

## 6.0 ALTERNATIVES

### 6.1 INTRODUCTION

This section evaluates alternatives to the Proposed Project. The CEQA Guidelines Section 15126.6 outlines the discussion of alternatives to a Proposed Project as follows: “An EIR shall 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. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible.” It further states that the lead agency is responsible for selecting a range of alternatives examined and must publically disclose its reasoning for selecting those alternatives. “There is no iron clad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason” (Citizens of Goleta Valley vs. Board of Supervisors [1990] 52 Cal. 3d 553 and Laurel Heights Improvement Association vs. Regents of the University of California [1998] 41 Cal. 3d 376). Thus, the EIR needs to evaluate those alternatives necessary to permit a reasoned choice and should not consider alternatives with effects that cannot be reasonably ascertained and whose implementation is remote and speculative.

CEQA also requires that an alternatives evaluation include sufficient information about each alternative to allow meaningful evaluation, analysis and comparison with the Proposed Project (CEQA 15126.6(d)). The analysis should identify aspects of the alternative that “substantially lessen any significant effects of the project” (CEQA 15126.6(b)). The following section presents a series of project alternatives considered, evaluated and/or rejected for the Proposed Project. The alternatives were developed based on issues identified in the Initial Study, comments received during circulation of the Notice of Preparation (NOP) and recommendation of Lead Agency staff. However it is noted that all potentially significant impacts associated with the Proposed Project are reduced to less than significant levels with mitigation; these are in the areas of air quality, geologic hazards, hazardous materials, flooding hazards and water quality, noise, and traffic. There are no areas of potential environmental impact that remain significant after mitigation.

The following alternatives to the Proposed Project are evaluated in Section 6.3:

- No-Project/No-Development Alternative
- Location Alternative
- Reduced Project Alternative

The Environmentally Superior Alternative will be selected from among these alternatives and the Proposed Project. An alternative that is environmentally superior would result in the fewest or least significant environmental impacts and still be able to achieve the objectives of the planning effort.

The analysis of alternatives includes the assumption that all applicable mitigation measures associated with the Proposed Project would be implemented as appropriate for each of the alternatives. However, applicable mitigation measures may be scaled to reduce or avoid the potential impacts of the alternative under consideration and may not precisely match those identified for the proposed project.

### **6.1.1 Project Description**

The proposed Project is the development of a maximum of 204,720 square feet (SF) of general commercial land uses on a rectangular-shaped site of approximately 17.37 acres located at the southwest corner of Highland Avenue and Arden Avenue in the City of San Bernardino (see Figures 3-1 and 3-2). The Project Applicant proposes to construct one (1) 107,979 square-foot home improvement center with an attached 28,111 square-foot garden center, and one (1) 43,830 square-foot major retail structure with 8,340 square feet of attached general commercial shops (See Figure 3-4: Site Map). The proposed major retail structure may include a grocery store. In addition to the major tenants and as shown on Figure 3-4, the retail center would have four (4) general commercial land uses totaling 16,460 square-feet (refer to Table 3-2). Retail use types are identified for the EIR evaluation; however actual tenants have not been identified with the exception of The Home Depot, which would occupy the home improvement center. CEQA does not require the identification of applicants or end users by name; however the likely types of use are useful to evaluating potential impacts such as traffic generation, traffic flow, on-site circulation patterns, noise, and the use of hazardous materials.

The Proposed Project includes the simultaneous processing of two Parcel Maps; the first is a Redevelopment Agency of the City of San Bernardino (RDA) initiated Parcel Map to combine existing parcels on the 17.37-acre Project Site into one large parcel, and second is an applicant initiated parcel map to create 7 parcels for the specific project ranging in size from 0.73 acres to 8.93 acres. The Proposed Project would require a Master Sign Program, Rezone and General Plan Amendment (GPA) to change the existing land use designation from Public Commercial Recreation (PCR) to Commercial General (CG-1), and approval of a Conditional Use Permit (CUP) to allow for increased building heights for architectural elements and multi-tenant use of the Project Site, potentially including a gas station with 24 hour operation and alcohol sales, a bank with drive thru, fast food with drive thru and sit down restaurant with alcohol sales.

The project would have an east-west orientation along Highland Avenue with major tenants facing north toward Highland Avenue. The home improvement center would be located at the southwest corner of the site, and the other major retail structure with attached shops is located near the southeast corner of the site. The remaining general commercial pad buildings are detached and are located primarily along the northern portion of the Project Site. In addition to the major tenants, the land uses may include two drive-through restaurants, a drive-through bank, and a gas station.

A retaining wall varying in height from three to eight feet is planned along portions of the southern and western boundary (see Figure 3-6, Conceptual Elevations). A split-level retaining wall constructed of a six-foot high lower level section, above which would be a ten-foot wide landscaped area, and another six-foot high second level retaining wall topped with a three-foot

high railing, is proposed for approximately 330 feet along the southern boundary, and approximately 240 feet along the western boundary (beginning at the southwest corner of the site, and gradually decreasing to a single level retaining wall).

Ingress and egress to the site is via three driveways on Highland Avenue, one driveway on Arden Avenue, and two driveways along 20<sup>th</sup> Street. Two driveways, located at the northwest corner of the Project Site and at the proposed traffic signal would provide ingress and egress, the third driveway located near Pad 3 at the northeast corner would provide ingress only. The location of the driveways and configuration of the shops and pad buildings near Highland Avenue create three distinct shopping areas.

### **6.1.2 Project Objectives**

CEQA Guidelines Section 15124(b) requires that the project description include a statement of objectives sought by the Proposed Project. The statement of objectives will assist the Lead Agency in developing a reasonable range of alternatives for evaluation in the EIR. The objectives will also assist the Lead Agency in developing findings for a statement of overriding considerations, if required.

The specific Project Objectives stated below are intended to be consistent with the City's goals for implementing the General Plan, and include the following:

- Increase employment opportunities in the City of San Bernardino.
- Redevelop property in a commercial area of the city and provide local shopping and retail service opportunities.
- Provide an attractively designed, economically viable Neighborhood Retail Center that will be an amenity for local residents.
- Provide a conveniently located Neighborhood Retail Center that will reduce trips from residents' homes to more distant shopping areas.
- Broaden the City's economic base by attracting new commercial uses to the project area.
- Locate the project near regional freeways to enhance accessibility and commercial viability.
- Develop a project that is both a financial asset to the City and that mitigates environmental impacts to the extent feasible.

## **6.2 ALTERNATIVES CONSIDERED AND REJECTED**

CEQA Guidelines 15126.6(c) requires that an EIR identify any alternatives that were considered and rejected as infeasible, and briefly explain the reasons for rejection.

Build-out Under the Existing Zoning Alternative: The Project Site is currently zoned as Public Commercial Recreation (PCR) which allows for commercial stadiums/sporting facilities, various other entertainment uses and open space. Under this alternative, the Project Site could be developed with commercial stadiums/sporting facilities such as a soccer field, golf course, miniature golf course, or batting cage facility. Maximum floor area ratio or other development standards are not listed for the PCR land use designation, however structures in the PCR zone are required to be incidental to a primary use and sited to complement the surrounding area. This alternative would yield less impacts for air quality, hazard potential and traffic than the Proposed Project. However, the alternative would not meet the Project's objective of broadening the City's economic base by establishing new commercial uses to the area, and providing a conveniently located Neighborhood Retail Center that will reduce trips from residents' homes to more distant shopping areas. Therefore, this alternative was rejected.

Residential Development Alternative: Under this alternative, the Project Site would be developed with a multi-family residential project. The development of residential uses would require that the General Plan Land Use and Zoning designations for the site be changed from Public/Commercial Recreation (PCR) to Residential Medium (RM) (14 dwelling units per acre, 14,400 minimum lot size). This alternative would provide for the construction of approximately 238 dwelling units on the 17.37-acre site. Although a residential use would result in a reduced level of impacts in the areas of hazard potential, traffic, noise, and air quality, the City has invested substantial time and energy into removing the previous residential development. The City is not seeking to develop the Project Site again as residential, and therefore this alternative was rejected from further consideration.

### **6.3 ALTERNATIVES CONSIDERED FOR EVALUATION**

The intent of a Project Alternatives evaluation is to identify ways to mitigate or avoid the significant effects that a project may have on the environment (CEQA 15126.6(b) and PRC Section 21002.1). The discussion shall focus on alternatives to the project or its location that avoid or substantially lessen significant effects even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly. The alternatives need to be reasonable and feasible. They should be potentially feasible, accomplish most of the basic objectives of the project, and lessen one or more of the significant effects (CEQA 15126.6(c)).

The RDA has incorporated this rationale in its evaluation for selecting the alternatives presented. The following alternatives were considered and are included in the analysis herein:

- **No Project/No Development Alternative:** Continuation of the Proposed Project site in its current vacant condition.
- **Alternative Site Location:** There are a number of sites in the general vicinity that may be developed into a commercial shopping center. This alternative evaluates a property located at the southwest corner of Highland Avenue and Central Avenue (approximately one-mile east of the Project Site). The Alternative Site is approximately 33.36 acres in size and is vacant with the exception of a parking lot on the northwest corner. The alternate site is zoned General Commercial (CG-1), and is traversed by an inactive Santa

Fe Railroad right-of-way. The property to the west is within the City of Highland and is zoned General Commercial (GC), and properties to the north, east and south are within the City of San Bernardino and are zoned Public Facilities (PF), Residential Medium (RM) and Residential Suburban (RS), respectively. The Proposed Project would be consistent with existing commercial zoning at the Alternative Site location.

- **Reduced Scale Alternative:** This alternative would reduce the project as proposed by eliminating one or more uses, or by reducing the size of one or more of the proposed uses. Reducing the size of one or more of the Major tenant buildings could reduce the economic feasibility of the project since by definition the grocery and home improvement stores must be of a certain size to accommodate their inventory and be financially feasible. Therefore, reducing other uses on-site would be more realistic and feasible.

## 6.4 EVALUATION OF ALTERNATIVES

### 6.4.1 No Project/No Development Alternative

Under this alternative, the Proposed Project would not be developed. The existing 17.37 acres would remain vacant and unchanged.

The No Project/No Development Alternative independently and in comparison to the Proposed Project is addressed briefly for each of the environmental impact topics consistent with the impact analysis conducted in Chapter 4.0 of this EIR. The discussion of impacts with potential significance is expanded to examine the potential for mitigation and comparison to the Proposed Project impacts.

#### Aesthetics

The project currently consists of vacant land surrounded by commercial, institutional and residential uses. The No Project/No Development Alternative would not have an impact on aesthetics and visual quality in the sense that no changes in the characteristics of the property would occur.

#### Air Quality

Under this Alternative, structures and parking lots would not be constructed; therefore, construction related air quality impacts would not be created. Operation emissions from on-site activities and from new vehicle trips would not occur, therefore, the No Project/No Development Alternative would have no impacts to air quality. Impacts would therefore be less than those associated with the Proposed Project, however the Proposed Project's impacts are reduced to a level of less than significant with mitigation.

#### Cultural Resources

The records search prepared as part of the Cultural Resource Assessment identified two recorded resources: CA-SBR-6847H is the Atchison, Topeka and Santa Fe Railroad alignment and is

located north of the project area, P1062-9H is a reference to the “pending” location and identification of resources associated with the Patton State Hospital dairy farming activities to the east of the Project Site. The report concluded that neither site would be impacted as a result of the Proposed Project. The No Project/No Development Alternative would not result in development of the site and the nearby cultural resources would not be impacted.

#### Geology and Soils

Under the No Project/No Development Alternative, no grading or any other soil disturbing activities would occur that could result in soil erosion or runoff. Therefore, existing geologic conditions would remain unchanged and impacts would be less as compared to the Proposed Project.

#### Hazardous and Hazardous Materials

Under this alternative, no commercial uses would be developed and therefore impacts from the transportation or storage of hazardous materials would not occur. Impacts would be less than the Proposed Project, although potentially significant impacts are reduced to less than significant levels with mitigation.

#### Hydrology and Water Quality

This Alternative would not result in construction or an increase in impervious surfaces and the potential increase in urban pollutants such as oil and grease. Stormwater runoff would remain unchanged, and no new sources of urban pollutants would be generated.

#### Noise

The No Project/No Development Alternative would not result in a new source of noise, as conditions would remain unchanged. Impacts would be less than those associated with the Proposed Project although the Proposed Project’s impacts are reduced to a level of less than significant with mitigation.

#### Traffic and Circulation

Under this alternative, new land uses are not proposed and therefore, additional vehicle trips would not be generated as conditions would remain unchanged. Impacts would be less than those associated with the Proposed Project, however the Proposed Project’s impacts are reduced to a level of less than significant with mitigation.

#### Greenhouse Gases/Climate Change

Under this Alternative, operation emissions from on-site activities and from new vehicle trips would not occur, therefore, the No Project/No Development Alternative would have no impacts to greenhouse gases/climate change. Impacts would be less than those associated with the Proposed Project which are less than significant.

### Economic Impact – Urban Decay

Under this Alternative, there would be no neighborhood commercial center and no home improvement store would be developed. While there have been declines in Building Materials and Home Improvement sales in recent years in the overall market area studied, there have also been decreases in the supply with the closing of the Lowe's Home Improvement store at the end of 2010 and, a Home Depot store located near the intersection of Interstate 215 and Highway 159 in San Bernardino is expected to close when its lease expires in early 2014. Without a detailed economic impact study it can only be projected that existing home improvement stores would benefit as a result of this alternative. Therefore, this alternative would result in no impact to urban decay as compared to a less than significant impact with implementation of the Proposed Project.

### Conclusions

Although the No Project/No Development Alternative would be environmentally superior to the Proposed Project as no development and related significant impacts would occur, this alternative would not meet any of the project objectives. Additionally, all potentially significant impacts associated with the Proposed Project are reduced to less than significant levels with mitigation; these are in the areas of air quality, geologic hazards, hazardous materials, flooding hazards and water quality, noise, and traffic.

#### **6.4.2 Alternative Site Location**

This alternative evaluates a property located at the southwest corner of Highland Avenue and Central Avenue (approximately one mile east of the Project Site). The Alternative Site is approximately 33.36 acres in size and is vacant with the exception of a carpool parking lot on the northwest corner. This site was previously developed with auxiliary facilities (boiler, laundry, wastewater treatment plant, and farm) of Patton State Hospital and has been vacant for at least four decades. During the 1980's the site was proposed for development of a headquarters facility for the East Valley Water District (EVWD) and during the 1990's, the site was proposed for the development of a golf resort with driving range and putting green. There are currently no applications for development of the site which is comprised of four parcels; two of which are owned by EVWD and the two larger of which are owned by Pine Mountain Development.

The alternate site is zoned General Commercial (CG-1) and is traversed by an inactive Santa Fe Railroad right-of-way. The property to the west is within the City of Highland and is zoned General Commercial (GC), and properties to the north, east and south are within the City of San Bernardino and are zoned Public Facilities (PF), Residential Medium (RM) and Residential Suburban (RS), respectively. The site is directly across Highland Avenue from the Patton State Hospital; west of a new senior housing complex and multi-family housing units; and east of a restaurant, abandoned commercial building, and multi-family housing units. The Proposed Project would be consistent with existing commercial zoning at the Alternative Site location. For this alternative, only 17.39 acres of the 33.36-acre Alternative Site would be developed.

### Aesthetics and Visual Quality

The Alternative Site, since it is greater in size than the Project Site, would allow for the Project to be developed as proposed. Under this alternative, impacts to Aesthetics and Visual Quality would be similar to those evaluated for the Proposed Project as there are adjacent sensitive receptors (residential development) to the east and west of the Alternative Site, and Patton State Hospital to the north of the site across Highland Avenue. Development at the alternative site would also be subject to a photometric plan that would minimize on-site lighting to the extent feasible and avoid any light spill-over onto surrounding properties. Impacts would be less than significant.

### Air Quality

Estimated construction emissions for the Proposed Project are expected to be less than significant upon implementation of mitigation measures AQ-1 through AQ-3. Since the Alternative Site Location would develop only 17.39 acres of the 33.36 acre site the construction emissions associated with this Alternative would be the same as the Proposed Project. Since proposed uses and daily traffic trips would be the same, estimated operational emissions are expected to be less than significant for both the Proposed Project and this Alternative. Under this alternative, construction emissions would be similar to those identified for the Proposed Project and would require mitigation to reduce impacts to a less than significant level. Cumulative impacts for both the Proposed Project and this alternative would be reduced to a less than significant level with implementation of mitigation measures.

### Cultural Resources

The records search for the Project Site indicated that between 1973 and 2005 a minimum of nine cultural resource investigations were completed within one-half mile of the Proposed Project site (see Table 4.3-1). The records search identified two recorded resources: the Atchison, Topeka and Santa Fe Railroad alignment, and resources associated with the Patton State Hospital dairy farming activities; both of these sites occur on the Alternative Location property.

A Phase II site evaluation program would be required to formally assess the significance of these historic resources sites. The development of the alternate site would be required to adequately record these resources before any site disturbance. Prior to mitigation, impacts to cultural resources would be greater for this Alternative than the Proposed Project location.

### Geology and Soils

The Project Site and Alternative Site are both relatively flat and not located in areas prone to land or mudslides. Both sites do not occur within areas that are susceptible to liquefaction and/or ground subsidence, as shown in Figures S-5 and S-6 of the City's General Plan. Soils at the Project Site exhibit moderate to high compressibility characteristics, low collapse potential, low shear strength, and very low expansion potential. A geotechnical report would need to be prepared for the Alternative Site to test for expansive soils and other soil characteristics.

Based on the Home Improvement Store finished floor elevation at the proposed Project Site of 1,218 feet amsl listed on the site plan and the current elevation within the building pad area (about 1,207 to 1,224 feet amsl) cuts up to about five feet and fills of up to about ten feet are anticipated to achieve the proposed building pad subgrade elevation. Based on a finished surface elevation of 1,220 feet amsl for Major 1 listed on the site plan provided and the current elevations within the Major 1 building pad area (about 1,220 to 1,230 feet amsl), cuts of up to about ten feet are anticipated to achieve the proposed Major 1 building pad subgrade elevation.

Since the Alternative Site location exhibits similar elevations (approximately 1280 near the northern boundary and 1240 at the southern boundary), the Alternative Site would require similar cut and fill activities to achieve proposed grades. Grading and earth work activities would increase the risk for soil erosion and site stability. Similar impacts would occur to geology and soils at the Alternative Site as compared to the Proposed Project Site, and all impacts would be mitigated to a less than significant level.

#### Hazards and Hazardous Materials

The majority of the retail/commercial uses proposed for the Proposed Project have a negligible potential to create a significant hazard to the public or the environment due to the use of hazardous materials. Associated with the home improvement store use is the transport, storage, use, and handling of hazardous or potentially hazardous materials. The Home Depot may be required to maintain a Certified Unified Program Agencies Plan and comply with State and local regulations regarding the use and storage of any regulated materials.

Other uses on-site may include a gas station which would result in the transportation and distribution of potentially hazardous petroleum fuel and related products. Storage and use of petroleum products on-site are regulated by various governmental agencies which require appropriate permits and monitoring and reporting to a number of agencies. Control of vapors associated with fueling stations is accomplished by state of the art pumps and nozzles. The station operator would be required to comply with all SCAQMD rules and regulations for operation of an automotive fueling station. These systems would be in place and tested prior to Certificate of Occupancy and commencement of operation of the fuel dispensing systems at both the Project Site and Alternative Site. Compliance with applicable State and SCAQMD rules and regulations would reduce the potential release of, or exposure to hazardous emissions to a less than significant level.

There are two schools that occur within ¼-mile of the Project Site, both within the San Bernardino Unified School District. Although the Alternative Site is not located adjacent to any schools, there are still sensitive receptors (residential development to the east and west, and Patton State Hospital to the north, resulting in impacts being similar to the Project Site.

Although this Alternative Site was previously identified (*Converse Consultants Inland Empire, July 1990. Executive Summary – Preliminary Findings of Site Survey EVWD Administration Expansion Site*) with sources of potential hazardous materials including the abandoned laundry facility potentially containing asbestos and lead paint, impacted soils from the old Patton wastewater treatment plant and sludge drying beds, the old Patton incinerator potentially

containing remains of medical waste, and the abandoned pig farm potentially containing asbestos and contaminated effluent from the slaughter house, remediation of the site was completed. Remediation included removal of impacted soil and demolition/removal of all remaining structures and their contents. Development of the Proposed Project at the Alternative Site would result in transportation or storage of hazardous materials, which would be reduced to a less than significant level with mitigation as listed for the Proposed Project. Therefore, impacts are anticipated to be similar to the Proposed Project.

### Hydrology and Water Quality

Construction of the Proposed Project would result in changes to existing drainage patterns at both the Project Site and Alternative Site. Additionally, the Proposed Project would generate urban runoff, which would affect water quality in the Project area and for the Alternative Site location, which would both require treatment of storm water. A site specific Hydrology Report would be required at the Alternative Site to determine specific hydrology in the area. A Storm Water Pollution Prevention Plan (SWPPP) would be required for both the Project Site and Alternative Site, as part of the construction package. The SWPPP would describe and dictate management practices to prevent contaminants from entering storm water discharge and prevent unauthorized non-storm water discharges during construction of either the Project Site or Alternative Site. Accordingly, storm water discharges to any surface or groundwater shall not cause or contribute to exceeding any applicable water quality objectives or standards contained in the Statewide Water Quality Control Plan, the California Toxics Rule, or the Santa Ana RWQCB's Basin Plan. Approval of the SWPPP by the RWQCB would result in implementation of Best Management Practices (BMPs) that would control pollutants in stormwater discharges from both the Project Site and Alternative Site.

Based on County of San Bernardino basin guidelines, a basin with a volume of 3.33 acre-feet is required for the development at the Proposed Project Site. A site-specific Hydrology report would be required for the Alternative Site to determine basin dimensions and requirements. Under this alternative, impacts to hydrology and water quality would be similar to those addressed within the Proposed Project, as approximately 17.39 acres would be disturbed at the Alternative Site and would require similar approvals (i.e., SWPPP, BMP's).

### Noise

Under this alternative, impacts to sensitive receptors would be similar to the Proposed Project as sensitive receptors about the east and west boundary of the Alternate Site, and also occur to the north of the site across Highland Avenue (Patton State Hospital). Noise impacts from delivery trucks, trash trucks and loading activities would be less for this alternative along the southern boundary as the I-210 Freeway occurs immediate south of the Alternative Site. Development at either site would require similar mitigation measures in order to reduce project noise levels within acceptable limits of City standards. Therefore, impacts at both sites would be less than significant with mitigation.

### Traffic and Circulation

Since this alternative would occur on a site located one-mile east of the Project Site and near a freeway off-ramp (westbound I-210 Freeway at Highland Avenue) it is expected to result in greater congestion along surface streets and intersections within the vicinity, as vehicle queuing time on surface streets traveling to the Alternative Site may be longer than would occur at the proposed Project Site. It is likely that additional improvements would be required for intersections that occur between the Project Site and Alternative Site (a span of up to one-mile) and possible for intersections that occur east of the Alternative Site between I-210 Freeway off-ramp at Highland Avenue/State Route 330 approximately two-mile east of the Alternative Site and the nearest freeway off-ramp. However, a site-specific traffic study would be required to document the predicted changes in levels of service for the impacted freeway and local street circulation system. Cumulative traffic impacts would for both this Alternative and the Proposed Project would be reduced to a less than significant level with implementation of proposed mitigation measures.

### Greenhouse Gases/Climate Change

This alternative, like the Project Site, would result in temporary greenhouse gas impacts from construction activities. The primary source of GHG emissions generated by construction activities is from use of diesel-powered construction equipment and other combustion sources (i.e., generators, worker vehicles, materials delivery, etc.). The GHG air pollutants emitted by construction equipment would primarily be carbon dioxide. Both the Project Site and Alternative Site would involve site preparation, grading, construction, painting, and paving. The primary sources of operational GHG emissions generated by the Proposed Project would be from motor vehicle use present at both the Project Site and Alternative Site. Under this alternative, impacts to greenhouse gases would be similar to the Proposed Project and are considered less than significant. There are no existing GHG plans, policies, or regulations that have been adopted by CARB or SCAQMD that would apply to combustion source of emissions. It is possible that CARB may develop performance standards for Project-related activities prior to Project construction. In this event, these performance standards would be implemented and adhered for development at either the Project Site or Alternative Site.

### Economic Impact – Urban Decay

This alternative would have similar impacts to the Project Site, as the Home Depot would still be developed but at an Alternative Site approximately one-mile east of the Project Site. Based on the performance measure of sales per square foot for Building Materials and Home Improvement stores serving the study RTA, it is concluded for the Proposed Project and this Alternative that the supply of competitive stores will not experience significant vacancies that will persist over the long-term. While it is possible that individual stores may experience greater or lesser sales per square foot impacts than averages shown for various distance bands from the proposed Home Depot store (due to their unique locations or business conditions), it is projected that the sales per square foot trends, in conjunction with increases and decreases in the competitive retail supply, would not likely result in substantial and persistent increases in commercial vacancies that would

result in urban decay. Therefore, any potential impacts are determined to be less than significant for both the Project Site and Alternative Site.

### Conclusions

The Location Alternative would meet most of the project goals and the overall environmental impacts would be similar to the Proposed Project for Aesthetics, Air Quality, Geology and Soils, Hazards, Hydrology, Noise and Greenhouse Gases due to sensitive receptors near the Alternative Site. Impacts to Cultural Resources are expected to be greater for this alternative, as the Alternative Site is known to contain cultural resources and appropriate mitigation would be required to reduce significant impacts to a less than significant level. In addition, impacts to traffic are expected to be greater for this alternative as levels of service are expected to be reduced at intersections that span between the nearest freeway off-ramps (I-210 Freeway at Highland Avenue approximately one-mile west of the Alternative Site and I-210 Freeway at Highland Avenue/State Route 330 approximately two-mile east of the Alternative Site) and the Alternative Site. In addition to resulting in greater impacts to Cultural Resources and Traffic, this alternative would meet the project's objectives of redeveloping a property in a commercial area of the city and providing local shopping and retail service opportunities as well as locating the project near regional freeways to enhance accessibility and commercial viability.

### **6.4.3 Reduced Scale Alternative**

The Reduced Scale Alternative involves eliminating the Shops adjacent to Major 1, and Pads 1, 3, and 4 from the Proposed Project, which would decrease the total commercial/retail square footage by 20,240 square feet or about ten percent. The remainder of the site would be graded and landscaped to ensure proper drainage.

### Aesthetics

The Reduced Scale Alternative would reduce the number of structures located on the northern portion of the site (adjacent to Highland Avenue). The decrease in parking lot size and elimination of buildings would result in a slight decrease in the amount of light emitted from the Project Site from both parking lot lighting and lighting generated from the buildings. However, due to the location of existing residential development (west and east of the site), this alternative would have a similar overall aesthetic effect which could be reduced with mitigation as proposed for the Proposed Project

### Air Quality

The Reduced Scale Alternative would involve a decrease in the total amount of commercial square footage by approximately ten percent on the Project Site. Fewer commercial uses on the site would result in a lower total trip volume (e.g. estimated trips are calculated by proposed land use and square footage) and thereby, a decrease in the total air emissions from vehicle trips generated to and from the commercial center. Under this alternative, air emissions would be slightly less than those identified for the Proposed Project but would still be considered less than significant after implementation of mitigation measures.

### Cultural Resources

Although this Alternative involves eliminating 10% of the development square footage, the expectation is that the same site area would be impacted because the remainder of the property would be landscaped and graded to ensure appropriate drainage of the site. Under this alternative, the impact to cultural resources would be similar to those addressed within the Proposed Project, as a majority of the site would be disturbed. This alternative would require the same mitigation as proposed for the Project, and impacts would be reduced to a less than significant level.

### Geology and Soils

Although this Alternative involves reduction of the total building square footage by ten percent, similar amount of soil disturbing and grading activities would occur at the Project Site to accommodate the reduced size development and provide for appropriate drainage and landscaping of non-developed areas. Similar impacts would occur to geology and soils as assessed with the Proposed Project and as related to earth moving activities, grading, soil erosion, and site stability; impacts would be less than significant.

### Hazards and Hazardous Materials

This Alternative would result in transportation or storage of slightly less but similar hazardous materials. Pad 1 which may include a gas station as part of the Proposed Project would be removed for this alternative, and a Business Plan Emergency Response Plan, as required in mitigation to reduce impacts for the Proposed Project, would not be required. Therefore impacts to Hazards and Hazardous Materials under this alternative would be less than the Proposed Project.

### Hydrology and Water Quality

Under this alternative, greater portions of the Project Site would be landscaped and would be available for stormwater infiltration. Landscaped areas would require additional water and therefore, this alternative would have a greater water demand than the Proposed Project. However, impacts associated with stormwater runoff and water quality would be slightly less than the Proposed Project related to a decrease in impermeable surfaces and rooftops; mitigation would be required to control runoff and to protect water quality.

### Noise

This alternative would reduce the proposed development square footage by approximately ten percent on the Project Site. This alternative would eliminate buildings along the northern portion of the site adjacent to Highland Avenue, and shops located near the eastern boundary of the site. A slight decrease in noise levels would result for residences located east of the Project Site across Arden Avenue with the elimination of the shops. Since the shops are designed to be 8,340 square feet or less than five percent of the total building square footage on-site, it is

expected that the elimination of the shops would slightly reduce noise levels generated from vehicles trips and deliveries received by the shops.

There are no sensitive receptors adjacent to the northern portion of the site, and therefore the reduction of the development square footage would not measurably reduce noise levels that would impact residents located along the western boundary of the Project Site, nearest The Home Depot. The noise impacts from deliveries to the Major Buildings along the southern portion of the Project Site would be similar to that of the Proposed Project. Noise impacts would be significantly reduced along the northern portion of the site, and slightly reduced for residents near the eastern boundary of the site. Similar mitigation measures to those proposed for the Proposed Project would be required to reduce noise levels along the western and southern boundaries. Noise impacts would be less than significant with this Alternative or the Proposed Project.

### Traffic and Circulation

The Reduced Scale Alternative would involve a decrease in the total amount of retail square footage and related vehicle trips by approximately ten percent as compared to the Proposed Project. This alternative would result in an estimated ten percent reduction of vehicle trips generated by the Project Site. This alternative would result in the development of 90 percent of the buildings as designed under the Proposed Project, with the majority of vehicle trips generated by The Home Depot and Major 1 building. This alternative would result in similar impacts to traffic as compared to the Proposed Project with only a slight reduction (approximately ten percent) in vehicle trips. Therefore similar impacts to traffic would result and similar mitigation would be required to improve streets and intersections for this alternative as compared to the Proposed Project.

### Greenhouse Gases

The Reduced Scale Alternative would involve a decrease in the total amount of commercial square footage by approximately ten percent on the Project Site. This would in turn result in a lower total trip volume generated by the development and an associated decrease in the total greenhouse gas emissions from vehicle trips generated. Emissions would also be reduced operationally by 10%. Under this alternative, greenhouse gas emissions would be slightly less than those identified for the Proposed Project and would still be considered less than significant.

### Economic Impact - Urban Decay

Under this Alternative, impacts would be the same as for the Proposed Project as The Home Depot would not be reduced in size or eliminated under this Alternative. Impacts would be less than significant as determined for the Proposed Project.

### Conclusions

Although the Reduced Scale Alternative would result in reduced impacts to Air Quality, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise and Traffic, this alternative

would not meet the project's objectives to the same extent as the Proposed Project of increasing local shopping availability, local employment opportunities, and providing a beneficial use to the full extent allowed under the proposed GPA and Zone change. This alternative does not eliminate any significant impacts that were identified for the Proposed Project.

## 6.5 SUMMARY OF ALTERNATIVES ANALYSIS

Table 6-1 summarizes the impacts to each resource area for the three alternatives that were carried forward for analysis.

**Table 6-1**  
**Impacts of the Alternatives on Analysis Topics**

<b>Environmental Issues/Effects</b>	<b>No Project/No Development Alternative</b>	<b>Location Alternative</b>	<b>Reduced Scale Alternative</b>
<b>Aesthetics</b>	No Impact	Less Than Significant with Mitigation	Less Than Significant with Mitigation
<b>Air Quality</b>	No Impact	Less Than Significant with Mitigation	Less Than Significant with Mitigation
<b>Cultural Resources</b>	No Impact	Less Than Significant with Mitigation	Less Than Significant with Mitigation
<b>Geology and Soils</b>	No Impact	Less Than Significant with Mitigation	Less Than Significant with Mitigation
<b>Hazards and Hazardous Material</b>	No Impact	Less Than Significant with Mitigation	Less Than Significant
<b>Hydrology and Water Quality</b>	No Impact	Less Than Significant with Mitigation	Less Than Significant with Mitigation
<b>Noise</b>	No Impact	Less Than Significant with Mitigation	Less Than Significant with Mitigation
<b>Traffic and Circulation</b>	No Impact	Less Than Significant with Mitigation	Less Than Significant with Mitigation
<b>Greenhouse Gas/Climate Change</b>	No Impact	Less Than Significant	Less Than Significant
<b>Economic Impacts - Urban Decay</b>	No Impact	Less Than Significant	Less Than Significant

Table 6-2 shows the impact levels of the alternatives as compared to those impacts for the Proposed Project. The three alternatives have impact levels similar to or greater than the Proposed Project and a few impacts levels are less than the Proposed Project.

**Table 6-2  
Impact Comparison of Proposed and Alternative Projects**

<b>Environmental Issues</b>	<b>Proposed Project</b>	<b>No-Project/ No-Development Alternative</b>	<b>Location Alternative</b>	<b>Reduced Scale Alternative</b>
<b>Aesthetics</b>	Less Than Significant with Mitigation	Less Impact	Similar Impact	Similar Impact
<b>Air Quality</b>	Less Than Significant with Mitigation	Less Impact	Similar Impact	Less Impact
<b>Cultural Resources</b>	Less Than Significant with Mitigation	Less Impact	Greater Impact	Similar Impact
<b>Geology and Soils</b>	Less Than Significant with Mitigation	Less Impact	Similar Impact	Similar Impact
<b>Hazards and Hazardous Materials</b>	Less Than Significant with Mitigation	Less Impact	Similar Impact	Less Than
<b>Hydrology and Water Quality</b>	Less Than Significant with Mitigation	Less Impact	Similar Impact	Greater Impact
<b>Noise</b>	Less Than Significant with Mitigation	Less Impact	Similar Impact	Similar Impact
<b>Traffic and Circulation</b>	Less Than Significant with Mitigation	Less Impact	Greater Impact	Similar Impact
<b>Greenhouse Gases</b>	Less Than Significant	Less Impact	Similar Impact	Less Impact
<b>Economic Impact – Urban Decay</b>	Less Than Significant	Less Impact	Similar Impact	Similar Impact
<b>Overall Impact</b>	Less Than Significant with Mitigation	<b>Less Impact</b>	<b>Greater Impact</b>	<b>Less Impact</b>

## Notes:

Less than Significant – If all impacts were identified as less than significant, after mitigation, as discussed in Chapter 4.0.

No Impact – No impact would occur.

Similar to Proposed Project – Level of significance is similar to the Proposed Project.

Greater than Proposed Project – Level of significance is greater as compared to the Proposed Project.

Less than Proposed Project – Level of significance is less as compared to the Proposed Project, but not necessarily to a less-than significant level or no impact level.

## 6.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Based on the evaluation of the three alternatives in this section, implementation of the No Project/No Development Alternative would result in fewer impacts than the Proposed Project but would not meet project objectives. The Location Alternative would have greater impacts for Cultural Resources and traffic. Impacts to Cultural Resources are expected to be more significant

as the Alternative Site is known to contain cultural resources. Impacts to traffic are expected to be greater for the Location Alternative as levels of service are expected to be reduced at intersections given the additional travel distance on surface streets from the freeway. In addition to resulting in greater impacts to Cultural Resources and Traffic, the Location Alternative would not entirely meet the project's objectives of redeveloping a property in a commercial area of the city and provide local shopping and retail service opportunities at the site or locate the project near regional freeways to enhance accessibility and commercial viability. The Reduced Project Alternative, would also have less impacts than the Proposed Project, although impacts would be less than significant for either the Reduced Scale Alternative or the Proposed Project. The Reduced Scale Alternative would not create as many jobs and therefore would not be as effective in meeting the objective of increasing local employment opportunities.

Based on the summary provided above, the No Project/ No Development Alternative would be considered the Environmentally Superior Alternative. However, under CEQA, another alternative must be selected as Environmentally Superior if in fact the "No Project" alternative is identified. For the proposed Highland Marketplace project, the Environmentally Superior Alternative would be the Reduced Scale Alternative.