

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 (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 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]).

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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 development 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 3.3, 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.

- **Objective 1:** Create a professional, well-maintained and attractive environment for the development of a multi-purpose business park, light industrial and warehousing/logistics complex that is compatible with nearby residential neighborhoods.
- **Objective 2:** Provide the entitlements and framework for the development of approximately 1.9 million square feet (sf) of business park and light industrial uses.
- **Objective 3:** Provide employment opportunities for community residents.
- **Objective 4:** Facilitate the construction of utilities, roads, and other major infrastructure investments that will be sufficiently sized to adequately serve the Specific Plan area.
- **Objective 5:** Expand Ontario’s industrial uses in proximity to local airports and regional transportation networks.
- **Objective 6:** Create an economic engine to drive future growth in Ontario Ranch, spur infrastructure improvements in the area and implement the Specific Plan vision.

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

The following is a discussion of the land use 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 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. 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]). In addition, an alternative site need not be considered when implementation is “remote and speculative,” such as when the alternative site is beyond the control of a project applicant.

There are no suitable alternative sites within the control of the project applicant. In the event land could be purchased of suitable size and developmental characteristics, based on the known general conditions in the southern portion of the City, an alternative site would likely have similar impacts after mitigation as the project. Given the size and nature of the proposed project and the project objectives, it would be impractical and infeasible to propose the project on an alternate site in the area with fewer environmental impacts.

Additionally, other land in the vicinity of the project site or within the southern portion of the City are similarly used for agricultural purposes and include agricultural soils, the loss of prime farmland would still occur with an alternative site. Given the size and type of the proposed development, similarly sized project and use elsewhere in the South Coast Air Basin would result in the same project-level and cumulative air quality and greenhouse gas emission impacts. Also, an alternative site would have similar traffic impacts in other jurisdictions that would be significant and unavoidable, because the City of Ontario cannot guarantee implementation of improvements outside of its jurisdiction. Therefore, analysis of an alternative site for the proposed 1,905,027 square feet of warehouse and office uses is neither meaningful nor necessary, because the significant impacts resulting from the project would not be avoided or substantially lessened by its implementation.

7.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Based on the criteria listed above, the following three alternatives have been determined to 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.

- No Project/No Build Alternative
- No Project/Existing General Plan Alternative
- Reduced Intensity Alternative

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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. Section 7.7 identifies the Environmentally Superior Alternative.

7.4 NO PROJECT/NO BUILD ALTERNATIVE

Section 15126.6(e) of the CEQA Guidelines requires analysis of the No Project Alternative. In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed as provided by Section 15126.6(e)(3)(B) of the CEQA Guidelines. Section 15126.6(e)(3)(B) provides that, “In certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.” Under this alternative, the proposed project would not be developed, and no new development would occur, however, the existing conditions would remain in operation.

The project site contains an operational dairy farm, two single-family residential structures, a dairy barn, a storage structure, approximately 10 feed storage barns, and numerous livestock corrals. The dairy, structures, and single-family residential uses would remain. Accordingly, the No Project/No Build Alternative provides a comparison between the environmental impacts of the proposed project as compared to the environmental conditions, resulting from not approving or denying the proposed project.

7.4.1 Agriculture and Forestry Resources

The No Project/No Build Alternative would continue the existing dairy uses on the project site. Implementation of the No Project/No Build Alternative would avoid the significant and unavoidable impacts to agricultural resources that would occur from implementation of the proposed project and impacts would be reduced compared to the proposed project.

7.4.2 Air Quality

Under the No Project/No Build Alternative, no new development would occur and no construction or demolition activities and related emissions would occur. In addition, by maintaining existing dairy and residential uses throughout the project area, an increase in traffic operational related air emissions would not occur. Therefore, overall air quality impacts would be reduced and the significant and unavoidable construction-related NO_x and operational-related VOC and NO_x emission impacts would be eliminated. Further, this alternative would eliminate significant and unavoidable impact related to inconsistency with the AQMP. No impacts related to air quality would occur by the No Project/No Build Alternative and impacts would be reduced compared to the proposed project.

7.4.3 Biological Impacts

The No Project/No Build Alternative would continue the existing agriculture and residential uses on the project site. No grading or development would occur under this alternative and there would be no potential

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impacts to sensitive wildlife species, and migratory and nesting birds that may be present on the project site. Therefore, the No Project/No Build Alternative would avoid all on and off-site disturbances and impacts to biological resources would not occur. Therefore, impacts under this alternative would be reduced compared to the proposed project.

7.4.4 Cultural Resources

The No Project/No Build Alternative would continue the existing agriculture and residential uses on the project site. No grading or development would occur under this alternative and there would be no potential impacts to subsurface archaeological resources that may exist beneath the ground surface. Although no impacts to historical resources would occur under the proposed project, this alternative would reduce impacts to archaeological resources compared to the proposed project.

7.4.5 Energy

Under this alternative, no demolition of existing structures or construction of new buildings would occur. Therefore, energy demand for electricity, natural gas and fuel consumption would remain as is. Compared to the proposed project, impacts on energy would be reduced compared to the proposed project.

7.4.6 Geology and Soils

No new construction activities, including demolition and grading, would occur under the No Project/No Build Alternative. Therefore, there would be no potential for additional workers, building and structures to experience seismic ground shaking, liquefaction, lateral spreading, subsidence, or collapse within the Specific Plan area. However, the buildings and structures that exist on the project site were built before current seismic safety codes; therefore, this alternative, by retaining older buildings and structures, could expose some people to greater hazards from strong ground shaking than the proposed project. Additionally, the proposed project's impacts to geology and soils were determined to be less than significant. This alternative would not result in impacts to paleontological resources since no grading would occur. Overall, the geologic hazard impacts from this alternative would be less than significant, and slightly less in comparison to the proposed project.

7.4.7 Greenhouse Gas Emissions

Under the No Project/No Build Alternative, no new development would occur, and no construction, demolition, or operational activities would generate GHG emissions. Although the existing dairy farm generates 18,309 MTCO_{2e} per year of GHG emissions, which exceeds SCAQMD's bright line threshold, this alternative would not increase GHG emissions by 8,596 MTCO_{2e} per year. Therefore, this alternative would eliminate significant and unavoidable GHG emission impacts would be reduced in comparison to the proposed project.

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7.4.8 Hazards and Hazardous Materials

Because no development would occur under the No Project/No Build Alternative, no impacts related to hazards or hazardous materials would occur. The dairy farming uses on the property would remain in place on-site. Although this alternative would avoid the project's potential effects related to hazards and hazardous materials, no cleanup of contaminated soils that exist on the property would occur as a result of the property's redevelopment. Remediation of on-site contamination is a benefit of the proposed project that would not be realized under this alternative. Therefore, hazards impacts would be greater compared to the proposed project.

7.4.9 Hydrology and Water Quality

Existing water quality conditions, groundwater supplies, drainage patterns, and runoff water amounts would remain "as is" under this alternative because no new development would occur. This alternative would not introduce new sources of water pollutants from either the construction or operation phases of development to the project site, because no new development would occur. Additionally, this alternative would not require off-site storm drain facility improvements required by the proposed project. However, this alternative would not include installation of new low-impact development (LID), source control, site design, and treatment control best management practices (BMPs) to minimize runoff and water pollution, which would occur under the proposed project. The storm water leaving the site would not be filtered and would continue to contain sediment and other potential pollutants associated with the dairy, agricultural, and residential uses. The beneficial water quality improvements that would occur under the proposed project would not occur and impacts would be greater compared to the proposed project.

7.4.10 Land Use and Planning

The No Project/No Build Alternative would continue the existing agriculture and residential uses, and the City's existing General Plan land use and zoning designations for the project site would remain unchanged. The project site is located within an Agricultural Overlay Zoning District, which provides for agricultural uses within the City, until such time that urban development consistent with the General Plan occurs. The operation of the existing on-site dairy operation is consistent with this ordinance. Therefore, like the proposed project, the No Project/No Build Alternative would result in a less than significant impact, and would be similar in comparison to the proposed project.

7.4.11 Noise

The No Project/No Build Alternative would not result in construction and, therefore, would not generate any noise associated with construction. Mobile-source and stationary noise volumes would be lower under this alternative compared to the proposed project, given the lack of urban development and associated vehicular traffic noise, noise from industrial warehousing uses, HVAC equipment, and other noise sources. Therefore, impacts would be less than significant and reduced compared to the proposed project.

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7.4.12 Population and Housing

Employment growth would not occur under the No Project/No Build Alternative because no new businesses, or other infrastructure would be constructed. Employees on the project site would remain as is under this alternative, resulting in no impact to population and housing. However, the proposed project was determined to be within the growth projections for the area and impacts to population and housing were determined to be less than significant. Therefore, population and housing impacts would be less than significant and similar to the proposed project.

7.4.13 Public Services

The existing number of residents and workers on the project site would remain under the No Project/No Build Alternative. Therefore, there would be no increase in demand for fire or police services. Although the proposed project's impacts related to fire and police services were determined to be less than significant, the public services impacts would be slightly reduced under this alternative compared to the proposed project.

7.4.14 Transportation

Under this alternative, no new employees or industrial warehouse uses would be introduced on the project site. The existing daily trips would remain at current conditions and all roadway segments and intersections would maintain existing levels of service and vehicle miles travelled. Therefore, impacts would be reduced to a less than significant level under this alternative and the significant and unavoidable traffic impacts that would occur from the proposed project would be eliminated. Impacts under this alternative would be reduced compared to the proposed project.

7.4.15 Tribal Cultural Resources

The No Project/No Build Alternative would continue the existing agriculture and residential uses on the project site. No grading or development would occur under this alternative and there would be no potential impacts to subsurface tribal cultural resources that may exist beneath the ground surface. Therefore, the No Project/No Build Alternative would avoid site disturbances on the project site and the project's potential impacts to tribal cultural resources would not occur. Impacts under this alternative would be reduced compared proposed project.

7.4.16 Utilities and Service Systems

Because no new development and employee increases would occur under the No Project/No Build Alternative, the existing onsite water well and septic systems would continue to be used, and no water or wastewater infrastructure would be constructed. No additional demand for regional water supplies would occur, and no additional wastewater would be conveyed to the regional wastewater treatment facilities. Therefore, the impacts related to water supplies and wastewater would be reduced compared to the project and less than significant.

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Similarly, no additional drainage infrastructure would be developed by the No Project/No Build Alternative, and runoff in the project area would remain in its current condition and would not connect to or require capacity in the regional storm water system. Solid waste generation would remain the same as existing conditions and increases in solid waste generation would not occur with the No Project/No Build Alternative. Therefore, impacts to utilities and service systems would be reduced compared to the proposed project and less than significant impact.

7.4.17 Conclusion

7.4.17.1 ABILITY TO REDUCE IMPACTS

The No Project/No Build Alternative would eliminate the significant and unavoidable impacts related to agriculture, air quality, greenhouse gas emissions, and traffic that would occur from implementation of the proposed project. This alternative would also reduce impacts related to biological resources, cultural resources, energy, geology and soils, land use and planning, noise, public services, tribal cultural resources, and utility and service systems. Impacts related to hazards and hazardous materials and hydrology and water quality would be greater under this alternative; impacts to population housing would be similar compared to the proposed project.

7.4.17.2 ABILITY TO ACHIEVE PROJECT OBJECTIVES

Implementation of the No Project/No Build Alternative new development is assumed to not occur on the project site, and none of the project objectives would be achieved under this alternative. The No Project/No Build Alternative would not create a professional, well-maintained and attractive environment for the development of a multi-purpose business park, light industrial and warehousing/logistics complex that is compatible with nearby residential neighborhoods (Objective 1); provide the entitlements and framework for the development of approximately 1.9 million square feet (sf) of business park and light industrial uses (Objective 2); provide employment opportunities for community residents (Objective 3); facilitate the construction of utilities, roads, and other major infrastructure investments that will be sufficiently sized to adequately serve the Specific Plan area (Objective 4); expand Ontario's industrial uses in proximity to local airports and regional transportation networks (Objective 5); nor would it create an economic engine to drive future growth in Ontario Ranch, spur infrastructure improvements in the area and implement the Specific Plan vision (Objective 6).

7.5 NO PROJECT/EXISTING GENERAL PLAN ALTERNATIVE

Section 15126.6(e) of the CEQA Guidelines requires that an EIR evaluate and analyze the impacts of the "No-Project" Alternative. When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the no-project alternative is the continuation of the plan, policy, or operation into the future. Therefore, under the No Project/Existing General Plan Alternative, the current general plan land uses and zoning would remain in effect. Development in accordance with the existing general plan and zoning would occur. The City's General Plan designates the project site for development of general commercial at a maximum 0.4 FAR, office commercial at 0.75 FAR, and low-medium density residential at 5.1-11 dwelling units per acre. The existing land use designations would allow approximately 559,774 sf of general

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commercial, 787,975 sf of office commercial, and 159 dwelling units at 8.5 dwelling units per acre¹. This alternative would generate approximately 2,267 employees and 635 residents.

7.5.1 Agriculture and Forestry Resources

The No Project/Existing General Plan Alternative would have the same development area as the proposed project. The existing dairy farming uses would be removed from the project site. Therefore, implementation of the No Project/Existing General Plan Alternative would result in the same significant and unavoidable impacts to agricultural resources that would occur from implementation of the proposed project. Thus, impacts under this alternative would be the same compared to the proposed project.

7.5.2 Air Quality

The No Project/Existing General Plan Alternative would reduce the amount of employment generating building square footage but would increase the number of employees by 203, and result in an increase of 159 residential units and 635 residents. Overall, there would be an increase in total building square footage. Additionally, this alternative would result in a substantial increase in vehicle trips compared to the proposed project. Therefore, construction and operation related air quality emissions would increase. Overall, impacts would be greater than the proposed project and would remain significant and unavoidable.

7.5.3 Biological Impacts

The No Project/Existing General Plan Alternative would have the same overall impact area as the proposed project. Impacts to sensitive wildlife species, and migratory and nesting birds would continue to occur and mitigation measures would be implemented to reduce impacts to such resources to a less than significant level. Therefore, impacts would be similar to compared to the proposed project.

7.5.4 Cultural Resources

The No Project/Existing General Plan Alternative would result in a similar potential to adversely affect any undiscovered archaeological resources on the project site as the proposed project. However, like the proposed project mitigation measures would be required to reduce potential impacts to less than significant. Therefore, impacts to cultural resources from the No Project/Existing General Plan Alternative would be similar to those associated with the proposed project.

7.5.5 Energy

The No Project/Existing General Plan Alternative would reduce the amount of employment generating building square footage but would increase the number of employees by 203, and result in an increase of 159 residential units and 635 residents. Overall, there would be an increase in total building square footage. Additionally, this alternative would result in a substantial increase in vehicle trips compared to the proposed project. Therefore, building energy and fuel consumption would increase under this alternative.

¹ Buildout was based on the 42.8 acres general commercial, 18.7 acres low-medium density residential, and 24.1 acres office commercial and the factors for density and floor area ratio from the City's TOP buildout assumptions for the New Model Colony.

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7.5.6 Geology and Soils

Grading and development of the project area would still occur under the No Project/Existing General Plan Alternative, and therefore, impacts to geology and soils would be similar to those that would be generated from the proposed project. The new structures under this alternative, would still result in additional persons and structures in the project area that would be subject to risks associated with seismic ground shaking and geologic hazards. Therefore, the No Project/Existing General Plan Alternative would be required to meet the same regulatory requirements as the proposed project. This alternative would result in a similar potential to impact paleontological resources during grading, as the proposed project. Therefore, impacts to geology and soils would be less than significant and similar to the proposed project.

7.5.7 Greenhouse Gas Emissions

The No Project/Existing General Plan Alternative would reduce the amount of employment generating building square footage and number of employees (733,837 sf and 188 employees) but would add 205 dwelling units and 818 residents to the project site. Overall, there would be an increase in total building square footage. Additionally, this alternative would result in a substantial increase in vehicle trips compared to the proposed project. Therefore, greenhouse gas emissions increase compared to the proposed project and would be significant and unavoidable.

7.5.8 Hazards and Hazardous Materials

The No Project/Existing General Plan would develop the project site for general commercial, office commercial, and residential uses, which would have less potential to use hazardous wastes on site. However, the use and storage of hazardous materials would be regulated by the same federal, state, and local laws and permitting requirements as would be done by the proposed project. In addition, this alternative would include cleanup of contaminated soils that exist on the site during construction activities and would be required to implement the same type of mitigation measures that are included in Section 5.8, *Hazards and Hazardous Materials*. However, this alternative would place residences within Safety Zone III, Traffic Pattern/Overflight Zone of the Chino Airport. ALUC review of all residential development exceeding two dwelling units per acre is required to determine consistency. Due to the increased risk of aircraft accident within this zone, restrictions on residential development may be imposed. Therefore, impacts with respect to Chino Airport's Land Use Plan would be greater compared to the proposed project. Like the proposed project, this alternative would also result in less than significant impacts with implementation of mitigation measures.

7.5.9 Hydrology and Water Quality

Under the No Project/Existing General Plan Alternative, the area of impervious surfaces would be similar compared to the proposed project. Therefore, this alternative would result in similar runoff and potential for impacts to drainage, erosion, and water quality. Like the proposed project, this alternative would introduce new sources of water pollutants from construction and operation activities. Additionally, this alternative would be required to include storm drain facility improvements, LID, source control, site design, and treatment control BMPs. Therefore, the No Project/Existing General Plan Alternative would result in

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impacts to hydrology and water quality that are similar to those that would occur from the proposed project. Overall, hydrology and water quality impacts would be less than significant.

7.5.10 Land Use and Planning

Under the No Project/Existing General Plan Alternative, the development onsite would conform with the general plan and zoning code and would not require any general plan amendment or zone change. Therefore, impacts would be reduced compared to the proposed project, although impacts were determined to be less than significant. Relative to SB 330, although the No Project/Existing General Plan Alternative would retain the current residential land use, as described in 7.5.16, *Utilities and Service Systems*, below, residential development is not feasible on the project site; therefore, impacts would be similar to the proposed project.

7.5.11 Noise

The No Project/Existing General Plan Alternative would reduce the amount of employment generating building square footage but would increase the number of employees by 203, and result in an increase of 159 residential units and 635 residents. Overall, there would be an increase in total building square footage. Additionally, this alternative would result in a substantial increase in vehicle trips compared to the proposed project. Therefore, construction and operational noise impacts would be slightly greater under this alternative.

7.5.12 Population and Housing

The No Project/Existing General Plan Alternative would increase employees and residents on the project site. Under this alternative, the population, housing, and employment at buildout would be consistent with the City's growth projections identified in SCAG's RTP/SCS. However, growth associated with the proposed project was also within growth projections. Overall, impacts to population and housing would remain less than significant with this alternative and similar to the proposed project.

7.5.13 Public Services

The No Project/Existing General Plan Alternative would introduce new residents at the project site which would increase the demand for public services, including fire, police, schools, and parks. The proposed project would have no impact on schools or parks and less than significant impacts to fire and police services. This alternative would result in slightly greater impacts to public services compared to the proposed project.

7.5.14 Transportation

Under the No Project/Existing General Plan Alternative transportation impacts would be increased compared to the proposed project due to the increase in vehicle trips associated with general commercial, office commercial, and residential uses. This alternative would result in 1,198 a.m. peak hour, 1,999 p.m. peak hour, and 19,356 average daily trips, resulting in an increase of 856 a.m. peak hour, 1,607 p.m. peak hour, and 15,028 average daily trips compared to the proposed project. Therefore, impacts would be greater than the proposed project and this alternative would exacerbate significant and unavoidable impacts.

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7.5.15 Tribal Cultural Resources

The No Project/Existing General Plan Alternative would result in a similar potential to adversely affect tribal cultural resources on the project site as the proposed project. However, like the proposed project, mitigation measures would be required to reduce potential impacts to less than significant. Therefore, impacts that could occur by the No Project/Existing General Plan Alternative would be similar to those associated with the proposed project.

7.5.16 Utilities and Service Systems

The No Project/Existing General Plan Alternative would result in greater impacts to utilities and service systems due to the approximate 31 percent increase in water demand and sewer generation associated with development of general commercial, office commercial, and low-medium density residential development allowed by the General Plan. This increase in water demand and sewer generation and the extensive length and amount of water and sewer infrastructure that is required to serve the site and the proposed project would render the No Project/Existing General Plan Alternative infeasible due to lack of market demand for the office commercial and general commercial land uses. Residential uses would not be feasible due to the cost of the infrastructure (see Appendix N) that would be funded in whole or in part by the residential development depending on development phasing, and the current City and New Model Colony development impact fee structure, which are greater than could be absorbed by home pricing in the area.

7.5.17 Conclusion

7.5.17.1 ABILITY TO REDUCE IMPACTS

The No Project/Existing General Plan Alternative would result in greater impacts to air quality, energy, greenhouse gas emissions, hazards and hazardous materials, noise, public services, transportation, and utilities and service systems. This alternative would exacerbate significant and unavoidable impacts related to air quality, greenhouse gas emissions, and transportation. Impacts related to agricultural resources, biological resources, cultural resources, geology and soils, hydrology and water quality, land use and planning, population and housing, and tribal cultural resources would be similar compared to the proposed project.

7.5.17.2 ABILITY TO ACHIEVE PROJECT OBJECTIVES

Implementation of the No Project/Existing General Plan Alternative would not meet four of the six project objectives for example this alternative would not create a professional, well-maintained and attractive environment for the development of a multi-purpose business park, light industrial and warehousing/logistics complex; (Objective 1); provide the entitlements and framework for the development of approximately 1.9 million square feet (sf) of business park and light industrial uses (Objective 2); expand Ontario's industrial uses in proximity to local airports and regional transportation networks (Objective 5); nor would it create an economic engine to drive future growth in Ontario Ranch, spur infrastructure improvements in the area and implement the Specific Plan vision (Objective 6). This alternative would provide employment opportunities for community residents (Objective 3) and facilitate the construction of utilities, roads, and other major

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infrastructure investments that will be sufficiently sized to adequately serve the Specific Plan area (Objective 4).

7.6 REDUCED INTENSITY ALTERNATIVE

Under the Reduced Intensity Alternative, a 25 percent reduction in building area of the proposed industrial warehousing uses would occur. Under this alternative, a total of 1,428,770 square feet of industrial and warehouse uses, a reduction of 476,257 square feet, would be developed with 1,251,770 square feet of warehouse and 177,000 square feet of office uses. The development impact area would generally remain the same as the proposed project. This alternative would generate approximately 1,548 employees. Access to the site would be similar to the proposed project with a proportional reduction in the number of parking spaces.

7.6.1 Agriculture and Forestry Resources

The Reduced Intensity Alternative would develop the project site for the same type of industrial and warehousing uses and have the same impact area. The existing dairy farming uses would be removed from the project site. Therefore, implementation of the Reduced Intensity Alternative would result in the same significant and unavoidable impacts to agricultural resources that would occur from implementation of the proposed project. Thus, impacts under this alternative would be the same compared to the proposed project.

7.6.2 Air Quality

The Reduced Intensity Alternative would develop the project site for the same type of industrial and warehousing uses, but less densely than the proposed project. Therefore, a reduced volume of construction activities and the related emissions would occur, resulting in an elimination of the significant and unavoidable construction-related air quality impact from the exceedance of NO_x emissions.

In addition, the reduced amount of square footage that would be developed by this alternative would result in less stationary source emissions from equipment onsite and less transportation-related air emissions than the proposed project. Therefore, overall air quality impacts would be reduced in comparison to the proposed Specific Plan. However, the volume of VOC and NO_x emissions from operational vehicular and truck trips generated by the Reduced Intensity Alternative would remain significant and unavoidable due to the volume of vehicular and truck trips that would occur from operation of 1,428,770 sf industrial warehousing space. After mitigation measures, the proposed project would generate a maximum of 57 pounds per day of VOC and 126 pounds per day of NO_x, which would be reduced to approximately 43 and 95 pounds per day with mitigation, respectively. The SCAQMD threshold for VOC and NO_x is 55. Therefore, this alternative would eliminate significant impacts related to VOC emissions, but significant and unavoidable impacts due to exceedance of NO_x emissions would continue to occur. Impacts under this alternative would be reduced compared to the proposed project.

7.6.3 Biological Impacts

The Reduced Intensity Alternative would reduce the amount of building area and associated parking stalls proposed for the project site. However, the development would continue to cover the same impact area as the

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project site. Impacts to sensitive wildlife species, and migratory and nesting birds would continue to occur and mitigation measures would be implemented to reduce impacts to such resources to a less than significant level. Therefore, impacts would be similar to compared to the proposed project.

7.6.4 Cultural Resources

The Reduced Intensity Alternative would result in a similar potential to adversely affect any undiscovered archaeological resources on the project site as the proposed project, despite the reduction in building area and associated surface parking. However, like the proposed project mitigation measures would be required to reduce potential impacts to less than significant. Therefore, impacts to cultural resources from the Reduced Intensity Alternative would be similar to those associated with the proposed project.

7.6.5 Energy

Under this alternative, allowable building square footage would be reduced and the associated energy demand would also be reduced by approximately 25 percent. Additionally, the reduction in vehicle trips associated with this alternative would reduce fuel consumption. Construction and operational activities associated with this alternative would have reduced energy demand compared to the proposed project. Impacts would remain less than significant.

7.6.6 Geology and Soils

Grading and development of the project area would still occur under the Reduced Intensity Alternative, and therefore, impacts to geology and soils would be similar to those that would be generated from the proposed project. The new structures under this alternative, would still result in additional persons and structures in the project area that would be subject to risks associated with seismic ground shaking and geologic hazards. Therefore, the Reduced Intensity Alternative would be required to meet the same regulatory requirements as the proposed project. This alternative would result in a similar potential to impact paleontological resources during grading, as the proposed project. Therefore, impacts to geology and soils would be less than significant, which is the same as the proposed project.

7.6.7 Greenhouse Gas Emissions

The Reduced Intensity Alternative would develop the project site for industrial warehousing uses less densely than the proposed project. Therefore, a reduced volume of construction activities and associated GHG emissions would occur. In addition, the reduced square footage would result in less stationary source emissions from equipment onsite, and less traffic-related GHG emissions than the proposed project. The proposed project would result in a net increase of 8,596 MTCO_{2e} per year, which would be reduced by approximately 25 percent to 6,447 MTCO_{2e} per year under the Reduced Intensity Alternative. This alternative would still result in significant and unavoidable GHG impacts, since it would exceed the bright-line threshold of 3,000 MTCO_{2e} per year. Therefore, the development and operation of 1,428,770 sf industrial warehousing and business park space would require implementation of the same GHG reduction features that are required for the proposed project, but impacts would be reduced compared to the proposed project.

7. Alternatives to the Proposed Project

7.6.8 Hazards and Hazardous Materials

The Reduced Intensity Alternative would develop the project site for industrial warehousing uses, and therefore the same type of hazardous materials typically used for construction and operation of the proposed project would be used under the Reduced Intensity Alternative. Similarly, the use and storage of hazardous materials would be regulated by the same federal, state, and local laws and permitting requirements as would be done by the proposed project. In addition, this alternative would include cleanup of contaminated soils that exist on the site during construction activities and would be required to implement the same type of mitigation measures that are included in Section 5.8, *Hazards and Hazardous Materials*. Therefore, like the proposed Specific Plan, this alternative would also result in less than significant impacts with implementation of mitigation measures and impacts that would occur by the Reduced Intensity Alternative would be similar compared to the proposed project.

7.6.9 Hydrology and Water Quality

The Reduced Intensity Alternative would reduce the total building square footage; however, the area of impervious surfaces would be similar compared to the proposed project. Therefore, this alternative would result in similar runoff and potential for impacts to drainage, erosion, and water quality. Like the proposed project, this alternative would introduce new sources of water pollutants from construction and operation activities. Additionally, this alternative would be required to include storm drain facility improvements, LID, source control, site design, and treatment control BMPs. Therefore, the Reduced Intensity Alternative would result in impacts to hydrology and water quality that are similar to those that would occur from the proposed project. Overall, hydrology and water quality impacts would be less than significant.

7.6.10 Land Use and Planning

The Reduced Intensity Alternative would require a general plan amendment and zone change to implement the Specific Plan. This alternative would have the same type of consistency with the SCAG SCS/RTP policies, the City's General Plan, the City's Development Code, and consistency with airport plans. Therefore, like the proposed project, the Reduced Intensity Alternative would result in a less than significant impact related to land use and would be similar compared to the proposed project.

7.6.11 Noise

Construction and operation noise impacts would be reduced under the Reduced Intensity Alternative because this alternative would decrease the development area by 476,257 sf. Although construction of this alternative would generate the same peak noise volumes and similar type and volume of construction noise as the proposed project, the length of time of construction and the associated noise would be marginally shorter. Operational noise would also be reduced under this alternative as traffic-generated and stationary noise sources would decrease in relation to the reduction in industrial warehousing square footage. Noise impacts from the Reduced Intensity Alternative would be the less than significant with implementation of mitigation measures and reduced compared to the proposed project.

7. Alternatives to the Proposed Project

7.6.12 Population and Housing

Under the Reduced Development Intensity Alternative, buildout would result in an approximate 25 percent reduction in employees on site. Under this alternative, the population, housing, and employment at buildout would be consistent with the City's growth projections identified in SCAG's RTP/SCS. However, growth associated with the proposed project was also within growth projections. The Reduced Development Intensity Alternative would provide fewer employment opportunities. Overall, impacts to population and housing would remain less than significant with this alternative and similar to the proposed project.

7.6.13 Public Services

The Reduced Intensity Alternative would reduce buildout of the project area by 25 percent compared to the proposed project. This would reduce the number of employees on the project site in relation to the reduction in industrial warehousing and business square footage. However, as with the proposed project, this alternative is not anticipated to result in new residences that could demand new services, would include design features to lessen the need for services, and impacts would be less than significant. Overall, the need for public services would be reduced under this alternative compared to the proposed project.

7.6.14 Transportation

Construction and operation-related traffic and truck trips would be reduced under the Reduced Intensity Alternative because this alternative would decrease the development area by 476,257 sf. The daily trips would be reduced in relation to the reduction of the building area (approximately 25 percent to 3,246 daily trips), which would reduce volumes on all roadway segments and intersections. However, due to the existing LOS in the traffic study area and the volume of traffic that would be generated by the 1,428,770 sf industrial warehousing space that would be developed by the Reduced Intensity Alternative, this alternative would still require implementation of the mitigation measures that involve roadway improvements in locations that are (1) not within the jurisdiction of the City of Ontario, and thus, the City cannot guarantee implementation of the mitigation measure improvements and (2) within the City of Ontario, but not accounted for in an adopted plan or program for improvements. Additionally, this alternative would not reduce total VMT/SP by at least 15 percent compared to the citywide average. As a result, traffic volumes generated from this alternative would be less, however, impacts from implementation of the Reduced Intensity Alternative would also be significant and unavoidable.

7.6.15 Tribal Cultural Resources

The Reduced Intensity Alternative would result in a similar potential to adversely affect any tribal cultural resources on the project site as the proposed project, despite the reduction in building area and associated surface parking. However, like the proposed project, mitigation measures would be required to reduce potential impacts to less than significant. Therefore, impacts that could occur by the Reduced Intensity Alternative would be similar to those associated with the proposed project.

7. Alternatives to the Proposed Project

7.6.16 Utilities and Service Systems

The Reduced Intensity Alternative would reduce buildout of the project site by 476,257 sf compared to the proposed project. This would reduce the number of employees on the project site in relation to the reduction in industrial warehousing and business park square footage and would also reduce the demand for utilities and service systems.

The demand for regional water supplies and generation of wastewater would be approximately 25 percent less than the proposed project. Thus, the impacts related to water supplies and wastewater would be less than the less than significant impacts that would occur from implementation of the proposed Specific Plan. Similarly, solid waste generation would be less than the proposed project and require less landfill capacity. Therefore, impacts to utilities and service system would be less under this alternative than the less than significant impacts that would occur from implementation of the proposed project.

7.6.17 Conclusion

7.6.17.1 ABILITY TO REDUCE IMPACTS

The Reduced Intensity Alternative would result in reduced impacts related to air quality, energy, greenhouse gas emissions, noise, public service, transportation, and utilities and service systems due to the reduction in square footage and associated vehicular trips. However, significant and unavoidable impacts related to agricultural resources, air quality, greenhouse gas emissions, and transportation would continue to occur from implementation of this alternative. Impacts related to agricultural resources, biological resources, cultural resources, geology and soils, hazardous and hazardous materials, hydrology and water quality, land use and planning, population and housing, and tribal cultural resources would be similar to the proposed project.

7.6.17.2 ABILITY TO ACHIEVE PROJECT OBJECTIVES

Implementation of the Reduced Intensity Alternative would achieve the project objectives, but not to the extent as would be achieved by the proposed project. The Reduced Intensity Alternative would create a professional, well-maintained and attractive environment for the development of a multi-purpose business park, light industrial and warehousing/logistics complex (Objective 1); provide employment opportunities for community residents (Objective 3); facilitate the construction of utilities, roads, and other major infrastructure investments (Objective 4); expand Ontario's industrial uses in proximity to local airports and regional transportation networks (Objective 5); and create an economic engine to drive future growth in Ontario Ranch, spur infrastructure improvements in the area and implement the Specific Plan vision (Objective 6). However, the reduction of 476,529 sf would attract fewer or smaller businesses and less employment opportunities to area residents. In addition, the smaller development would provide less flexibility to meet the needs of an ever-changing business market. This alternative would not fully meet Objective 2 to provide the entitlements and framework for the development of approximately 1.9 million sf of business park and light industrial uses.

7. Alternatives to the Proposed Project

7.7 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 development alternative must be identified. One alternative has been identified as “environmentally superior” to the proposed project:

- Reduced Intensity Alternative

The Reduced Intensity Alternative has been identified as the environmentally superior alternative because it would result in reduced impacts related to air quality, energy, greenhouse gas emissions, noise, public service, transportation, and utilities and service systems due to the reduction in square footage and associated vehicular trips. However, significant and unavoidable impacts related to agricultural resources, air quality, greenhouse gas emissions, and transportation would continue to occur from implementation of this alternative. Impacts related to agricultural resources, biological resources, cultural resources, geology and soils, hazardous and hazardous materials, hydrology and water quality, land use and planning, population and housing, and tribal cultural resources would be similar to the proposed project.

CEQA does not require the lead agency (the City of Ontario) to choose the environmentally superior alternative. Instead, CEQA requires the City to consider environmentally superior alternatives, weigh those considerations against the environmental impacts of the proposed project, and make findings that the benefits of those considerations outweigh the harm. “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]).