

6.0 ALTERNATIVES

6.1 Introduction

California Environmental Quality Act (CEQA) requires that Environmental Impact Reports (EIR) “describe a range of reasonable alternatives to the Project, or to the location of the Project, which would feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the Project and evaluate the comparative merits of the alternatives.” (State CEQA Guidelines § 15126.6). The State CEQA Guidelines require that the EIR include sufficient information about each Alternative to allow meaningful evaluation, analysis, and comparison with the Project. If an alternative would cause one or more significant effects in addition to those that would be caused by the Project as proposed, the significant effects of the Alternative must be discussed, but these effects may be discussed in less detail than the significant effects of the project as proposed (California Code of Regulations [CCR] § 15126.6[d]). The EIR is not required to consider every conceivable Alternative to a project but is guided by a rule of reason. An EIR is not required to consider alternatives which are infeasible. Section 15126.6[d]) states that the EIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. Key provisions of the State CEQA Guidelines on alternatives (§ 15126.6(a) through (f)) are summarized below to explain the foundation and legal requirements for the Alternative’s analysis in the Draft EIR.

- “The 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 was published, at the time the environmental analysis is commenced, as well as what would reasonably be 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 require an 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 (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)” (§ 15126.6(f)(1)).

- For alternative locations, “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)).

6.2 Project Objectives

Section 15124(b) of the CEQA Guidelines indicates that an EIR should include “a statement of objectives sought by the proposed Project.” The Specific Plan was prepared to achieve the following Project objectives, which are also described in **Section 3.0** of this Draft EIR:

1. Provide a comprehensive land use plan that designates the distribution, location, and extent of land uses.
2. Provide a land use plan that is sensitive to the environment through avoidance of sensitive resources, aesthetically pleasing through application of design guidelines, and places compatible land uses and facilities in an appropriate location.
3. Develop a state-of-the-art logistics/e-commerce center with complimentary commercial uses that take advantage of existing and planned infrastructure, is feasible to construct, is economically competitive with, and in the general vicinity of, similar logistics/e-commerce center uses.
4. Develop and operate a large format logistics center that is in close proximity to the I-10 freeway to support the distribution of goods throughout the region and that also limits truck traffic disruption to sensitive receptors within the surrounding region.
5. Facilitate the development of underutilized land currently planned for residential uses with uses that maximize the use of the site as a large format e-commerce center consisting of one or more buildings with total e-commerce building space in excess of 2,557,465 square feet in size and approximately 150,000 square feet of mixed commercial uses responding to market demand.
6. Provide a system of infrastructure that includes public and private transportation, sewer, water, drainage, solid waste disposal, and other essential facilities to serve the needs of the Project.
7. Provide access patterns that minimize traffic conflicts.
8. Develop project identity through the identification of project design elements such as architecture, landscaping, walls, fencing, signage, and entry treatments.
9. Facilitate the establishment of design guidelines and development standards that create a unique, well-defined identity for the proposed Project.
10. Positively contribute to the economy of the region through new capital investment, creation of new employment opportunities, and expansion of the tax base.
11. Establish landscape guidelines that emphasize the use of drought-tolerant and water-efficient plant materials.
12. Provide and plan that incorporates appropriate buffers with the surrounding development through the use of landscaped setbacks and expanded parkways along Cherry Valley Boulevard and Brookside Avenue.

6.3 Significant and Unavoidable Environmental Impact of the Project

Sections 4.1 through 4.18 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 ROG and 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 ROG and NO_x emissions; and (3) result in cumulative air quality impacts, as a result of operational ROG and 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 33,940 MTCO_{2e} per year (mitigated) of GHG emissions that could have a significant impact on the environment; (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; and (3) the Project would result in a potentially significant cumulative GHG impact.

Noise

Noise impacts would be less than significant with the exception of cumulative off-site traffic noise along Cherry Valley Boulevard (from Project access to Hannon Road, from Hannon Road to Union Street, and from Union Street to Nancy Avenue). Cumulative traffic noise impacts would occur primarily as a result of increased traffic on local roadways due to buildout of the proposed Project and other projects in the vicinity. Noise levels along the affected segments of Cherry Valley Boulevard would be Conditionally Acceptable. However, mitigation was determined to be infeasible to reduce mobile traffic noise to Normally Acceptable levels in accordance with the Land Use Compatibility standards.

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 6.4 VMT and second by 12.1 VMT. A cumulatively consideration transportation impact would also occur.

6.4 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.

6.5 Alternatives Removed from Further Consideration

State CEQA Guidelines § 15126.6(c) states that an EIR should identify any alternatives that were considered by the lead agency but rejected because the Alternative would be infeasible, fail to meet most of the basic project objectives, or unable to avoid significant environmental impacts. Furthermore, an EIR may consider an alternative location for the proposed Project but is only required to do so if significant project effects would be avoided or substantially lessened by moving the Project to another site and if the Project proponent can reasonably acquire, control, or otherwise have access to the alternative site.

In developing the Project and alternatives, consideration was given to the density of development that could meet Project objectives and reduce significant impacts. The anticipated significant impacts would result from the intensity of the development proposed. In developing a reasonable range of alternatives, an alternative site alternative was considered but removed from consideration for a variety of reasons. These Alternative and the reasons are discussed briefly below:

Alternative Site Alternative

The analysis of alternatives to the proposed 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 (CEQA § 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. For example, development of the proposed Project on any suitable alternative site in or around the City may not avoid or substantially lessen the proposed Project's impacts. This generally applies to impacts such as air quality impacts, greenhouse gas emissions, or transportation impacts that occur over a wider area than generally site-specific impacts such as those to aesthetic or biological resources. Additionally, impacts like these could be greater if the alternative site is located further away from a major transportation corridor or in areas with existing unacceptable traffic levels. Moreover, an alternative site that is adjacent to undeveloped lands could result in increased impacts on aesthetics and utilities due to increased service capacity and

incongruous development, than a site, such as the Project site that is surrounded by existing and future planned development.

Furthermore, viable alternative locations for the Project are limited to those that would feasibly attain most of the Project objectives. There are no other lots appropriately located and sufficient sized and owned by the Project applicant in the City and along a major transportation corridor that would satisfy the Project objectives and eliminate or reduce impacts from the Project. The Project is proposed to be located near a major transportation route with Interstate 10 (I-10) directly to the southwest.

6.6 Alternatives to the 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 Reduced Building Intensity 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/Existing Specific Plan”
- “Reduced Building Intensity”

6.7 Comparison of Project Alternatives

Alternative 1: No Project/Existing Specific Plan

Consistent with State CEQA Guidelines § 15126.6, the No Project/Existing Specific Plan assumes that the existing land uses and condition of the Project Site at the time the NOP was published (September 2021) would continue to exist without the Project. The setting of the Project site at the time the NOP was published is described as part of the existing conditions within **Section 3.0, Project Description** and throughout **Section 4.0** 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/Existing Specific Plan Alternative assumes the Project would not be implemented and proposed land uses, and other improvements would not be constructed related to proposed Project and under this alternative none of the proposed improvements would occur. However, development allowed under the previously approved Sunny-Cal Specific Plan could occur and is analyzed as part of this Alternative.

The previously approved Sunny-Cal Specific Plan allows for the development of 200 acres with approximately 560 Dwelling Units (DU) on approximately 159 acres, over 30 acres of parks, open space, landscaped buffers, and paseos, and approximately 10 acres of circulation improvements.¹

Under this Alternative, the Sunny-Cal Specific Plan would remain and would not be replaced with the proposed Beaumont Summit Station Specific Plan. While the Sunny-Cal Specific Plan allows for a variety of land uses, this Alternative assumed development in accordance with the residential densities allowed under the specific plan which, as noted above, allows for up to 560 DUs, park space, and roads.

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 Project site under the Sunny-Cal Specific Plan.

Comparison of Project Impacts

An evaluation of the potential environmental impacts of the No Project/Existing Specific Plan Alternative, as compared to those of the Project, is provided below. Impacts from the No Project/Existing Specific Plan Alternative are largely derived from the Recirculated Draft Environmental Impact Report Sunny-Cal Specific Plan, Annexation, and Sphere of Influence Amendment SCH # 2004121092 (Sunny-Cal DEIR; May 2006).

Aesthetics

Sunny-Cal DEIR Analysis

The Sunny-Cal DEIR found that implementation of the Specific Plan and related approvals as proposed would result in significant aesthetic impacts by creating a fundamental change in views from a nearby scenic route (I-10 Freeway) and the rural Cherry Valley area to the east. Furthermore, the project could have a substantial adverse effect on a scenic vista, and could substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. Furthermore, the project could substantially degrade the existing visual character or quality of the site and its surroundings and would create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Current DEIR Analysis

The proposed Project was found to have a less than significant impact on scenic vistas, as the City does not contain any designated scenic vistas. No impact would occur with regard to substantially damaging scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway because I-10 is no longer designated as a scenic highway by Caltrans.² A less than significant impact would occur with regard to degradation of the existing visual character or quality of public views because the Project would incorporate perimeter landscaping, trees, and ground covers to visually buffer the structures. Lastly, the Project would result in a less than significant impact on day/night-

¹ Stantec. 2007. *Sunny-Cal Specific Plan*.

² Caltrans. 2018. *California State Scenic Highway System Map*.
<https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca> (accessed November 2021).

time views in the area due to light and glare because the Project would comply Chapter 8.50, Outdoor Lighting of the Beaumont MC which sets forth restrictive lighting standards that act to prevent or minimize overall illumination levels, and effectively reduce or preclude potential light/glare overspill impacts.

Based on the above discussion, the No-Project alternative would have impacts regarding aesthetics, light, and glare that would be greater when compared to the proposed Project.

Air Quality

Sunny-Cal DEIR Analysis

The Sunny-Cal DEIR found that even with implementation of all feasible mitigation, the project would create significant short-term air quality regional impacts during construction from ROG and NO_x emissions and would create long-term regional impacts during project occupancy from ROG emissions. The Project also has the potential to create similar significant localized impacts during project construction and operation from PM₁₀. Because the Project has the potential to emit air pollutants in excess of the appropriate standards, there is the potential that air emissions of PM₁₀ and ROG during construction and operation of the Project could impact the health of nearby residents. Therefore, the Project may result in pollutant concentrations to significantly affect sensitive receptors. In addition, the Project was not compliant with the 2003 Air Quality Management Plan (AQMP).

Current DEIR Analysis

With mitigation incorporated, the proposed Project would not exceed SCAQMD thresholds for construction-related emissions. The same does not hold true for operational emissions at Project buildout, which exceed SCAQMD thresholds for ROG, NO_x, CO, and PM₁₀. Even with the implementation of numerous PDFs and mitigation measures included to reduce emissions to the maximum extent feasible, the impact would remain significant and unavoidable. Due to the exceedances, the Project would not be consistent with the AQMP. Impacts to sensitive receptors due to exposure of substantial pollutant concentrations would be less than significant with mitigation incorporated **MM AQ-1** through **MM AQ-6**. There would be no impact pertaining odors.

The No-Project Alternative and the proposed Project would exceed thresholds for criteria pollutants, and it is anticipated that the No-Project Alternative would result in both construction and operational impacts as well as impacts to sensitive receptors. This is because the No-Project Alternative provides the opportunity for the site to still be developed under the Sunny-Cal Specific Plan which, as noted above, would create significant impacts on air quality. Therefore, based on the above discussion, under this Alternative, impacts regarding air quality are anticipated to be equivalent to No-Project Alternative/the possibility for the site to be developed under the Sunny-Cal Specific Plan.

Biological Resources

Sunny-Cal DEIR Analysis

The Sunny-Cal DEIR found that through the Fish and Game § 1600 Streambed Alteration Agreement process, direct impacts to riparian habitat would be reduced to below the level of significance. Mitigation measures included in the Sunny Cal EIR determined that impacts would be less than significant. Through

implementation of MM BR-5, impacts to avian nesting sites would be reduced to below the level of significance. Through the Section 404 permitting process, direct impacts to waters of the U.S. and wetlands would be reduced to below the level of significance. Implementation of MMs BR-1 and BR-2 would reduce indirect impacts to jurisdictional waters to below the level of significance.

Current DEIR Analysis

With mitigation incorporated, the proposed Project would have less than significant impact on species identified as a candidate, sensitive, or special status species. **MM BIO-1** would address least Bell's vireo; **MM BIO-2** burrowing owl, and **MM BIO-3** nesting birds

According to the Project DBESP Report (**Appendix C3**), the Project site contains approximately 8.48 acres of MSHCP riparian/riverine areas, as defined by Section 6.1.2 of the MSHCP, of which, 2.41 acres (0.24 acre of riparian habitat and 2.17 acres of vegetation streambed) would be directly impacted by construction; approximately 6.07 acres of MSHCP riparian/riverine areas would be avoided on site. The on-site MSHCP riparian/riverine areas coincide with CDFW-jurisdictional vegetated streambed and associated riparian habitat. To address impacts to riparian/riverine areas, **MM BIO-4** is proposed, which would mitigate direct impacts at a 2:1 ratio.

No impact would occur to wetlands and a less than significant impact would occur to wildlife corridors or nursery sites. A less than significant impact would occur with regard to conflict with local policies or ordinances. With mitigation incorporated (**MM BIO-1** through **BIO-4**), a less than significant impact would occur regarding conflict with the MSHCP.

Based on the above discussion, under the No-Project Alternative, impacts regarding biological resources would be equivalent when compared to the proposed Project.

Cultural Resources and Tribal Cultural Resources

Sunny-Cal DEIR Analysis

The Sunny-Cal DEIR found that impacts to potential cultural resources from construction of the proposed Sunny-Cal Specific Plan would be less than significant after implementation of the recommended mitigation measures. MMs CR-1 and CR-2 would address impacts to undiscovered archaeological resources, human remains, and tribal cultural resources. MM CR-3 and MM CR-4 would address impacts to historical resources (a monument commemorating Gorgeous George and his turkey farm and a historian to monitor grading and construction in the vicinity of the Danny Thomas Ranch House).

Current DEIR Analysis

The proposed Project would have no impact to historical resources as no historic-age resources were identified on the Project site. Archaeological impacts would be mitigated to a less than significant level with the incorporation of **MMs CUL-1** and **CUL-2**. Under **MM CUL-1**, a qualified archaeological monitor will be present during Project-related ground-disturbing activities in undisturbed native sediments. **MM CUL-2** addresses the discovery of potentially significant cultural materials. Impacts to human remains would be less than significant following adherence with applicable laws, including California HSC §§ 7050.5-7055 and California PRC § 5097.98 and § 5097.99. Impacts to tribal cultural resources were

found to be less than significant due to the lack of TCRs found during the site visit, the lack of TCRs noted by NAHC and the SLF search, and the lack of tribal interest for the APE from tribes.

Based on the above discussion, under the No-Project Alternative, impacts regarding cultural resources would be equivalent when compared to the proposed Project.

Energy

Sunny-Cal DEIR Analysis

The Sunny-Cal DEIR did not evaluate energy impacts. However, the DEIR did analyze impacts to air quality impacts, which are largely related to the consumption (and associated combustion) of energy resources. As previously mentioned, this Alternative would result in both construction and operational air quality impacts despite implementation of all feasible mitigation.

Current DEIR Analysis

The proposed Project would result in a less than significant impact as it pertains to resulting in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation. The proposed Project would not Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Based on the above discussion, under the No-Project Alternative, impacts regarding energy are anticipated be greater when compared to the proposed Project because the proposed Project would not result in impacts that would require the implementation of mitigation.

Geology and Soils

Sunny-Cal DEIR Analysis

The Sunny-Cal DEIR found that with implementation of the proposed mitigation measures, potential impacts of the project related to geologic, seismic, and soil-related constraints would be reduced to less than significant levels. MM GS-1 requires the developer to comply with the recommendations and general earthwork and grading specifications found in the project-specific geotechnical studies and MM GS-2 requires a detailed geotechnical investigation to be prepared and approved for all foundations for residential structures. MM CR-5 was proposed to prevent significant impacts to paleontological resources that may have been present within the Sunny-Cal Specific Plan area.

Current DEIR Analysis

The proposed Project was found to have a less than significant impact regarding the rupture of known earthquake faults; strong seismic ground shaking; and seismic-related ground failure, including liquefaction. No impact would occur with regard to landslides and the ability for the Project to support the use of septic tanks or alternative wastewater disposal systems. Soil erosion or loss of topsoil impacts would be mitigated to a less than significant level with the incorporation of **MM GEO-1** which addresses inclusion of a Settlement Monitoring Program and Foundation and Grading Plan Review and over-excavation. **MM GEO-1** would also address impacts regarding expansive soils. **MM GEO-2**, which includes a Paleontological Construction Monitoring and Compliance Program, retention of a Qualified

Paleontologist, paleontological monitoring, and completion of a Paleontological Mitigation and Monitoring Program, would mitigate impacts to paleontological resources to a less than significant level.

Based on the above discussion, under the No-Project Alternative, impacts regarding geology and soil resources and paleontological resources would be equivalent when compared to the proposed Project.

Greenhouse Gas Emissions

Sunny-Cal DEIR Analysis

The Sunny-Cal DEIR did not evaluate greenhouse gas emissions (GHG) impacts.

Current DEIR Analysis

Even with the implementation of numerous standard conditions and mitigation measures, the proposed Project would result in a significant unavoidable impact as it pertains to GHG emissions and conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing GHG emissions. At proposed Project buildout, the mitigated GHG impact would be 25,107 MTCO_{2e} per year, exceeding the City's 3,000 MTCO_{2e} per year threshold. Based on air quality impacts, it is assumed that the Sunny-Cal Specific Plan project would result in an exceedance of the City's threshold due to the extensive construction and operational activities that would result from the development of the 560 DUs. However, it is likely that mitigation, including compliance with the City's CAP would reduce impacts to a level of less than significant. Based on this discussion, under the No-Project Alternative, impacts regarding GHG emissions would be reduced when compared to the proposed Project.

Hazards and Hazardous Materials

Sunny-Cal DEIR Analysis

The Sunny-Cal DEIR found that with implementation of the proposed mitigation measure, the proposed Specific Plan would not have significant impacts relative to hazardous materials, fire hazards, and airports/airfields. MM HZ-1 requires the preparation of a Voluntary Work Plan in consultation with the State Department of Toxic Substances Control.

Current DEIR Analysis

The Phase I ESA for the Project site evaluated the potential for hazardous materials, based upon readily discernible and/or documented present and historic uses of the properties and uses adjoining the sites and generally characterized the expected nature of hazardous materials that may be present as a result of such uses. Evidence of contaminated soils were not found on-site.

The Project site is not listed on an NPL or Superfund site, however the site was identified on the Historical HIST UST and SWEEPS UST databases at the site address 37251 Cherry Valley Boulevard under Sunny-Cal Egg & Poultry Co for having historically one 550-gallon diesel UST, one 8,000-gallon diesel UST and one 1,000-gallon unleaded gasoline UST, installed between 1978 and 1979. The removal date of the USTs is unknown. Based on the lack of UST removal and closure documents, the historical USTs are considered evidence of a REC in connection with the site, resulting in a potentially significant impact. A request to the County of Riverside Department of Environmental Health has been submitted for closure records. Their

response is currently pending at the time of this report and is expected the week of March 22. The report will be updated pending the receipt of the records.

The proposed Project would have a less than significant impact as it pertains to the routine transport, use, or disposal of hazardous materials; upset and accident conditions involving the release of hazardous materials; emitting hazardous materials within one-quarter mile of a school; being located on a Government Code § 65962.5 site; impairing/interfering with an emergency response plan or emergency evacuation plan; and exposure of people/structures to wildland fire. The Project site is not within two miles of a public airport or public use airport; therefore, no safety hazard or noise impacts would occur.

Based on the above discussion, under the No-Project Alternative, impacts regarding hazardous materials and waste would be similar when compared to the proposed Project because the proposed Project would have to address any site-specific REC on the site. Result in impacts that would require the implementation of **MM HAZ-1**.

Hydrology and Water Quality

Sunny-Cal DEIR Analysis

The Sunny-Cal DEIR found that potentially significant hydrology and water quality impacts would be reduced to less than significant levels with implementation of the proposed mitigation measures. MMs H-1 through H-3 would address flood control/drainage channels and MMs H-4 through H-10 would address water quality.

Current DEIR Analysis

The proposed Project would have a less than significant impact as it pertains to water quality/waste discharge standards/requirements; groundwater supplies and recharge; erosion or siltation; flooding/floodflows and runoff; and conflict or obstruction of a water quality control plan or sustainable groundwater management plan. No impact would occur regarding flood hazard, tsunami, and seiche zones and project inundation.

Based on the above discussion, under the No-Project Alternative, impacts regarding hydrology and water quality would be greater when compared to the proposed Project because the proposed Project would not result in impacts that would require the implementation of mitigation.

Land Use and Planning

Sunny-Cal DEIR Analysis

The Sunny-Cal DEIR found that it would not physically divide an established neighborhood. In addition, it does not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (e.g., general plan, specific plan, zoning, etc.) adopted for the purpose of avoiding or mitigating an environmental effect. The Sunny-Cal Specific Plan was found to be consistent with surrounding planned land uses and with applicable policies of the General Plans of the County of Riverside, including The Pass Area Plan, and the City of Beaumont. Therefore, it would not create significant impacts related to land use or planning.

Current DEIR Analysis

Like the Sunny-Cal Specific Plan project, the proposed Project would not physically divide an established community. The proposed Project would be compatible with the SCAG's RTP/SCS strategies and would be consistent with the City's Zoning Ordinance and Zoning Map; therefore, it would be consistent with all goals, policies, within the Beaumont GP. Note, however, that a General Plan Amendment would be required which would change the property's land use designation from Single Family Residential to Industrial, General Commercial, and Open Space. The proposed land use designations would be consistent with the proposed e-commerce center, commercial area, and open space uses. Ultimately, the proposed Project is consistent with its context as the area is rapidly developing with other similar uses, such as the development across the way just north of Cherry Valley Boulevard. However, because the proposed Project would require a General Plan Amendment, it is determined that the No-Project (or the development of the site under the existing Specific Plan), the No-Project is considered to be the superior Alternative.

Noise

Sunny-Cal DEIR Analysis

The Sunny-Cal DEIR found that with implementation of the proposed mitigation measures, potential noise impacts on and from the project would be reduced to less than significant levels. At project buildout, projected traffic along adjacent roads/highways could generate significant noise impacts on future project residents. Therefore, on-site uses must be shielded or otherwise protected from anticipated future noise impacts. Project traffic alone would not expose persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Similarly, the project was not expected to produce a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. Construction of the project could cause a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. This potential impact is significant. The project is not expected to expose persons to or generation of excessive groundborne vibration or groundborne noise levels. The project is not located within two miles of a public airport, a private airfield, and is not within an airport land use plan. Therefore, the project would not expose people residing or working in the project area to excessive noise levels from these sources. MMs N-1 through N-3 would apply to long-term noise and MM N-4 to construction noise.

Current DEIR Analysis

The proposed Project would result in a less than significant impact as it pertains to generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. At Project opening year and Project buildout, the proposed Project would not exceed traffic noise level thresholds. A less than significant impact would occur regarding groundborne vibration/noise levels and airport noise. However, it was determined that the proposed Project would have a significant and unavoidable cumulative noise impact and no mitigation would be feasible. Based on the above discussion, the No-Project Alternative would be the superior alternative.

Population and Housing

Sunny-Cal DEIR Analysis

The Sunny-Cal DEIR found that the amount of new housing and population generated by the project was consistent with regional growth projections and did not represent a significant impact in this regard. Potential population and housing impacts of the project were not expected to be significant over the short- or long-term, based on local and SCAG demographic projections.

Current DEIR Analysis

The proposed Project was found to result in a less than significant impact as it pertains to employment growth, population growth, and the jobs-housing balance. The Project would generate approximately 4,010 new employment opportunities in the City of Beaumont. All growth is planned according to the Beaumont GP 2040 and SCAG Connect SoCal Plan and would support SCAG's job-housing imbalance. The Project's employment is anticipated to be served by the regional and local workforce and would not require additional housing.

While both the No-Project Alternative and the proposed Project were found to result in a less than significant impact, this Alternative would result in both direct population and housing growth. Therefore, based on the above discussion, under the No-Project Alternative, impacts regarding population and housing would be greater when compared to the proposed Project.

Public Services

Sunny-Cal DEIR Analysis

The Sunny-Cal DEIR found that with implementation of the recommended mitigation measures and payment of applicable development impact fees, potential impacts to public services as a result of the proposed Specific Plan would be less than significant. MM PS-1 pertains to fire services and dedicating land within the project for a station; MM PS-3 to police services and dedicating land within the project for a substation; and MM PS-5 to school services and whether or not BUSD requires a joint school/park site in the final mapped area.

Current DEIR Analysis

The proposed Project was found to have a less than significant impact as it pertains to fire and police protection and following compliance with design/building standards. The Project would not substantially affect service ratios, response times, or other performance objectives such that new facilities are required. The Project also would include design elements such as lighting of streets, walkways, and bikeways; visibility of doors and windows from the street; and fencing of the property. These measures would help reduce demands for law enforcement services and impacts would be less than significant.

Riverside County Fire Department has reviewed the Project design to ensure conformance to RCFD requirements and would thereby reduce demands on fire protection services. Additionally, payment of the Fire Protection impact fees, property taxes, and other revenues generated by development within the Project area would be available to the City to offset any increased costs for fire protection services with

little or no net effect on the City's budget. Additionally, Project development would be subject to BPD review. BPD has previously reviewed the Project for consistency with crime prevention design and BPD requirements.

Project payment of fees in compliance with Government Code § 65996 fully mitigates all impacts to school facilities. Therefore, this impact would be less than significant. The Project would pay the Public Services impact fees of \$38.36 per square foot according to the City's Fee Schedule, a portion of which could be used to pay for library services among other public facilities. Therefore, the Project would not affect the District's ability to provide library services with no net effect on the City's budget. Impacts would be less than significant in this regard and no mitigation is required.

Based on the above discussion, under the No-Project Alternative, impacts regarding public services would be greater when compared to the proposed Project because the proposed Project would not result in impacts that would require the implementation of mitigation.

Recreation

Sunny-Cal DEIR Analysis

The Sunny-Cal DEIR found that with implementation of the proposed mitigation, the project would not have significant impacts on recreation. Under MMs R-1 and R-2 pocket parks would be improved; under MM R-3 paseos and trails constructed; and under MM R-4 improvements to the neighborhood park.

Current DEIR Analysis

The proposed Project would have a less than significant impact as it pertains to the increase in the use of park/recreation facilities resulting in physical deterioration. Through compliance with the City's goals and policies within its GP, the Project would comply with Quimby Act and City regulations through the dedication of parkland and/or payment of in-lieu fees for parks/recreation purposes, as determined by the City. Therefore, impacts to existing neighborhood and regional parks or other recreational facilities will be less than significant.

Based on the above discussion, under the No-Project Alternative, impacts regarding recreation would be greater when compared to the proposed Project because the proposed Project would not result in impacts that would require the implementation of mitigation.

Transportation

Sunny-Cal DEIR Analysis

With implementation of the recommended mitigation measures, the proposed Sunny-Cal Specific Plan project would not have significant impacts related to traffic, circulation, or parking. Data from the consultant who prepared the Circulation Element as part of the City's then current General Plan update indicated that implementation of the improvements shown in MMs T-1 and T-2, including the fair share contribution by the project, would allow local streets to function within City standards at build out. MMs T-1 and T-2 require participation by the developer in the phased construction of designated roadway segments and traffic signals through payment of an established City of Beaumont impact fee and

participation in the Transportation Uniform Mitigation Fee program. MM T-3 calls for the developer to install the site-specific circulation and access recommendations shown in Sunny-Cal EIR Exhibit 4.11-4 prior to the issuance of building permits. MM T-4 includes improvements to Cherry Valley Boulevard. Per MM T-5, the plans shall show bicycle racks and other non-vehicular transportation improvements for the proposed parks and any clubhouse facilities. MM T-6 requires the installation of up to three bus stops if requested by RTA. Lastly, MM T-7 requires the developer shall contact the RTA in writing to identify and pay an appropriate fair share contribution for park and ride facility along Cherry Valley Boulevard or Brookside Avenue at I-10.

Current DEIR Analysis

Public transportation within the City of Beaumont is provided by PASS Transit, operated by the Riverside County Transportation Commission (RCTC), the Riverside Transit Authority (RTA) and the Sunline Transit Agency lines. The nearest bus stop to the Project site is Bus Route 3, located near the intersection of Cherry Valley Boulevard and Beaumont Avenue approximately 2 miles away from the Project site.

Bus Route 3 ends at the Walmart Supercenter, at Highland Springs Avenue and I-10. This shopping center is a transfer point for the PASS Banning Lines, as well as the RTA and Sunline Transit Agency lines. Coordination with the Pass Transit System would be required as the Project builds out to determine the need for future bus turnouts along Cherry Valley Boulevard.

The proposed Project would result in a less than significant impact as it pertains to conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The Project would not substantially increase hazards due to a geometric design feature or incompatible uses nor result in inadequate emergency access. For Project impacts at specific intersections, the Project shall be conditioned to pay a combination of fee payments to established programs, construction of specific improvements, payment of a fair-share contribution toward future improvements, or a combination of these approaches. VMT impacts would be significant and unavoidable due to exceeding City impact thresholds.

Based on the above discussion, under the No-Project Alternative, impacts regarding transportation would be lesser when compared to the proposed Project because the proposed Project would result in a significant unavoidable impact.

Utilities and Service Systems

Sunny-Cal DEIR Analysis

The Sunny-Cal DEIR found that the project would consume less water than could be used by the former egg ranch operations (631 versus 1,748 acre-feet per year). Without egg production activities, it is estimated the site would consume less than 200 acre-feet of water per year. According to the analysis, implementation of the project would not result in the need for new utility systems, or substantial alterations to electric or natural gas systems, communication systems, water, sewer, or solid waste disposal systems. Therefore, the project would not have any significant utility impacts. Implementation of MMs U-1 through U-4 would occur to help assure that potential impacts related to water consumption, sewage and solid waste generation, and utility systems would remain at less than significant levels.

Current DEIR Analysis

For the proposed Project, a less than significant impact would occur regarding relocation or construction of utilities which could impact the environment. The Project would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. The Project would have little or no net effect on the operation of wastewater collection facilities or wastewater treatment capacity. Impacts would be less than significant, and mitigation is not required. The Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Lastly, Project development would comply with all federal, state, and local statutes and regulations related to solid waste. The Project does not propose any activities that would conflict with the applicable programmatic requirements. Therefore, impacts would be less than significant.

Based on the above discussion, under the No-Project Alternative, impacts regarding utilities and service systems would be greater when compared to the proposed Project because the proposed Project would not result in impacts that would require the implementation of mitigation.

Wildfire

Sunny-Cal DEIR Analysis

The Sunny-Cal DEIR did not evaluate wildfire. However, it did find that the project was consistent with the following policy from the City's then current general plan update: The City of Beaumont will continue to implement those measures that will be effective in reducing the potential for wildfire. The project would increase the need for fire services, and the Sunny-Cal EIR proposed the project provide space for a fire station if the City fire department determined it was needed to adequately serve the project and/or surrounding area. Also note that according to the then current County general plan, most of the project site was categorized as having 'low' risk from wildland fires.

Current DEIR Analysis

The proposed Project site is not located in or near SRA or lands classified as Very High FHSZ. A less than significant impact would occur regarding impairment of an adopted emergency response plan or emergency evacuation plan. The Project would not, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The Project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. All improvements would occur within areas already planned for disturbance as part of the Project or within existing or planned roadways or within easements that have been previously disturbed. Lastly, through compliance with existing regulations and Beaumont GP goals and policies there are no significant risks as a result of runoff, post-fire slope instability, or drainage changes, and impacts are considered less than significant.

Based on this discussion, under the No-Project Alternative, impacts regarding wildfire would be equivalent when compared to the proposed Project.

Alternative 2: Reduced Building Intensity

As estimated by the City, Alternative 2 would entail the development of e-commerce and commercial uses, but at a smaller square footage (15 percent less) than what was proposed for the Project. The Alternative would involve the development of 2,173,846 square feet of e-commerce space. Additionally, since the Project footprint would be smaller, it is anticipated that the amount of graded area would be smaller as well. Modifications would occur to multiple on-site features such as drainage basins, parking, and landscaping. **Table 6-1, Alternative 2 Design Comparison** summarizes the similarities and differences between the Project design features and Alternative 2’s design features.

Table 6-1: Alternative 2 Design Comparison

Feature	Project	Alternative 2
Net Site Area	181.3 ac	181.3 ac
Warehouse Building Area	Bldg. 1: 985,860 sq. ft.	Bldg. 1: 837,981 sq. ft.
	Bldg. 2: 1,213,235 sq. ft.	Bldg. 2: 1,031,250 sq. ft.
	Bldg. 3: 358,370 sq. ft.	Bldg. 3: 304,615 sq. ft.
	Total: 2,557,465 sq. ft.	Total: 2,173,846 sq. ft.
Coverage	Bldg. 1: 43.2%	Bldg. 1: 36.7%
	Bldg. 2: 41.8%	Bldg. 2: 35.5%
	Bldg. 3: 39.7%	Bldg. 3: 33.8%
	Total: 32.4%	Total: 27.5%
Auto Parking Provided	Bldg. 1: 628 stalls	Bldg. 1: 534 stalls
	Bldg. 2: 610 stalls	Bldg. 2: 519 stalls
	Bldg. 3: 222 stalls	Bldg. 3: 189 stalls
	Total: 1,460 stalls	Total: 1,242 stalls
Trailer Parking Provided	Bldg. 1: 246 stalls	Bldg. 1: 209 stalls
	Bldg. 2: 514 stalls	Bldg. 2: 437 stalls
	Bldg. 3: 149 stalls	Bldg. 3: 127 stalls
	Total: 909 stalls	Total: 773 stalls
Floor Area Ratio	1.0	0.85
Notes: ac = acre sq. ft. = square feet		

Off-site improvements to the adjacent roadways of Cherry Valley Boulevard and Brookside Avenue would remain consistent with the Project.

Comparison of Project Impacts

Alternative 2 would minimize impacts related to the scale of the Project. Therefore, environmental impact areas such as aesthetics, energy, utilities and service systems, and wildfire may see a nominal improvement regarding potential impact significance. However, these resource areas are anticipated to have a less than significant impact under the Project. The Project was able to achieve a less than significant impact with mitigation incorporated in all environmental impact areas except air quality, greenhouse gas emissions, and transportation. These resources were anticipated to create significant and unavoidable

impacts. An evaluation of the impacts associated with the development of Alternative 2 (Reduced Building Intensity) are described below.

Aesthetics

The same general aesthetics impacts would occur with the Reduced Building Intensity Alternative when compared to the proposed Project. Although the building footprint would be reduced with this Alternative, the same general mass and scale of the site would be the same. When compared to the proposed Project, aesthetics impacts associated with the Reduced Building Intensity Alternative 2 would be similar when compared to the proposed Project.

Air Quality

As previously stated, the Project would conflict with established air quality plans for the region and pollutant generation. Specifically, the Project would exceed ROG, NO_x, CO, and PM₁₀ emissions thresholds during its operational phase.

Alternative 2 would propose the same e-commerce land use as the Project although the e-commerce building space would be reduced by 383,619 square feet for the Alternative. Presumably, this would reduce potential operational emissions through the reduced building area. However, the majority of operational emissions stemmed from mobile sources such as vehicles and construction equipment. The vehicular traffic generated from the Project is not anticipated to be significantly reduced in Alternative 2. Operations of Alternative 2 is expected to be similar to the Project. Because the usage would be similar, the emissions generated from the Alternative 2 would be similar to the Project and would also likely create a significant and unavoidable impact.

Biological Resources

Under this Alternative, the construction footprint would be smaller due to the 15 percent reduction in e-commerce building space and associated amenities. This would result in a smaller area being graded, thus leading to a reduction in impacts to wildlife habitat and water crossings. As with the proposed Project, mitigation measures would be required to reduce biological resource impacts to a level of less than significant. However, lesser impacts would occur with implementation of the Reduced Building Intensity Alternative 2 due to the reduced footprint.

Cultural Resources and Tribal Cultural Resources

Under this Alternative, the construction footprint would be smaller due to the 15 percent reduction in e-commerce building space and associated amenities. This would result in a greater area being designated as open space, leading to a reduction in potential impacts to undiscovered archaeological resources. As with the proposed Project, mitigation measures would be required to reduce cultural resource impacts to a level of less than significant. However, lesser impacts would occur with implementation of the Reduced Building Intensity Alternative 2 due to the reduced footprint.

Energy

Both the Reduced Building Intensity Alternative and the proposed Project would require energy during both the construction and operations phases of the Project, although the Reduced Building Intensity Alternative would require approximately 15 percent less energy to build and operate when compared to the proposed Project. When compared to the proposed Project, the Reduced Building Intensity Alternative 2 would result in fewer energy-related impacts than the proposed Project.

Geology and Soils

Under this Alternative, the construction footprint would be smaller due to the 15 percent reduction in e-commerce building space and associated amenities. This would result in a greater area being designated as open space, leading to a reduction in potential impacts to geological and paleontological resources. As with the proposed Project, mitigation measures would be required to reduce geological and paleontological resource impacts to a level of less than significant. However, lesser impacts would occur with implementation of the Alternative 2 due to the reduced footprint.

Greenhouse Gas Emissions

The Project's significant and unavoidable greenhouse gas impacts were associated with the potential to conflict with GHG emissions regulations through the generation of excess MTCO₂e. For this impact, mitigation was proposed to reduce potential impacts, however, the Project was still found to exceed thresholds with mitigation. Like air quality above, the Project's emissions stem largely from mobile source emissions.

Alternative 2 would likely reduce emissions impacts through a reduction in energy use in a smaller space. However, the usage rate of the Project site would remain similar. Even with a reduction in energy use emissions, the mobile source emissions associated with vehicular travel would not be largely reduced. Therefore, Alternative 2 would likely remain in excess of the City's GHG emissions thresholds. The impact would be expected to remain a significant and unavoidable impact.

Hazards and Hazardous Materials

Under this Alternative, the construction footprint would be smaller due to the 15 percent reduction in e-commerce building space and associated amenities. This would result in a greater area being designated as open space, leading to a reduction in potential discovery of hazardous materials and decreased generation of hazards and hazardous materials. As with the proposed Project, mitigation measures would not be required to reduce hazards and hazardous materials impacts to a level of less than significant. Lesser impacts would occur with implementation of the Alternative 2 due to the reduced footprint.

Hydrology and Water Quality

Under this Alternative, the construction footprint would be smaller due to the 15 percent reduction in e-commerce building space and associated amenities. This would result in a smaller area of disturbance, leading to a reduction in impact to floodplain and hydrological resources, and water quality due to reduced grading, excavation, or construction activities. As with the proposed Project, mitigation measures

would not be required to reduce hydrology and water quality impacts to a level of less than significant. Lesser impacts would occur with implementation of the Alternative 2 due to the reduced footprint.

Land Use and Planning

Both the Reduced Building Intensity Alternative and the proposed Project would require a General Plan Amendment. Therefore, impacts between Alternative 2 and the Project would be similar.

Noise

Both the Reduced Building Intensity Alternative and the proposed Project would generate noise during both the construction and operations phases of the Project, although the Reduced Building Intensity Alternative would generate approximately 15 percent less noise when compared to the proposed Project given the reduction in size. When compared to the proposed Project, the Reduced Building Intensity Alternative would result in fewer noise-related impacts than the proposed Project; however, it is anticipated that both the Reduced Intensity Alternative and the proposed Project would require similar mitigation measures to reduce noise impacts. Although the under Alternative 2 traffic noise would be reduced by 15 percent compared to the proposed Project, it was determined that the Project would have a significant impact from cumulative traffic noise and no feasible mitigation would reduce the impact. As such, cumulative off-site traffic noise impacts are anticipated to remain significant and unavoidable for both Alternative 2 and the proposed Project. Because Alternative 2 would see a 15 percent reduction in traffic noise, it is determined that Alternative 2 would be the superior alternative in this regard.

Population and Housing

The Project site would be comprised of e-commerce and commercial uses and therefore would have an indirect impact on population. Because this Alternative would include smaller sized warehouses than the Project, it is anticipated that the demand for employees would be less. It is anticipated that most employees would come from within the City and surrounding areas, resulting in a demand for new workers potentially needing housing within the City. Therefore, Alternative 2 would have slightly less impacts to population and housing than the Project.

Public Services

Both the Reduced Building Intensity Alternative and the proposed Project would require additional public service needs, although the Reduced Building Intensity Alternative would require approximately 15 percent less public service needs when compared to the proposed Project given the reduction in size. When compared to the proposed Project, Alternative 2 would result in fewer public service impacts related impacts than the proposed Project; however, it is anticipated these reductions would be nominal.

Recreation

Neither this Alternative nor the proposed Project would increase the use of existing recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated nor include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. The Project would include approximately 30 acres of designated Open Space, allowing for further recreational development within the City. The Reduced

Building Intensity Alternative would result in a 383,619-square foot reduction in e-commerce space which could lead to a proportional increase in open space under Alternative 2. Therefore, Alternative 2 would result in a reduced impact.

Transportation

The Project was found to conflict with the requirement that VMT be three percent lower than the City average. The VMT for the Project was instead found to exceed the City threshold by 6.4 for the HBW VMT and 12.1 for VMT per SP.

As previously discussed, Alternative 2 would involve the development of a smaller e-commerce buildings which would utilize a smaller portion of the Project site for e-commerce uses. With the smaller size, Alternative 2 would likely have a lesser usage intensity than the Project. The number of dock doors would be reduced and the number of employees less under this Alternative. Alternative 2 e-commerce uses would be approximately 15 percent less than the Project. It is anticipated that a 15 percent reduction of projected employment would occur with this Alternative. VMT impacts associated with the proposed Project were found to be significant and unavoidable. While the Reduced Building Intensity Alternative e-commerce buildings would be 15 percent smaller, it is anticipated that this Alternative would still exceed City VMT thresholds and realize a significant and unavoidable impact. Therefore, the Alternative 2 would result in a similar impact.

Utilities and Service Systems

Both the Reduced Building Intensity Alternative and the proposed Project would require additional utilities and service systems needs, although the Reduced Building Intensity Alternative would require approximately 15 percent less utility needs when compared to the proposed Project given the reduction in size. When compared to the proposed Project, Alternative 2 would result in fewer utility and service system impacts related impacts than the proposed Project; however, it is anticipated these reductions would be nominal.

Wildfire

Under the Reduced Building Intensity Alternative, the development of the Project site would occur similar to the Project, but e-commerce use would be reduced 15 percent. Development in the Project area includes roadways, residential, and commercial, and well as planned industrial development to the north. The Project site is not within a Very High FHSZ zone nor is it located in a SRA. The Project site is within a LRA zone. Since the Project is within an LRA zone, provision of fire protection services would continue under contract to the RCFD. The warehouse structures would be predominantly concrete which is not typically susceptible to fire. Specifically, the warehouses would be built consistent with the California Building Code requiring new buildings to use ignition-resistant construction methods and materials as well as have a fire suppression system.

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, Alternative 2 would be environmentally equivalent to the Project regarding wildfire.

6.8 Environmentally Superior Alternative

An EIR is required to identify the environmentally superior Alternative from among the range of reasonable alternatives that are evaluated. Section 15126.6 (e)(2) of the State CEQA Guidelines requires that an environmentally superior alternative be designated and states that if the environmentally superior Alternative is the No Project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

Based on the summary of information presented in **Table 6-2, Comparison of Project Alternatives Environmental Impacts with the Project**, the environmentally superior Alternative is Alternative 2: Reduced Building Intensity. Because Alternative 2 would reduce the e-commerce development footprint by 15 percent, this Alternative has fewer environmental impacts than the proposed Project or any of the other alternatives.

Section 15126.6(e)(2) of the State CEQA Guidelines states that if the “No Project” alternative is found to be environmentally superior, “the EIR shall also identify an environmentally superior alternative among the other alternatives. The No Project/Existing Specific Plan Alternative was not found to be environmentally superior.

The context of an environmentally superior alternative is based on the consideration of several factors including the reduction of environmental impacts to a less than significant level, the Project objectives, and an alternative’s ability to fulfill the objectives with minimal impacts to the existing site and surrounding environment. According to **Table 6-2**, the Reduced Building Intensity Alternative would be the environmentally superior Alternative because it would reduce some of the potentially significant impacts of the proposed Project. However, while the Reduced Building Intensity Alternative is the environmentally superior alternative, it is not capable of meeting all of the basic objectives of the Project.

Table 6-2: Comparison of Project Alternatives Environmental Impacts with the Project

EIR Resource Section	Alternatives		
	Project - Level of Impact After Mitigation	Alternative 1: No Project/Existing Specific Plan	Alternative 2: Reduced Building Intensity
Aesthetics	Less than Significant	+	=
Air Quality	Significant Unavoidable	+	=
Biological Resources	Less than Significant	=	-
Cultural Resources and Tribal Cultural Resources	Less than Significant	=	-
Energy	Less than Significant	+	-
Geology and Soils	Less than Significant	=	-
Greenhouse Gas Emissions	Significant Unavoidable	=	=
Hazards and Hazardous Materials	Less than Significant	+	-
Hydrology and Water Quality	Less than Significant	+	-
Land Use and Planning	Less than Significant	-	=

EIR Resource Section	Alternatives		
	Project - Level of Impact After Mitigation	Alternative 1: No Project/Existing Specific Plan	Alternative 2: Reduced Building Intensity
Noise	Less than Significant	=	+
Population and Housing	Less than Significant	+	-
Public Services	Less than Significant	+	-
Recreation	Less than Significant	+	-
Transportation	Significant Unavoidable	-	=
Utilities and Service Systems	Less than Significant	+	-
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 proposed Project. A plus (+) sign means the Project Alternative has increased impacts from the proposed Project. An equal sign (=) means the Project Alternative has similar impacts to the proposed Project.			

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