

4.0 ALTERNATIVES TO THE PROPOSED PROJECT

4.1 INTRODUCTION

The State CEQA Guidelines require analysis of a range of reasonable alternatives to the Project, or to the location of the Project, which would feasibly attain most of the Project's basic objectives and avoid or substantially lessen any of the significant effects of the Project. The range of potentially feasible 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 potential feasibility of an alternative may be determined based on a variety of factors, including economic viability, availability of infrastructure, and other plans or regulatory limitations. Specifically, § 15126.6(f) (1) of the State CEQA Guidelines states, in part:

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 (projects with a regionally significant impact should consider the regional context), 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). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

In determining the range of alternatives to be considered in the EIR, it is important to acknowledge the objectives of the Project, the significant effects, and unique Project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in § 15126.6(a). The State CEQA Guidelines further require that the alternatives be compared to the Project's environmental impacts and that the "No Project" alternative is considered (§ 15126.6[d] [e]).

An EIR need not evaluate the environmental effects of alternatives in the same level of detail as the Project, but must include enough information to allow meaningful evaluation, analysis, and comparison with the Project. The requirement that an EIR evaluate alternatives to the Project or alternatives that address the location of the Project is a broad one; the primary intent of the alternatives analysis is to disclose other ways that the objectives of the Project could be attained while reducing the magnitude of, or avoiding, the environmental impacts of the Project. Alternatives that are included and evaluated in the EIR must be feasible alternatives. However, the Public Resources Code (PCR) and the CEQA Guidelines direct that the EIR need "set forth only those alternatives necessary to permit a reasoned choice." The ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency's decision-making body (see PRC § 21081[a] [3].)

4.2 CONSIDERATION OF ALTERNATIVES

4.2.1 PROJECT OBJECTIVES

As discussed above, one of the evaluation criteria for the alternative discussion is the ability of a specific alternative to attain most of the basic Project objectives. The basic Project objectives as listed in **Section 2, Project Description** are as follows:

1. Develop a warehouse use in proximity to nearby transportation corridors and truck routes near SR-60 and I-10.
2. Develop a single pad warehouse of sufficient size (greater than 500,000 square feet) to be competitive within the industrial warehouse marketplace, support multiple simultaneous warehouse operations, and support a high level of mechanization and automation to attract a high-end buyer or tenant.
3. Provide new land uses consistent with the designed flexibility of the City's General Plan and Zoning Code.
4. Increase employment and create a revenue generating use consistent with market opportunities.
5. Provide infrastructure and landscaping improvements to the Potrero Boulevard and 4th Street vicinity to enhance aesthetics as well as improve safety and traffic flow.
6. Develop a warehouse use in proximity to other similar planned uses south of SR-60 to the west and east.
7. Facilitate goods movement for the benefit of local and regional economic growth.
8. Provide new development that will generate a positive fiscal balance for the City moving forward.
9. Provide additional temporary and permanent employment opportunities while improving the local balance of housing and jobs.

4.2.2 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS OF THE PROJECT

Sections 3.1 through **3.16** of this Draft EIR address the environmental impacts of implementation of the Project. The analyses contained in these sections identified the following significant and unavoidable environmental impacts resulting from the Project:

Air Quality

The Project would result in the following significant and unavoidable air quality impacts, despite the implementation of all feasible mitigation measures: (1) conflict with or obstruct implementation of the applicable air quality plan, due to operational NO_x emissions; (2) result in a cumulatively considerable net increase in a criteria pollutant for which the region is non-attainment, due to operational NO_x emissions; and (3) result in cumulative air quality impacts, as a result of operational NO_x emissions.

Greenhouse Gas Emissions

The Project would result in the following significant and unavoidable greenhouse gas (GHG) emissions impacts, despite the implementation of all feasible mitigation measures: (1) generation of 13,259.79 MTCO₂e per year of GHG emissions that could have a significant impact on the environment; and (2) conflict with an applicable plan, policy, or regulation of an agency, adopted for the purpose of reducing GHG emissions, as a result of total emissions.

Transportation

The Project would result in the following significant and unavoidable impact, despite the implementation of all feasible mitigation measures: (1) the Project would exceed the City's Vehicles Miles Traveled (VMT) thresholds of 8.9 VMT per Employee and 30.4 VMT per service population. The former threshold would be exceeded by 7.44 VMT and second by 1.7 VMT.

4.2.3 CRITERIA FOR SELECTING ALTERNATIVES

Per § 15126.6(b) of the State CEQA Guidelines, the discussion of alternatives shall focus on alternatives to a project, or its location, that are capable of avoiding or substantially lessening significant impacts of a project, even if the alternatives would impede to some degree the attainment of the project objectives or would be more costly. This alternatives analysis; therefore, focuses on project alternatives that could avoid or substantially lessen environmental impacts of the Project related to the environmental categories listed in Appendix G of the State CEQA Guidelines.

Per State CEQA Guidelines § 15126.6(d), additional significant effects of the alternatives are discussed in less detail than the significant effects of the project as proposed. For each alternative, the analysis below describes each alternative, analyzes the impacts of the alternative as compared to the Project, identifies significant impacts of the Project that would be avoided or lessened by the alternative, assesses the alternative's ability to meet most of the Project objectives, and evaluates the comparative merits of the alternative and the Project. The following sections provide a comparison of the environmental impacts associated with each of the Project alternatives, as well as an evaluation of each Project alternative to meet the Project objectives.

4.2.4 ALTERNATIVES REMOVED FROM FURTHER CONSIDERATION

Alternative Location

The analysis of alternatives to the Project must also address “whether any of the significant effects of the Project would be avoided or substantially lessened by putting the Project in another location” (CEQA Guidelines, § 15126.6(f)(2)(A)). Only those locations that would avoid or substantially lessen any of the significant effects of the Project need be considered. If no feasible alternative locations exist, the agency must disclose the reasons for this conclusion (§ 15126.6(f)(2)(B)). In this case, while it is feasible that an alternative site could be selected for the Project, an alternative site would entail either the same or new significant environmental effects as the Project Site, given that the air quality, GHG emissions, and vehicle miles traveled (VMT) impacts are not site-specific. For example, development of the Project on any suitable alternative site in or around the City may not avoid or substantially lessen the Project's air quality or GHG emissions impacts because emission related impacts would occur no matter where the development is located.

Additionally, these impacts could be greater if the alternative site is located further away from a major transportation corridor or on a site further from worker residents resulting in greater VMT. Moreover, an alternative site that is adjacent to undeveloped lands could result in increased impacts if utilities or services are extended, or service capacity is increased and it encourages or enables additional

development. Compared to the Project Site, which is largely surrounded by and contiguous with developed properties, or properties planned for development and that are close to existing utility lines, these considerations are not applicable.

Furthermore, viable alternative locations for the Project are limited to those that would feasibly attain most of the Project objectives. No other lots appropriately located along a major transportation corridor and that would satisfy the Project objectives and eliminate or reduce impacts from the Project were identified. The Project would offer an industrial use adjacent State Route (SR)-60 and within approximately one mile of Interstate (I)-10. Furthermore, the site is located adjacent to and would provide right-of-way (ROW) for the Potrero Boulevard and 4th Street improvements.

Mixed Housing and Industrial Alternative

This alternative was developed to satisfy the Project objective to provide for a revenue and employment producing use while still providing for housing to be consistent with the land use designations of the County general plan and zoning. This alternative, as its name implies, would include both residential and industrial uses onsite. The Mixed Housing and Industrial Alternative would use approximately half of the site, the City area and northerly County parcel for industrial use and the balance for residential use. The southerly County parcel would be annexed to the City at a similar density to Rural Residential, resulting in an approximate residential density of one du/five acres. The industrial use would include approximately 400,000 sf of warehouse and distribution facility. To account for spacing between uses, it is anticipated the drainage in the central portion of the overall Project Site would be preserved and no disturbance in this area would occur.

This alternative would increase the demand on public and utilities services due to the increase in population. Although this alternative is not anticipated to increase demand such that new facilities are required, it would make a greater contribution to the cumulative demand. This alternative's impacts to aesthetics, biological resources, cultural resources, geology and soils, hazards and hazardous materials, tribal cultural resources, and wildfire would be similar to those of the Project.

This alternative would not meet most of the Project objectives. Specifically, this alternative would not provide a warehouse of sufficient size (greater than 500,000 sf) to be competitive in the industrial warehouse marketplace and would not increase employment and generate revenue to the same extent as the Project. While the alternative would provide infrastructure and landscaping, development of new residential uses intermixed with industrial would not meet the objective of improving safety and traffic flow to the same extent as the Project. While the alternative would promote goods movement to some extent, the significantly reduced size of the warehouse pad would not promote goods movement to the same extent as the Project, for the benefit of local and regional economic growth. Finally, the alternative would not improve the local jobs to housing imbalance.

Because this alternative fails to reduce or eliminate the Project's significant and unavoidable impacts, would likely result in increased impacts when compared to the Project, and would not meet most of the Project's objectives or meet them to the same extent as the Project, this alternative has been removed from further consideration.

Community Commercial Alternative

This alternative was developed to evaluate an alternative to the proposed industrial warehouse use while providing revenue to the City. Under this alternative, the site would be developed with community serving commercial uses that would create jobs and increase economic benefit the City. Similar to the proposed Project, the Community Commercial Alternative would have the same area of disturbance, and leave the annexed County land undeveloped until such time when a future development is proposed.

Overall, this alternative would not reduce impacts associated with the Project. This alternative would increase the VMT because the commercial component would generate more vehicle trips than the proposed warehouse use and VMT would increase. These increased vehicle trips would generate additional air emissions and GHGs. Thus, this alternative would not avoid or reduce any of the Project's significant and unavoidable impacts. Further, this alternative would incrementally increase the demand on public and utilities services due to the likely commercial uses such as restaurants and other eating establishments such as food courts. Although this alternative is not anticipated to increase demand such that new facilities would be required, it would make a greater contribution to the cumulative demand. This alternative's impacts to aesthetics, biological resources, cultural resources, geology and soils, hazards and hazardous materials, tribal cultural resources, and wildfire would be similar to those of the Project.

This alternative would not meet most of the Project objectives. This alternative would not develop a warehouse, or a warehouse in proximity to transportation corridors and truck route. This alternative would not develop a warehouse competitive in the industrial warehouse marketplace, or development warehouse use in proximity to other planned use south of SR-60. No goods movement would be facilitated with this alternative. Therefore, this alternative has been removed from further consideration.

4.2.5 ALTERNATIVES TO THE PROPOSED PROJECT

Two alternatives to the Project are analyzed in additional detail in this EIR. First, as required by CEQA, the No Project Alternative is considered. Second, a Habitat Preservation Alternative is considered. Per the State CEQA Guidelines § 15126.6(d), additional significant effects of the alternatives may be discussed in less detail than the significant effects of the Project as proposed. In addition, the EIR is to include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Project. For each alternative, the analysis below describes each alternative, analyzes the impacts of the alternative as compared to the Project, identifies significant impacts of the Project that would be avoided or lessened by the alternative, assesses the alternative's ability to meet most of the Project objectives, and evaluates the comparative merits of the alternative and the Project. The following sections provide a comparison of the environmental impacts associated with each of the Project alternatives, as well as an evaluation of each Project alternative to meet the Project objectives.

No Project Alternative (Existing Zoning, General Plan, No Annexation Alternative)

This alternative focuses on impacts that would occur if no zoning map amendment, no General Plan Amendment, and no annexation was proposed. This alternative evaluates what development could occur if developed under the existing land use (Industrial) and zoning (Manufacturing) designations within the City APN 424-010-020. County APNs 424-010-009 and 424-010-010 are located in the County's

jurisdiction; the current land use designation for both parcels is Rural Residential (RR) and the current zoning designation for both parcels is Controlled Development Area (W-2-20). This alternative would eliminate the need for the annexation of the County lands and assumes subsequent development of that portion of the Project Site under County guidance.

Habitat Preservation Alternative

This alternative would reduce the overall development footprint by approximately 50 percent with a warehouse area of approximately 288,000 sf and would concentrate development outside of the riparian areas on the Project Site. This alternative would preserve the riparian and wetland habitat that has the greatest habitat value than the more heavily disturbed upland areas. This alternative would reduce overall impacts to the Project Site and decrease potential impacts to sensitive species and preserve the riverine connectivity through the Project Site to off-site and adjacent undeveloped areas.

4.2.6 COMPARISON OF PROJECT ALTERNATIVES

No Project Alternative

Consistent with State CEQA Guidelines § 15126.6, the No Project Alternative assumes that the existing land uses and condition of the Project Site at the time the NOP was published (May 2020) would continue to exist without the Project. The setting of the Project Sites at the time the NOP was published is described as part of the existing conditions within **Section 2: Project Description** and throughout **Section 3** of the Draft EIR. The discussion within the respective sections provides a description of the environmental conditions in regard to the individual environmental issues.

The No Project Alternative assumes the Project would not be implemented and proposed land uses and other improvements would not be constructed. Under this alternative none of the proposed improvements would occur. However, development allowed under the existing City and County General Plan designations and City and County zoning (as applicable) could occur and are analyzed as part of this Alternative.

The General Plan land use designation for the City portion of the Project site is Industrial (I) which allows for a range of industrial uses, including “standalone” industrial activities, general and light industrial, research parks, private trade schools, colleges, and business parks. The zoning designation for the City portion of the Project site is Manufacturing (M) which is intended to maintain the existing industrial and manufacturing uses and to promote the development of new business parks, light industrial use, research parks, manufacturing uses, warehousing activities, and ancillary and supportive uses.

Under this alternative the Riverside County area would not be annexed, and the Rural Residential (RR) land use designation and Controlled Development Zone (W-2-20) would remain. While the W-2-20 zone allows for a variety of land uses, this alternative assumed development in accordance with the residential densities allowed under the General Plan. Under the densities allowed in the Riverside General Plan, Rural Residential (RR) can be built with a minimum lot size of five acres. There are two parcels consisting of approximately 38.5 acres within the County. A total of seven rural residential single-family units could be

constructed without the need for additional discretionary permits from the County such as subdivision map.

Infrastructure improvements including water, wastewater, drainage, extension of electrical and natural gas, and roadway improvements and right-of-way dedications identified in the Project would still be required to be extended into the City portion of the Project Site. Because the County portion would not be annexed, this area would not be eligible for City services, and utilities would be provided by the County or through the use of well and alternative wastewater disposal systems.

Comparison of Project Impacts

An evaluation of the potential environmental impacts of the No Project Alternative, as compared to those of the Project, is provided below.

Aesthetics

Under the No Project Alternative, the City portion of the Project Site could be developed with industrial and manufacturing uses. The County portion of the Project Site could be developed with seven rural residential units without the need for additional discretionary permits from the County. Similar to the Project, any future use under the designations and allowable uses would result in changes to the onsite topography, vegetation, and offsite view corridors. The visual changes to the site as seen from off-site viewers including travelers on SR-60 and the future extensions of Potrero Boulevard and 4th Street, would be that of new development compared to the vacant property that currently exists. The Project was found to have less than significant impacts for aesthetics and development under this alternative would be incrementally greater. Industrial and manufacturing development would result in a similar architectural styles related to building articulation, structure heights, and densities. Overall, this element of this alternative would result in no changes in Project design, and ultimately would result in the construction of similarly sized structures all of which would be incongruous with the existing vacant site as viewed from off-site areas.

The seven rural residential units also would slightly change the visual environment of the southerly portion of the Project Site. These units would occur in an area where no development is proposed and change the visual characteristics of the area. In addition, this would result in additional nighttime light sources as viewed from offsite areas. Although changes to the visual environmental would occur, it is anticipated impacts would remain less than significant. Therefore, under this alternative, impacts regarding aesthetics, light, and glare also would be less than significant; but would be greater when compared to the Project.

Air Quality

Under this alternative, short-term construction and long-term operational air emissions would be similar but slightly elevated compared to construction of the Project. The overall size and square footage of the industrial and manufacturing structures would be similar and the overall development footprint of development would be similar. Ground disturbance under this alternative would occur over most of the City site to accommodate building(s) and parking lots. Although some additional work to extend utility lines to the industrial and manufacturing building(s) would be needed, the emissions from this work would

not result in a substantial increase compared to the Project. Therefore, construction emissions would be similar and temporary in nature and similar to the Project in this regard.

Under this alternative, daily trip generation would be slightly less as the Project Site for industrial and manufacturing use would be smaller, only occurring on APN 424-010-020. This alternative is anticipated to require a lesser number of employees, of which would generate a decreased volume of trips and decrease the VMT as a result of less employees travelling to and from the industrial and manufacturing uses. This would result in a decrease in mobile source emissions of criteria pollutants and a lesser contribution to air quality impacts.

In regard to the County area, the development of the rural residential uses would result in incrementally less contributions associated with construction of the homes and roads needed to access them. In addition, the decrease in VMT associated with seven single family units, which would be allowed by right under the General Plan and zoning designations, also would be less as compared to Project.

The Project would result in significant and unavoidable impacts on air quality as a result of NO_x emissions from transportation sources. Under the No Project Alternative there would be substantially fewer truck trips but similar overall car trips with the addition of car trips accessing rural residential uses. Therefore, impacts under this alternative would be equal to or less than the Project.

Biological Resources

Under the No Project Alternative, the Project would not be built in its entirety with industrial uses on the northerly portion of the site (APN 424-010-020) and rural residential uses on the southerly portion (APNs 424-010-009 and 424-010-010) of the site as allowed pursuant to the existing City and County General Plan and zoning designations. Development under the No Project Alternative would require implementation of the same mitigation as the Project to protect biological resources. This alternative; however, would place seven rural residential uses in the County lands. While the Project Site is disturbed it does contain sensitive biological resources including two drainages and wetland habitat. Sensitive species also are present, and there is the potential for nesting birds, and species to use the site for breeding and brooding.

Impacts under this alternative would be slightly increased because the residential uses would increase the disturbance to biological resources in an area that would not experience disturbance under the Project. This alternative still would minimize impacts to biological resources through the preservation of off-site habitat as part of the applicable Multiple Species Habitat Conservation Plan (MSHCP). Similar mitigation measures also would be required that would constrain the construction timeline to protect nesting birds and would increase the off-site habitat preservation that would be required. Similar to the Project, it is anticipated that would reduce impacts to less than significant. Therefore, this alternative would result in increased impacts to special-status species, sensitive habitats, nesting birds, and use of the site as a migration or transitional habitat. Similar to the Project, direct and indirect impacts on biological resources would be mitigated to less than significant under this alternative, but overall, impacts would be incrementally increased.

Cultural Resources and Tribal Cultural Resources

Under the No Project Alternative, the existing zoning and general plan designations would remain applicable to the Project Site. Under this alternative, the portion of the site within the City would be developed with manufacturing and industrial uses and the area within the County would not be annexed and developed with rural residential uses under the County designation. This alternative has the same potential as the Project to contain known and unknown cultural and tribal cultural resources. This alternative would increase the amount of ground disturbance and excavation needed to enable the proposed improvements to facilitate construction of the new buildings, interior roadways, parking areas, utilities, and roadway dedications because this alternative would develop all three parcels. Nonetheless, the Project Site does not contain any structures and effects in this regard would be the same as under the Project. Industrial, manufacturing, and residential development under the No Project Alternative still would require implementation of the same mitigation to protect cultural and tribal cultural resources as would be required under the Project. This would include construction monitoring in case unknown buried resources or human remains are found during construction. Similar to the Project, direct and indirect impacts on unknown buried cultural resources would be mitigated to less than significant. Nonetheless, due to the increased development on the County parcels with seven single-family residences, impacts would be increased compared to the Project.

Energy

The intensity of development of the No Project Alternative would be increased compared to the Project. Energy used for construction activities including that needed to operate machinery for excavation and grading would be increased because construction would occur over a greater area when compared to the Project.

The Project would build a structure with a greater overall square footage of building area and the No Project Alternative would be anticipated to include a smaller structure(s) to accommodate future industrial and manufacturing uses on the City parcel. This would result in reduced energy demands for construction as well as operational energy for heating and cooling. The operational energy use from the industrial and manufacturing development would be lesser when compared to the Project because of the reduced demand for energy needed as a result of fewer daily vehicle trips.

The energy use of the potential seven residential structures for both construction and operations would be small, and would contribute to a minimal increase in overall energy demand. Therefore, it is anticipated that this alternative would use similar energy in the form of vehicle fuels, compared the Project. Impacts under this alternative would be less than significant and lesser than the Project.

Geology and Soils

This alternative would include the industrial or manufacturing development in the City and rural residential uses (seven units) in the County. No annexation would occur under this alternative. The No Project Alternative would not change the existing geologic conditions under which the alternative uses would be developed. Although this alternative would result in less people visiting the industrial or manufacturing uses and be located in an area that could experience ground shaking and associated

hazards impacts, this would not substantially reduce the associated risk. The amount of grading and need for retaining walls would depend on the size and uses within the manufacturing and industrial uses and parking needs. For purposes of this analysis, it is assumed that, similar to the Project, retaining walls up to 26 feet in height would be required to maximize the developable area. All future residential uses that could be built within the Project Site also would be constructed to the most recent codes which would minimize potential effects from geologic and soil conditions. Neither these uses or development of the industrial or manufacturing uses would exacerbate any existing hazards. Potential geologic hazards at the site would be the same in terms of seismic shaking from faults, liquefaction, subsidence, collapse, expansive soils, landslides, soil stability, or slopes. Therefore, similar to the Project, development of this alternative would conform to all required codes related to development standards related to geology and soils. Thus, would be mitigated to less than significant. Impacts would be similar compared to the Project.

Greenhouse Gas Emissions

Under this alternative, GHG emissions similar when compared to the Project. Short-term construction impacts would be similar. Although this alternative would include the construction of seven rural residential uses on the County land, construction of the industrial or manufacturing uses on the City land would be similar. These areas would result in a smaller overall building footprint, but would involve a similar amount of grading and ground disturbance to create building pad(s) and parking area(s). Ultimately, construction emissions would be roughly equivalent. Operationally, the emissions from the industrial or manufacturing uses would be similar and the residential uses under this alternative would make an insignificant contribution. However, the daily vehicle trips from the industrial or manufacturing uses would be slightly less than the vehicle trips under the Project. Long-term operational emission of GHG would be similar when compared to operation of the Project. Accordingly, use of fossil fuels for energy and associated GHG emissions would be similar under this alternative. Therefore, although not anticipated to be substantial, impacts under this alternative would be similar than that under the Project.

Hazards and Hazardous Materials

Under the No Project Alternative, the Warehouse Site would be developed with industrial or manufacturing uses and approximately seven residential uses within the County land. The No Project Alternative would occur within the same development footprint as the Project. Although this alternative would disturb a greater area overall, and although the area is disturbed with evidence of previous off-road vehicle use, there are no recognized environmental conditions within the area. Thus, both this alternative and the Project would have a similar potential to contain known and unknown hazards and hazardous materials. Because all of the Project Site is vacant and has not experienced substantial previous development or previous uses, this potential is considered low.

Development of the industrial or manufacturing uses on the City parcel would include disturbance of the same area and similar construction techniques. Excavation, grading, and trenching for utilities would still be required and overall grading quantities on the City parcel would be reduced because of the smaller development footprint. Accordingly, impacts associated with accidental upset of materials or disturbance of an unknown hazardous material site would be similar. Development and operation of the residential components and potential for accidental upset also would be low. Residential and

industrial/manufacturing uses are anticipated to use some volume of hazardous materials. Such materials would consist of cleaners, pesticides and fertilizers for landscaping, and other materials for machinery and equipment need for day to day operations would be similar. Neither the Project nor any components of this alternative are anticipated to use acutely hazardous materials, but if they do, all applicable regulations related to the use, storage, handling, and disposal would be required. Therefore, these impacts for hazardous materials would be similar and substantial differences in the potential risk of upset would not occur. Impacts compared to the Project would be similar and mitigation would reduce impacts to less than significant.

Hydrology and Water Quality

This alternative would include industrial or manufacturing uses in the City parcel and rural residential uses within the County area. The No Project Alternative would not substantially change the hydrologic conditions compared to development of the site with a warehouse. This alternative would result in the creation of a similar amount of impermeable surface and would require similarly sized water detention basin, series of smaller basins, and stormwater management system to control runoff. This alternative; however, would decrease the area of disturbance and result in minor modifications to the County parcel if rural residential units are constructed. Both the Project and this alternative would be developed with design elements and drainage features to capture and control the timing of runoff. The Project Site, whether developed for use as a warehouse or industrial would include a SWPPP with BMPs to minimize effects from erosion both on-site and off-site. Development of the residential areas also would require erosion control plans during construction and while runoff from these site is not anticipated to be substantial, would be constructed with plans approved by the County. The drainage facilities would minimize the contribution of sediments and pollutants to downstream receiving water. The No Project Alternative would have a similar impact when compared to the Project.

Land Use and Planning

This alternative would include industrial or manufacturing uses in the City parcel. This alternative also would include construction of seven rural residential units on the County parcels. These uses within the City area would be consistent with the existing land use designations of Industrial (I) and the residential areas consistent with County general plan designation of Rural Residential (RR). This alternative would not require a general plan amendment or zone change, and would not result in annexation of the County land. This alternative also includes the development of seven residential homes on the County parcels but this is not considered a substantial change to the development context of the site. Neither this alternative nor the Project would physically divide an established community because there are no existing communities adjacent to the Project Site. The Project did not have any significant land use impacts, however, the No Project Alternative would not require a General Plan Amendment or Rezone and potential land use conflicts would be reduced under this alternative.

Noise

Under this alternative, short-term construction and long-term operational noise emissions would be similar to the Project. Construction noise associated with building the industrial/manufacturing uses under this alternative would be similar to the construction of the Project. Both the Project and this

alternative would use similar grading and excavation practices and similar construction techniques to build the structure(s). Noise generated from these activities would be in a similar proximity to off-site receptors. Operationally, both the Project and alternatives would generate similar volumes of noise, but this alternative would generate slightly greater levels of noise due to the anticipated increase in vehicle trips from residents driving to and from the rural residential uses. Noise generated by the vehicles; however, is not anticipated to exceed thresholds nor would it occur in proximity to sensitive land uses. Most of the operational noise from the Project would be from truck traffic driving to and leaving the site for shipping operations. Some intermittent noise from the loading and unloading process may be audible and would occur under both alternatives. This alternative also would include the construction noise and a slight increased vehicle noise from the potential residential uses. These sources of noise, however, would be minimal and not make a substantial contribution to the ambient noise environment. Lastly, the Warehouse Site is not in proximity to (i.e., less than 500 feet from) any sensitive receptors and neither the Project nor this alternative would have significant impacts in this regard. Therefore, a substantial increase in noise is not anticipated under the No Project Alternative and overall impacts from noise would be similar compared to the Project.

Public Services

This alternative would result in the development of industrial or manufacturing uses within the City jurisdiction and the residential uses on the County parcels. This alternative would directly increase population which would increase the potential demand for public services including police, fire, school, library, and other municipal services. This increase; however, because of the limited number of residential units, would not be substantial. In addition, this alternative would result in an incremental increase in demand for public services from the industrial or manufacturing sites and residential uses. While increases are anticipated, the increase would not to be substantial or result in the need for expansion of existing facilities or construction of new facilities to house more law enforcement or fire services. In addition, all buildings would be constructed with required fire control elements such as sprinklers and emergency access as would occur under the Project. Lastly, this element of this alternative would not increase demands on schools or other services because the industrial or manufacturing uses would not directly increase population. The residential component would directly increase population, but the increase would be small and existing services, including fire and police protection services and schools are anticipated to be sufficient. No new schools or expansion of existing schools beyond that which is already planned would be required. Therefore, increased demand for public services including fire protection and emergency medical services, law enforcement, schools, and other general governmental services under this alternative would be considered to be similar to the Project.

Transportation

This alternative would decrease the average daily trips to the City parcel and hence, decrease the vehicle miles travelled (VMT). It is anticipated that the total number of employees would be less and a corresponding decrease in VMT would occur. It should be noted that all access points to the Project would be designed to conform to all safety standards under this alternative and the Project, and both dedications for Potrero Boulevard and 4th Street would still occur. Impacts in these regards would be the similar as under the Project. The seven new residential units would result in new vehicle trips, and residential uses

in this area could result in decreased VMT given the small number of trips generated by the residences. Therefore, this alternative would result in similar impacts associated with transportation and overall VMT because it would generate a similar number of daily trips than the Project. Therefore, impacts under this alternative would be similar to that under the Project.

Utilities and Service Systems

This alternative would result in the development of industrial or manufacturing uses on the City parcel and seven residential sites on the County parcels. Uses associated with industrial or manufacturing businesses would result in a slight decrease in demand of utilities including electricity, natural gas, water, solid waste, and wastewater due to a smaller development footprint. Although the decrease is not anticipated to be substantial, depending on the nature of different industrial or manufacturing uses, a decrease would occur.

The seven rural residential properties would require utility services as well, but these increases would be small. In addition, water and sewer, depending on the proximity to existing service lines, could be provided by water wells or on-site wastewater disposal systems such as septic tanks. If these systems are used, it would eliminate increased demand for these services. Therefore, depending on the future mix of industrial or manufacturing uses and how the residential uses are served, a decrease in utility demand would be anticipated under this alternative. Although the overall demand for services would increase, adequate capacity to serve this alternative is anticipated. Therefore, while demand under this alternative would increase, impacts would remain less than significant under both this alternative and the Project.

Wildfire

This alternative would not increase the developable area and would not place any structures in an area susceptible to wildfire or at any greater risk than under the Project. This alternative would occur on the same site that contains the heavily disturbed but native vegetated habitat and communities. The surrounding areas adjacent to these areas have similar vegetation patterns and are typically classified as high fire hazard severity zones. The project footprint under this alternative would be decreased compared to the Project and would be located adjacent to undeveloped areas. Under this alternative the industrial or manufacturing uses would have similar buffers and defensible space between the built uses and surrounding undeveloped areas.

Under this alternative, the residential structures built within the County area also would be developed with appropriate defensible space and buffers between the residences and undeveloped native habitat. This project would incorporate all required fire access routes and would not encroach into any emergency route or interfere with any emergency plan or evacuation plan. Lastly, the Project does not require construction of any infrastructure that would exacerbate hazards. Nonetheless, this alternative would enable the construction of seven rural residential units in an upland area that could experience wildfire and exacerbate associated risk. This would incrementally increase effects of wildfire compared to the Project.

Habitat Preservation Alternative

This alternative would reduce the overall development footprint by approximately 50 percent with a warehouse area of approximately 288,960 sf. This alternative would concentrate development outside of the riparian area on the Project Site. Under this alternative, parking areas and retention basins would be reduced commensurate with the reduced building size. This alternative also would avoid impacts to riparian corridors through the Project Site. The annexation of Riverside County Parcels 424-010-009 and 424-010-010 would still occur under this alternative, and development would still occur on a portion of 424-010-009; however, no development would occur within the existing natural drainage area. This alternative would preserve the riparian and wetland habitat with more significant habitat value than the heavily disturbed upland areas. Under this alternative, the natural drainage would remain in its current condition and would not be converted to an underground storm drain.

Comparison of Project Impacts

An evaluation of the potential environmental impacts of the No Project Alternative, as compared to those of the Project, is provided below.

Aesthetics

Under the Habitat Preservation Alternative, approximately half the site would remain undeveloped. This would reduce visual impacts that would occur during construction and operation of the Project. This would reduce the magnitude of the changes occurring on the Project Site as seen from off-site viewers. However, because the intervening land uses, and existing landforms would remain, view would still be obscured. This would include views from residences and views from travelers along nearby roadways. Although the development footprint would be reduced, this alternative would still alter the visual appearance of the site as seen by adjacent viewers. Because the Project would not interfere with views of the San Bernardino or San Jacinto mountains, this alternative would not substantially reduce any effects with the related changes and impacts in this regard would be the similar to the Project. The existing environment in terms of proximity to state scenic highways would be the same and impacts would not occur. Overall, this alternative would reduce the on-site disturbance and land area upon which development would occur, but slopes and similar landform modifications would be required. While this would reduce the visual changes, impacts to aesthetic resources would be roughly equivalent and remain less than significant.

Air Quality

This alternative would reduce development on the Project Site by approximately 50 percent and thereby reduce construction and operational air emissions by a similar amount. Accordingly, emissions of criteria pollutants from construction equipment and truck trips would be reduced, and dust emissions from ground disturbance during construction would be reduced. Under this alternative the Project would conform to applicable air quality management plans. The Project would not exceed construction emission thresholds for any of the criteria pollutants including reactive organic gases (ROG), nitrogen oxide (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), fine particulate matter (PM_{2.5}), or coarse particulate matter (PM₁₀). The Project would exceed the 55 pounds per day maximum threshold NO_x under mitigated conditions. Transportation sources represent the largest contributions to NO_x emissions. Under the Habitat Preservation Alternative, emissions would be reduced as a result of fewer employees and fewer

trucks coming to the Project Site. Reducing the development on the Project site will reduce emissions proportionally. For operations, all emissions are below thresholds except NO_x which is 139.66 lbs/day and over the 55 lbs/day threshold. Reducing the project size would roughly reduce the operational emissions to 70 lbs/day, which is still over the 55 lb/day threshold. Therefore, impacts would remain significant and unavoidable. Therefore, while this alternative project may still exceed the NO_x threshold, potential impacts would be reduced compared to the Project. All other impacts associated with air quality would be incrementally reduced and remain less than significant.

Biological Resources

Under this alternative, approximately half of the proposed developable area would remain undeveloped and in its current state. This would reduce impacts to biological resources and improve the habitat value of the site compared to the Project. With the proposed building footprint reduced to approximately half, disturbance to existing scrub, riparian, wetland, nesting bird, and other habitats would be reduced. Under this alternative, the unnamed tributary to Cooper's Creek that traverses the Project Site would not be impacted and the drainage would not be converted to an underground pipeline. Therefore, this alternative would avoid the drainage and adjacent riparian area. This alternative also would have less effect on wildlife movement as it would retain open areas that could be used for connections to off-site areas. This alternative also would require less mitigation land to be dedicated per MSHCP mitigation requirements. Thus, impacts would be less than the Project. Similar to the Project, impacts on biological resources would be less than significant with mitigation incorporated, this alternative would further reduce impacts.

Cultural Resources and Tribal Cultural Resources

This alternative would reduce the building footprint by approximately 50 percent on the Project Site and reduce the developable area by avoiding the onsite drainage and subsequently reducing the area where unknown buried archaeological resources could be disturbed. Similarly, this would reduce the potential to damage or destroy unknown human remains. Similar to the Project, potential impacts would be less than significant with the same mitigation measures incorporated. Overall, this would reduce potential impacts on cultural resources and tribal cultural resources compared to the Project.

Energy

Like the Project, this alternative would require energy during both construction and operation phases. This alternative would reduce energy demand during construction and energy consumption during operation because the structure would be approximately half the size and operate at approximately half of the building energy demand. This would reduce the demand for energy for heating and cooling, fuels for on-site operations, and fuels needed for trucks and other employee transportation needs. Similar to the Project, this alternative would comply with applicable state and local plans related to renewable energy and fuel efficiencies. Thus, when compared to the Project, the Habitat Preservation Alternative would result in fewer energy-related impacts than the Project, and impacts would remain less than significant.

Geology and Soils

This alternative would reduce the proposed building size by approximately 50 percent. Although this alternative would reduce the area potentially affected by ground shaking and associated hazards including faults and seismicity, liquefaction, subsidence, collapse, expansive soils, landslides, soil stability, or slopes, similar to the Project this alternative would not exacerbate any of the listed geologic conditions. Although this alternative would reduce the soil disturbance within the Project Site, both projects would conform to an approved Stormwater pollution prevention plan (SWPPP) and implement associated best management practices (BMPs) as required by the National Pollution Discharge Elimination System (NPDES). Thus, while the overall area of impact would be greater and potentially fewer workers and/or employees would be exposed to potential geologic hazards, and less land would be susceptible to soils impacts from erosion, overall impacts would remain less than significant. Therefore, compared to the Project, geology and soil impacts would be the similar as under this alternative.

Greenhouse Gas Emissions

This alternative would reduce proposed building size by approximately 50 percent and reduce GHG emissions from construction and operation by commensurate amount. The Project related emissions associated with development of the entire Project and larger warehouse footprint were found to exceed the 10,000 MTCO₂e per year threshold for both unmitigated (13,638.93) and mitigated (13,259.79) emissions. The Project had significant and unavoidable impacts from GHG emissions. This resulted in a significant and unavoidable impact finding. Similarly, because the Project would exceed thresholds, the Project also was found to conflict with applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions. Because this alternative would reduce the building size by approximately 50 percent, GHG emissions would be reduced as a result of reduced energy demand from the building as well as reduced energy needs from transportation as a result of few cars and fewer trucks, including refrigerated trucks. It is anticipated that such a reduction would reduce unmitigated GHG emissions to below the 10,000 MTCO₂e emissions threshold. Therefore, compared to Project, impacts found under the Habitat Preservation Alternative, would be reduced and less than significant, including cumulatively, and significant and unavoidable impact would be avoided.

Hazards and Hazardous Materials

This alternative would reduce the building footprint by approximately 50 percent and as such, the potential for accidental upset of unknown hazardous materials is reduced by an incremental amount. Similarly, this alternative would reduce the potential area in which work would occur or areas in which potentially hazardous materials are handled. Similar to the Project, this alternative would still require the handling and storage and use of materials but this would be in conformance with all applicable rules and regulations. No acutely hazardous materials are anticipated for use under either alternative. Depending on the specific nature and quantity of materials used, a Hazardous Materials Business Plan which would be used to regulate the storage and handling of hazardous materials through education, facility inspections and enforcement of State law. For any hazardous materials stored onsite, all applicable rules and regulations regarding their storage, use, and handling of those materials would be required. Therefore, while the potential for impacts hazardous materials would be reduced under this alternative, potential impacts would remain less than significant.

Hydrology and Water Quality

This alternative would reduce the developable area to avoid the existing drainage onsite. Under this alternative the existing natural drainage would continue to convey offsite flows and discharge both the offsite and onsite flows into Cooper's Creek to the southwest of the Project Site. Under this alternative there would be no need to convert the drainage to an underground pipeline. This alternative would still have onsite retention basins to collect and treat onsite surface water before releasing the flow into the drainage. The detention basins would be smaller due to less impervious surface area (less building rooftop and less parking area) within the development envelope. This would reduce the potential for water quality impacts because less of the Project site would be disturbed and subject to erosion during construction and decreased stormwater flows during operation. Because fewer impervious surfaces such as parking lots and building roof area would be introduced, the detention basins and storm water discharge system would be reduced in scale. Under this alternative a SWPPP and BMPs would be still be implemented, would still conform with applicable NPDES and RWQCB permitting procedures permitting, and would still be anticipated to reduce potential effects to downstream waters from sediments and other pollutants in stormwater runoff. Because this alternative would leave the natural drainage and landscape, fewer modifications to the onsite drainages and existing surface water flow regime would be required. Overall, this alternative would reduce the potential effects to hydrology and water quality compare to the Project, and impacts would remain less than significant with mitigation incorporated.

Land Use and Planning

As discussed above, this alternative would reduce the overall building footprint by approximately 50 percent. This alternative would still locate the Warehouse on the same parcel would include the same land use entitlements. Land use impacts to the developable areas would be the same as under the Project. Although this alternative would reduce the developable area and overall warehouse footprint, it would not substantially reduce impacts associated with land use. The annexation of the Riverside County parcels would still occur under this alternative. Regardless of its size, under the Project or under this alternative, the warehouse would not be in a location that would physically divide an established community. The reduced size also would not conflict with any goals or policies of applicable plans leading to environmental impacts. Therefore, while the overall development footprint would be reduced, there would not be an appreciable difference in the severity of the impacts related to land use. Impacts would remain less than significant.

Noise

This alternative would reduce the building footprint on the Warehouse Site by approximately 50 percent. This alternative would occur within the same site and would be surrounded by the same surrounding uses including vacant land, proposed roadways, and nearby ongoing industrial development. None of the immediately surrounding uses are considered sensitive receptors. Because the warehouse would be smaller in size, there would be less construction and operational noise generated during these project phases. Operational impacts would be reduced because there would be fewer truck trips and less noise associated with loading and unloading, vehicle movements around the facility, and less machinery needed to operate. There also would be less noise generated by the HVAC system. Overall, while the potential for impacts would be reduced because less area would be used, the impacts conclusion would remain the

same and would be less than significant. Therefore, noise impacts would be incrementally reduced compared to the Project and impacts would remain less than significant.

Public Services

This alternative would result in the construction of a warehouse building approximately 50 percent less in size as would occur under the Project. Because this alternative would reduce the warehouse size by approximately half, it is anticipated that the demand for employees would be similarly reduced. This also would reduce the potential for increased calls for police and fire services. As discussed in population and housing above, although it is anticipated that most employees would come from within the City and surrounding areas, this alternative would slightly reduce the potential demand for new housing and reduce the potential for inducing people to move to the City or surrounding areas for work at the warehouse. Because of this there also would be an incremental decrease in the potential for emergency services as well as other City municipal services and use of libraries, medical facilities, and parks. Again, because the change in population would relatively small, these reductions would be similarly small and would not have a substantial effect or appreciable change compared to the Project. Analysis of the Project found these impacts to be less than significant and the change under this alternative does not reduce the severity impact and it would remain less than significant.

Transportation

The alternative would result in the construction of a warehouse building approximately 50 percent less in size as would occur under the Project. Regarding the Warehouse Site, because a smaller building would be developed under this alternative, the length of construction time would be reduced. This would reduce the length of time the construction workers would commute to the Project Site. Similarly, with the warehouse being approximately half the size, fewer employees would be needed, and this would result in fewer daily trips to and from the site. Also, because the warehouse would be able to accommodate less materials, fewer truck trips would be needed to deliver and remove goods. Therefore, under this alternative the vehicle traffic including both personal vehicle and truck trips would be reduced by half. Impacts under the Project were found to be significant and unavoidable with regard exceeding the City's VMT Thresholds. Similar to the Project, implementation of a TDM plan would be required as mitigation. While, this alternative would reduce the overall number of trips generated from the site, it would not necessarily reduce VMT under the City's VMT thresholds because the smaller site would also reduce the number of employees and service population on which the VMT calculations are based. Therefore, the impacts under this alternative, while reduced, would remain significant and unavoidable.

Utilities and Service Systems

This alternative would reduce the warehouse building size by approximately 50 percent. Because this alternative would reduce the warehouse size by approximately one half, it is anticipated that the demand for utility services, including electricity and natural gas, volume of water, and the amount of wastewater and waste materials produced, would be reduced by approximately half. This would have a corresponding reduction in demand on services providers. Under the Project service providers would have an adequate capacity to serve the development as designed and impacts would be less than significant. Under this alternative, while the warehouse footprint would be reduced, on-site improvements and tie-ins to existing

utility lines would still be required. This would occur in the same areas, same rights-of-way, and same adjacent areas as under the Project. Analysis of the Project found these impacts to be less than significant and although this alternative would reduce the demand on utility services, it would not change the areas of disturbance needed to serve the warehouse. Thus, this alternative would not result in a reduction of the impact severity determination and impacts would remain less than significant.

Wildfire

This alternative would reduce the developable area on the Warehouse Site by approximately 50 percent and leave approximately 50 percent of the site with the existing vegetation and habitat. The warehouse would be located within an area that contains native vegetated habitat characterized by coastal sage scrub, grassland, and other similar habitat communities. Immediately adjacent to the Project Site are undeveloped areas as well as roadways and areas that are urbanizing with other commercial/industrial uses. The developed areas are not prone to wildfire. Because this alternative would be located on the same site, the on-site and surrounding fire hazard designations would be the same. The northerly portion of entire Project Site is within a local responsibility area (LRA) and is designated as a very high fire hazard severity zone (VHFHSZ). The southerly parcels are within the state responsibility area (SRA) and designated as high fire hazard severity zone (HFHSZ). The adjoining areas to the south and east of the Project Site are designated as HFHSZ, and a small portion to the west is moderate fire hazard severity zone (MFHSZ) with the balance being a HFHSZ designated as a VHFHSZ.

While this alternative would reduce the size of the warehouse development area, it would remain within the same environment and risks from wildfire would be similar. Under both the Project and under this alternative, the warehouse would be developed with appropriate defensible space and buffers between undeveloped native habitat and structures. Neither this alternative nor the Project would interfere with any emergency plan or evacuation plan. This alternative also would not exacerbate any existing fire hazards associated with slopes or spreading of wildfire. Lastly, neither the Project nor this alternative would require construction of any infrastructure that could exacerbate fire hazards. Therefore, while the developable area of this alternative would be less than the Project, there would be no appreciable difference in impacts associated with wildfire between this alternative and those of the Project.

4.3 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

As shown in **Table 4-1**, below, the Habitat Preservation Alternative would be the environmentally superior alternative. This alternative, however, would meet only approximately half of the Project Objectives. This alternative would locate a warehouse in proximity to other such uses, and would be consistent with the existing general plan and zoning, but would not take advantage of the flexibility to maximize development potential in consideration of environmental constraints. This alternative also would dedicate lands for roadway and other infrastructure improvements, and which would enable movement of goods and services. However, this alternative would not make the most of the site and would not as effectively facilitate the movement of goods and services, would not result in as great a benefit to regional economic growth, would not generate the volume of revenue to the city, would not result in as many additional employment opportunities and would not enhance the fiscal balance of the City to the extent as would the Project.

Table 4-1: Comparison of Project Alternatives Environmental Impacts with the Proposed Project

| EIR Chapter | Alternatives | | |
|---|---|--------------------------------------|--------------------------------------|
| | Proposed Project - Level of Impact After Mitigation | Alternative 1 - No Project | Alternative 2 – Habitat Preservation |
| 3.1 – Aesthetics | Less Than Significant | + | =/- |
| 3.2 – Air Quality | Significant and Unavoidable | =/- | - |
| 3.3 – Biological Resources | Less Than Significant | + | - |
| 3.4 and 3.14 – Cultural Resources and Tribal Cultural Resources | Less Than Significant | + | - |
| 3.5 – Energy | Less Than Significant | - | - |
| 3.6 – Geology and Soils | Less Than Significant | = | =/- |
| 3.7 – Greenhouse Gas Emissions | Significant and Unavoidable | = | - |
| 3.8 – Hazards and Hazardous Materials | Less Than Significant | = | =/- |
| 3.9 – Hydrology and Water Quality | Less Than Significant | = | - |
| 3.10 – Land Use and Planning | Less Than Significant | - | = |
| 3.11 – Noise | Less Than Significant | = | =/- |
| 3.12 – Public Services | Less Than Significant | = | =/ |
| 3.13 – Transportation | Significant and Unavoidable | = | - |
| 3.15 – Utilities and Service Systems | Less Than Significant | + | =/- |
| 3.16 – Wildfire | Less than Significant | + | = |
| Attainment of Project Objectives | Meets all of the Project Objectives | Meets some of the Project Objectives | Meets some of the Project Objectives |

Notes:

A minus (-) sign means the Project Alternative has reduced impacts from the Project.

A plus (+) sign means the Project Alternative has increased impacts from the Project.

An equal sign (=) means the Project Alternative has similar impacts to the Project.

An =/- sign means the Project Alternative has a similar but slightly less impacts from the Project.

An =/+ sign means the Project Alternative has a similar but slight greater impact than the Project.

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