



7.0 Alternatives to the Proposed Project



7.0 ALTERNATIVES TO THE PROPOSED PROJECT

CEQA requires that an EIR include an analysis of a range of project alternatives that could feasibly attain most of the basic project objectives, while avoiding or substantially lessening any of the significant effects identified for the proposed project. The Lead Agency must disclose its reasoning for selecting each alternative. The Lead Agency must also identify any alternatives that were considered, but rejected as infeasible during the scoping process, and disclose the reasons for the exclusion. The range of alternatives is governed by a “rule of reason”, which requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. Specifically, Section 15126.6(a) of the *CEQA Guidelines* requires that:

“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. The lead agency is responsible for selection of a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.”

Section 15126.6(f)(1) of the *CEQA Guidelines* provides the following information regarding the “feasibility” of a project alternative:

“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.”

Within every EIR, the *CEQA Guidelines* require that a “No Project” Alternative is analyzed. The “No Project” Alternative allows decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. In addition, the identification of an “Environmentally Superior” Alternative is required. The “No Project” Alternative may be the “Environmentally Superior” Alternative to the proposed project based on the minimization or avoidance of physical environmental impacts. However, the “No Project” Alternative must also achieve most of the basic objectives of the projects in order to be considered the “Environmentally Superior” Alternative. Thus, the *CEQA Guidelines* require that if the “Environmentally Superior” Alternative is the “No Project” Alternative, the EIR shall identify a superior alternative from the remaining alternatives analyzed.

In order to provide background regarding the selection or rejection of a project alternative, the discussion below provides a summary of project objectives, in addition to a description of the significant and unavoidable impacts found to occur upon project implementation. An explanation behind each selected project alternative is provided, in addition to a discussion of alternatives that were considered during the scoping process but not selected for further analysis.



Throughout the following analysis, impacts of the alternatives are analyzed for each of the issue areas examined in Section 5.0, *Environmental Analysis* of this EIR. In this manner, each alternative can be compared to the proposed project on an issue-by-issue basis. Table 7-6, *Comparison of Alternatives*, which is provided at the end of this Section, provides an overview of the alternatives analyzed and a comparison of each alternative's impact in relation to the proposed project. This section concludes with a review of alternatives considered but rejected from further analysis.

7.1 SUMMARY OF PROJECT OBJECTIVES

As stated above, an EIR must only discuss in detail an alternative that is capable of feasibly attaining most of the basic objectives associated with the action, while at the same time avoiding or substantially lessening any of the significant effects associated with the proposed project. Thus, a summary of the objectives, as provided within Section 3.0, *Project Description*, is provided below:

The proposed project goals and objectives are as follows:

1. To develop an industrial business center on the site in conformance with the applicable goals, objectives and policies of the City's General Plan.
2. To develop a business center that will accommodate light manufacturing/warehouse/distribution tenants with access to freeways and regional transportation corridors, thereby minimizing truck traffic on local streets and reducing vehicle miles traveled in the region.
3. Create opportunities for business-to-business interaction between various on-site tenants, promoting economic development within the City's West End Light Industrial district.
4. To develop a business center on the site in a manner that is economically viable and provides long term fiscal benefits to the property owner and City.
5. To attract new businesses and jobs to the City, thereby improving the jobs/housing balance both in the City and the region.
6. Attract high-quality businesses by provided a development with a range of facility options, such as varying structure sizes and building configurations.
7. To develop a high-quality business center on the site with an architectural design, landscaping, signage, and operational characteristics that are compatible with existing and planned development in the immediate vicinity.
8. To construct a business center that incorporates energy efficiency and low water use principles in order to promote the City's environmental goals.
9. Improve the existing railroad crossing and other public infrastructure improvements in the vicinity of the proposed business center.
10. Replace the existing obsolete buildings on the site with land uses that will support the City's economic development goals.



11. Implement a comprehensive and cohesive plan for the physical and economic development of the project site.

7.2 SUMMARY OF SIGNIFICANT IMPACTS

Pursuant to Section 15126.6(a) of the *CEQA Guidelines*, an EIR shall describe a range of reasonable alternatives to 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. Only those impacts found significant and unavoidable are relevant in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project. As such, a description of significant impacts associated with the proposed project is provided below. This information is based on the analysis provided within Section 5 of this EIR.

- Air Quality
 - Long-Term (Operational) Air Emissions;
 - Cumulative Operational Emissions; and
 - Consistency with Regional Plans.
- Traffic and Circulation
 - Local and State Highway Roadway Intersections.

7.3 ALTERNATIVES CONSIDERED BUT NOT CARRIED FORWARD FOR ADDITIONAL ANALYSIS

Three alternatives were carried forward for analysis within this section: 1) No Project/No Development Alternative; 2) Reduced Density Alternative; and 3) Alternative Use Alternative; refer to Sections 7.4, 7.5, and 7.6 below. However, in determining an appropriate range of alternatives to be evaluated in the EIR, two possible alternatives were considered but not carried forward for additional analysis, since they would not accomplish most of the basic objectives of the project or was considered infeasible. These alternatives are described below.

“ALTERNATIVE SITE” ALTERNATIVE

The Alternative Site Alternative would involve relocating the proposed project to another site within the DWL (District West End Light Industrial) within the City of Azusa. The Alternative Site Alternative would generally retain the same characteristics (square footage, site plan, amenities, etc.) of the project. Since DWL areas generally exist within the western portion of the City, it is expected that travel patterns related to traffic generated by this alternative would remain similar to the proposed project. The Alternative Site Alternative would require adequate land, access, infrastructure, and must be compatible with existing General Plan and Development Code designations for the site. Although other suitable sites may be available that could accommodate the project, it is not anticipated that the Alternative Site Alternative would substantially lessen any of the significant impacts associated with the proposed project. Long-term operational and cumulative air quality impacts would remain similar due to the same operational trip generation. In addition, since long-term operational uses would be the same as the proposed project, a similar number of project-



generated trips would occur and it is expected that a similar range of roadway intersections would be significantly impacted. Thus, the Alternative Site Alternative was rejected from further analysis since: 1) no other sites in the DWL are under the Applicant's ownership; 2) the Applicant has invested substantial resources in the remediation of on-site hazardous materials; and 3) relocation to another site would likely result in similar impacts, including significant impacts related to air quality and traffic. Consequently, the Alternative Site Alternative was rejected from further consideration within the EIR.

“EXISTING GENERAL PLAN” ALTERNATIVE

In the context of this EIR, the Existing General Plan Alternative assumes that the proposed project would not be implemented, and that a similar use would be proposed in compliance with the City's General Plan land use designation for the project site. Based on the City's General Plan designation for the site (Light Industrial), the City's goals for development within the Light Industrial designation and DWL Development Code district, and available infrastructure and services in the site vicinity, it is reasonable to assume that a similar industrial/manufacturing/warehousing development may occur.

The Light Industrial General Plan designation allows a maximum floor area ratio (FAR) of 2.0. The FAR associated with the proposed project is approximately 0.36. As such, a similar alternative proposed on the site could potentially have a substantially higher development intensity on the 21.63-acre site. With a greater development intensity, it is expected that this alternative would have a higher trip generation than the proposed project. Thus, it is anticipated that the significant and unavoidable impacts related to air quality and traffic under the proposed project would remain. Thus, the Existing General Plan Alternative has been rejected from further analysis since it would not have the potential to reduce or eliminate the significant impacts identified under the proposed project.

7.4 “NO PROJECT/NO DEVELOPMENT” ALTERNATIVE

Pursuant to *CEQA Guidelines* Section 15126.6(e)(2), the No Project Alternative must be analyzed within the EIR. The No Project Alternative should discuss what would be reasonably expected to occur in the foreseeable future if the proposed project were not approved. In certain instances, the No Project Alternative means “no build” wherein the existing environmental setting is maintained. Thus, the “No Project/No Development” Alternative assumes that no development would take place on-site and that the site would remain in its existing vacant, disturbed condition.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Aesthetics/Light & Glare

The existing visual character of the project site consists of vacant, disturbed land, a vacant one-story office building, foundation remnants, concrete remnants associated with a former shipping and receiving bay, paved areas, and nominal vegetation (refer to [Exhibit 5.1-1, Existing On-Site Conditions](#)). The short-term visual impacts associated with demolition, grading, and construction activities that would occur with the proposed project would not occur with the No Project/No Development



Alternative. Therefore, the project's construction-related impacts to the visual character/ quality of the project site and its surroundings would be avoided.

The project site's long-term visual character would be altered with the proposed project, because the existing vacant project site would be replaced with a new 342,629 square-foot industrial/warehousing development. The long-term visual character of the project site would not be altered with the No Project/No Development Alternative, because no construction activities would occur, and the project site would remain in its current vacant, non-operational condition. However, the project site is currently vacant, and the aging facilities remaining on-site are in a dilapidated condition. The existing office building on the North Todd Avenue frontage is frequently subject to vandalism and graffiti, and on-site landscaping is generally unmaintained. Since the No Project/No Development Alternative would leave the site in its dilapidated condition, long-term aesthetic/visual impacts would be increased in comparison to the proposed project.

The No Project/No Development Alternative would result in decreased short-term impacts when compared to the proposed project. However, since the site would remain in its vacant, dilapidated condition over the long-term, it is considered environmentally inferior to the proposed project.

Traffic and Circulation

The No Project/No Development Alternative would not result in any vehicle trips generated to or from the project site, since the site would be left in its existing non-operational condition. The significant and unavoidable impacts to local/State Highway intersections that would occur under the proposed project would not occur under this Alternative. Thus, the No Project/No Development Alternative is considered environmentally superior in comparison to the proposed project.

Air Quality

Since no construction or development would occur under the No Project/No Development Alternative, no air quality emissions would be generated. The site would remain in its vacant, non-operational condition and would not generate vehicle trips or uses that would emit air pollutants. Thus, the significant and unavoidable air quality impacts identified under the proposed project would no longer occur under this Alternative. Thus, the No Project/No Development Alternative is considered environmentally superior in this regard.

Greenhouse Gas Emissions

Since no construction or development would occur under the No Project/No Development Alternative, and the site would remain in its existing non-operational condition, no greenhouse gas emissions would be generated. The less than significant construction-related and long-term operational greenhouse gas impacts identified under the proposed project would no longer occur. Thus, the No Project/No Development Alternative is considered environmentally superior in this regard.



Noise

No noise or vibration would be generated by the No Project/No Development Alternative since no construction or development would occur, and the site would remain in its existing non-operational condition. As such, the less than significant impacts related to noise under the proposed project would not occur under this Alternative. Thus, this Alternative is considered environmentally superior in comparison to the proposed project.

Public Services and Utilities

Implementation of the proposed project would place increased demands upon public services (i.e., fire and police protection, schools, and parks and recreation) and utilities and service systems (i.e., wastewater, water, and solid waste). Since no development would occur, and the site would remain vacant and non-operational under the No Project/No Development Alternative, increased demand for public services and utilities would not occur, and the less than significant impacts related to public services and utilities under the proposed project would not occur. Thus, the No Project/No Development Alternative would be environmentally superior in comparison to the proposed project.

Cultural Resources

There are no cultural resources that have been identified on the project site. However, mitigation measures have been incorporated into the proposed project in the event buried resources are encountered during ground-disturbing activities. No earth-disturbing activities would occur under the No Project/No Development Alternative, and the site would remain in its existing vacant and non-operational condition. As such, the less than significant impacts related to cultural resources under the proposed project would not occur under this Alternative. Thus, this Alternative is considered environmentally superior in comparison to the proposed project.

Hydrology and Water Quality

The No Project/No Development Alternative would leave the site unaltered in its vacant, disturbed state. No short-term construction impacts related to water quality would occur, since no disturbance of on-site soils would be proposed, and the site would remain vacant and non-operational. As such, the less than significant short-term impacts related to hydrology and water quality for the proposed project would not occur under this Alternative.

The proposed project would implement storm water drainage infrastructure and associated water quality features to minimize impacts during long-term operations. Under the No Project/No Development Alternative, these improvements would not occur. The existing drainage system on-site is considered non-operable due to not being maintained for many years; it is currently clogged with soil and debris. Thus, hydrology and water quality impacts associated with the No Project/No Development Alternative are expected to be greater in comparison to the proposed project.

The No Project/No Development Alternative would result in decreased short-term impacts when compared to the proposed project. However, since the existing non-operational drainage system on-site would remain over the long-term, it is considered environmentally inferior to the proposed project.



Geology and Soils

Implementation of the No Project/No Development Alternative would not expose people or structures to potential adverse effects associated with seismic, geologic, or soil hazards, since no new land uses would be developed and the project site would remain vacant and non-operational. The less than significant geology and soils impacts identified under the proposed project would no longer occur. Thus, the No Project/No Development is considered environmentally superior in comparison to the proposed project.

CONCLUSION

The No Project/No Development Alternative would not meet any of the project objectives, as listed above in [Section 7.1](#). Generally, impacts associated with this Alternative would be reduced in comparison to the proposed project, with the exception of aesthetics/light and glare and hydrology and water quality. None of the significant impacts identified for the proposed project (air quality and traffic and circulation) would occur under this Alternative.

7.5 “REDUCED DENSITY” ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The Reduced Density Alternative would involve a reduction in development in comparison to the proposed project. The types of proposed uses would be similar to the proposed project (industrial/warehousing). The limits of the 21.63-acre project site would remain the same. Although the configuration and/or development intensity may vary widely for such an alternative, for the purposes of this analysis the Reduced Density Alternative would consist of a 50 percent reduction in floor area (for a reduction to 171,315 square feet). As opposed to three separate structures, the Reduced Density Alternative would be configured as a single building. The remaining areas of the site would be utilized for additional surface parking and landscaping.

REASONING FOR SELECTING THE ALTERNATIVE

The Reduced Density Alternative has been selected for analysis due to its substantially reduced amount of industrial/warehousing development. This reduction in development could lessen the significant impacts identified for the proposed project related to air quality (long-term operational emissions, consistency with the applicable air quality plan, and long-term cumulative), and traffic/circulation (local/State Highway intersection impacts and cumulative impacts). The reduced project size would generate substantially less employee vehicle trips and truck trips, which could result in a decrease in impacts to surrounding roadway facilities. Impacts related to the Reduced Density Alternative are compared to the proposed project below.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Aesthetics/Light & Glare

The short-term visual impacts associated with demolition, grading, and construction activities that would occur with the proposed project would similarly occur with the Reduced Density Alternative.



Comparatively, the construction-related impacts to the visual character/quality of the project site and its surroundings would be slightly less than the proposed project, since this Alternative would likely involve a shorter construction period and less overall construction.

The long-term visual character of the project site and its surroundings would be altered with the Reduced Density Alternative, to a lesser degree than the proposed project, because the project site would be developed with a single building consisting of 171,315 feet instead of the three-building scenario under the proposed project. Although the project was determined to result in a less than significant impact to scenic vistas, visual character/quality, and light and glare, this Alternative would generally result in a reduced visual mass and associated reduction in light and glare.

Thus, the less than significant construction-related and long-term operational aesthetics/light and glare impacts identified under the proposed project would be reduced under this Alternative. Thus, this Alternative is considered environmentally superior in comparison to the proposed project.

Traffic and Circulation

Under the Reduced Density Alternative, a 171,315 square-foot industrial/warehousing building would be developed in place of the project's proposed 342,629 industrial/warehousing development (three buildings). Given the reduction in development intensity, it is expected that short-term construction related traffic impacts would be slightly reduced in comparison to the proposed project (i.e., a reduced amount of construction hauling, materials, and equipment).

Operational impacts would also be reduced as a result of the lower development intensity. Table 7-1, Comparison of Proposed Project and Reduced Density Alternative ADT, presents the forecast daily traffic volumes for the Reduced Density Alternative for a typical weekday, and indicates this Alternative is forecast to generate approximately 654 ADT. Therefore, this Alternative would have 655 fewer daily trips than the proposed project.

**Table 7-1
Comparison of Proposed Project and
Reduced Density Alternative ADT**

Land Use	Trip Generation Rate ¹	Project		Reduced Density Alternative		Difference	
		Thousand Square Feet	Average Daily Trips	Thousand Square Feet	Average Daily Trips ²	Average Daily Trips	Average Daily Trips %
Manufacturing	3.82	342.6	1,309	171.3	654	-655	-50%

1. Trip Generation rate was derived from Stantec Consultants.
2. Fleet mix for the Reduce Density Alternative is the same as the proposed project.

Based on the trip generation shown in Table 7-1, Table 7-2, Reduced Density Alternative LOS Summary, summarizes forecast existing plus project and forecast short-range plus project conditions AM and PM peak hour LOS of the study intersections.



**Table 7-2
Reduced Density Alternative LOS Summary**

Study Intersections	No Project				With Reduced Density Alternative				Significant Impact?	
	A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour			
	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS		
ICU Methodology										
<i>Forecast Existing Plus Reduced Density Alternative</i>										
1	I-605/Mount Olive Avenue and Huntington Drive	0.83	D	0.97	E	0.83	D	0.98	E	No
2	Irwindale Avenue and Foothill Boulevard	0.82	D	0.88	D	0.83	D	0.90	D	No
<i>Forecast Short-Range Plus Reduced Density Alternative</i>										
2	Irwindale Avenue and Foothill Boulevard	0.85	D	0.94	E	0.87	D	0.96	E	PM only
4	Irwindale Avenue & I-210 eastbound on and off-ramps	0.89	D	0.82	D	0.91	E	0.83	D	AM only
HCM Delay Methodology										
<i>Forecast Existing Plus Reduced Density Alternative</i>										
1	I-605/Mount Olive Avenue and Huntington Drive	57 sec	E	70 sec	E	57 sec	E	72 sec	E	PM only
4	Irwindale Avenue and I-210 westbound on- and off-ramps	42 sec	D	24 sec	C	44 sec	D	24 sec	C	No
6	Todd Avenue and Tenth Street ¹	21 sec	C	33 sec	D	52 sec	F	53 sec	F	AM, PM
<i>Forecast Short-Range Plus Reduced Density Alternative</i>										
1	I-605/Mount Olive Avenue and Huntington Drive	84 sec	F	131 sec	F	84 sec	F	133 sec	F	PM only
4	Irwindale Avenue and I-210 westbound on- and off-ramps	50 sec	D	32 sec	C	53 sec	D	33 sec	C	AM only
6	Todd Avenue and Tenth Street ¹	21 sec	C	34 sec	D	56 sec	F	56 sec	F	AM, PM
12	I-210 westbound on and off-ramps/Alameda Avenue and First Street	41 sec	D	37 sec	D	44 sec	D	38 sec	D	AM only
Note: V/C = volume to capacity ratio; delay shown in seconds per vehicle; deficient intersection operation shown in bold . 1. Stop-controlled intersection. ICU methodology only applies to signalized intersections; therefore, HCM delay methodology was used for these intersections. Source: Stantec Consultants, <i>Traffic Report</i> , April 2014.										

Based on the information provided in Table 7-2, the Reduced Density Alternative would result in decreased impacts to the identified study area intersections when compared to the proposed project. Under forecast existing plus project conditions, the significant and unavoidable impacts identified for the Irwindale Avenue/Foothill Boulevard intersection and Irwindale Avenue/I-210 eastbound on- and off-ramps would no longer occur. However, the significant and unavoidable impact for I-605/Mount Olive Avenue and Huntington Drive would remain.

Under forecast short-range plus project conditions, all significant and unavoidable impacts identified under the proposed project (Irwindale Avenue/Foothill Boulevard intersection Irwindale Avenue/I-210 eastbound on- and off-ramps intersection, and I-605/Mount Olive Avenue and Huntington Drive intersection) would remain.

Impacts related to CMP facilities were determined to be less than significant under the proposed project. Given the reduction in trip generation by 50 percent, CMP impacts would also be reduced under the Reduced Density Alternative.

Impacts related to hazardous traffic conditions would not change as part of this Alternative. The site would remain subject to City and LACFD review for adequate access and safety, and the project driveway at the intersection of North Todd Avenue and Tenth Street would still be improved to



ensure that no conflicts with UPRR rail operations occur. As such, impacts would be similar to the proposed project in this regard.

Thus, the project would result in an overall reduction in construction-related traffic, operational traffic, and traffic impacts to CMP facilities. The Reduced Density Alternative would eliminate some, but not all, of the significant and unavoidable impacts to local and State Highway intersections within the study area. As such, this Alternative is considered environmentally superior to the proposed project.

Air Quality

Table 5.3-3, *Project Construction Emissions*, presents the project's anticipated daily short-term construction emissions and indicates that less than significant impacts would occur in this regard. Short-term air quality impacts from demolition, grading, and construction activities would also occur with the Reduced Density Alternative. Comparatively, the construction-related air quality impacts would be less than the proposed project, given the reduction in development and commensurately lower intensity of construction/building activities. Therefore, the short-term air quality impacts under this Alternative would be slightly reduced under this Alternative.

The proposed project would, however, exceed the SCAQMD's regional operational NO_x emission thresholds, as indicated in Table 5.3-4, *Long-Term Air Emissions*. The project would be within the SCAQMD's regional operational emission thresholds for all other air pollutants. In addition, the project would not violate any LST thresholds, and would not result in CO hotspots at any of the study intersections. Long-term air quality impacts from mobile and area source pollutant emissions would occur with the Reduced Density Alternative, although to a lesser degree (50 percent less than the proposed project). It should be noted that due to a 50 percent decrease in the project building area (171,315 square feet), and 50 percent decrease in project-generated trips (655 trips), a proportional decrease in air quality emissions would be expected for the Reduced Density Alternative. Under this Alternative, both construction and operational emissions would be well below SCAQMD thresholds.

The Reduced Density Alternative would be environmentally superior to the proposed project regarding air quality impacts since it would result in a reduction in short-term and long-term operational air pollutant emissions. Thus, the Reduced Density Alternative is considered environmentally superior in comparison to the proposed project.

Greenhouse Gas Emissions

As indicated in Table 5.4-1, *Business As Usual Greenhouse Gas Emissions*, project implementation would result in 4,951.884 MTCO₂eq/yr, which is below the 10,000 MTCO₂eq/yr threshold. Thus, less than significant short-term and operational GHG emission impacts would occur with the proposed project. GHG emissions from construction and operational activities would also occur with the Reduced Density Alternative, although to a lesser degree (due to a reduction in intensity of construction activities and an approximately 50 percent decrease in ADT). As with the proposed project, the combined construction and operational GHG emissions would also result in less than significant impacts from a cumulative perspective under this Alternative, although to a lesser degree than the proposed project (proportional 50 percent reduction in GHG emissions).



Thus, the less than significant GHG impacts identified under the proposed project would be reduced under this Alternative. Thus, this Alternative is considered environmentally superior in comparison to the proposed project.

Noise

Construction noise associated with the proposed project would result in less than significant impacts, with mitigation incorporated, regarding exposure to surrounding sensitive receptors to noise levels in excess of the established standards. Construction activities would cause less than significant increased mobile noise along access routes to and from the site due to movement of equipment and workers. The project's construction-related vibration impacts are also anticipated to be less than significant.

Short-term noise impacts from demolition, grading, and construction activities would occur with the Reduced Density Alternative due to construction of the proposed building and improvements. Comparatively, this Alternative's construction-related noise impacts would be slightly less than the proposed project, given this Alternative would result reduced intensity of construction and building activities. Therefore, short-term noise impacts associated with this Alternative would be reduced in comparison to the proposed project.

During long-term operations, the proposed project would increase noise levels on the surrounding roadways by a maximum of 0.4 dBA along Tenth Street, from Todd Avenue to Vernon Avenue, thus, resulting in less than significant noise levels. Long-term noise impacts from vehicular travel on the surrounding roadway network would also occur with the Reduced Density Alternative, although to a lesser degree than the proposed project. Comparatively, this Alternative's mobile source noise impacts would be less than the proposed project, given this Alternative would decrease ADT by approximately 50 percent. Therefore, the mobile source noise impacts that would occur with this Alternative would be reduced in comparison to the proposed project.

Project implementation would result in less than significant impacts from stationary noise sources associated with the proposed project, which would be typical of the surrounding industrial, open space, and residential uses. With the Reduced Density Alternative, a new a 171,315 square-foot industrial/warehousing building would operate on the project site, generating noise from new stationary sources, including parking lots and loading/unloading areas, among others. Comparatively, the stationary source noise impacts under the Reduced Density Alternative would be slightly less than the proposed project, given this Alternative would have a smaller operational footprint as the proposed project.

Thus, the less than significant noise impacts identified under the proposed project would be reduced under this Alternative. Thus, this Alternative is considered environmentally superior in comparison to the proposed project.

Public Services and Utilities

The Reduced Density Alternative would result in similar range impacts associated with increased demands upon public services and utilities, because a new a 171,315 square-foot industrial/warehousing building would be developed. However, impacts related to these services and utilities would be commensurately reduced due to the Alternative's reduction in building area by



50 percent. Thus, the less than significant public services/utilities impacts identified under the proposed project would be reduced under this Alternative. Thus, this Alternative is considered environmentally superior in comparison to the proposed project.

Cultural Resources

There are no cultural resources that have been identified on the project site. However, mitigation measures have been incorporated into the proposed project in the event buried resources are encountered during ground-disturbing activities.

Under the Reduced Density Alternative, slightly less grading and excavation would occur due to the reduction in building size. As such, the potential to impact buried cultural resources would be slightly reduced in comparison to the proposed project. Thus, the less than significant cultural resources impacts identified under the proposed project would be reduced under this Alternative. Thus, this Alternative is considered environmentally superior in comparison to the proposed project.

Hydrology and Water Quality

Similar to the proposed project, the Reduced Density Alternative would result in grading and excavation within the 21.63-acre site that would expose soils to wind and water erosion. This Alternative would require similar National Pollutant Discharge Elimination System (NPDES) compliance measures to reduce water quality impacts to a less than significant level. Since the overall grading impact area for exposed soils would be the same as the proposed project, short-term impacts under this Alternative would also be similar.

The proposed project would implement storm water drainage infrastructure and associated water quality features to minimize impacts during long-term operations. It is expected that a similar range of improvements would be required under the Reduced Density Alternative. It is also expected that a similar amount of impervious areas would occur, and that similar water quality features would be required. Thus, the less than significant hydrology/water quality impacts identified under the proposed project would also occur under this Alternative. This Alternative is considered neither superior nor inferior to the proposed project.

Geology and Soils

None of the geologic conditions and hazards affecting the project would be altered as a result of the Reduced Density Alternative. Implementation of the Reduced Density Alternative would continue to expose additional people and structures to potential adverse effects associated with seismic, geologic, and soil hazards, since new land uses would be developed on the project site, similar to the proposed project. Similar measures incorporated into the proposed project (compliance with California Building Code requirements, setback from identified earthquake fault zones) would remain applicable under this Alternative. Thus, the less than significant geology and soils impacts identified under the proposed project would also occur under this Alternative. This Alternative is considered neither superior nor inferior to the proposed project.



CONCLUSION

The Reduced Density Alternative would accomplish the project objectives with the exception of Objectives 3, 4, 6, 10, and 11, for the following reasons:

- Since the Reduced Density Alternative would consist of a single, large structure, it would not create opportunities for business-to-business interaction between various on-site tenants;
- The implementation of a reduced square footage would not maximize site utilization and associated fiscal benefits to the property owner and City;
- The inclusion of a single, large structure would not provide a diverse range of facility options relative to varying structure/unit sizes and building configurations;
- The reduced square footage would result in reduced economic benefits to the City, and would not fully support the City's economic development goals; and
- The reduction in density would result in an underutilization of the site, and would not implement a comprehensive and cohesive plan for physical and economic development of the site.

In comparison to the proposed project, the Reduced Density Alternative would result in reduced impacts related to aesthetics/light and glare, traffic and circulation, air quality, GHG, noise, public services and utilities, and cultural resources. Impacts in regards to hydrology and water quality and geology and soils would be similar to the proposed project. Under this Alternative, the significant and unavoidable impacts related to air quality would no longer occur. The Reduced Density Alternative would eliminate some, not all, of the significant and unavoidable impacts to local and State Highway intersections within the study area.

7.6 “ALTERNATIVE USE” ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The Alternative Use Alternative would consist of the development of the site in a similar nature to the proposed project, but with long-term operations resulting in a lower vehicle trip generation. For the purposes of this analysis, it is assumed that the Alternative Use Alternative would operate as a “high-cube” warehousing facility. High-cube warehouses are a relatively new type of warehouse used for the storage of manufactured goods and their distribution to retail outlets. These facilities consist of large shells of steel buildings and large halls, often subdivided for individual tenants, with a typical ceiling height of 24 to 26 feet. They are also characterized by a small employment count due to a high level of mechanization. Truck activities frequently occur outside of the peak hour of the adjacent street system. Site layout for the Alternative Use Alternative would be similar to the proposed project. However, under this Alternative, all buildings would be equipped with dock-high doors to accommodate high-cube storage and distribution activities.



REASONING FOR SELECTING THE ALTERNATIVE

The Alternative Use Alternative has been selected for analysis since high-cube warehousing activities typically have a low employee generation rate, and truck trips associated with its operation frequently occur outside of the peak hour. Based on this lowered employee count and peak hour traffic generation, this Alternative could lessen the significant impacts identified the proposed project related to air quality and traffic and circulation. The high-cube warehousing concept would also be consistent with the City’s General Plan and zoning designations for the project site. Impacts related to the Alternative Use Alternative are compared to the proposed project below.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Aesthetics

Under the Alternative Use Alternative, the short-term construction process and long-term site design would remain the same as the proposed project. The same grading, construction methodologies, and construction equipment would be employed, and the construction duration would also remain the same. The site plan under this Alternative would not be different from the proposed project. Building layouts, heights, and architectural treatments would remain the same. As such, the Alternative Use Alternative would be neither environmentally superior nor inferior to the proposed project regarding aesthetics/light and glare.

Traffic and Circulation

Under the Alternative Use Alternative, the site plan and construction methodology would remain the same as the proposed project. The same grading, construction methodologies, and construction equipment would be employed, and the construction duration would also remain the same. Thus, it is expected that short-term construction related traffic impacts would be similar to the proposed project.

Operational impact would also be reduced as a result of the lower trip generation associated with high-cube uses. *Table 7-3, Comparison of Proposed Project and Alternative Use Alternative ADT*, presents the forecast daily traffic volumes for the Alternative Use Alternative for a typical weekday, and indicates this Alternative is forecast to generate approximately 654 ADT. Therefore, this Alternative would have 655 fewer daily trips than the proposed project.

Table 7-3
Comparison of Proposed Project and Alternative Use Alternative ADT

Project				Alternative Use Alternative (High Cube Warehouse)				Difference	
Land Use	Trip Generation Rate ¹	Thousand Square Feet	Average Daily Trips	Land Use	Trip Generation Rate ¹	Thousand Square Feet	Average Daily Trips ²	Average Daily Trips	Average Daily Trips %
Manufacturing	3.82	342.6	1,309	High Cube Warehouse	1.68	342.6	576	-733	-56%

1. Trip Generation rates were derived from Stantec Consultants.
2. The fleet mix for the Alternative Use Alternative goes as follows: passenger vehicles: 71.4 percent; medium trucks: 21.6 percent; and heavy trucks: 7 percent.



Based on the trip generation shown in Table 7-3, Table 7-4, *Alternative Use Alternative LOS Summary*, summarizes forecast existing plus project and forecast short-range plus project conditions AM and PM peak hour LOS of the study intersections.

Table 7-4
Alternative Use Alternative LOS Summary

Study Intersections		No Project				With Alternative Use Alternative				Significant Impact?
		A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour		
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	
ICU Methodology										
<i>Forecast Existing Plus Alternative Use Alternative</i>										
1	I-605/Mount Olive Avenue and Huntington Drive	0.83	D	0.97	E	0.83	D	0.97	E	No
2	Irwindale Avenue and Foothill Boulevard	0.82	D	0.88	D	0.82	D	0.89	D	No
<i>Forecast Short-Range Plus Alternative Use Alternative</i>										
2	Irwindale Avenue and Foothill Boulevard	0.85	D	0.94	E	0.86	D	0.95	E	No
4	Irwindale Avenue & I-210 eastbound on and off-ramps	0.89	D	0.82	D	0.89	E	0.83	D	No
HCM Delay Methodology										
<i>Forecast Existing Plus Alternative Use Alternative</i>										
1	I-605/Mount Olive Avenue and Huntington Drive	57 sec	E	70 sec	E	57 sec	E	71 sec	E	No
4	Irwindale Avenue and I-210 westbound on- and off-ramps	42 sec	D	24 sec	C	42 sec	D	24 sec	C	No
6	Todd Avenue and Tenth Street ¹	21 sec	C	33 sec	D	26 sec	D	38 sec	E	PM only
<i>Forecast Short-Range Plus Alternative Use Alternative</i>										
1	I-605/Mount Olive Avenue and Huntington Drive	84 sec	F	131 sec	F	84 sec	F	132 sec	F	No
4	Irwindale Avenue and I-210 westbound on- and off-ramps	50 sec	D	32 sec	C	51 sec	D	32 sec	C	No
6	Todd Avenue and Tenth Street ¹	21 sec	C	34 sec	D	27 sec	D	39 sec	E	PM only
12	I-210 westbound on and off-ramps/Alameda Avenue and First Street	41 sec	D	37 sec	D	42 sec	D	37 sec	D	No
Note: V/C = volume to capacity ratio; delay shown in seconds per vehicle; deficient intersection operation shown in bold . 1. Stop-controlled intersection. ICU methodology only applies to signalized intersections; therefore, HCM delay methodology was used for these intersections. Source: Stantec Consultants, <i>Traffic Report</i> , April 2014.										

Based on the information provided in Table 7-4, the Alternative Use Alternative would result in decreased impacts to the identified study area intersections when compared to the proposed project. Under forecast existing plus project conditions, all significant and unavoidable impacts to study area intersections would no longer occur. Note that the impact identified within Table 7-4 for the Todd Avenue/Tenth Street intersection is prior to mitigation; refer to Mitigation Measure TRA-4. The analysis within Section 5.2 of this EIR determined that impacts at Todd Avenue/Tenth Street were mitigated to a level below significance.

Impacts related to CMP facilities were determined to be less than significant under the proposed project. Given the reduction in trip generation by 56 percent, CMP impacts would also be reduced under the Alternative Use Alternative.

Impacts related to hazardous traffic conditions would not change as part of this Alternative. The site would remain subject to City and LACFD review for adequate access and safety, and the project driveway at the intersection of North Todd Avenue and Tenth Street would still be improved to



ensure that no conflicts with UPRR rail operations occur. As such, impacts would be similar to the proposed project in this regard.

Thus, the project would result in an overall reduction in construction-related traffic, operational traffic, and traffic impacts to CMP facilities. The Alternative Use Alternative would eliminate all of the significant and unavoidable impacts to local and State Highway intersections within the study area. As such, this Alternative is considered environmentally superior to the proposed project.

Air Quality

As noted above, the short-term construction process under the Alternative Use Alternative would remain the same as the proposed project. The same grading, construction methodologies, and construction equipment would be employed, and the construction duration would also remain the same. Thus, short-term air quality impacts for this Alternative would be the same as the proposed project.

Although the site design and layout would be identical to the proposed project, the Alternative Use Alternative would result in reduced long-term operational air quality impacts since fewer trips would be generated by this high-cube use. This Alternative would result in fewer vehicle trips as compared to the proposed project, as this Alternative would result in 576 ADT, representing a decrease of 733 ADT or approximately 56 percent less than the proposed project. As shown in Table 7-5, *Alternative Use Alternative Long-Term Air Emissions*, proportionately less long-term air quality impacts from mobile pollutant emissions would occur, as compared to the proposed project. The significant and unavoidable air quality impact identified under the proposed project would no longer occur. Thus, this Alternative is considered environmentally superior to the proposed project.

**Table 7-5
Alternative Use Alternative Long-Term Air Emissions**

Source	Estimated Emissions (pounds/day) ¹					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Total Operational Emissions	19.01	40.40	50.0	0.16	10.40	3.50
<i>SCAQMD Threshold</i>	55	55	550	150	150	55
Is Threshold Exceeded? (Significant Impact)	No	No	No	No	No	No
Notes:						
1. Based on CalEEMod modeling results, worst-case seasonal emissions for area, energy, and mobile emissions have been modeled.						
Source: Refer to <u>Appendix 13.4, <i>Air Quality/Greenhouse Gas Data</i></u> , for assumptions used in this analysis.						

Greenhouse Gas Emissions

As noted above, construction-related emissions of GHG would be the same as the proposed project since the same grading, construction methodologies, and construction equipment would be employed. Short-term impacts of the Alternative Use Alternative would be similar to the proposed project.



However, GHG emissions from operational activities would be reduced under the Alternative Use Alternative since it would result in an approximately 56 percent decrease in ADT. Thus, the less than significant GHG impacts identified under the proposed project would be reduced under this Alternative. Thus, this Alternative is considered environmentally superior in comparison to the proposed project.

Noise

Construction-related noise would be the same as the proposed project since the same grading, construction methodologies, and construction equipment would be employed. The duration of construction would also remain the same. Thus, short-term noise impacts of the Alternative Use Alternative would be similar to the proposed project.

However, mobile noise resulting from operational activities would be reduced under the Alternative Use Alternative since it would result in an approximately 56 percent decrease in ADT. This reduction in ADT would result in fewer vehicles generating noise on local and regional roadways in the project area. On-site stationary noise sources associated with this Alternative are expected to result in similar noise generation as the proposed project.

Thus, the less than significant noise impacts identified under the proposed project would be reduced under this Alternative. Thus, this Alternative is considered environmentally superior in comparison to the proposed project.

Public Services and Utilities

The Alternative Use Alternative would result in reduced impacts to public services and utilities because this Alternative would include a lower employment count due to a high level of mechanization. The operational characteristics of this Alternative would result in an incremental decrease in the need for fire, police, school, or parks/recreation services or utilities such as water, wastewater, and solid waste. Thus, the Alternative Use Alternative would be considered environmentally superior in comparison to the proposed project.

Cultural Resources

There are no cultural resources that have been identified on the project site. Project related impacts to cultural resources would be tied to ground disturbance and the potential to impact unknown, buried cultural resources. Since the same grading, construction methodologies, and construction equipment would be employed under the Alternative Use Alternative and the project footprint would not change, impacts related to cultural resources would be similar to the proposed project. Thus, the Alternative Use Alternative would be neither environmentally superior nor inferior to the proposed project regarding potential impacts to cultural resources.

Hydrology and Water Quality

Under the Alternative Use Alternative, the short-term construction process and long-term site design would remain the same as the proposed project. The same grading, construction methodologies, and construction equipment would be employed, and the construction duration



would also remain the same. Similar NPDES compliance measures and BMPs would be required during the short-term construction process.

In addition, the site plan under this Alternative would not be different from the proposed project. Drainage features, retention basins, and water quality features would remain the same. As such, the Alternative Use Alternative would be neither environmentally superior nor inferior to the proposed project regarding hydrology and water quality.

Geology and Soils

None of the geologic conditions and hazards affecting the project would be altered as a result of the Alternative Use Alternative. Implementation of this Alternative would continue to expose additional people and structures to potential adverse effects associated with seismic, geologic, and soil hazards, since new land uses would be developed on the project site, similar to the proposed project. The site design under this Alternative would remain identical to the proposed project. The same measures incorporated into the proposed project (compliance with California Building Code requirements, setback from identified earthquake fault zones) would remain applicable under this Alternative. Thus, the less than significant geology and soils impacts identified under the proposed project would also occur under this Alternative. This Alternative is considered neither superior nor inferior to the proposed project.

CONCLUSION

The Alternative Use Alternative would accomplish the project objectives with the exception of Objectives 3, 4, 5, and 6, for the following reasons:

- Since the Alternative Use Alternative would only be comprised of competing high-cube uses, it would not create opportunities for business-to-business interaction between various on-site tenants;
- The implementation of a development limited to high-cube uses would not establish the diversity required for long-term economic development and stability for the property owner and City;
- The Alternative Use Alternative would be comprised of high-cube uses and rely heavily on mechanization (resulting in a substantially lower number of employees in comparison to the proposed project). Thus, the jobs/housing balance in the City and region would not be improved.
- The inclusion of development limited to high-cube uses would not provide a diverse range of facility options.

In comparison to both the proposed project, the Alternative Use Alternative would result in reduced impacts related to traffic and circulation, air quality, GHG, noise, and public service and utilities. Impacts related to aesthetics/light and glare, cultural resources, and geology and soils would be similar to the proposed project. Under this Alternative, the significant and unavoidable impacts related to air quality and traffic would no longer occur.



7.7 “ENVIRONMENTALLY SUPERIOR” ALTERNATIVE

Table 7-6, *Comparison of Alternatives*, summarizes the comparative analysis presented above (i.e., the alternatives compared to the proposed project). Review of Table 7-6 indicates the No Project/No Development Alternative is the environmentally superior alternative, because it would avoid or lessen the majority of impacts associated with development of the proposed project. According to CEQA Guidelines Section 15126.6(e), “No Project” Alternative, “if the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” Accordingly, an environmentally superior alternative among the other alternatives is identified below.

Among the other alternatives, the environmentally superior alternative is the Alternative Use Alternative, given it would eliminate the significant and unavoidable impacts associated with the proposed project. As concluded in the analysis presented above, the Alternative Use Alternative would generally lessen the impacts associated with development of the proposed project, because it would involve a lower trip generation through implementation of high-cube facilities. These decreases would result in corresponding and proportionate decreases in the following issue areas:

- Traffic and Circulation (due to lower trip generation);
- Air Quality (reduced pollutant emissions through lower trip generation);
- Greenhouse Gas Emissions (reduced pollutant emissions through lower trip generation);
- Noise (reduced noise generation through lower trip generation); and
- Public Service and Utilities (reduced demand for services and utilities due to lower employee count).

**Table 7-6
Comparison of Alternatives**

Sections	No Project/No Development	Reduced Density	Alternative Use
Aesthetics/Light and Glare	▲	▼	=
Traffic and Circulation	▼	▼*	▼
Air Quality	▼	▼	▼
Greenhouse Gas Emissions	▼	▼	▼
Noise	▼	▼	▼
Public Services and Utilities	▼	▼	▼
Cultural Resources	▼	▼	=
Hydrology and Water Quality	▲	=	=
Geology and Soils	▼	=	=
▲ Indicates an impact that is greater than the proposed Project (environmentally inferior). ▼ Indicates an impact that is less than the proposed Project (environmentally superior). = Indicates an impact that is equal to the proposed Project (neither environmentally superior nor inferior). * Indicates an impact that remains significant and unavoidable in comparison to the proposed project.			



The Reduced Density Alternative would also nominally lessen the impacts associated with development of the proposed project. However, several unavoidable impacts traffic to study area intersections would remain under this Alternative, despite the 50 percent reduction in trip generation. Also, these alternatives would only partially fulfill the project's objectives. With implementation of the Alternative Use Alternatives and/or Reduced Density Alternative, the various benefits related to jobs creation, economic goals, and the jobs/housing balance in the City would only be partially obtained.

The Alternative Use Alternative and/or Reduced Density Alternative would fulfill most of the proposed project's objectives, as outlined in Section 3.4, *Project Objectives*, although to a lesser degree than the proposed project. However, these alternatives would not meet the project's basic and fundamental objective of providing an economically viable business at the project site, and would not be a significant source for job growth in the City. However, when compared to the proposed project, the Alternative Use Alternative is considered environmentally superior, since it would reduce environmental impacts to the greatest extent and eliminate the significant and unavoidable impacts regarding traffic and air quality.