

CHAPTER 6 Alternatives to the Proposed Project

In accordance with CEQA Guidelines Section 15126.6, EIRs are required to include a discussion of alternatives to a proposed project. Section 15126.6(a) states that an EIR should describe a range of reasonable alternatives to a project and should evaluate the comparative merits of the alternatives. The EIR should consider a reasonable range of potentially feasible alternatives that would attain most of the basic objectives of a project while reducing one or more of the significant impacts of the project. In Section 15126.6(b), the CEQA Guidelines recognizes that these alternatives may not fully attain the project objectives, or may be more costly. Section 15126.6(c) of the CEQA Guidelines describes the selection process for a range of reasonable alternatives, stating that, “Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.” Section 15126.6(d) of the CEQA Guidelines clarifies that the EIR shall include sufficient information about each alternative to allow a meaningful evaluation, analysis, and comparison; however, Section 15126.6(d) also states that the discussions of the environmental effects of the project alternatives may be less detailed than those provided for the proposed project.

The CEQA Guidelines Section 15126.6(e) requires the analysis of a No Project Alternative. In accordance with Section 15126.6(e)(3)(B), the No Project Alternative is the circumstance under which the proposed project does not proceed. The No Project Alternative may signify a “no build” alternative in which the existing environmental setting is maintained or, in instances where failure to proceed with the project would likely result in the development of some other project on the property, the No Project Alternative may describe the development that would be reasonably expected to occur in the foreseeable future based on current land use plans and site zoning. The “No Project/No Development Alternative” is evaluated in this document. As the proposed project represents a use for which the site is currently designated under the General Plan, the No Project/Reasonably Foreseeable Development Alternative (development under the current General Plan) is not analyzed in this document.

CEQA Guidelines Section 15126.6(f) defines the “Rule of Reason,” which requires that an EIR set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to those that would lessen an environmental impact while feasibly attaining most of the basic objectives of the project. Section 15126.6(f)(1) further clarifies what constitutes “feasibility,” including such issues as site suitability, economic viability, and consistency with applicable land use plans.

6.1 RATIONALE FOR SELECTING PROJECT ALTERNATIVES

To identify reasonable alternatives to this proposed project, the City, as Lead Agency, considered the objectives of the proposed project. The detailed objectives of the proposed project are listed in Chapter 3 (Project Description) of this document; however, the objectives of the proposed project are as follows:

- Serve as a premier warehouse distribution facility.
- Bring jobs to the City of San Bernardino.
- Provide an urban landscape that will enhance the aesthetic and visual quality of the area.
- Provide an expanded economic base for the City.
- Provide the infrastructure necessary to meet project needs in an efficient and cost effective manner.
- Locate the project near to similarly industrial business on a properly zoned industrial site.
- Develop a regional distribution facility on a single large piece of land.
- Locate the project near regional freeway and transit facilities.

Based on these objectives, the City has identified two potential project alternatives for in-depth evaluation in addition to the No Project Alternative. One alternative is a reduced project alternative, which would limit the size of the project to approximately one-half, or 341,204 sf. A second development alternative is the Reduced Development with Second Access Driveway Alternative, which reduces the size of the warehouse structure and provides a second access driveway in the southern portion of the site. These alternatives were chosen to reduce the impacts of the proposed project by reducing the size of the development.

The following subsections describe each of these alternatives, analyze the potential impacts of each alternative, and evaluate the ability of each alternative to meet the proposed project objectives. The analysis of the potential impacts of each alternative compares the impacts of each alternative to those of the proposed project for all environmental issues addressed in this document. At the end of this section, a matrix comparing the impacts of the proposed project to the impacts of each of the project alternatives summarizes the results of the alternatives analysis.

6.2 ALTERNATIVES ELIMINATED FROM FURTHER CONSIDERATION

As noted, above, the range of alternatives required in an EIR is limited to those that would avoid or substantially lessen any of the significant effects of the project. 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. An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.

6.2.1 Alternative Sites

With respect to alternative locations, a key question is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.

The significant and unavoidable impacts identified for the proposed project include the following:

- Air Quality
 - > Operation of the proposed project would violate an air quality standard or contribute substantially to an existing or projected air quality violation (NO_x).
 - > Operation of the proposed project would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is classified non-attainment under an applicable federal or state ambient air quality standard (ozone, PM₁₀, and PM_{2.5}).
 - > Construction activities associated with development of the proposed project would generate emissions that would result in an exceedance of localized significance thresholds for PM₁₀ and PM_{2.5} established by the SCAQMD, and, therefore, would expose sensitive receptors to substantial pollutant concentrations.

Because the entire South Coast Air Basin is in nonattainment for criteria pollutants, locating the project on an alternative site in the City of San Bernardino would not reduce the significant and unavoidable impacts of the proposed project, as violation of air quality standards would still occur. As there are no significant impacts of the project other than to air quality, and an alternative site would not reduce the significant impacts of the project, this alternative was rejected from further consideration in this EIR.

6.2.2 Alternative Uses

The proposed project would fall within the Industrial Light (IL) land use category as established in the City's General Plan. The project site and a large contiguous area to the south, east, and west are currently zoned Industrial. The project site is adjacent to, and immediately north of, the Northwest Redevelopment Area. Areas to the south, east, and west are similarly zoned for industrial uses. Given the site's location in an industrial area (there are no residential uses to the south of I-215 in this area), uses other than industrial would not represent a compatible land use with adjacent development. Commercial uses could be developed on the site, but would not reduce the significant impacts of the proposed project unless the development was extremely small (see discussion, below, under subsection 6.2.3). Therefore, this alternative was rejected from further consideration as infeasible.

6.2.3 Maximum Reduction of Project Impacts

To potentially avoid the significant air quality impacts of the proposed project, the size of the project could be reduced or modified.

Construction-related daily emissions associated with project development would exceed SCAQMD significance thresholds for PM_{10} , and $PM_{2.5}$ during site grading. Therefore, the emissions generated by construction of the proposed project would constitute a substantial contribution to an existing or projected air quality violation. Because the proposed project would exceed SCAQMD thresholds for the pollutants and precursors of ozone for which the Basin is in non-attainment during construction, the proposed project would make cumulatively considerable contributions of these pollutants during both construction and operation of the proposed project. Localized CO 1-hour concentrations, CO 8-hour concentrations, and NO_2 1-hour concentrations would not exceed SCAQMD thresholds during project construction. The closest sensitive receptors to the project site would be the residential uses to the north of the project site. These uses could be exposed to criteria pollutant concentrations which exceed the SCAQMD's localized significance thresholds. The only project that would reduce the impact on air quality to less than significant would be no project at all.

Industrial Parkway, on which the project site is located, is currently developed with a series of industrial uses. If no project were to occur on the project site, the property may become the only empty parcel on the roadway. The no project alternative would not have the beneficial impacts of providing new employment opportunities or satisfy any of the project objectives for the project area.

6.2.4 Alternative Site Configuration

Given the size and shape of the property and the fact that the project consists of one large structure, other site configurations would not be feasible and still accommodate large truck movements. In any event, an alternative site configuration would not reduce the significant and unavoidable impacts of the project. Therefore, an alternative site configuration was eliminated from further consideration.

6.3 ANALYSIS OF ALTERNATIVES TO THE PROPOSED PROJECT

6.3.1 Alternative 1: No Project/No Development Alternative

■ Description of Alternative

Alternative 1 assumes that the proposed project would not be constructed and the existing conditions would remain. Specifically, the project site would remain undeveloped and remain vacant. The two hill features within its boundaries that occupy approximately 35 percent of the property would remain on the property.

■ Environmental Impacts

In accordance with CEQA Guidelines Section 15226.6(e)(3)(B), a discussion of environmental impacts under Alternative 1 compares the environmental effects of the property remaining in its existing state against environmental effects that would occur if the proposed project were approved. Note that Section 15226.6(e)(2) defines the "existing conditions" as those that exist on the date that the notice of preparation was published, which is August 3, 2007, in the case of this proposed project.

In general, no new environmental effects would directly result from the selection of this alternative. Preservation of the project site in its present state would avoid any environmental impacts associated with air quality, biological resources, cultural resources, geology/soils, hazards and hazardous materials, hydrology/water quality, noise, public services, recreation, and utilities/service systems that were identified for the proposed project. Alternative 1 would maintain the existing vacant conditions. The two defining hill features within its boundaries that occupy approximately 35 percent of the property would remain on the property.

With specific respect to traffic impacts, zero trips from the proposed site would be generated daily, as well as during the AM and PM peak hour. Of the five study intersections, two are currently operating at unacceptable level of service (LOS) E or F during the AM and/or PM peak hours, and four of the five study intersections are projected to operate at unacceptable LOS in the future, without the proposed project. The future impacts would occur as a result of growth independent of the proposed project. In other words, traffic growth in the area would still get worse in the future, but the proposed project would not contribute to future traffic conditions. As such, no significant and adverse environmental impacts directly or cumulatively associated with the proposed project would occur under the No Project/No Development Alternative.

■ Attainment of Project Objectives

This alternative would not create a premier warehouse distribution facility what would provide employment opportunities; provide an expanded economic base for the City; provide an urban landscape to enhance the aesthetic and visual quality of the area; or develop a regional distribution facility near a regional freeway and transit facility. Alternative 1 would not attain any of the project objectives.

■ Conclusion

Alternative 1, the No Project/No Development Alternative, would eliminate all three significant and unavoidable impacts of the proposed project, although traffic in the area would still get worse due to ambient growth. The project area is undergoing development of other industrial uses, and Alternative 1 may result in the property being the only empty parcel in the vicinity. Alternative 1 would not construct new businesses or infrastructure. The alternative would not have the beneficial impact of providing new employment opportunities. This alternative would not satisfy any of the project objectives.

6.3.2 Alternative 2: Reduced Project Alternative

■ Description

Alternative 2 represents development of a warehouse/distribution center of approximately one-half the square footage of the proposed project. The proposed project would be reduced to a smaller scale and consist of a structure of 341,204 sf instead of the proposed 678,275 sf. The two hill features within the project boundaries occupy approximately 35 percent of the property. This alternative would result in less

grading, as some of the hill features could remain. Figure 6-1 (Reduced Project Alternative Site Plan) shows the site plan as it would occur under this alternative.

■ Environmental Impacts

Aesthetics

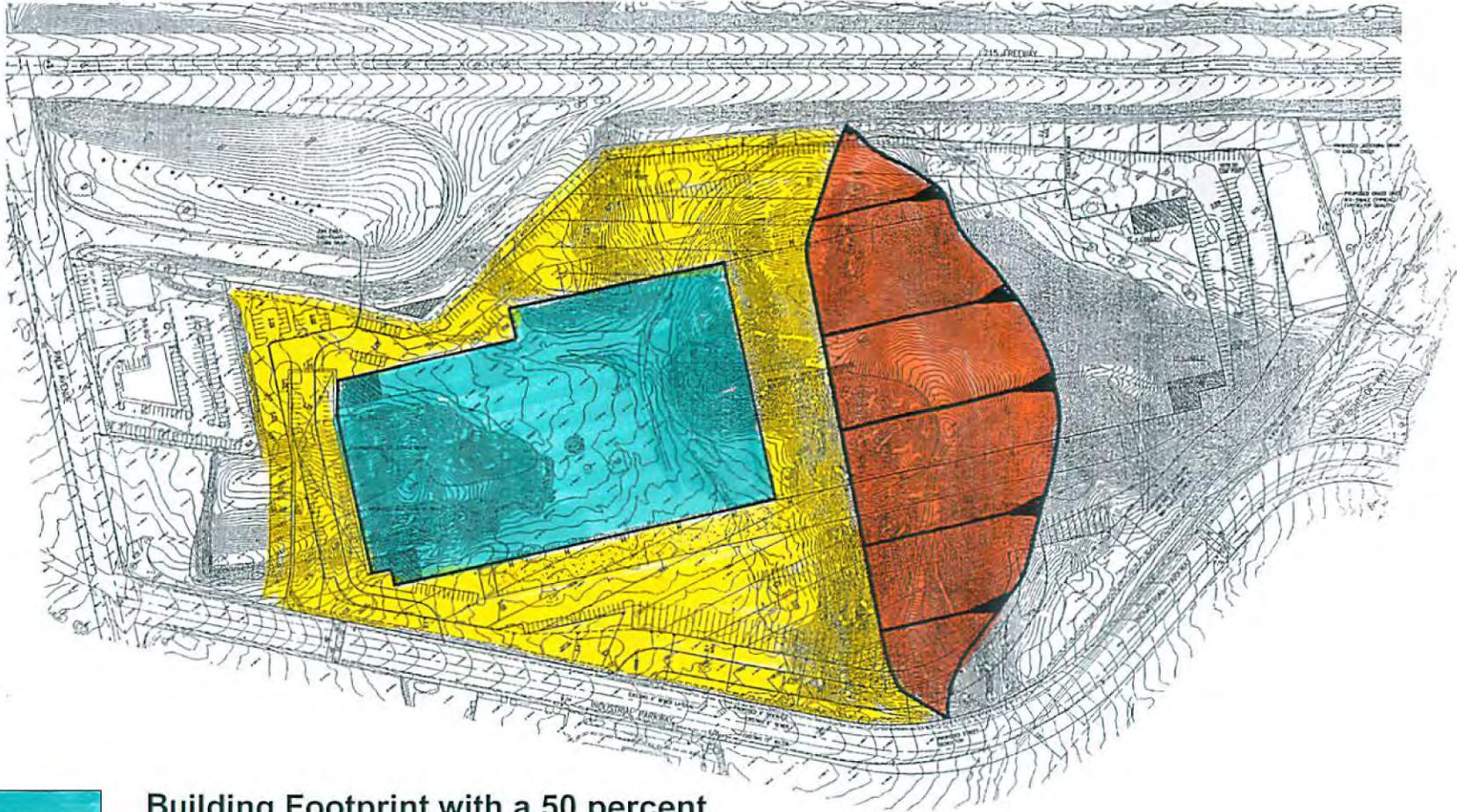
Both the proposed project and Alternative 2 would develop the project site. As there are no scenic vistas from or through the project site, this alternative would result in no impact on scenic vistas, similar to the proposed project. Neither would this alternative nor the proposed project adversely impact scenic resources. The proposed project and Alternative 2 would not block views of the mountains from residents or motorists, as these are located to the north and east of the property.

Alternative 2 would change the visual character of the site similar to the proposed project, converting it from vacant open space and hilly landforms to a distribution center. However, less grading would be required, and features of the two hills within the project boundaries could remain on the site because of the smaller building footprint. Construction of buildings and other facilities/amenities on the project site would noticeably change the view onto the site from surrounding properties, particularly from I-215 and the residential communities east of the project site. Both this alternative and the proposed project would add additional sources of light and glare resulting in less-than-significant impacts to nighttime views. As Alternative 2 would include substantially less square footage, this alternative would generate fewer aesthetic impacts than the proposed project, although the project impacts are less than significant.

Air Quality

Development under this alternative would build a 341,204 sf distribution center instead of the proposed 678,275 sf. The development of the project would still require grading activities to create a flat surface to build the distribution center. The construction activity would involve reduced grading activities because less of the site would be graded. Similar to the proposed project, 200,000 cubic yards of soil would be exported from the site to either the SANBAG grade separation project adjacent to the project site or one of the three servicing landfills identified in Section 4.12 (Utilities/Service Systems). Although from a regional perspective the reduction in grading and building size would not be noticeable, it would result in a reduction in overall VOC, NO_x, CO, PM₁₀, and PM_{2.5} emissions associated with the development of the project site compared to the proposed project. Table 6-1 (Estimated Peak Daily Construction Emissions in Pounds per Day for the Reduced Project Alternative) below illustrates the construction-related emissions for this alternative. Similar to the proposed project, Alternative 2 would not exceed the screening level threshold for any criteria pollutant during construction. Impacts would be less than significant.

Emissions during operation are mainly associated with vehicle trips. Operation of the proposed project would not exceed the SCAQMD significant thresholds for VOC, CO, PM₁₀, and PM_{2.5}, but would exceed the significance threshold for NO_x. Alternative 2 would reduce the daily vehicle trips associated with the distribution center by approximately 50 percent, further reducing the already less-than-significant operational impacts and reducing NO_x emissions compared to the proposed project. Table 6-2 (Daily



- Building Footprint with a 50 percent Reduction in building size
- New Building Pad Limits
- Slopes created by 50 Percent Alternate



NOTE: This alternate will require the export of approximately 800,000 C.Y.



Source: Stantec, 2004.

0D2133100 | Palm-Industrial Distribution Center Project

Figure 6-1
Reduced Project Alternative Site Plan

Operational Emissions for the Reduced Project Alternative) below illustrates the operational-related emissions for this alternative. As shown in this table, NO_x emissions would still exceed the SCAQMD significance threshold under this alternative.

Construction Phase	Peak Day Emissions in Pounds per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5} ^c
Mass Grading ^a	3	25	13	0	60	13
Fine Grading ^b	3	22	12	0	6	2
Trenching	2	15	9	0	1	1
Construction	6	43	57	0	3	2
Paving	3	17	13	0	1	1
Architectural Coating ^c	31	0	2	0	0	0
Alternative 2 Maximum Daily Emissions	31	43	57	0	60	13
<i>Maximum Proposed Project Daily Emissions</i>	61	71	104	0	63	14
SCAQMD Thresholds	75.0	100.0	550.0	150.0	150.0	55.0
Significant Impact as a Result of Alternative 2?	No	No	No	No	No	No

SOURCE: URBEMIS 2007. Calculation sheets are provided in Appendix B.

a. Assumes watering of the project site would occur three times per day.

b. Assumes watering of the project site would occur two times per day.

c. Assumes Low-VOC coating and 80 percent reduction from URBEMIS estimate.

Emissions during operation are mainly associated with vehicle trips. Operation of the proposed project would not exceed the SCAQMD significant thresholds for VOC, CO, PM₁₀, and PM_{2.5}, but would exceed the significance threshold for NO_x. Alternative 2 would reduce the daily vehicle trips associated with the distribution center by approximately 50 percent, further reducing the already less-than-significant operational impacts and reducing NO_x emissions compared to the proposed project. Table 6-2 (Daily Operational Emissions for the Reduced Project Alternative) below illustrates the operational-related emissions for this alternative. As shown in this table, NO_x emissions would still exceed the SCAQMD significance threshold under this alternative.

Construction emissions of VOCs and NO_x, and operational emissions of NO_x, would still exceed established thresholds in a region in nonattainment for criteria pollutants, cumulative air quality impacts under this alternative would remain significant and unavoidable. The proposed project is an industrial warehouse and distribution center and is not a use typically associated with the production of objectionable odors. Similar project requirements would be expected to apply to this alternative as for the proposed project; therefore, this alternative would not generate offensive odors that would affect a substantial number of people, and would result in less-than-significant impacts. Alternative 2 would reduce the construction- and operation-related project impacts, but not to a level less than significant.

Table 6-2 Daily Operational Emissions for the Reduced Project Alternative

Emissions Source	Emissions in Pounds per Day					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Water and Space Heating	0	1	1	0	0	0
Landscape Maintenance	0	0	2	0	0	0
Consumer Products	0	—	—	—	—	—
Architectural Coatings	2	—	—	—	—	—
Motor Vehicles	12	87	129	0	40	10
Total Alternative 2 Daily Emissions	12	88	132	0	40	10
<i>Proposed Project Total Daily Emissions</i>	29	176	260	1	81	19
Thresholds (lb/day)	55.00	55.00	550.00	150.00	150.00	55.00
Significant Impact as a result of Alternative 2?	No	Yes	No	No	No	No

SOURCE: URBEMIS 2007. Computer sheets are provided in Appendix B.

Biological Resources

The project site does not contain riparian habitats, wetlands, or wildlife nursery sites, and is not part of a major or local wildlife corridor/travel route. There is no adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state habitat conservation plan that covers the project site. Therefore, similar to the proposed project, Alternative 2 would result in no impacts for these thresholds. As discussed in Section 4.3 (Biological Resources), the proposed project would directly impact coastal sage scrub (20.91 acres), critical habitat for the coastal California gnatcatcher (along with other sensitive species whose numbers are in decline due to the destruction of coastal sage scrub habitat) by the USFWS. Similar mitigation would be assumed under this alternative as for the proposed project; therefore, the impacts of both Alternative 2 and the proposed project to the coastal sage scrub would be less than significant, although because the building footprint would be smaller, portions of the two, on-site hills could remain with natural vegetation. Migratory avian species and raptors, which may use the large western sycamore trees located within the project site during breeding season, are protected under the MBTA while nesting. The loss or disturbance of an MBTA-protected occupied nest, or substantial interference with roosting and foraging opportunities for migratory species, sensitive avian species, or raptors is a potentially significant impact. The same mitigation would be assumed under this alternative as for the proposed project; therefore, the potential impacts of both Alternative 2 and the proposed project to migratory bird habitat would be less than significant. Overall, the impacts of this alternative on biological resources would be similar to the impacts of the proposed project, less than significant, and somewhat less than the proposed project.

Cultural Resources

Both the proposed project and Alternative 2 would develop the proposed project site and potentially disturb previously unknown cultural resources, including human remains, during grading. Project

requirements and mitigation measures incorporated into the proposed project would ensure that this impact would be less than significant. Alternative 2 would be required to adhere to the policies of the General Plan and Municipal Code requirements with regard to cultural/historic resources, and impacts from Alternative 2 would similarly be less than significant. Alternative 2 would reduce the area to be graded and would thus reduce the potential for disturbing archaeological or paleontological resources.

Geology/Soils

Both the proposed project and Alternative 2 would construct buildings on the project site, and both would be subject to the same state and local regulations and BMPs designed to reduce seismic and other geologic hazards. Due to the fact that all geologic/seismic impacts are highly regulated by the California Building Code, Alternative 2 and the proposed project would result in similar less-than-significant impacts related to seismic hazards. As less area would be graded to accommodate the smaller building footprint, the impact of this alternative would be less than the proposed project, although still less than significant.

Hazards and Hazardous Materials

The project site is not located within ¼ mile of a school or in the vicinity of a private airstrip or airports. There are no wildlands in the project area. Therefore, similar to the proposed project, Alternative 2 would have no impact for these thresholds. There are no residential uses within close proximity to Alternative 2 (west of I-215). Construction and operation activities would not impair evacuation routes for City residents. Alternative 2 does not propose any structures or uses that would impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan. Development of Alternative 2 would result in the same less-than-significant impacts on emergency evacuation routes or access as the proposed project. Although Alternative 2 is located on a site that is included on one or more hazardous materials lists compiled in accordance with Government Code Section 65962.5, construction and operation of Alternative 2 would not create or result in a significant hazard to people or the environment. Therefore, Alternative 2 would result in a less-than-significant impact, consistent with the proposed project. The project site is within a designated High Wind Area and is exposed to significant wind hazards. Similar regulations would be assumed under this alternative as for the proposed project; therefore, the impacts of Alternative 2 would be less than significant similar to the proposed project.

The risk of accident or upset from transportation, use, and handling of hazardous materials would be reduced compared to the proposed project because fewer materials would be transported during construction, and fewer daily operational trips would occur. Similar mitigation would be assumed under this alternative as for the proposed project; therefore, the impacts of both Alternative 2 and the proposed project relating to the potential risk of exposure to contamination would be reduced to less than significant by implementing investigation and remediation efforts in the event that unknown contamination is encountered during the construction phase of the proposed project. The proposed project and the Alternative 2 would both be likely to transport, dispose of, or handle hazardous materials or generate hazardous emissions. The development of Alternative 2 reduces the project scale by 50 percent. Construction and operation activities on the site would also be reduced by 50 percent.

Alternative 2 would be required to comply with all federal, state, and local regulations pertaining to transportation, handling, use of, and disposal of hazardous materials and similar mitigation would be assumed under this alternative as for the proposed project. As Alternative 2 would reduce the project by 50 percent, this alternative would result in a lesser impact on transportation, disposal, and handling of hazardous materials, and the generation of hazardous emissions than the proposed project. Regardless, these impacts would remain less than significant, similar to the proposed project.

Hydrology/Water Quality

The project site is not located in a 100-year flood hazard area as mapped by FEMA, nor is it in a dam inundation or levee failure area. The project site is not at risk for mudflow or flooding by seiche or tsunami. Therefore, both Alternative 2 and the proposed project would result in no impacts with regard to these thresholds. Alternative 2 would be required to develop a construction SWPPP to protect water quality during construction activities. Incorporation of required BMPs would reduce potential discharge of stormwater pollutants. Impacts to hydrology/water quality were identified as less than significant for the proposed project with implementation of project requirements and BMPs. Alternative 2 would generate fewer impacts to water quality because the development size would be reduced. Impervious surfaces would be substantially less under this alternative than with the proposed project due to the smaller development size. Thus, Alternative 2 would result in less impact to hydrology/water quality than as the proposed project.

Land Use/Planning

The project site is currently zoned for light industrial uses. Both Alternative 2 and the proposed project would develop a distribution center. Development under Alternative 2 would not conflict with the designated land uses in the General Plan and Zoning Code. Alternative 2 would also be compatible with the land uses that surround the project site. This alternative would not conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the site adopted for the purpose of avoiding or mitigating an environmental effect. Alternative 2 would generate similar less-than-significant impacts to land use because it is essentially the same use as the proposed project.

Noise

One source of noise is construction activity. Development of this alternative would include less square footage as the proposed project, and noise and vibration impacts from construction activities would, therefore, be less than the proposed project. While this alternative would reduce the number of truck trips during construction, these trips would not have traversed residential neighborhoods or otherwise impacted sensitive receptors. Therefore, construction noise for Alternative 2, similar to the proposed project, would not generate noise levels that exceed the noise standards established by the City of San Bernardino Municipal Code. Construction activities may cause intermittent and localized groundborne vibration from the operation of heavy construction equipment; however, this impact would be considered less than significant, as no sensitive uses are calculated to be within 25 feet of construction activity at any location. Additionally, groundborne vibration would not exceed the FTA's vibration impact thresholds for human annoyance.

The primary sources of long-term noise impacts are from motor vehicles, heating and air-conditioning (HVAC) equipment, material deliveries, and human activity. Noise and vibration from vehicular traffic and HVAC equipment would be slightly less for this alternative than the proposed project, reducing the already less-than-significant impacts. As Alternative 2 would reduce the activities on the site with a substantially less amount of square footage, this alternative would generate fewer noise impacts than the proposed project.

Public Services

All impacts related to the proposed land uses would be the less under this alternative than the proposed project, and would be less than significant. As Alternative 2 would reduce the activities on the site with a substantially less square footage, this alternative would generate less impacts to public services than the proposed project.

Transportation/Traffic

Because Alternative 2 would develop a smaller distribution center than would the proposed project, this alternative would generate fewer vehicle trips and, consequently, less traffic. The proposed project would generate a total of 1,303 daily vehicle trips (refer to Table 4.11-5 [Project Traffic Generation]). Reducing the distribution center would generate 50 percent fewer vehicle trips, for a total of approximately 652 trips. Construction activities associated with this alternative would temporarily impact the level of service on nearby roadways from construction vehicles and contractor employee vehicles, a potentially significant impact. With implementation of the identified mitigation measures, this impact would be reduced to a less-than-significant level, similar to the proposed project.

As Alternative 2 would generate approximately 50 percent less traffic than the proposed project, operation of this alternative would not exceed established service levels designated by the San Bernardino County Congestion Management Program and impacts would remain less than significant. As Alternative 2 would reduce the activities on the site with substantially less square footage, this alternative would result in less impact to transportation and traffic than the proposed project, which are identified as less than significant.

Utilities/Service Systems

Alternative 2 would develop a smaller distribution center than the proposed project, with half the square footage. Accordingly, this alternative would reduce demand for water, gas, and electrical supplies and generate less wastewater and solid waste. The effect on storm drains would be less than the proposed project, as the amount of impervious surfaces would be less under this alternative than the proposed project. Similar to the proposed project, development of this alternative would result in a less-than-significant impact on utilities/service systems, but would be less than the proposed project.

Energy and Greenhouse Gas Emissions

Alternative 2 would develop a smaller distribution center than the proposed project, with half the square footage. Accordingly, this alternative would reduce demand for electricity, natural gas, and petroleum.

Alternative 2 would further reduce the already less-than-significant impacts related to the wasteful or inefficient use of energy and greenhouse gas emissions. Table 6-3 (Operational Greenhouse Gas Emissions for the Reduced Project Alternative) below illustrates the GHG emissions for this alternative. As shown in this table, construction and operational GHG emissions would be reduced under this alternative compared to the proposed project due to the decreased size of the facility.

Table 6-3 Operational Greenhouse Gas Emissions for the Reduced Project Alternative		
<i>Source of Emissions</i>	<i>Alternative 2 Build out</i>	
	<i>CO₂e (metric tons)</i>	<i>Percent of Total Emissions</i>
Vehicular Use	5,313	73
Electricity Use	1,216	16
Natural Gas Use	334	5
Solid Waste	315	4
Water Use	52	1
Construction Emissions (amortized)	36	1
<i>Alternative 2 Annual Total</i>	<i>7,266</i>	<i>100</i>
<i>Proposed Project Annual Total</i>	<i>14,520</i>	

SOURCE: URBEMIS 2007 (Version 9.2.2). California Climate Action Registry General Reporting Protocol, Reporting Entity-Wide GHG Emissions, Version 3.1, January 2009; USEPA, 1998; Navigant Consulting, 2006 (output data are provided in Appendix B)

Represent business-as-usual GHG emissions and does not take into account any GHG-reducing features or Pavley emission reduction.

■ Attainment of Project Objectives

Alternative 2 would meet some of the project objectives, as it is similar to the proposed project but on a reduced scale. The reduced size of the distribution center would reduce the amount of workload, employees, and other associated distribution center activities. It would not provide the economic means that is sought by the proposed project objectives and would not bring as many jobs to the City or provide as much of an expanded economic base.

■ Conclusion

Alternative 2 would result in similar impacts as the proposed project, but to a lesser extent because of the smaller building footprint. This Alternative reduces the significant air quality impacts of the proposed project, but not to a less-than-significant level, as it is likely that construction and operational emissions would still exceed SCAQMD thresholds for criteria pollutants. The reduced size of the distribution center would reduce the number of employees, and the amount of workload, as well as other associated distribution center activities by approximately 50 percent. The reduced project would not achieve to the same extent the economic objectives provided by the proposed project, due to the reduced scale of the project.

6.3.3 Alternative 3: Reduced Project with Second Access Driveway

■ Description

Alternative 3 represents development of a 642,657 sf warehouse/distribution center with a second access driveway provided in the southern portion of the site. This alternative would result in slightly less construction than the proposed project because of the smaller building. Overall building height would remain the same as the proposed project, at 40 feet above pad level, including parapets. Grading activities would remain the same, as would soil export, compared to the proposed project. Figure 6-2 (Reduced Project with Second Access Driveway Alternative Site Plan) shows the site plan as it would occur under this alternative.

■ Environmental Impacts

Aesthetics

Both the proposed project and Alternative 3 would develop the project site. As there are no scenic vistas from or through the project site, this alternative would result in no impact on scenic vistas, similar to the proposed project. Neither this alternative nor the proposed project would adversely impact scenic resources. The proposed project and Alternative 3 would not block views of the mountains from residents or motorists, as these are located to the north and east of the property.

Alternative 3 would change the visual character of the site similar to the proposed project, converting it from vacant open space and hilly landforms to a distribution center. The slightly smaller building and second access driveway would not substantially change compared to the proposed project. Construction of buildings and other facilities/amenities on the project site would still noticeably change the view onto the site from surrounding properties, particularly from I-215 and the residential communities east of the project site. Both this alternative and the proposed project would add additional sources of light and glare, resulting in less-than-significant impacts to nighttime views. The visual change on the southern portion of the site resulting from construction of the second access driveway would be substantially similar to the proposed project, as the area would be landscaped similar to the project. Alternative 3 would have essentially the same less-than-significant impacts as the proposed project on visual quality, visual character, scenic vistas, and light and glare. All visual impacts would remain less than significant.

Air Quality

Development under this alternative would build a 642,657 sf distribution center instead of the proposed 678,275 sf. This alternative, however, would include a second access driveway at the southern end of the project. The development of the project would still require grading activities to create a flat surface to build the distribution center. The grading activities would be revised slightly to accommodate construction of the second access driveway, but would not substantially change the nature of the overall grading of the site. The construction activities would involve the same soil export as the proposed project. Overall, daily vehicle trips (and vehicle miles) associated with the construction and operation of

this alternative would be the same as for the project. Similar to the proposed project, Alternative 3 would not exceed the screening level threshold for any criteria pollutant during construction. Impacts would be less than significant. The slightly reduced size of the warehouse facility would not reduce operational truck trips and overall operational emission would be identical to the proposed project. Operation of Alternative 3 would not exceed the SCAQMD significant thresholds for VOC, CO, PM₁₀, and PM_{2.5}, but would still exceed the significance threshold for NO_x.

Biological Resources

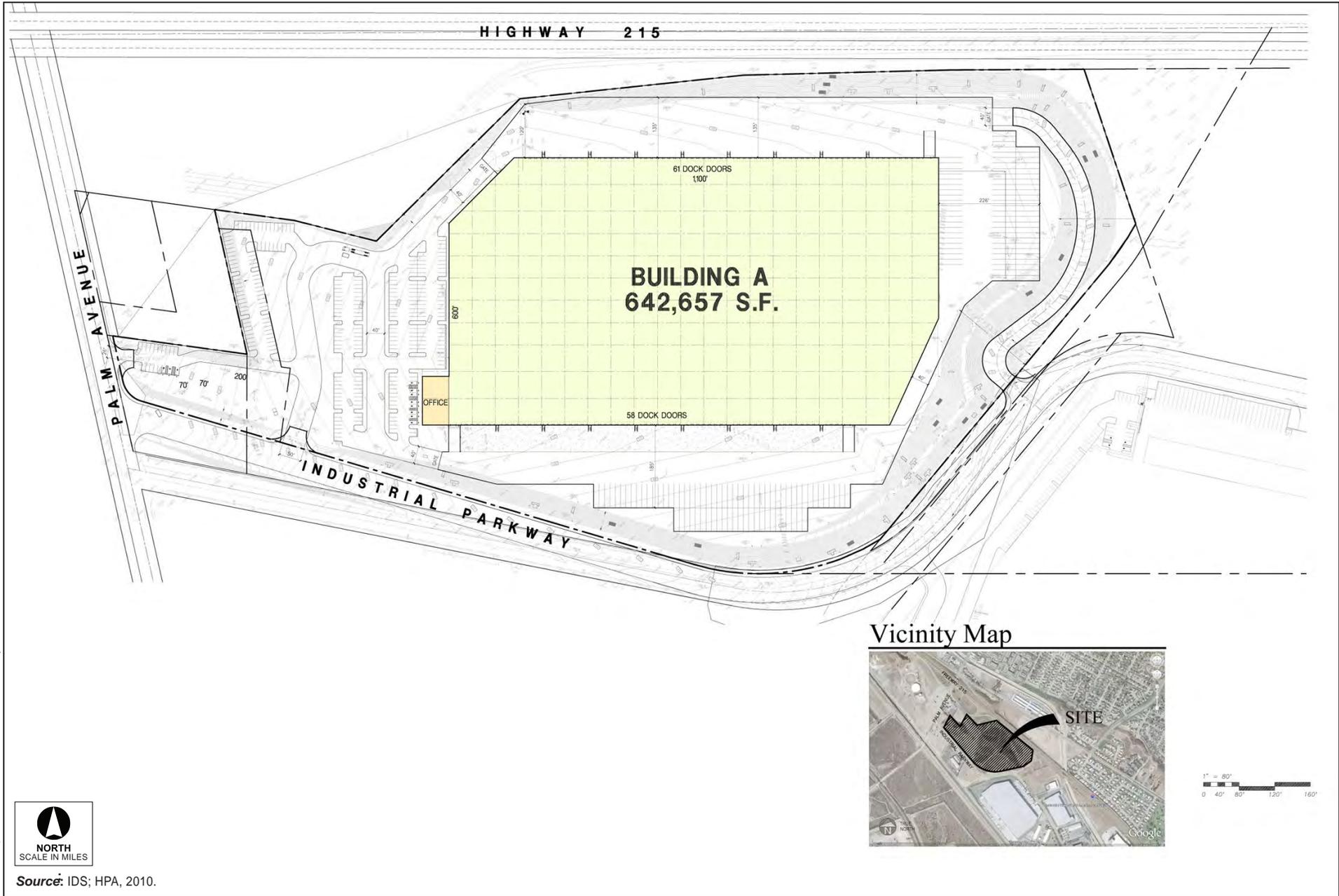
The project site does not contain riparian habitats, wetlands, or wildlife nursery sites, and is not part of a major or local wildlife corridor/travel route. There is no adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state habitat conservation plan that covers the project site. Therefore, similar to the proposed project, Alternative 3 would result in no impacts for these thresholds. As discussed in Section 4.3 (Biological Resources), the proposed project would directly impact coastal sage scrub (20.91 acres), critical habitat for the coastal California gnatcatcher (along with other sensitive species whose numbers are in decline due to the destruction of coastal sage scrub habitat) by the USFWS. Similar mitigation would be assumed under this alternative as for the proposed project; therefore, the impacts of both Alternative 3 and the proposed project to the coastal sage scrub would be less than significant. Migratory avian species and raptors, which may use the large western sycamore trees located within the project site during breeding season, are protected under the MBTA while nesting. The loss or disturbance of an MBTA-protected occupied nest, or substantial interference with roosting and foraging opportunities for migratory species, sensitive avian species, or raptors is a potentially significant impact. The same mitigation would be assumed under this alternative as for the proposed project; therefore, the potential impacts of both Alternative 3 and the proposed project to migratory bird habitat would be less than significant. Overall, the impacts of this alternative on biological resources would be similar to the impacts of the proposed project, less than significant, and somewhat less than the proposed project.

Cultural Resources

Both the proposed project and Alternative 3 would develop the proposed project site and potentially disturb previously unknown cultural resources, including human remains, during grading. Project requirements and mitigation measures incorporated into the proposed project would ensure that this impact would be less than significant. Alternative 3 would be required to adhere to the policies of the General Plan and Municipal Code requirements with regard to cultural/historic resources, and impacts from Alternative 3 would similarly be less than significant. Alternative 3 would reduce the area to be graded and would thus reduce the potential for disturbing archaeological or paleontological resources.

Geology/Soils

Both the proposed project and Alternative 3 would construct buildings on the project site, and both would be subject to the same state and local regulations and BMPs designed to reduce seismic and other geologic hazards. Due to the fact that all geologic/seismic impacts are highly regulated by the California Building Code, Alternative 3 and the proposed project would result in similar less-than-significant



Vicinity Map



1" = 80'
0 40' 80' 120' 160'

0D2133100 | Palm-Industrial Distribution Center Project



Source: IDS; HPA, 2010.

Figure 6-2
Reduced Project with Second Access Driveway Alternative Site Plan

impacts related to seismic hazards. The same grading and soil export would occur under Alternative 3. Therefore, overall, impacts would be the same as for the proposed project, and less than significant.

Hazards and Hazardous Materials

The project site is not located within ¼ mile of a school or in the vicinity of a private airstrip or airports. There are no wildlands in the project area. Therefore, similar to the proposed project, Alternative 3 would have no impact for these thresholds. There are no residential uses in close proximity to the project site west of I-215. Construction and operation activities would not impair evacuation routes for City residents. Alternative 3 does not propose any structures or uses that would impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan. Development of Alternative 3 would result in the same less-than-significant impacts on emergency evacuation routes or access as the proposed project. Although Alternative 3 is located on a site that is included on one or more hazardous materials lists compiled in accordance with Government Code Section 65962.5, construction and operation of Alternative 3 would not create or result in a significant hazard to people or the environment. Therefore, Alternative 3 would result in a less-than-significant impact, consistent with the proposed project. The project site is within a designated High Wind Area and is exposed to significant wind hazards. Similar regulations would be assumed under this alternative as for the proposed project; therefore, the impacts of Alternative 3 would be less than significant, similar to the proposed project.

The risk of accident or upset from transportation, use, and handling of hazardous materials would be the same compared to the proposed project because similar amounts of materials would be transported during construction, and the same daily operational trips would occur. Similar mitigation would be assumed under this alternative as for the proposed project; therefore, the impacts of both Alternative 3 and the proposed project relating to the potential risk of exposure to contamination would be reduced to less than significant by implementing investigation and remediation efforts in the event that unknown contamination is encountered during the construction phase. The proposed project and the Alternative 3 would both be likely to transport, dispose of, or handle hazardous materials or generate hazardous emissions. Alternative 3 would be required to comply with all federal, state, and local regulations pertaining to transportation, handling, use of, and disposal of hazardous materials and similar mitigation would be assumed under this alternative as for the proposed project. This alternative would result in a similar impact on transportation, disposal, and handling of hazardous materials, and the generation of hazardous emissions than the proposed project and these impacts would remain less than significant, similar to the proposed project.

Hydrology/Water Quality

The project site is not located in a 100-year flood hazard area as mapped by FEMA, nor is it in a dam inundation or levee failure area. The project site is not at risk for mudflow or flooding by seiche or tsunami. Therefore, both Alternative 3 and the proposed project would result in no impacts with regard to these thresholds. Alternative 3 would be required to develop a construction SWPPP to protect water quality during construction activities. Incorporation of required BMPs would reduce potential discharge of stormwater pollutants. Impacts to hydrology/water quality were identified as less than significant for

the proposed project with implementation of project requirements and BMPs. Alternative 3 would generate the same impacts to water quality because grading activities would be substantially similar and the building size is only slightly reduced. Impervious surfaces would be substantially similar under this alternative than with the proposed project, as the smaller building footprint would be offset by the additional paved surface for the secondary access driveway. Thus, Alternative 3 would result in substantially similar less-than-significant impacts to hydrology/water quality compared to the proposed project.

Land Use/Planning

The project site is currently zoned for light industrial uses. Both Alternative 3 and the proposed project would develop a distribution center. Development under Alternative 3 would not conflict with the designated land uses in the General Plan and Zoning Code. Alternative 3 would also be compatible with the land uses that surround the project site. This alternative would not conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the site adopted for the purpose of avoiding or mitigating an environmental effect. Alternative 3 would generate similar less-than-significant impacts to land use because it is essentially the same use as the proposed project.

Noise

One source of noise is construction activity. Development of this alternative would include slightly less square footage of the building compared to the proposed project, which would slightly reduce construction activities. Noise and vibration impacts from construction activities would, therefore, be less than the proposed project and would slightly reduce the already less-than-significant impacts from the proposed project for construction noise. This alternative would result in substantially the same number of truck trips during both construction and operation. Therefore, construction noise for Alternative 3, similar to the proposed project, would not generate noise levels that exceed the noise standards established by the City of San Bernardino Municipal Code. Construction activities may cause intermittent and localized groundborne vibration from the operation of heavy construction equipment; however, this impact would be considered less than significant, as no sensitive uses are calculated to be within 25 feet of construction activity at any location. Additionally, groundborne vibration would not exceed the FTA's vibration impact thresholds for human annoyance.

The primary sources of long-term noise impacts are from motor vehicles, heating and air-conditioning (HVAC) equipment, material deliveries, and human activity. Noise and vibration from vehicular traffic and HVAC equipment would be substantially the same for this alternative compared to the proposed project, and would be similarly less than significant. As Alternative 3 would reduce the activities on the site with a substantially less amount of square footage, this alternative would generate fewer noise impacts than the proposed project.

Public Services

All impacts related to the proposed land uses would be the same under this alternative as the proposed project, and would be less than significant. Alternative 3 would result in the same less-than-significant impacts to public services as the proposed project.

Transportation/Traffic

Alternative 3 would result in the same number of construction and operational vehicle trips. Construction activities associated with this alternative would temporarily impact the level of service on nearby roadways from construction vehicles and contractor employee vehicles, a potentially significant impact. With implementation of the identified mitigation measures, this impact would be reduced to a less-than-significant level, similar to the proposed project. Operation of Alternative 3 would result in the same traffic impacts as identified for the proposed project and would not exceed established service levels designated by the San Bernardino County Congestion Management Program.

Provision of the second driveway at the “S” curve of Industrial Parkway could potentially result in a hazard to inbound and outbound motorists because of line of sight restrictions. Crain & Associates performed a sight distance analysis for this alternative (Appendix L1, February 2011). The current clearance between the south edge of Industrial Parkway and the building located south of Industrial Parkway is more than 15 feet, which satisfies the desired sight distance of 430 feet based on the 45 mph design speed for Industrial Parkway. The measured restricted sight distances (with the south edge of Industrial Parkway serving as the limit for lines of sight) exceed the minimum standard sight distance requirements. The study indicated that adequate line of sight can be provided at the second access driveway intersection with Industrial Parkway, particularly if vegetation control on the south side of the curve is maintained by the City and the widening of Industrial Parkway with a center two-way left-turn lane is completed by the City. Grading of the project site along the northern edge of Industrial Parkway would be performed to maximize lines of sight to and from the west. Therefore, this impact would be less than significant.

Utilities/Service Systems

Alternative 3 would develop a slightly smaller distribution center than the proposed project. However, the difference in square footage would not be substantial enough to significantly affect the demand for water, gas, and electrical supplies, nor would it result in a substantially different wastewater and solid waste generation compared to the proposed project. The effect on storm drains would be similar to the proposed project, as the amount of impervious surfaces would be substantially similar under this alternative compared the proposed project (the decrease in building footprint would be offset by the increase in paved surfaces for the secondary access driveway). Overall, while demand for utilities would be slightly reduced because of the smaller building, development of this alternative would result in a less-than-significant impact on utilities/service systems, similar to the proposed project.

Energy and Greenhouse Gas Emissions

Alternative 3 would develop a somewhat smaller distribution center than the proposed project. However, the reduction in size is not substantial enough to significantly reduce demand for electricity, natural gas,

and petroleum. Alternative 3 would not change the already less-than-significant impacts related to the wasteful or inefficient use of energy and greenhouse gas emissions. The number of construction and operational vehicle trips would be the same under this alternative compared to the proposed project. Because there would be a slightly reduced demand for electricity, natural gas, and petroleum because of the smaller building footprint, construction and operational GHG emissions would be correspondingly slightly reduced under this alternative compared to the proposed project.

■ Attainment of Project Objectives

Alternative 3 would meet all of the project objectives, as it is substantially similar to the proposed project and provides a large warehouse distribution facility. It would provide a substantially similar number of jobs, just accommodated in a somewhat smaller space, and would provide an expanded economic base to the City.

■ Conclusion

Alternative 3 would result in similar impacts as the proposed project, to a slightly lesser extent because of the smaller building footprint. This Alternative reduces the significant air quality impacts of the proposed project, but not to a less-than-significant level, as construction and operational emissions would still exceed SCAQMD thresholds for criteria pollutants. Alternative 3 would achieve all of the objectives of the proposed project.

6.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Table 6-6 (Summary of Impacts of Alternatives) provides a side-by-side comparison of the proposed project with each of the alternatives analyzed in this document. Based on the information provided, Alternative 1 (No Project/No Development Alternative) is environmentally superior, as it reduces the significant air quality impacts of the proposed project to no impact. However, the CEQA Guidelines requires that an additional alternative be chosen from among the remaining alternatives, which, in this case, would be Alternative 2 (Reduced Project Alternative). While Alternative 2 does not reduce the significant impacts of the proposed project to a less-than-significant level (all impacts remain significant and unavoidable), it does reduce the air quality impacts because of reduced traffic and construction activities. However, it does not achieve many of the project objectives.

Table 6-6 Summary of Impacts of Alternatives

Impact Area	Proposed Project Impacts	Alternative 1: No Project/No Development Alternative	Alternative 2: Reduced Project Alternative	Alternative 3: Reduced Project with Second Access Driveway Alternative
Aesthetics	LTS	Less	Less	Similar
Air Quality	SU	Less	Less but still Significant and Unavoidable	Less but still Significant and Unavoidable
Biological Resources	LTS	Less	Less	Similar
Cultural Resources	LTS	Less	Less	Similar
Geology/Soils	LTS	Less	Less	Similar
Hazards and Hazardous Materials	LTS	Less	Less	Similar
Hydrology/Water Quality	LTS	Less	Less	Similar
Land Use/Planning	LTS	Less	Similar	Similar
Noise	LTS	Less	Less	Slightly less
Public Services	LTS	Less	Similar	Similar
Transportation/Traffic	LTS	Less	Less	Similar
Utilities/Service Systems	LTS	Less	Less	Slightly less
Energy and Greenhouse Gas Emissions	LTS	Less	Less	Slightly less
Achieve Project Objectives?	—	No	No	Yes

LTS = less than significant SU = significant and unavoidable

6.5 REFERENCES

- Crain & Associates. 2007. *Traffic Impact Analysis Report for the Palm Avenue Warehouse/Distribution Center Project*, December.
- . 2011. *Traffic Conditions Update*, February 3 (Draft).
- . 2011. *Sight Distance Analysis for the Proposed Palm Avenue Warehouse Project in the City of San Bernardino*. February 3.

