project's basic objectives:

- **Residential.** Currently (2019) there is a strong need and market demand for housing. It would likely be an economically viable land use alternative for the project site. Housing, however, could not be developed on the site pursuant to the current brownfield cleanup agreement with DTSC. Development of housing would also require a General Plan Amendment.
- **Agricultural.** None of the lands within the project site have been categorized by the Department of Conservation as important farmlands, and the site is characterized by various contaminants related to the former limestone mining and cement manufacturing uses. The site is unlikely to be a viable site for agricultural uses, and this use would also require a General Plan Amendment.
- **Retail.** Based on the City's 2017 General Plan and Economic Analysis (General Plan Appendix E¹) there is no indication that the project site could support major retail use. The project site is within one of six designated opportunity areas (Northeast Area) but is listed for industrial uses. Note also that the General Plan designates 1,080 acres for commercial retail uses, of which 379 acres (35 percent) were shown as vacant.

7.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Table 7-1 describes the four alternatives that represent a reasonable range of alternatives which have the potential to feasibly attain most of the basic objectives of the project, but which may avoid or substantially lessen any of the significant effects of the project. These alternatives are analyzed in detail in the following sections.

¹ Economic Development Strategy and Implementation Plan Summary, Kosmont Companies, December 18, 2014.

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Table 7-1 Alternatives Description and Statistical Comparison

Alternative Description	Land Use			Environmental Reasons Considered
	Designation	Acres	Square Footage	
Proposed Project Project development includes decontamination and demolition of all on-site structures associated with the Riverside Cement Plant, followed by mass grading and site remediation. The Industrial Park would allow for uses such as manufacturing, research and development, e-commerce centers, high-cube, general warehousing, and distribution and cross-dock facilities. The Business Park would allow for industrial, service-commercial, and related uses, including warehousing/ distribution, research and development, assembly and light manufacturing, repair facilities, and supporting retail uses. The Business Park district includes an existing 23,000-square-foot research and development building (CalPortland area). The Specific Plan allows for an additional 41,000 square feet of Business Park use in the CalPortland area either through expansion of the existing building or new construction. A 70.9-acre Open Space District component would be located in the southern portion of the Specific Plan area.	Business Park/Office (BP) ¹	33.8	264,000	N/A
	Industrial (IP)	189.7	4,216,000	
	Rail ROW	8.4	—	
	Open Space District (OS)	70.9	—	
	Total	302.8	4,480,000	
No Project/No Development This alternative assumes that the existing 23,000-square-foot research and development building (CalPortland area) on the site would remain, and leases would be extended/renewed to continue office operations. The existing limestone quarry and cement manufacturing plant structures would remain, and the site would not be remediated.	Business Park/Office (BP)	33.8	23,000 SF	Required by CEQA
	Industrial (IP)	—	—	
	Rail ROW	8.4	—	
	Open Space District (OS)	—	—	
	Total	42.2	23,000	
Existing General Plan This alternative is based on a floor to area ratio (FAR) of 0.25 for offices and light industrial across the entire site (294.4 acres). No heavy industrial or open space uses are allowed under the existing general plan.	Business Park/Office (BP)	294.4	3,206,016	Potential to reduce significant impacts related to: <ul style="list-style-type: none"> • Air Quality • Greenhouse Gas Emissions
	Industrial (IP)	—	—	
	Rail ROW	8.4	—	
	Open Space District (OS)	—	—	
	Total	302.8	3,206,016	

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Table 7-1 Alternatives Description and Statistical Comparison

Alternative Description	Land Use			Environmental Reasons Considered
	Designation	Acres	Square Footage	
Reduced Intensity Alternative The reduced intensity alternative is based on an FAR for the industrial park of 0.40 instead of a FAR of 0.52 associated with the proposed project. The square footage for the business park remains consistent with the development option referred to as "Alternative 1" throughout this DEIR. The expansion of the 23,000 SF research and development building to 64,000 SF is also included in this alternative. This alternative also includes the open space as with the proposed project. It is assumed that a Specific Plan would be adopted for this alternative.	Business Park/Office (BP)	33.8	264,000 SF	Potential to reduce significant impacts related to: • Air Quality • Greenhouse Gas Emissions • Transportation
	Industrial (IP)	189.7	3,305,300 SF	
	Rail ROW	8.4 acres	—	
	Open Space District (OS)	70.9 acres	—	
	Total	302.8	3,569,300	
Alternate Land Use Mix This alternative assumes an increase in square footage for the business park (500,000-square SF) and a reduction in the industrial park (warehousing) use (2,500,000 SF (FAR of 0.3)) in comparison to the proposed project. Overall building development would be reduced by approximately 1.48M SF. This alternative includes the open space as with the proposed project. It is assumed that a Specific Plan would be adopted for this alternative.	Business Park/Office (BP)	33.8	564,000 SF	Potential to reduce significant impacts related to: • Air Quality • Greenhouse Gas Emissions • Transportation
	Industrial (IP)	189.7	2,500,000 SF	
	Rail ROW	8.4 acres	—	
	Open Space District (OS)	70.9 acres	—	
	Total	302.8	3,064,000	

Notes:

BP: Business Park

IP: Industrial Park

ROW: Right-of-way

¹ Includes light industrial. Alternative 1 considered.

An EIR must identify an "environmentally superior" alternative, and where the No Project Alternative is identified as environmentally superior, the EIR is required to identify as environmentally superior alternative from among the others evaluated. Each alternative's environmental impacts are compared to the proposed project and determined to be environmentally superior, neutral, or inferior. The impacts found significant and unavoidable have been used in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project. Only the impacts involving air quality, greenhouse gas, and transportation were found to be significant and unavoidable. Section 7.7 identifies the Environmentally Superior Alternative.

The preferred land use alternative (proposed project) is analyzed in detail in Chapter 5 of this DEIR.

7.3.1 Alternatives Comparison

The following statistical analysis provides a summary of general buildout projections for the four project alternatives and the proposed project. Table 7-2 identifies City-wide information regarding population and

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employment projections, and also provides the jobs-to-housing ratio for each of the alternatives. Furthermore, Table 7-2 includes the FAR for each alternative, allowable land use for the site, and maximum building height allowed.

Table 7-3 shows the morning and evening peak hour trips for each alternative. Trip generation is based upon rates obtained from the Institute of Transportation Engineers' (ITE) *Trip Generation Manual*, 10th edition (2017), and the City of Fontana's "Truck Trip Generation Study" (2003). Truck trips are converted to passenger car equivalent (PCE) using factors obtained from the San Bernardino County Transportation Authority.

Table 7-4 shows the projected vehicle miles traveled (VMT) for each alternative. The vehicle mix used in the traffic study was applied to the alternatives to estimate VMT. The study was based on 21 percent truck trips for the Business Park and 38 percent truck trips for the Industrial Park. The Air Quality Impact Report for the project (Appendix C 1a) assumes 40 miles per truck and 9.3 miles per passenger vehicle.

Table 7-2 Buildout Statistical Summary

	Proposed Project	No Project/No Development	Existing General Plan	Reduced Intensity Alternative	Alternative Land Use Plan
Employment					
Business Park/Office ¹	121	—	1,603	121	271
Industrial ²	844	—	—	661	500
Total	965	—	1,603	782	771
Jobs-to-Housing Ratio ³	1.10 by 2040	1.07 by 2040	1.13 by 2040	1.10 by 2040	1.10 by 2040
Allowable Land Use ⁴	<p>Industrial Park: Manufacturing, high-cube logistics warehouse uses, e-commerce centers, materials processing.</p> <p>Business Park: industrial, service-commercial, and related uses, including warehousing/distribution, research and development, assembly and light manufacturing, repair facilities and supporting retail uses.</p> <p>Open Space:</p>	Employee-intensive uses, including research and development, technology centers, corporate offices, clean industry, and supporting retail uses.	Employee-intensive uses, including research and development, technology centers, corporate offices, clean industry, and supporting retail uses.	Same as proposed project.	Same as proposed project.

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Table 7-2 Buildout Statistical Summary

		Proposed Project	No Project/No Development	Existing General Plan	Reduced Intensity Alternative	Alternative Land Use Plan
Maximum Building Height ⁵		Industrial Park: 100 ft Business Park: 50 ft Open Space: 35 ft	50 ft	50 ft	Industrial Park: 100 ft Business Park: 50 ft Open Space: 35 ft	Industrial Park: 100 ft Business Park: 50 ft Open Space: 35 ft
FAR ⁶	Business Park/Office	0.35	0.02	0.25	0.18	0.38
	Industrial	0.52	—		0.40	0.30

Notes:

SF: square foot

FAR: Floor area ratio

¹ Generation factors were obtained from the Utility Report for the proposed project prepared by Langan. Industry standard numbers, reviewed by the Rubidoux Community Services District, were used. An employment generation rate of 1 employee to 2,000 SF was used for offices and light industrial. It should be noted that the 23,000 SF of existing research and development are not included in this analysis since they are not associated with the addition of employees.

² An employment generation rate of 1 employee to 5,000 SF was used for industrial/warehousing.

³ Housing and employment is based on SCAG's 2040 projections for the City of Jurupa Valley. The table shows the resultant Jobs-to-Housing ratios with projects citywide.

⁴ The current allowable land use for the site, under the General plan, is Business Park with Specific Plan Overlay. For the proposed project, reduced intensity alternative, and alternative land use mix, it is assumed that a general plan amendment is adopted to change the land use designation to Heavy Industrial (HI) with Specific Plan Overlay, Light Industrial (LI) with Specific Plan Overlay, and Open Space Recreational (OS-R) with Specific Plan Overlay.

⁵ The maximum height allowed for the No Project and Existing General Plan alternatives are based on the current zoning for the site. The majority of the project site is zoned Manufacturing-Heavy (M-H). The northeast corner of the site is zoned Manufacturing-Service Commercial (M-SC). The maximum height allowed for the proposed project and the remainder of the alternatives is based on the development standards in the Aqua Mansa Specific Plan.

⁶ FAR is calculated for the industrial park area (189.7 acres) and the business park area (33.8 acres) separately except for the Existing General Plan alternative. For this alternative, business park uses will be developed across the entire project site (294.4 acres), including the area designated as open space under the proposed project. The FAR for this alternative is calculated for the entire site area.

Table 7-3 Trip Generation Comparison

	Daily	Morning Peak Hour	Evening Peak Hour
Proposed Project (Alternative 1)	11,376	746	868
No Project/No Development	259	10	12
Existing General Plan	20,500	2,819	2,542
Reduced Intensity Alternative	9,356	633	719
Alternative Land Use Mix	9,465	798	839

Source: Ganddini 2019.

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Table 7-4 VMT Comparison

	VMT Total	Passenger Vehicle VMT	Truck VMT	Difference %
Proposed Project	146,706	48,426	98,280	—
No Project/No Development	2,404	2,404	0	-98%
Existing General Plan	253,884	120,663	133,221	73%
Reduced Intensity Alternative	119,929	41,058	78,871	-18%
Alternative Land Use Mix	119,874	45,433	74,441	-18%

7.3.2 Environmental Impact Comparison

Table 7-5, *Project Alternatives: Environmental Impact Comparison*, assesses the relative impact for each project alternative in comparison to the proposed project. All of the environmental categories evaluated for the proposed project in this DEIR are compared. A determination is provided whether the impact is “less than” (LT), “greater than” (GT), or “similar to” (S) the respective environmental impact for the proposed project.

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Table 7-5 Project Alternatives: Environmental Impact Comparison

Impact	No Project	Existing General Plan	Reduced Intensity Alternative	Alternate Land Use Mix
Aesthetics	Under the No Project alternative, no new development would occur on the project site. It is anticipated that the existing buildings and structures would remain, and improved maintenance and upgrades would potentially take place over time at the CalPortland area. Landscaping and surface parking would be expected to remain the same. In comparison, the proposed project would completely change the character of the site, introducing warehousing and offices, and substantially increase the massing/scale of development on the property. Although aesthetic impacts are inherently subjective, the proposed project would introduce new buildings, more landscaping, and open space. Therefore, it is concluded that the aesthetics impact for the No Project alternative (existing aging cement plant structures and the research and development office building) would be greater than for the proposed project. As with the proposed project, aesthetic impacts would be considered less than significant. GT	Aesthetic impacts associated with the Existing General Plan alternative would be greater than for the proposed project since it would result in the development of offices and light industrial uses across the entire site without the open space area. Although buildout intensity would be reduced within the area proposed for industrial park under the proposed Specific Plan, the elimination of the open space under the Existing General Plan alternative would increase aesthetic impacts in comparison to the proposed project. As with the proposed project, impacts would be less than significant. GT	Aesthetic impacts associated with the Reduced Intensity alternative would be similar to the proposed project. The primary difference would be that the industrial park building footprint would be reduced (from 4.2M SF under the proposed project to 3.3M SF). It is assumed that a Specific Plan with similar development standards (heights, setbacks, and design standards) would apply to this alternative. The business park development and open space area would be the same as the proposed project. Therefore, impacts would be less than significant and similar to the proposed project. S	Under this alternative, the business park use would be intensified (more than doubling the square footage in comparison to the proposed project), and the industrial park (warehousing) would be substantially reduced. The intensity of development along Rubidoux Boulevard would increase from an 0.18 FAR to a 0.38 FAR. It is assumed that a Specific Plan with similar development standards (heights, setbacks, and design standards) would apply to this alternative. The open space area would be the same as the proposed project. The overall character would be different than the proposed project, but overall impacts would be similar and less than significant. S
Agriculture	Similar to the proposed project, the No Project alternative would have no impacts on agricultural resources. S	Similar to the proposed project, the existing general plan alternative would have no impacts on agricultural resources. S	Similar to the proposed project, the reduced intensity alternative would have no impacts on agricultural resources. S	Similar to the proposed project, the Alternate Land Use Mix would have no impacts on agricultural resources. S
Air Quality	This alternative would not generate an increase in emissions from construction or operational activities. Therefore, no impacts to air quality would occur under this alternative. Impacts associated with this alternative would be substantially reduced and would be less than significant. In comparison to the proposed project, this alternative would eliminate a significant, unavoidable impact. LT	This alternative would have similar short-term impacts to air quality during the construction phase. This alternative would generate an increase in emissions from operational activities and would generate substantially higher VMT than the project (73 percent higher VMT compared to Alternative 1). Therefore, this alternative would substantially increase impacts compared to the proposed project, and air quality impacts of this alternative would continue to be significant. GT	This alternative would have similar short-term impacts to air quality during the construction phase. This alternative would generate an increase in emissions from operational activities but would generate approximately 18 percent fewer truck trips than the proposed project and would result in an approximate 18 percent VMT reduction and associated criteria air pollutant emissions. Therefore, this alternative would reduce impacts compared to the proposed project, but air quality impacts would remain significant and unavoidable. LT	This alternative would have similar short-term, construction-related air quality impacts. This alternative would generate an increase in operation-related emissions but would generate fewer truck trips compared to the proposed project, resulting in an approximate 18 percent reduction in VMT and associated criteria air pollutants. Therefore, this alternative would reduce impacts compared to the proposed project, but air quality impacts would remain significant and unavoidable. LT
Biological Resources	Under the No Project alternative, the site would not be redeveloped, and potential impacts to biological resources (i.e., migratory bird nesting habitat in onsite ornamental trees) would be eliminated. No impact would occur under this alternative, and impacts would be reduced compared to the proposed project, which requires mitigation to reduce impacts to less than significant. LT	In comparison to the proposed project, impacts to biological resources associated with the Existing General Plan alternative would be greater than for the proposed project since it would result in the development of the entire site, including the approximate 70.9 acres of open space under the proposed project. Although it is not certain, it is anticipated that sensitive species habitats and riparian areas could be preserved so that significant impacts would be mitigated to less than significant. GT	This alternative would reduce industrial uses by approximately 0.9M SF (approximately 21 acres). Although this reduction would allow the preservation of additional native habitat, the site is not characterized by sensitive habitats, particularly the area proposed for industrial uses, which is highly disturbed. Overall, therefore, impacts would be expected to be similar to the proposed project and be reduced to less than significant upon compliance with the MSCHP and implementation of mitigation measures. S	This alternative would reduce building square footage by 1.4 M SF (approximately 32 acres) in comparison to the proposed project. It would intensify development within the Business Park area, but almost all of this area is already disturbed or ornamental vegetation. Overall, therefore, impacts would be expected to be similar to the proposed project, and as with the proposed project, would be reduced to less than significant upon compliance with the MSCHP and implementation of mitigation measures. S
Cultural Resources	Under this alternative, no demolition, grading, or redevelopment activities would occur on the project site. Accordingly, this alternative would not result in the potential to encounter archaeological resources during grading activities. Since no earthmoving activities would occur, there would be no potential to damage cultural resources, and impacts would be reduced compared to the proposed project. LT	Implementation of this alternative would cover a wider development area and would have an increased potential for discovery of cultural resources during grading and excavation activities. Thus, impacts would be greater than the proposed project. As with the proposed project, cultural resource impacts would be reduced to less than significant upon implementation of mitigation measures. GT	Implementation of this alternative would cover the same development area and would have the same potential for discovery of cultural resources during grading and excavation activities. Thus, impacts would be the same as the proposed project and be reduced to less than significant upon implementation of mitigation measures. S	Implementation of this alternative would cover the same development area and would have the same potential for discovery of cultural resources during grading and excavation activities. Thus, impacts would be the same as the proposed project and would be reduced to less than significant upon implementation of mitigation measures. S

7. Alternatives to the Proposed Project

Table 7-5 Project Alternatives: Environmental Impact Comparison

Impact	No Project	Existing General Plan	Reduced Intensity Alternative	Alternate Land Use Mix
Geology and Soils	<p>No new construction activities, including demolition and grading, would occur under the No Project alternative. This alternative would not involve any grading or excavation that could cause unstable subsurface geologic conditions or erosion impacts.</p> <p>The No Project alternative would not introduce new employees to the project site that could be exposed to seismic ground shaking or other geologic hazards. Overall, therefore, geologic and soils impacts, would be reduced relative to the proposed project.</p> <p>Furthermore, under this alternative there is no potential to encounter paleontological resources during grading activities. Since no earthmoving activities would occur, there would be no potential to damage paleontological resources, and impacts would be reduced compared to the proposed project.</p> <p style="text-align: center;">LT</p>	<p>Under this alternative, like the proposed project, existing structures would be removed and replaced with buildings that would be required to comply with the most recent building and seismic codes and regulations.</p> <p>Geology and soils impacts of this alternative would be less than significant, similar to the proposed project.</p> <p style="text-align: center;">S</p>	<p>Under this alternative, like the proposed project, existing structures would be removed and replaced with buildings that would be required to comply with the most recent building and seismic codes and regulations.</p> <p>Geology and soils impacts of this alternative would be less than significant, similar to the proposed project.</p> <p style="text-align: center;">S</p>	<p>Under this alternative, like the proposed project, existing structures would be removed and replaced with buildings that would be required to comply with the most recent building and seismic codes and regulations.</p> <p>Geology and soils impacts of this alternative would be less than significant, similar to the proposed project.</p> <p style="text-align: center;">S</p>
Greenhouse Gas Emissions	<p>This alternative would not generate an increase in emissions from construction or operational activities. Therefore, no impacts to GHG emissions would occur under this alternative. Impacts associated with this alternative would be substantially reduced and would be less than significant. In comparison to the proposed project, this alternative would eliminate a significant, unavoidable impact.</p> <p style="text-align: center;">LT</p>	<p>This alternative would generate an increase in GHG emissions from operational activities and would result in substantially higher VMT compared to the proposed project (73 percent higher VMT compared to Alternative 1). Therefore, this alternative would increase impacts compared to the proposed project, and GHG impacts of this alternative would continue to be significant and unavoidable.</p> <p style="text-align: center;">GT</p>	<p>This alternative would increase GHG emissions in comparison to existing conditions but would generate approximately 18 percent fewer truck trips compared to the proposed project and would reduce VMT by approximately 18 percent. Therefore, this alternative would reduce impacts compared to the proposed project, but GHG impacts of this alternative would continue to be significant and unavoidable.</p> <p style="text-align: center;">LT</p>	<p>This alternative would increase GHG emissions in comparison to existing conditions but would generate substantially fewer truck trips, resulting in an approximately 18 percent decrease in VMT and associated GHG emissions. Therefore, this alternative would reduce impacts compared to the proposed project, but GHG impacts of this alternative would continue to be significant and unavoidable.</p> <p style="text-align: center;">LT</p>
Hazards and Hazardous Materials	<p>No demolition or grading would occur under the No Project alternative. Potential hazards from the mitigation, reuse, and disposal of impacted soils and materials would not occur.</p> <p>Under the No Project alternative, however, the site would not be remediated under the Brownfield program. The site would not require the oversight by the Department of Toxic Substances Control (DTSC), and no further soil sampling activities would be required. Since the site would not be cleaned up and existing hazards would remain, this alternative would result in greater impacts to hazards than the proposed project.</p> <p style="text-align: center;">GT</p>	<p>As with the proposed project, for the most part, the transport, use, and storage of hazardous materials would be mitigated by comprehensive regulations. Since the 70.9 acres proposed for open space under the proposed project would be developed, more grading activities would be required with the Existing General Plan alternative. Potential hazards from the mitigation, reuse, and disposal of impacted soils and materials would be increased compared to the proposed project. For the Existing General Plan alternative, DTSC oversight would most likely still be obtained for the development, including soil management plan, waste management plan, and dust control activities. Hazards and hazardous material impacts would be slightly greater under this alternative.</p> <p style="text-align: center;">GT</p>	<p>As with the proposed project, the transport, use, and storage of hazardous materials would be mitigated by comprehensive regulations. Although the overall building square footage would be reduced, the area to be remediated, to be graded, and the volume of earth to be moved will not change in comparison to the proposed project. Potential hazards from the mitigation, reuse, and disposal of impacted soils and materials also will not change compared to the proposed project. For the Reduced Intensity alternative, DTSC oversight would still be obtained for the development, including soil management plan, waste management plan, and dust control activities. Overall hazards and hazardous materials impacts would be similar to the proposed project.</p> <p style="text-align: center;">S</p>	<p>As with the proposed project, , the transport, use, and storage of hazardous materials would be mitigated by comprehensive regulations. Although the overall building square footage would be reduced, the area to be remediated, to be graded, and the volume of earth to be moved will not change in comparison to the proposed project. Potential hazards from the mitigation, reuse, and disposal of impacted soils and materials also will not change compared to the proposed project. For the Alternate Land Use mix, DTSC oversight would still be obtained for the development, including soil management plan, waste management plan, and dust control activities. Overall hazards and hazardous materials impacts would be similar to the proposed project.</p> <p style="text-align: center;">S</p>
Hydrology and Water Quality	<p>Existing water quality conditions, groundwater supplies, drainage patterns, and runoff amounts would not change under the No Project alternative. This alternative would not introduce new sources of water pollutants to the project area. However, this alternative would not include improvements associated with new low-impact development, source control, site design, and treatment control best management practices (BMPs) to minimize runoff and water pollution. These BMPs are required measures that would occur under the proposed project and have a beneficial impact on stormwater quality. Overall, hydrology and water quality impacts would be slightly greater under this alternative but, as with the proposed project, would be less than significant.</p> <p style="text-align: center;">GT</p>	<p>As with the proposed project, this alternative would comply with the NPDES, which regulates discharges into waters of the United States and mandates MS4 permits (regulating municipal storm sewer systems) and Storm Water Pollution Prevention Plans (SWPPPs) requiring implementation of BMPs for potential surface water and water quality impacts related to project construction. Hydrology impacts, therefore, would be similar to the proposed project.</p> <p style="text-align: center;">S</p>	<p>The Reduced Intensity alternative is a reduced version of the proposed project. As with the proposed project, this alternative would comply with the NPDES, which regulates discharges into waters of the United States and mandates MS4 permits (regulating municipal storm sewer systems) and Storm Water Pollution Prevention Plans (SWPPPs) requiring implementation of BMPs for potential surface water and water quality impacts related to project construction. Hydrology impacts, therefore, would be similar to the proposed project.</p> <p style="text-align: center;">S</p>	<p>Similar to the Reduced Intensity alternative, this alternative is a reduced version of the proposed project. As with the proposed project, this alternative would comply with the NPDES, which regulates discharges into waters of the United States and mandates MS4 permits (regulating municipal storm sewer systems) and Storm Water Pollution Prevention Plans (SWPPPs) requiring implementation of BMPs for potential surface water and water quality impacts related to project construction. Hydrology impacts, therefore, would be similar to the proposed project.</p> <p style="text-align: center;">S</p>

7. Alternatives to the Proposed Project

Table 7-5 Project Alternatives: Environmental Impact Comparison

Impact	No Project	Existing General Plan	Reduced Intensity Alternative	Alternate Land Use Mix
Land Use and Planning	<p>Under the No Project alternative, the existing 23,000 SF of office uses would remain. This use is consistent with the Business Park designation for the project site. Leaving the site in its existing site would not as effectively achieve the goals and policies of the City's General Plan and the Southern California Association of Governments' (SCAG's) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). For the RTP/SCS, it would not maximize accessibility of people and good in the region or maximize productivity of the transportation system. For the City's General Plan, it would not effectively accommodate industrial and business park development or concentrate these uses near major transportation facilities. Although it would not hamper achieving many of the General Plan's environmental resources-related policies, it also would not provide some of the benefits of improved infrastructure, including water quality improvements. Overall, impacts would be greater than for the proposed project but, as with the proposed project, would result in less than significant impacts.</p> <p style="text-align: center;">GT</p>	<p>This alternative would be consistent with the land use designation for the project site, but may not be as effective in achieving many of the General Plan policies as the proposed project. It would not provide for the open space area, and therefore would not be as effective in encouraging a land use balance. And finally, it would be less effective in achieving conservation goals since this alternative would maximize business park development within the 70.9 acres designated for open space under the proposed project. Since, this alternative would, however, be consistent with the General Plan designations and policies, the land use and planning impact is considered similar to the proposed project, and like the proposed project would result in less than significant impacts.</p> <p style="text-align: center;">S</p>	<p>This alternative would include the same land uses as the proposed project but would reduce the industrial park use by approximately one million square feet. It would include the Open Space. As with the proposed project it would require a General Plan Amendment, and it is assumed that a Specific Plan would be adopted for this alternative. Overall, land use impacts would be similar and less than significant.</p> <p style="text-align: center;">S</p>	<p>This alternative would increase Business Park uses and reduce Industrial Park uses relative to the proposed project. It would include the Open Space area. As with the proposed project, it would require a General Plan Amendment, and it is assumed that a Specific Plan would be adopted for this alternative. Overall, land use impacts would be similar to the proposed project and less than significant.</p> <p style="text-align: center;">S</p>
Mineral Resources	<p>The No Project alternative would not result in redevelopment of the project site, and potential impacts to mineral resources would be eliminated. No impact would occur under this alternative, and impacts would be reduced compared to the proposed project. It should be noted that impacts to mineral resources under the proposed project are less than significant.</p> <p style="text-align: center;">LT</p>	<p>Implementation of this alternative would cover the same development area and would have the same potential impacts to mineral resources. Thus, impacts would be the same as the proposed project and would be less than significant.</p> <p style="text-align: center;">S</p>	<p>Implementation of this alternative would cover the same development area and would have the same potential impacts to mineral resources. Thus, impacts would be the same as the proposed project and would be less than significant.</p> <p style="text-align: center;">S</p>	<p>Implementation of this alternative would cover the same development area and would have the same potential impacts to mineral resources. Thus, impacts would be the same as the proposed project and would be less than significant.</p> <p style="text-align: center;">S</p>
Noise	<p>Under the No Project alternative, existing commercial office uses on the project site would continue indefinitely. Because no redevelopment would occur, no construction-related noise or vibration would occur. Therefore, construction-related noise impacts would be less than the proposed project.</p> <p>Operation of the No Project alternative would not introduce new stationary or mobile sources of noise to the project site, such as recreational noise, and operational traffic for this alternative would be less than the proposed project.</p> <p>Therefore, the No Project alternative would reduce noise impacts in comparison to the proposed project. However, as discussed in Section 5.10 of this DEIR, noise impacts of the proposed project would be less than significant.</p> <p style="text-align: center;">LT</p>	<p>Reduction in building development intensity could slightly reduce the length of project-related construction noise impacts but would not affect peak construction noise volumes. Due to similar peak construction noise volumes and generally similar length of construction activities, construction-related noise impacts would be the same as the proposed project and less than significant.</p> <p>The increase in vehicle trips would increase the operational traffic-related noise impacts. However, no significant operational-related noise impacts would arise. Noise impacts of this alternative would increase compared to the proposed project and would remain less than significant.</p> <p style="text-align: center;">GT</p>	<p>Reduction in building development intensity could slightly reduce the duration of project-related construction noise impacts but would not affect peak construction noise volumes. Due to similar peak construction noise volumes and generally similar length of construction activities, construction-related noise impacts would be the same as the proposed project and less than significant.</p> <p>The reduction in vehicle trips would slightly reduce the operational traffic-related noise impacts. However, no significant operational noise impacts were identified for the proposed project. Noise impacts of this alternative would be reduced compared to the proposed project and would remain less than significant.</p> <p style="text-align: center;">LT</p>	<p>Reduction in building development intensity could slightly reduce the duration of project-related construction noise impacts but would not affect peak construction noise volumes. Due to similar peak construction noise volumes and generally similar length of construction activities, construction-related noise impacts would be the same as the proposed project and less than significant.</p> <p>The reduction in vehicle trips would slightly reduce the operational traffic-related noise impacts. However, no significant operational-related noise impacts were identified for the proposed project. Noise impacts of this alternative would be reduced compared to the proposed project and would remain less than significant.</p> <p style="text-align: center;">LT</p>
Population and Housing	<p>The No Project alternative would not introduce new residents to the project site, and therefore would not directly impact community population. Since this alternative would not provide new jobs, however, it would not help improve the area's jobs-housing balance. Since this is not considered an environmental impact, however, population and housing impacts would be considered similar to the proposed project and less than significant impact.</p> <p style="text-align: center;">S</p>	<p>As with the proposed project, this alternative would not displace residents or relocate housing. It may indirectly affect the need for new housing, but the project employment due to the project is within regional projections. As with the proposed project, this alternative would improve the jobs/housing balance in the City of Jurupa Valley. This is not considered an environmental impact, however, so impacts are considered similar to the project</p> <p style="text-align: center;">S</p>	<p>As with the proposed project, this alternative would not displace residents or relocate housing. It may indirectly affect the need for new housing, but the project employment due to the project is within regional projections. As with the proposed project, this alternative would improve the jobs/housing balance in the City of Jurupa Valley. This is not considered an environmental impact, however, so impacts are considered similar to the project.</p> <p style="text-align: center;">S</p>	<p>As with the proposed project, this alternative would not displace residents or relocate housing. It may indirectly affect the need for new housing, but the project employment due to the project is within regional projections. As with the proposed project, this alternative would improve the jobs/housing balance in the City of Jurupa Valley. This is not considered an environmental impact, however, so impacts are considered similar to the project.</p> <p style="text-align: center;">S</p>

7. Alternatives to the Proposed Project

Table 7-5 Project Alternatives: Environmental Impact Comparison

Impact	No Project	Existing General Plan	Reduced Intensity Alternative	Alternate Land Use Mix
Public Services	<p>Under the No Project alternative, the public service demand would not change. The existing development does not generate school and library service demand, and demand for other public services is typically lower for commercial uses than residential uses. The No Project alternative demand for fire and police services would be less than for the proposed project. Public service impacts would be less than for the proposed project. Impacts for the proposed project, however, are less than significant.</p> <p style="text-align: center;">LT</p>	<p>Like the proposed project, this alternative would comply with the California Fire Code, and implementation of existing regulations and standard conditions would ensure that impacts related to fire service are not substantially different from those of the proposed project. Because this alternative would accommodate approximately 638 more employees than the proposed project, this alternative could increase demand for fire and police services compared to the proposed project. It would not, however, generate public service demand related to the Open Space area included in the proposed project. Overall, public service demand would likely be slightly greater than for the proposed project, but less than significant.</p> <p style="text-align: center;">GT</p>	<p>Like the proposed project, this alternative would comply with the California Fire Code, and implementation of existing regulations and standard conditions would ensure that impacts related to fire service are not substantially different from those of the proposed project. This alternative would generate approximately 183 fewer employees (an 18% reduction) than the proposed project, decreasing demand for fire and police services compared to the proposed project. However, as with the proposed project, public service impacts would be less than significant.</p> <p style="text-align: center;">LT</p>	<p>Like the proposed project, this alternative would comply with the California Fire Code, and implementation of existing regulations and standard conditions would ensure that impacts related to fire service are not substantially different from those of the proposed project. Because this alternative would generate approximately 194 fewer employees (a 20% reduction) than the proposed project, this alternative would decrease demand for fire and police services compared to the proposed project. However, as with the proposed project, public service impacts would be less than significant.</p> <p style="text-align: center;">LT</p>
Recreation	<p>Under this alternative, there would be no increase in demand for recreational facilities or services, since no residential uses would be developed. However, this alternative would not provide the 70.9-acre open space and in-lieu fees that would be provided by the proposed project. Although the No Project alternative would not generate new demand for parks, it would not provide in-lieu fees. In comparison to the proposed project, therefore, the No Project alternative would be considered to have a slightly greater impact on recreation. Recreation impacts for both the No Project alternative and proposed project are less than significant.</p> <p style="text-align: center;">GT</p>	<p>Similar to the proposed project, this alternative would not increase the demand for recreational facilities or services, since no residential uses would be developed. However, this alternative would not pay in-lieu fees. Therefore, the impact of this alternative to recreational services would be greater than that of the project.</p> <p style="text-align: center;">GT</p>	<p>Similar to the proposed project, this alternative would not increase the demand for recreational facilities or services, since no residential uses would be developed. This alternative would also pay in-lieu fees. Therefore, the impact of this alternative to recreational services would be similar to the proposed project.</p> <p style="text-align: center;">S</p>	<p>Similar to the proposed project, this alternative would not increase the demand for recreational facilities or services, since no residential uses would be developed. This alternative would also provide the open space area and pay in-lieu fees. Therefore, the impact of this alternative to recreational services would be similar to the proposed project.</p> <p style="text-align: center;">S</p>
Transportation and Traffic	<p>Under this alternative, existing land uses would remain, and development associated with the proposed project would not occur. No additional trips would be generated, and this alternative would eliminate the significant unavoidable transportation impact of the project.</p> <p style="text-align: center;">LT</p>	<p>Land uses allowed under the Existing General Plan would generate substantially more trips than the proposed project. Compared to the proposed project Alternative 1, this alternative would generate 2,073 additional PCE morning peak hour trips and 1,674 additional PCE evening peak hour trips than the proposed project. Consequently, this alternative would substantially increase transportation impacts associated with the project, and impacts would remain significant and unavoidable.</p> <p style="text-align: center;">GT</p>	<p>This alternative would reduce transportation impacts of the proposed project. This alternative would result in 113 fewer PCE morning peak hour trips (15 percent less) and 149 fewer PCE evening peak hour trips (17 percent less) than Alternative 1. While this alternative would reduce transportation impacts of the proposed project, this alternative would not eliminate the project's significant and unavoidable impacts, including impacts to Caltrans facilities.</p> <p style="text-align: center;">LT</p>	<p>This alternative would slightly reduce transportation impacts of the proposed project during the evening peak hour but would slightly increase impacts during the morning peak hour. This alternative would result in 29 fewer PCE evening peak hour trips (3 percent less) but would result in 52 additional PCE morning peak hour trips (7 percent more) than Alternative 1. Overall, this alternative would have similar impacts compared to the proposed project and would not eliminate the project's significant and unavoidable impacts, including impacts to Caltrans facilities.</p> <p style="text-align: center;">S</p>
Tribal Cultural Resources	<p>Under this alternative no ground disturbance would occur. There would be no potential for tribal cultural resource impacts, and these impacts would be reduced compared to the proposed project. However, tribal cultural resources are not a significant and unavoidable impact of the proposed project.</p> <p style="text-align: center;">LT</p>	<p>Implementation of this alternative would cover a wider development area and would have an increased potential for discovery of tribal cultural resources during grading and excavation activities. Thus, impacts would be greater than the proposed project and be reduced to less than significant upon implementation of mitigation measures.</p> <p style="text-align: center;">GT</p>	<p>Similar to the proposed project, this alternative would replace existing structures with new buildings and result in ground disturbances due to grading. Therefore, potential tribal cultural resources impacts would be similar to the proposed project and less than significant after mitigation.</p> <p style="text-align: center;">S</p>	<p>Similar to the proposed project, this alternative would replace existing structures with new buildings and result in ground disturbances due to grading. Therefore, potential tribal cultural resources impacts would be similar to the proposed project and less than significant after mitigation.</p> <p style="text-align: center;">S</p>
Utilities and Service Systems	<p>Due to the increase in land use intensity under the proposed project, upgrades to existing utilities and service systems would be required, such as upgrading water, wastewater, and storm drainpipes and fixtures to tie into off-site connections. This alternative would also eliminate the ongoing increased need for services and resources (including water supply and treatment, wastewater treatment, natural gas, and electricity) in comparison to the proposed project. Therefore, the No Project alternative would reduce impacts to utility services compared to the proposed project. Impacts would be less than significant as with the proposed project.</p> <p style="text-align: center;">LT</p>	<p>Because this alternative would accommodate approximately 638 more employees than the proposed project, this alternative would increase demand for utility and service system. Furthermore, office and light industrial uses typically have a higher demand for water and generate more wastewater than industrial uses. However, as with the proposed project, utility service impacts would be less than significant.</p> <p style="text-align: center;">GT</p>	<p>Because this alternative would accommodate approximately 183 fewer employees and approximately 0.9M less building square footage than the proposed project, this alternative would decrease demand for utility and service system. As with the proposed project, utility service impacts would be less than significant.</p> <p style="text-align: center;">LT</p>	<p>Because this alternative would accommodate approximately 194 fewer employees and approximately 1.4M less building square footage than the proposed project, this alternative would decrease demand for utility and service system. As with the proposed project, utility service impacts would be less than significant.</p> <p style="text-align: center;">LT</p>

7. Alternatives to the Proposed Project

7.3.3 Conclusion

7.3.3.1 ABILITY TO REDUCE ENVIRONMENTAL IMPACTS

Table 7-6 summarizes the environmental impacts of each alternative compared to the proposed project.

Table 7-6 Summary of Proposed Project and Alternatives Impacts

Topic	Proposed Project	No Project Alternative	Existing General Plan	Reduced Intensity	Alternate Land Use Mix
Aesthetics	LTS	+	+	=	=
Agricultural Resources	LTS	=	=	=	=
Air Quality	S/U	-	+	-	-
Biological Resources	LTS/M	-	+	=	=
Cultural Resources	LTS/M	-	+	=	=
Geology and Soils	LTS/M	-	=	=	=
Greenhouse Gas Emissions	S/U	-	+	-	-
Hazards and Hazardous Materials	LTS/M	+	+	=	=
Hydrology and Water Quality	LTS/M	+	=	=	=
Land Use and Planning	LTS	+	=	=	=
Mineral Resources	LTS	-	=	=	=
Noise	LTS	-	+	-	-
Population and Housing	LTS	=	=	=	=
Public Services	LTS	-	+	-	-
Recreation	LTS	+	+	=	=
Transportation and Traffic	S/U	-	+	-	=
Tribal Cultural Resources	LTS/M	-	+	=	=
Utilities and Service Systems	LTS	-	+	-	-

Notes: LTS = Less than Significant; LTS/M = Less than Significant with Mitigation Incorporated; S/U = Significant and Unavoidable
 (-) The alternative would result in less of an impact than the proposed project.
 (+) The alternative would result in greater impacts than the proposed project.
 (=) The alternative would result in the same/similar impacts as the proposed project.

No Project Alternative. This alternative would result in similar impacts to 2 impact categories, reduced impacts to 11 environmental impacts, and increased impacts to 5 categories. Impacts would be similar for agricultural resources and population and housing. This alternative would reduce impacts for air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, mineral resources, noise, public services, transportation and traffic, tribal cultural resources, and utilities and service systems. Impacts to

7. Alternatives to the Proposed Project

aesthetics, hazards and hazardous materials, hydrology and water quality, land use and planning, and recreation would increase. Impacts to air quality, greenhouse gas emissions, and transportation and traffic would be reduced from significant and unavoidable to less than significant. Overall, impacts under this alternative would be decreased in comparison to the proposed project.

Existing General Plan Alternative. This alternative would result in similar impacts to 6 impact categories and increased impacts to 12 categories. It would not reduce any impacts compared to the proposed project. Impacts would be similar for agricultural resources, geology and soils, hydrology and water quality, land use and planning, mineral resources, and population and housing. This alternative would increase impacts to aesthetics, air quality, biological resources, cultural resources, greenhouse gas emissions, hazards and hazardous materials, noise, public services, recreation, transportation and traffic, tribal cultural resources, and utilities and service systems. As with the proposed project, impacts to air quality, greenhouse gas emissions, and transportation and traffic would remain significant and unavoidable. Overall, impacts under this alternative would be increased in comparison to the proposed project.

Reduced Intensity Alternative. This alternative would reduce impacts to 6 environmental impacts and result in similar impacts to 12 categories. It would not increase any impacts. It would reduce impacts to air quality, greenhouse gas emissions, noise (operational), public services, transportation and traffic, and utilities and service systems. Impacts would be very similar for aesthetics, agricultural resources, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, recreation, and tribal cultural resources. As with the proposed project, impacts to air quality, greenhouse gas emissions, and traffic would remain significant and unavoidable. Overall, impacts under this alternative would be reduced in comparison to the proposed project.

Alternate Land Use Mix Alternative. This alternative would reduce impacts to 5 environmental impacts and have similar impacts to 13 categories. It would not increase any impacts. It would reduce impacts to air quality, greenhouse gas emissions, noise (operational), public services, and utilities and service systems. Impacts would be very similar for aesthetics, agricultural resources, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, recreation, transportation and traffic, and tribal cultural resources. As with the proposed project, impacts to air quality, greenhouse gas emissions, and traffic would remain significant and unavoidable. Overall, impacts under this alternative would be reduced in comparison to the proposed project.

7.3.3.2 ABILITY TO ACHIEVE PROJECT OBJECTIVES

Table 7-7 summarizes each alternative's ability to achieve the project objectives.

7. Alternatives to the Proposed Project

Table 7-7 Ability of Each Alternative to Meet the Project Objectives

Objective	Proposed Project	No Project Alternative	Existing General Plan	Reduced Intensity	Alternate Land Use Mix
1. Promote the remediation and reuse of contaminated brownfield sites within the City, with priority given to those near environmental justice populations.	Yes	No	Yes	Yes	Yes
2. Adopt a Specific Plan that allows for high-cube logistics warehouse uses, e-commerce centers, research and development uses, and retail uses that would encourage private capital investment sufficient to both remediate the entire project site in accordance with DTSC requirements and to develop the Project.	Yes	No	No	Maybe	Maybe
3. Facilitate job growth and capitalize on predictable and marketable future development opportunities that provide the City with economic benefits through employment, tax revenues, and infrastructure improvements.	Yes	No	No	Maybe	Maybe/Yes
4. Locate industrial, warehousing, and service-commercial uses to areas readily accessible from major highways or rail traffic, and sufficiently separated and buffered to protect residential uses.	Yes	No	No	Yes	Yes

The No Project alternative, as shown in Table 7-7, does not meet any of the proposed projects objectives.

The Existing General Plan alternative meets only one of the project objectives, promoting remediation and reuse of contaminated brownfield sites. The remaining three objectives would not be met: adoption of a specific plan that allows for high-cube logistics warehouse uses and e-commerce centers that would encourage private capital investment in the City; facilitating job growth and capitalizing on predictable and marketable future development opportunities; and locating warehousing in an area that is readily accessible from major highways or rail traffic, and sufficiently separated and buffered to protect residential uses. While this alternative could generate more jobs than the proposed project, there is a limited market and capital availability for this use, particularly for a site with environmental complexity and scale.

The Reduced Intensity alternative would represent a similar project as the proposed project, but with a substantial reduction in allowable industrial use. This alternative would achieve Objectives No.'s 1 and 4. It would promote site remediation and reuse, and would locate new industrial warehousing and service-commercial uses in areas easily accessible to major highways or rail, and sufficiently buffered from residential areas. It is not certain, however, whether this alternative could achieve Objectives No.'s 2 and 3. The extent to which a reduced use could attain these objectives is dependent upon the economic viability of this alternative. With a reduction in almost one million square feet of warehousing uses, this alternative may not be able to

7. Alternatives to the Proposed Project

absorb the extensive site remediation costs. If this alternative is not economically viable, it would not provide the anticipated job growth, or provide projected economic and infrastructure benefits to the City.

The Alternate Land Use Mix is would more than double business park use (from approximately 264,000 SF to 564,000 SF), and would reduce the allowable industrial use (warehousing) by approximately 40% (from approximately 4.2 million SF to 2.5 million SF). As with the Reduced Intensity alternative, the ability for the alternative to achieve project objectives is dependent upon its economic viability. It is anticipated that this alternative would achieve Objectives No.'s 1 and 4. It would promote site remediation and reuse, and would locate new industrial warehousing and service-commercial uses in areas easily accessible to major highways or rail, and sufficiently buffered from residential areas. It is unknown whether this alternative could achieve Objectives No.'s 2 and 3. It is not known whether the site could support double the business park uses, and if so, how long it would take to absorb that level of development of service and retail uses. Moreover, with a substantial reduction in industrial use, it may not be possible for this alternative to fund the extensive site remediation. Given the uncertainty of this alternative's economic viability, it cannot be assumed that this alternative would facilitate job growth and economic opportunities for the City. Even if viable, it would not achieve this objective at the same level as the proposed project.

7.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the "environmentally superior alternative"; in cases where the "No Project" alternative is environmentally superior to the proposed project, the environmentally superior development alternative must be identified. In this case, the No Project alternative would not be considered the environmentally superior alternative. The Reduced Intensity alternative is identified as "environmentally superior" to the proposed project, but due to the brownfield nature of the site and the fact that the entire site must be remediated, this alternative presents other challenges, such as whether remediation would be economically feasible given the reduction in square footage. In addition, the reduction in size results in 20 percent fewer jobs than would be created by the project.

As shown in Table 7-6, the Reduced Intensity alternative reduces the most impacts compared to the proposed project. Impact reduction for the Alternate Land Use Mix alternative is similar to the Reduced Density alternative; however, since the morning peak hour vehicle trips are increased compared to the proposed project, it was determined not to result in less transportation impact than the proposed project. Although impacts are reduced, none of the development alternatives eliminate any of the significant, unavoidable impacts of the proposed project.