

# 7. Alternatives to the Proposed Project

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## 7.1 INTRODUCTION

### 7.1.1 Purpose and Scope

The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) 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 alternatives 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]).

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- “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])
- “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 project alternative, this analysis:

- Describes the alternative.
- Analyzes the impact of the alternative as compared to the proposed project.
- Identifies the impacts of the project that would be avoided or lessened by the alternative.
- Assesses whether the alternative would meet most of the basic project objectives.
- Evaluates 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. Comply with the Consent Judgement in the case: *Center for Community Action and Environmental Justice (CCA EJ) v. County of Riverside, et. al.*
2. Consider adoption of a City ordinance prohibiting trucks over 16,000 pounds from accessing the two roadway segments in the proposed project.
3. Remain consistent with goals in the City’s General Plan to designate truck routes, and manage commercial truck impacts to disadvantaged and other residential neighborhoods.
4. Reduce exposure to toxic air contaminants, including diesel particulate matter and other pollutants, at sensitive receptors and residential neighborhoods while maintaining the efficiency of the local and regional transportation system.

### 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. The impact analysis in Chapter 5 of this DEIR concludes that the following impacts would remain significant and unavoidable after mitigation for the proposed project.

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### 7.1.3.1 TRANSPORTATION AND TRAFFIC

#### Impact 5.5-1

Under 2035 conditions, the rerouting of trucks due to the truck restriction ordinance would increase traffic at the intersection of Milliken Avenue/Mission Boulevard, resulting in an increase in delay of 1 second per vehicle in the AM peak hour and 7.3 seconds in the PM peak hour. The project-related impact on this intersection, which is already forecast to be deficient during the PM peak hour in 2035, would be significant. The intersection is at the boundary of Eastvale and Ontario and is therefore outside the control of the City of Jurupa.

#### Impact 5.5.3

Under 2020 conditions, 5 of the 16 freeway ramps have demand that exceeds capacity in the peak hour. The project would also add trips to the freeway ramps that are anticipated to operate at unacceptable conditions. This would be considered a significant impact without mitigation at 5 ramps under 2020 conditions

Under 2035 conditions, 7 of the 16 ramps have demand that exceeds capacity in the AM peak hour, and all but one location in the PM peak hour have demand that exceeds capacity in the PM peak hour under Without Project and With Project conditions. The project would also add trips to these freeway ramps. Therefore, a significant impact would occur at 12 ramps under 2035 conditions

In summary, the following off-ramps would operate at a deficient level of service without mitigation:

- I-15 Southbound Off- Ramp at Jurupa Street (2020)
- I-15 Southbound On- Ramp at Jurupa Street (2020, 2035)
- I-15 Northbound Off-Ramp at Jurupa Street (2035)
- I-15 Northbound On-Ramp at Jurupa Street (2035)
- Milliken Avenue at SR-60 Eastbound Off-Ramp (2035)
- Milliken Avenue at SR-60 Westbound Off-Ramp (2035)
- Milliken Avenue at SR-60 Westbound On-Ramp (2020, 2035)
- Etiwanda Avenue at SR-60 Eastbound On-ramp(2020, 2035)
- Etiwanda Avenue at SR-60 Westbound Off-ramp (2035)
- Mission Boulevard at SR-60 Eastbound Off-Ramp (2035)
- Mission Boulevard at SR-60 Westbound On-Ramp (2020, 2035)
- Country Village at SR-60 Westbound Off-Ramp (2035)
- Country Village at SR-60 Eastbound Off-Ramp (2035)

These ramps are under the control of the California Department of Transportation, and there is currently no funding mechanism for projects to contribute fair share fees to implement potential improvements.

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### Impact 5.5-3

The proposed project's contribution to additional trips on Congestion Management Program (CMP) roadways operating below the minimum adopted level of service threshold of level of service E is a significant, unavoidable impact of the proposed project. The deficient ramps are listed under Impact 5.5.3, above.

## 7.2 ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING/PROJECT PLANNING PROCESS

The following is a discussion of the project alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in this EIR.

### 7.2.1 Alternative Location

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. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. 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 § 15126[5][B][1]). Unlike land use development projects, the proposed Etiwanda Avenue/Country Village Road Truck Restriction Ordinance would implement a change in transportation operation and would not result in physical impacts to a particular site. Moreover, this project is unique because consideration of the truck restriction along Etiwanda Avenue is a requirement of the 2012 settlement reached in the Center for Community Action and Environmental Justice (CCA EJ) lawsuit challenging the County of Riverside's approval of the Mira Loma Commerce Center (see Section 3.3.1 *Description of the Project*). The requirement is tied specifically to the impact of truck traffic along this route to the adjacent Mira Loma Village community. Evaluation of a truck restriction ordinance that did not include the specified segment of Etiwanda Avenue (SR-60 to Hopkins Street) would therefore not comply with the settlement agreement.

Based on the initial traffic study prepared pursuant to the settlement agreement, however, it was determined that truck restriction exclusively on Etiwanda Avenue would divert a substantial number of trucks to Country Village Road to the east. Residential uses along this roadway would then be disproportionately impacted by the additional truck traffic. The relative impacts of the Etiwanda Avenue Only Truck Restriction is evaluated in the alternatives below.

## 7.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Based on the criteria listed above, the following alternatives have been determined to represent a reasonable range of alternatives that 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 described below and analyzed in the following sections.

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### 7.3.1 Truck Restriction Ordinance: Etiwanda Avenue Only

As required by the *CCA EJ v. County of Riverside* settlement agreement, in February 2014, the City initiated traffic studies on Etiwanda Avenue from SR-60 to Hopkins Street. The results of the traffic study were presented at the City Council meeting of December 4, 2014. Pursuant to requirements outlined by the California Department of Transportation, it was noted that a diversion of trucks to other roadways would need further study to identify potential noise and air quality impacts.

Additional traffic, air, and noise analyses were initiated in February 2015. The findings, presented on May 5, 2016, revealed that truck restrictions along Etiwanda Avenue would result in the diversion of trucks that would impact residents along Country Village Road north of SR-60. The truck restriction route was expanded to include Country Village Road between SR-60 and Philadelphia Avenue. The Etiwanda Avenue Only Restriction is included here to provide a reasonable range of alternatives and disclosure for decision makers.

### 7.3.2 No Project Alternative

As required by CEQA, this section also evaluates the No Project alternative, which allows decision makers to compare the impacts of approving the proposed project with the impacts of not approving the project. This alternative must consider what would reasonably be expected to occur the foreseeable future if the project were not approved.

An EIR must identify an “environmentally superior” alternative, and where the No Project alternative is identified as environmentally superior, the EIR is then required to identify as environmentally superior an 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. However, only those impacts found significant and unavoidable are used in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project. Section 7.6 addresses the environmentally superior alternative.

The proposed project is analyzed in detail in Chapter 5.

## 7.4 NO PROJECT ALTERNATIVE

Under the No Project alternative, trucks with a gross vehicle weight rating over 16,000 lbs. would continue to be allowed on the 0.6-mile segment of Etiwanda Avenue between SR-60 and Hopkins Street and the 1-mile segment of Country Village Road between SR-60 and Philadelphia Avenue.

### 7.4.1 Air Quality

Health risk impacts from diesel particulate matter (DPM) emissions are influenced primarily by truck traffic along roadways proximate to sensitive receptors (i.e., residences). Under the No Project alternative, medium-heavy to heavy-duty trucks (gross vehicle weight over 16,000 lbs) would continue traveling north-south on Etiwanda Avenue and Country Village Road without restriction. Compared to the proposed project, the No

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Project alternative would result in higher truck traffic and increased DPM emissions in areas where residences are located along Etiwanda Avenue, Country Village Road and Mulberry Avenue. Figure 5.1-7, *Cancer Risk and Chronic Hazard Indices for Sensitive Receptors*, depicts the changes in health risks due to implementation of the proposed project. For the residential areas along Etiwanda Avenue, Country Village Road, and Mulberry Avenue, the No Project alternative would result in a greater incremental cancer risk of up to 45 in a million compared to the proposed project. Therefore, health risk impacts to nearby residences would be greater under the No Project alternative, particularly in the disadvantaged Mira Loma community, compared to the proposed project. Incremental cancer risks in other areas are reduced slightly under the No Project alternative but remain less than significant for residents west of Hamner Avenue and south of SR-60, compared to the proposed project, as shown in Figure 5.1-7.

Regional, operation-related air quality impacts under the proposed project are associated with emissions from vehicles traveling along the roadways within the traffic study area. As shown in Table 5.1-8, *Average Daily Roadway Segment Volumes and VMT*, in Chapter 5.1, *Air Quality*, in 2020 overall daily vehicle miles traveled (VMT) would be less under the No Project alternative (1,926,202 miles) compared the proposed project (1,929,066) miles. Thus, overall operation-related emissions would be reduced under this alternative and operation-related regional air quality impacts would be reduced compared to the proposed project. Impacts related to construction, odors, and consistency with regional air quality management plans (AQMP) would be similar and less than significant for the No Project alternative and proposed project.

Overall, the No Project alternative would result in greater health risks in disadvantaged residential communities compared to the proposed project and could potentially result in significant health risk impacts. Although this alternative would slightly reduce VMT and overall vehicle emissions, the change to air quality in comparison to the proposed project would be minimal. Therefore, due to the greater health risk impacts, the air quality impacts for this alternative would be greater than for the proposed project.

### 7.4.2 Greenhouse Gas

Modeling for GHG emissions accounts for the on-road mobile emissions generated from vehicles in year 2020, which includes the change in traffic patterns due to the trucking restrictions and new development and general growth in the project area by 2020. As shown in Table 5.2-6, *Annual Roadway Segment Volumes and VMT*, in Chapter 5.2, *Greenhouse Gas Emissions*, overall annual VMT would be slightly less under the No Project alternative (668,391,959 miles) compared the proposed project (669,385,840) miles. Additionally, as shown in Table 5.2-7, *Operational Phase GHG Emissions*, of Chapter 5.2, *Greenhouse Gas Emissions*, a no-project scenario (i.e., Year 2020 Without Project) would generate 202 fewer metric tons of GHG emissions (MTCO<sub>2e</sub>) than the proposed project. Therefore, the No Project alternative would result in a slight decrease in GHG emissions impacts compared to the proposed project, and impacts would remain less than significant. Overall, this GHG impact of this alternative would be considered similar to the proposed project.

### 7.4.3 Land Use and Planning

The No Project alternative would not substantially differ from the proposed project relative to consistency with the SCAG 2016-2040 RTP/SCS. Under this alternative, the regional transportation system would not be

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adversely affected, and use of nonmotorized transportation would not be impacted. The No Project alternative, however, would not as effectively achieve the goals and policies of the City of Jurupa Valley General Plan. It would not promote or implement truck routes to avoid impacts to sensitive residential uses, and heavy trucks would continue to adversely affect disadvantaged and minority residential neighborhoods, particularly Mira Loma Village. The Land Use and Planning impacts of this alternative, therefore, would be greater than for the proposed project and would be considered significant.

### 7.4.4 Noise

Noise levels in the project area are influenced primarily by motor vehicle traffic along roadways. The traffic study provided vehicle trip projections, including cumulative growth, for both 2020 and 2035. Year 2035 would reflect the worst condition, and therefore was used to evaluate potential noise impacts. Truck traffic along Etiwanda Avenue and Country Village Road would continue to increase (over existing conditions) under the No Project alternative, and therefore would result in higher traffic noise levels affecting land uses adjacent to these roadways.

Relative to the proposed project, the residential areas in the study area that would be mostly affected by changes in traffic noise under the No Project alternative would be (1) east of Etiwanda Avenue at the Mira Loma Village neighborhood between SR-60 and Hopkins Street, and (2) both sides of Country Village Road between SR-60 and Philadelphia Avenue. At these locations, compared to the proposed project in 2035 conditions, the noise levels would increase by approximately 2dBA at residential areas adjacent to Country Village Road, and from 1.7 to 3 dBA at residential areas adjacent to Etiwanda Avenue in the Mira Loma Village neighborhood (see Table 5.4-5). In comparison, relative to the proposed project, the No Project alternative would result in a decrease in traffic noise on roadway segments that are mostly surrounded by industrial uses. In conclusion, the No Project alternative would generally result in increased traffic noise at segments proximate to residential uses and decreased traffic noise proximate to industrial uses. Overall, noise impacts for this alternative would be greater than for the proposed project. Considering the increase in noise of up to 3 dBA for Mira Loma Village homes closest to Etiwanda Avenue, this alternative would also introduce a new significant impact for noise that would not occur under the proposed project.

### 7.4.5 Transportation and Traffic

Under the No Project alternative, truck traffic would not be restricted along Etiwanda Avenue and Country Village Road. Since these roadways provide more direct access for some origins/destinations, truck traffic along these roadways would increase compared to the proposed project. Under the No Project alternative, in 2035, an additional 2,460 trucks and 1,260 trucks per day would travel the study area sections of Etiwanda Avenue and Country Village Road, respectively. As a result, intersections' level of service along Etiwanda Avenue and Country Village Road would worsen compared to the proposed project. Under the threshold of significance criteria identified in Section 5.5.2, several intersections and freeway ramps would be significantly impacted:

- Etiwanda Avenue at SR-60 Eastbound On-Ramp (2035, PM peak hour)
- Etiwanda Avenue at Mission Boulevard (2035, AM and PM peak hour)

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- Etiwanda Avenue at Philadelphia Street (2035, PM peak hour)
- Country Village at Philadelphia Street (2035, PM peak hour)
- Country Village at SR-60 Westbound Ramps (2020 and 2035, AM and PM peak hour)

Conversely, relative to the proposed project, the No Project alternative would improve operations at intersections along Milliken Avenue, Mission Boulevard, and at the I-15 interchange at Jurupa Street. While operations would improve under No Project conditions relative to the proposed project, none of the intersections, except Milliken Avenue at Mission Boulevard, were identified as deficient under the proposed project. The intersection of Milliken Avenue at Mission Boulevard (significantly impacted under proposed project conditions) would improve operations, but would also operate at unacceptable LOS E in the PM peak hour. Impacted freeway ramps are:

- I-15 Southbound Off-Ramp at Jurupa Street (2035 AM and PM peak hour)
- I-15 Southbound On-Ramp at Jurupa Street (2035 PM peak hour)
- Country Village at SR-60 Westbound On-Ramp (2035 AM peak hour)
- Country Village at SR-60 Eastbound On-Ramp (2035 AM and PM peak hour)

There would be fewer freeway ramps significantly impacted under No Project conditions compared to the proposed project. Relative to the proposed project, the No Project alternative would improve operations at several freeway ramps.

In conclusion, traffic impacts for the No Project alternative would be increased at intersections but decreased at freeway ramps. Overall, the traffic impact under the No Project alternative would be similar to the proposed project.

### 7.4.6 Ability to Reduce Environmental Impacts

Table 7-1, *Summary of Project Alternative Impacts Compared to Proposed Project*, includes a significance conclusion and impact summary for each topical area for the project alternatives, including the No Project alternative.

The No Project alternative represents what would happen if the proposed truck restriction ordinance is not implemented. For air quality and greenhouse gases, conditions were evaluated for 2020 compared to the proposed project. This year represents a worse case than 2035 (as included in the traffic study) because by 2035, higher vehicle emission standards will reduce project-related emissions. The analysis for traffic and noise reflects year 2035 conditions because they represent the worst case for those impacts. Under the No Project alternative, air quality, land use, and noise impacts would be increased relative to the proposed project. Future health risk and noise conditions would be significantly worse than the proposed project. Since the No Project alternative would not be consistent with General Plan policies to implement truck routes to minimize impacts to residential uses, this impact would also be considered significant. Impacts to the roadway network would be different than the proposed project, but considered similar as far as significance. Greenhouse gas impacts would also be similar. Overall, the proposed project is environmentally superior to the No Project alternative.



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### 7.4.7 Ability to Achieve Project Objectives

This summary references the project objectives as numbered in Section 7.1.2, *Project Objectives*. The preparation of this DEIR achieves the project objective to comply with the Consent Judgement in the *CCA EJ v. County of Riverside* lawsuit (Objective 1). Assuming that City decision makers move forward and review the environmental findings of this DEIR in addition to other factors and consider the adoption of the ordinance, whether or not the ordinance is adopted, Objective 2 would also be achieved. However, the No Project alternative would not achieve project objectives 3 and 4. This alternative would not be consistent with the goals in the City's General Plan to designate truck routes and manage commercial truck impacts to disadvantaged and other residential neighborhoods (Objective 3). Also, as quantified in this DEIR, relative to the proposed project, the No Project alternative would increase exposure to toxic air contaminants at sensitive receptors and residential neighborhoods (Objective 4). Since transportation would be similar to the proposed project, it is determined to be similar in maintaining the efficiency of the local regional transportation system (part of Objective 4). In summary, this alternative would achieve two of the four project objectives.

## 7.5 TRUCK RESTRICTION ORDINANCE: ETIWANDA AVENUE ONLY

The evaluation of environmental impacts for this alternative was based in part on the previous technical studies (traffic, air quality, and noise) prepared for restricting trucks on Etiwanda Avenue. Based on these studies, it was determined that restricting trucks on this roadway would divert trucks to Country Village Road and disproportionately impact residences along that roadway. These studies, however, were not as comprehensive as the studies conducted for the proposed project for this DEIR. Many of the conclusions, that follow, therefore, are more qualitative than the conclusions that support the No Project alternative.

### 7.5.1 Air Quality

Health risk impacts from DPM emissions are influenced primarily by truck traffic along roadways proximate to sensitive receptors (i.e., residences). Under this alternative, a substantial number of trucks would utilize Country Village Road instead of Etiwanda Avenue and increase truck traffic on Country Village Road between SR-60 and Philadelphia Avenue, and on Mulberry Avenue between Philadelphia Avenue and Marlay Avenue. Compared to the proposed project, this alternative would increase DPM emissions affecting the sensitive residential areas along Country Village Road and Mulberry Avenue. Therefore, health risk impacts to residential areas along Country Village Road and Mulberry Avenue would be greater under this alternative compared to the proposed project. For localized impacts associated CO hotspots, similar to the proposed project, it is not anticipated that the traffic patterns under this alternative would result in the required number of peak hour trips at any one intersection to substantially increase CO hotspots.

While this alternative would increase traffic on some roadways and decrease traffic on other roadway segments compared to the proposed project, limiting the truck restriction ordinance to Etiwanda Avenue would reduce the overall rerouting of truck trips.. This alternative would also potentially result in reduced passenger-vehicle rerouting (passenger vehicles that may change their traffic patterns). It is anticipated that these patterns would result in a small overall reduction of VMT and associated mobile-source emission

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compared to the proposed project. Similar to the proposed project, implementation of this alternative would not result in impacts related to consistency with the AQMP and impacts related to nuisance odors.

Overall, the Etiwanda Avenue Only alternative would slightly reduce mobile emission air quality impacts compared to the proposed project but substantially increase health risk impacts to residential areas along Country Village Road and Mulberry Avenue compared to the proposed project. Therefore, the overall air quality impacts of the Etiwanda Avenue Only alternative would be greater than the proposed project and would be considered significant.

### 7.5.2 Greenhouse Gas

GHG emissions impacts are not site-specific impacts, but cumulative impacts. The modeling accounts for the on-road mobile emissions generated from vehicles in 2020, which includes the change in traffic patterns due to the trucking restrictions and new development and general growth in the project area. As stated in the air quality discussion above, it is anticipated that the Etiwanda Avenue Only alternative would minimally reduce overall VMT compared to the proposed project due to rerouting of fewer trucks and passenger vehicles. GHG emissions, therefore, would be slightly reduced under this alternative in comparison to the proposed project, and GHG impacts would remain less than significant. Overall, this alternative would be similar to the proposed project in regard to GHG emissions impacts.

### 7.5.3 Land Use and Planning

The Etiwanda Avenue Only truck restriction alternative would not substantially differ from the proposed project relative to consistency with the SCAG 2016-2040 RTP/SCS. Under this alternative, the regional transportation system would not be adversely affected, and use of nonmotorized transportation would not be impacted. This alternative, however, would not as effectively achieve the goals and policies of the City of Jurupa Valley General Plan. Although it would implement the truck restriction along Etiwanda Avenue, additional trucks would be diverted to Country Village Road. The trucks would continue to impact sensitive residential uses, although the precise extent to which additional trucks would increase noise, health risk, and traffic along Country Village Road has not been quantified. These impacts for Country Village Road, however, would be greater than those quantified and discussed for the No Project alternative (since additional trucks would be diverted from Etiwanda Avenue). The Land Use and Planning impacts of this alternative, therefore, would be greater than for the proposed project and would be considered significant.

### 7.5.4 Noise

Noise levels in the project area are influenced primarily by motor vehicle traffic along roadways. The proposed truck restriction along Etiwanda Avenue, without restrictions on Country Village Road, would result in a redistribution of truck and passenger car traffic compared to the proposed project. Under this scenario, a substantial amount of north-south truck traffic would utilize Country Village Road instead of Etiwanda Avenue and Milliken Road, resulting in an increase in truck traffic noise along the segment of Country Village Road between SR-60 and Philadelphia Avenue, and on Philadelphia Avenue between Country Village Road and Etiwanda Avenue. Relative to the proposed project, there would be an increase in traffic

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noise to residences along Country Village Road and Philadelphia Avenue. Land uses adjacent to segments that would result in less traffic noise under this alternative, such as Milliken Avenue between SR-60 and Philadelphia Street, are mostly industrial. Industrial uses are not considered noise sensitive and would not perceive a benefit from the anticipated noise reduction. The noise impacts of this alternative would, therefore, be greater than for the proposed project and potentially significant.

### 7.5.5 Transportation and Traffic

A traffic evaluation for this alternative was conducted in 2014 (Etiwanda Avenue Truck Restriction Study, Iteris 2014). The study, however, was less detailed than the traffic study conducted for the proposed project for this DEIR and did not include intersection level-of-service analysis. Compared to the proposed project, a greater number of trucks would utilize Country Village Road instead of Etiwanda Avenue, causing a substantial increase in traffic on Country Village Road between SR-60 and Philadelphia Avenue, and on Philadelphia Avenue between Country Village Road and Etiwanda Avenue. This would lead to more congestion on Country Village Road and Philadelphia Avenue than the proposed project. Impacts at the freeway ramps at Country Village Road and at intersections along Country Village Road and Philadelphia street east of Etiwanda Avenue would likely worsen.

Conversely, this alternative would result in reduced truck traffic on (1) Country Village Road north of SR-60, (2) on Philadelphia Street/Avenue between Milliken Avenue and Etiwanda Avenue, and (3) on Milliken Avenue between SR-60 and Philadelphia Street. Therefore, in comparison to the proposed project, intersection impacts at Milliken Avenue/Mission Boulevard would be reduced but not eliminated. Impacts at several freeway ramps would also be reduced—such as on SR-60 at Milliken Avenue, SR-60 at Mission Boulevard, and I-15 at Jurupa Street.

Overall, traffic impacts for this alternative would be different, but similar to the proposed project. It would not be expected to eliminate the significant intersection impact at Milliken Avenue/Mission Boulevard, and would also result in significant impacts to several freeway ramps.

### 7.5.6 Ability to Reduce Environmental Impacts

Table 7-1, *Summary of Project Alternative Impacts Compared to Proposed Project*, includes a significance conclusion and impact summary for each topical area for the project alternatives, including the Etiwanda Avenue Only truck restriction alternative.

Air quality, land use, and noise impacts would be increased under this alternative compared to the proposed project. Future health risk and noise conditions would be substantially worse for residents along Country Village Road. Health risk impacts would be significant, and noise levels may increase as much as 3 dBA, which would also be significant. This alternative would partially comply with the General Plan policy to implement truck routes to minimize impacts to residential uses, but since it would result in significant impacts to Country Village Road residences, the land use impact would also be considered significant. Impacts to the roadway network would be different than for the proposed project, but considered similar as far as significance. Greenhouse gas impacts would also be similar. Overall, the proposed project is environmentally superior to the Etiwanda Avenue Only truck reduction alternative.

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### 7.5.7 Ability to Achieve Project Objectives

This summary references the project objectives as numbered in Section 7.1.2, *Project Objectives*. The preparation of this DEIR achieves the project objective to comply with the Consent Judgement in the *CCA EJ v. County of Riverside* lawsuit (Objective 1). Assuming that City decision makers move forward and review the environmental findings of this DEIR in addition to other factors and consider the adoption of the ordinance, whether or not the ordinance is adopted, Objective 2 would also be achieved. However, the Etiwanda Avenue Only alternative would not achieve project objectives 3 and 4. This alternative would not be completely consistent with the goals in the City's General Plan to designate truck routes and manage commercial truck impacts to disadvantaged and other residential neighborhoods (Objective 3). It would reroute truck trips off of Etiwanda Avenue and reduce traffic, health risk, and noise impacts to Mira Loma Village. However, this would be at the expense of increasing these impacts to residences along Country Village Road. As such, relative to the proposed project, the Etiwanda Avenue Only alternative would substantially increase exposure to toxic air contaminants at sensitive receptors and residential neighborhoods (Objective 4). Since transportation would be similar to the proposed project, it is determined to be similar in maintaining the efficiency of the local regional transportation system (part of Objective 4). In summary, this alternative would achieve two of the four project objectives.

## 7.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the “environmentally superior alternative,” and in cases where the “No Project” alternative is environmentally superior to the proposed project, the environmentally superior alternative must be identified. Table 7-1 summarizes the environmental impacts of each alternative compared to the proposed project. As summarized above in Section 7.2.1, this project is unique in that consideration of the truck restriction ordinance (the proposed project) is a requirement of a court settlement. It also does not lend itself to a more typical alternatives review of optional development alternatives or different construction scenarios. The proposed project results in one significant impact (transportation), and neither of the project alternatives eliminate that significant impact (traffic impacts are similar for the No Project and Etiwanda Avenue Only alternatives). Because both alternatives evaluated exacerbate air quality (health risk), noise, and land use impacts, neither is environmentally superior to the proposed project. Between the No Project alternative and the Etiwanda Only alternative, the Etiwanda Only alternative would be slightly environmentally superior because it would substantially reduce impacts to the Mira Loma Village community. The increase to health risk and noise impacts to residences along Country Village Road would be greater, but the extent has not been quantified. The proposed project reduces these impacts and is superior to both the No Project and Etiwanda Avenue Only alternatives.

Although a project alternative that is superior to the proposed project has not been identified, this DEIR evaluates a reasonable ranges of alternatives. Additional alternatives that could meet the objectives of the proposed project, (including the court mandate requirement to consider implementation of a truck ordinance) and potentially reduce or eliminate significant impacts of the project could not be defined.

Table 7-1 summarizes the impacts of the proposed project and the alternatives, and Table 7-2 shows each scenario's ability to meet the project objectives.

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**Table 7-1 Summary of Project Alternative Impacts Compared to Proposed Project**

Environmental Impact	Proposed Project	No Project Alternative		Etiwanda Avenue Only Truck Restriction Alternative	
		Significance	Impact Comparison	Significance	Impact Comparison
Air Quality	LS	> S	Health risk impacts under this alternative would be substantially greater and affect residents along Etiwanda Avenue and Country Village Road. Compared to the proposed project cancer risk of 21 in a million, this alternative would result in risk as high as 66 in a million. For comparison, an acceptable risk is less than 10 in a million.  Criteria pollutants related to overall vehicle emissions and miles traveled would nominally decrease and remain less than significant.	> S	Health risk impacts under this alternative would be substantially greater and affect residents along Country Village Road and Mulberry Avenue, since a substantial number of trucks would utilize these two roadways instead of Etiwanda Avenue.  Since overall vehicle miles traveled would likely decrease under this alternative, air quality impacts not related to health risk would be similar to the proposed project and remain less than significant.
Greenhouse Gas	LS	= LS	A decrease in vehicle miles traveled under this alternative would decrease GHG emissions by 202 MTCO <sub>2e</sub> per year. Overall GHG emissions impacts would nominally decrease and remain less than significant.	= LS	Since overall vehicle miles traveled would likely decrease under this alternative, GHG emissions would also decrease and impacts would remain less than significant.
Land Use	LS	> S	The No Project alternative would not as effectively achieve the goals and policies of the City of Jurupa Valley General Plan, not avoiding impacts to sensitive residential uses. Under this alternative, truck traffic would continue to adversely affect disadvantaged and minority residential neighborhoods, particularly Mira Loma Village.	> S	This alternative would not as effectively achieve the goals and policies of the City of Jurupa Valley General Plan. Some trucks would be diverted from Etiwanda Avenue to Country Village Road, which would increase noise, health risk, and traffic along residences by Country Village Road.
Noise	LS	> S	Noise impacts to noise sensitive areas in the study area under this alternative would be greater, adversely affecting residents adjacent to Etiwanda Avenue with increases of up to 3 dBA and residences adjacent to Country Village Road with increases of up to 2 dBA.  Traffic noise increases of 3 dBA to residences adjacent to Etiwanda Avenue would be significant and unavoidable.	> PS	Noise impacts to noise sensitive areas in the study area under this alternative would be greater, adversely affecting residents adjacent to Country Village Road. Noise impacts to residences along Country Village Road would likely be significant.

## 7. Alternatives to the Proposed Project

**Table 7-1 Summary of Project Alternative Impacts Compared to Proposed Project**

Environmental Impact	Proposed Project	No Project Alternative		Etiwanda Avenue Only Truck Restriction Alternative	
		Significance	Impact Comparison	Significance	Impact Comparison
Transportation/ Traffic	S	= S	Intersection level of service along Etiwanda Avenue and Country Village Road would worsen compared to the proposed project. Four more intersections along Etiwanda Avenue and Country Village Road would be significantly impacted. This alternative would result in significant impacts at fewer (9 instead of 12) freeway ramps. Traffic impacts for the No Project alternative would be increased at intersections but decreased at freeway ramps. Overall, the traffic impact under the No Project alternative would be similar to the proposed project.	= S	Intersection level of service along Country Village Road and Philadelphia Street would worsen compared to proposed project. More intersections along County Village Road and Philadelphia Street would be significantly impacted. This alternative would result in significant impacts at fewer freeway ramps. Traffic impacts for this alternative would be increased at intersections but decreased at freeway ramps. Overall, the traffic impact under this alternative would be similar to the proposed project.

- > Impact would be greater than proposed project
- = Impacts would be similar to the proposed project
- LS Less than Significant Impact
- PS Potentially Significant Impact
- S Significant Impact (if not indicated, impacts could be mitigated to less than significant)

**Table 7-2 Ability of Each Alternative to Meet the Project Objectives**

Objective	Proposed Project	No Project Alternative	Truck Restriction Ordinance: Etiwanda Avenue Only Alternative
1. Comply with the Consent Judgement in the case: Center for Community Action and Environmental Justice (CCA EJ) v. County of Riverside, et. al.	Yes	Yes	Yes
2. Consider adoption of a City ordinance prohibiting trucks over 16,000 pounds from accessing the two roadway segments in the proposed project.	Yes	Yes	Yes
3. Remain consistent with goals in the City's General Plan to designate truck routes, and manage commercial truck impacts to residential and low income disadvantaged and other residential neighborhoods.	Yes	No	No
4. Reduce exposure to toxic air contaminants, including diesel particulate matter and other pollutants, at sensitive receptors and residential neighborhoods while maintaining the efficiency of the local and regional transportation system.	Yes	No	No

## 7. Alternatives to the Proposed Project

“Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts” (CEQA Guidelines § 15126.6[c]).

As shown in Table 7-1, none of the alternatives identified would reduce impacts. Both alternatives would increase impacts to air quality, land use and planning, and noise. Impacts to greenhouse gas emissions and transportation and traffic would be similar. Table 7-2 shows that the No Project and Etiwanda Avenue Only alternatives would only comply with two of the four project objectives.

## 7. Alternatives to the Proposed Project

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