



## **7.0 Alternatives to the Proposed Project**

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## 7.0 ALTERNATIVES TO THE PROPOSED PROJECT

Under CEQA, the identification and analysis of alternatives to a project is a fundamental part of the environmental review process. CEQA Public Resources Code Section 21002.1(a) establishes the need to address alternatives in an Environmental Impact Report (EIR) by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is ... to identify alternatives to the project."

Direction regarding the definition of project alternatives is provided in the *CEQA Guidelines* 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.<sup>1</sup>*

The *CEQA Guidelines* emphasize that the selection of project alternatives be based primarily on the ability to reduce significant effects relative to the proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."<sup>2</sup> The *CEQA Guidelines* further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed.<sup>3</sup>

In selecting project alternatives for analysis, potential alternatives must pass a test of feasibility. *CEQA Guidelines* Section 15126.6(f)(1) states that:

*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...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).*

Beyond these factors, *CEQA Guidelines* require the analysis of a "no project" alternative and an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives.<sup>4</sup> In addition, *CEQA Guidelines* Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible and discuss the reasons for their rejection.

The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. The range of potential alternatives to the proposed project shall also include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. Among

<sup>1</sup> *CEQA Guidelines* Section 15126.6(a).

<sup>2</sup> *CEQA Guidelines* Section 15126.6(b).

<sup>3</sup> *CEQA Guidelines* Section 15126.6(f).

<sup>4</sup> *CEQA Guidelines* Section 15126.6(e)(2).



the factors that may be considered when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, General Plan consistency, other plans or regulatory limitations, jurisdictional boundaries, 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). Only locations that would avoid or substantially lessen any of the project's significant effects need be considered for inclusion. An alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative need not be considered.

Potential environmental impacts associated with the following alternatives are compared to the Project's impacts:

- Alternative 1 – “No Project” Alternative;
- Alternative 2 – “Reduced Density Option One” Alternative; and
- Alternative 3 – “Reduced Density Option Two” Alternative.

Throughout the following analysis, the alternatives' impacts are analyzed for each environmental issue area, as examined in Section 5.1, *Land Use and Relevant Planning*, through Section 5.12, *Public Services and Utilities*, of this EIR. In this manner, each alternative can be compared to the Project on an issue-by-issue basis. A table is included at the end of this section that provides an overview of the alternatives analyzed and a comparison of each alternative's impact in relation to the Project. This section also identifies alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process. Among the factors used to eliminate alternatives from detailed consideration are: failure to meet most of the basic project objectives; infeasibility; or inability to avoid significant environmental impacts. Section 7.6, *Environmentally Superior Alternative*, references the “environmentally superior” alternative, as required by the *CEQA Guidelines*.

## 7.1 SUMMARY OF PROJECT OBJECTIVES

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. The purpose of the Project is to demolish the existing vacant Colorama Wholesale Nursery site and construct an industrial business park with warehousing and/or manufacturing uses. A summary of the objectives, as provided within Section 3.0, *Project Description*, is provided below:

1. Develop an industrial business park on the Site in conformance with the applicable goals, objectives, and policies of the City's General Plan;
2. Attract high-quality industrial businesses by developing an industrial business park with variety of building configurations and sizes;
3. Develop an industrial business park with an architectural design, landscaping, signage, and operational characteristics that are compatible with existing surrounding uses;
4. Replace the existing obsolete buildings on the site with an industrial business park that will contribute towards the City's economic development goals;



5. Maximize employment opportunities by entitling a warehouse use that is responsive to market needs and which will add a significant number of high quality jobs to the site;
6. Entitle a warehouse use that is adjacent to existing infrastructure and available public services and existing facilities;
7. Reduce vehicle miles traveled by entitling a warehouse project in a region with ample available labor; and
8. Entitle a warehouse project that provides employment for skilled construction and labor trades.

## 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 and unavoidable impacts associated with the Project is provided below. This information is based on the analysis provided within Section 5.1 through Section 5.12 of this EIR.

- **Air Quality**
  - Long-Term (Operational) Air Emissions;
  - Cumulative Operational Emissions; and
  - Consistency with Regional Plans.
- **Greenhouse Gas Emissions (GHG)**
  - Cumulative GHG Emissions; and
  - Consistency with Regional Plans.

## 7.3 ALTERNATIVES CONSIDERED BUT REJECTED

In accordance with *CEQA Guidelines* Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to *CEQA Guidelines*, among the factors that may be used to eliminate alternatives from detailed consideration are the alternative's failures to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. The following 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 were considered infeasible.



## **“ALTERNATIVE SITE” ALTERNATIVE**

The Alternative Site Alternative would involve relocating the Project to another site within the West End Light Industrial (DWL) zoning district in the City. This alternative would generally retain the same characteristics (proposed land uses, square footage, site plan, amenities, etc.) of the Project. Since the DWL zoning district generally exists 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 Project. The Alternative Site Alternative would require adequate land, access, infrastructure, and must be compatible with existing *City of Azusa General Plan*, April 2004 (General Plan) and *City of Azusa Municipal and Development Code* (Municipal Code) designations/zoning 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 Project. Long-term operational and cumulative air quality impacts associated with nitrous oxide (NO<sub>x</sub>) emissions and consistency with the *2016 Air Quality Management Plan* (2016 AQMP) would remain similar due to the same operational trip generation. In addition, significant and unavoidable GHG impacts related to emissions and GHG plan consistency would also remain. Thus, the Alternative Site Alternative was rejected from further analysis since: 1) no other sites in the DWL zoning district are under the Project Applicant’s ownership; 2) the Project Applicant has invested substantial resources in the due diligence and planning of the Project on the Site; and 3) relocation to another site would likely result in similar impacts, including significant and unavoidable impacts related to air quality and GHG emissions generated by mobile sources. Consequently, the Alternative Site Alternative was rejected from further consideration within this EIR.

## **“NO PROJECT/EXISTING ZONING” ALTERNATIVE**

The No Project/Existing Zoning Alternative would allow the currently vacant Site to be developed consistent with the Site’s existing zoning. Based on the City’s Zoning Map, the Site is zoned DWL, which is appropriate for a variety of light- and medium-intensity manufacturing and industrial activities. However, the Project itself is an allowed use within the DWL district. As such, development of the No Project/Existing Zoning Alternative would likely result in a similar industrial development to the Project at the Site. While development of another light industrial development on-site may have different project characteristics (i.e., square footage, building configuration, amenities, etc.), environmental impacts would likely be similar to the Project. For example, the Site would have similar site-specific environmental constraints related to geology and soils, hydrology and water quality, and hazards and hazardous materials under both the Project and this alternative. Impacts related to aesthetics, land use and planning, and public services and utilities would also be similar to the Project. Further, impacts determined based on a development’s square footage, construction details, and specific end-users would also be similar to the Project, since both development scenarios would likely have similar grading, construction, and building square footages. As such, the No Project/Existing Zoning Alternative was rejected from further analysis since: 1) the overall development would be similar to the Project; and 2) this alternative would likely result in similar impacts, including similar significant and unavoidable impacts related to air quality and GHG emissions generated by mobile sources.



## 7.4 “NO PROJECT” ALTERNATIVE

In accordance with the *CEQA Guidelines*, “the no project analysis shall discuss the existing conditions . . . , as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.”<sup>5</sup> The *CEQA Guidelines* continue to state that “in certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.”<sup>6</sup> The “No Project” Alternative includes a discussion and analysis of the existing baseline conditions at the time the Notice of Preparation was published on February 21, 2018. The No Project Alternative is described and analyzed in order to enable the decision-makers to compare the impacts of approving the Project with the impacts of not approving the Project.

### DESCRIPTION OF ALTERNATIVE

The 23.27-acre Site is developed with the former Colorama Wholesale Nursery. Existing on-site development include an office, greenhouses, potting sheds, shade structures, an agricultural chemical storage building, a tractor repair building, detention/retention basins, parking areas, and other features typical of a wholesale nursery. The No Project Alternative would retain the Site in its current condition. The nursery ceased operations in 2017 and is currently removing/recycling materials at the Site; therefore, the Site would remain vacant and non-operational under this alternative. No new development would be constructed on-site, and no landscape or hardscape improvements would be provided.

The following discussion evaluates the potential environmental impacts associated with the No Project Alternative, as compared to impacts from the Project.

### IMPACT COMPARISON TO THE PROPOSED PROJECT

#### Land Use and Relevant Planning

Under the No Project Alternative, the Site would remain vacant after the structures and equipment associated with the Colorama Wholesale Nursery are removed. Similar to the Project, the No Project Alternative would not require amendments to the General Plan or Zoning Code. In addition, the following land use approvals and/or permits required under the Project would not be required under the No Project Alternative: Use Permit, Minor Use Permit, Variance, Sign Permit, and Grading/Building Permits. Similar to the Project, the No Project Alternative would not achieve General Plan policies that pertain to providing pedestrian and landscaping linkages in the City’s industrial areas.

Thus, the No Project Alternative would be neither environmentally superior nor inferior to the Project regarding land use and relevant planning.

<sup>5</sup> *CEQA Guidelines Section 15126.6(e)(2)*.

<sup>6</sup> *CEQA Guidelines Section 15126.6(e)(3)(B)*.



## **Aesthetics/Light and Glare**

The short-term visual impacts associated with grading and construction activities associated with the Project would not occur under the No Project Alternative. Therefore, the Project's less than significant construction-related impacts to the visual character/quality of the Site and its surroundings would be avoided. Both the No Project Alternative and Project would have no impact on any designated scenic views or vistas in the Project area.

The Site's long-term visual character would be altered with the development of a new industrial business center. The Project would develop warehousing and/or manufacturing buildings on-site with hardscape and landscape improvements, consistent with adjacent industrial uses to the north, south, and west. The Project would also increase light and glare sources in the Project vicinity but would be similar to lighting associated with the adjacent industrial uses. With implementation of the No Project Alternative, these less than significant changes in long-term visual character of the Site would not occur, and the Site would remain in its current condition as a closed down nursery. However, with no new development, the Site may gradually deteriorate as a vacant lot. As such, the No Project Alternative would be environmentally inferior to Project regarding aesthetics/light and glare, given that it would result in no new development on-site and would likely lead to a deteriorating vacant lot.

## **Biological Resources**

Project implementation would not impact special status species, sensitive natural communities, or jurisdictional waters and wetlands. Impacts to migratory birds and would be reduced to a less than significant level with the implementation of recommended mitigation. Under the No Project Alternative, no construction activities would occur, and the Site would remain in its current condition. Therefore, although less than significant, the Project's impacts would be avoided. As with the Project, no impact to special status plant species, sensitive vegetation communities, wetlands, jurisdictional waters would occur under the No Project Alternative and impacts pertaining to migratory birds would be avoided altogether.

The No Project Alternative would be environmentally superior to the Project regarding biological resources, given it would avoid less than significant impacts to migratory birds.

## **Tribal and Cultural Resources**

No historic properties, archaeological resources, or paleontological resources were identified on the Site. Although the Site has low sensitivity for archaeological, paleontological resources, and tribal cultural resources, standard conditions of approval, in compliance with Municipal Code requirements, have been incorporated in the event unknown buried resources are encountered during ground-disturbing activities. Under the No Project Alternative, no ground-disturbing activities would occur on-site, and thus, these less than significant impacts would be avoided. Comparatively, less than significant impacts would occur to cultural resources under the Project, while no impacts would occur under the No Project Alternative.

The No Project Alternative would be environmentally superior to the Project regarding cultural resources, given it would avoid the potential for any impact to occur.



## Geology and Soils

Implementation of the No Project 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 Site would remain vacant and non-operational. The less than significant impacts to geology and soils under the Project would no longer occur.

The No Project Alternative would be environmentally superior to the Project pertaining to geology and soils impacts, given it would not introduce any people or structures to potential seismic, geologic, or soil hazards on-site.

## Hydrology and Water Quality

The No Project Alternative would result in no short-term impacts to water quality associated with grading, excavation, or construction activities, as no construction would occur. In comparison, less than significant water quality Project impacts from construction activities would be avoided under the No Project Alternative.

In addition, the No Project Alternative would avoid the Project's long-term operational impacts to water quality and quantity, as new warehouse and manufacturing uses would not be developed and increased traffic would not occur. The Project's post-construction best management practices (BMPs) and Site improvements required by the County of Los Angeles' Low Impact Development provisions (e.g., detention basins and underground infiltration chambers) to address pollutants in storm water runoff and new drainage improvements would not be constructed under the No Project Alternative. Since new development would not occur, impacts related to hydrology and water quality under the Project would not occur under the No Project Alternative.

The No Project Alternative would be neither environmentally superior nor inferior to the Project regarding hydrology and water quality impacts. As construction activities would not occur and new land uses would not be developed, no changes in drainage patterns or on-site operations would occur. However, no BMPs would be constructed on-site that would improve drainage and water quality for downstream areas.

## Hazards and Hazardous Materials

The No Project Alternative would leave the Site vacant and non-operational, and therefore, would not create any new significant hazards through the routine transport, use, or disposal of hazardous materials, or through reasonably foreseeable upset and accident conditions. The less than significant impacts (with mitigation incorporated) to hazards and hazardous materials under the Project would no longer occur.

The No Project Alternative would be environmentally superior to the Project pertaining to hazards and hazardous materials impacts, given that no hazardous materials would be used at the Site.

## Traffic and Circulation

Existing a.m. and p.m. peak hour intersection operating conditions were evaluated in the Traffic Impact Analysis; refer to [Section 5.8, \*Traffic and Circulation\*](#). All study intersections are currently



operating at an acceptable LOS during peak hours based on the City of Azusa, City of Irwindale, City of Duarte, and the California Department of Transportation standards with the exception of three intersections: Mt. Olive Drive/I-605 Ramps/Huntington Drive (No. 1), North Irwindale Avenue/ East Foothill Boulevard (No. 2), and North Todd Avenue/10th Street (No. 8). These existing conditions would continue under the No Project Alternative. The No Project Alternative would not result in any vehicle trips generated to or from the Site, since the Site would be left in its existing non-operational condition. Therefore, although less than significant, the Project's impacts to study area intersections during construction and operational activities would be avoided.

The No Project Alternative would be environmentally superior to the Project regarding traffic and circulation, given it would result in no increase in average daily trips and no traffic impacts at intersections.

## **Air Quality**

Since no construction or development would occur under the No Project Alternative, no short-term construction or long-term operational 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. This alternative would also be consistent with the South Coast Air Quality Management District's (SCAQMD) 2016 AQMP. Thus, the significant and unavoidable air quality impacts associated with long-term operational emissions and 2016 AQMP consistency identified under the Project would be eliminated under this alternative.

The No Project Alternative would be environmentally superior to the Project regarding air quality, given it would avoid the Project's significant and unavoidable impacts pertaining to long-term air quality impacts and would maintain consistency with the 2016 AQMP.

## **Greenhouse Gas Emissions**

No construction or development would occur under this alternative, and the Site would remain vacant and non-operational. Thus, this alternative would not generate any GHG emissions. In comparison, the Project would result in significant and unavoidable impacts related to GHG emissions and GHG plan consistency. The significant and unavoidable GHG impacts that would occur with the Project would be avoided under this alternative.

The No Project Alternative would be environmentally superior to the Project regarding GHG emissions, since no GHG emissions would occur and the Project's significant and unavoidable GHG emissions impacts would be avoided.

## **Noise**

No noise or vibration would be generated by the No Project Alternative since no construction or development would occur on-site. The Site would remain vacant and non-operational and would not generate vehicle trips that may increase operational mobile noise impacts. As such, the Project's less than significant impacts related to construction noise and vibration and operational noise (mobile and stationary sources) would not occur under the No Project Alternative.



The No Project Alternative would be environmentally superior to the Project regarding noise, since it would result in no short-term construction, or long-term operational noise impacts, compared to the Project.

## **Public Services and Utilities**

Implementation of the Project would place increased demands upon public services (i.e., fire and police protection) and utilities and service systems (i.e., wastewater, water, and solid waste). Since no development would occur and the Site would remain vacant under the No Project 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 Project would not occur.

The No Project Alternative would be environmentally superior in comparison to the Project, given that no demands for public services or utilities would occur.

## **ABILITY TO MEET PROJECT OBJECTIVES**

The No Project Alternative would not attain any of the Project objectives. The existing vacant Colorama Wholesale Nursery site would not be demolished and an industrial business park would not be developed on-site consistent with the General Plan with compatible architectural design, landscaping, and operational characteristics with surrounding uses (Objective No. 1 and 3), and thus, the former commercial nursery would not be replaced (Objective No. 4). This alternative would not contribute towards the City's economic development goals related to providing an industrial business park in the City's DWL zoning district; attract high-quality industrial businesses (Objective No. 2); or maximize employment opportunities for skilled construction and labor trades (Objective No. 5 and 8). The No Project Alternative also would not entitle a warehouse use adjacent to existing infrastructure and available public services and existing facilities (Objective No. 6) nor would it reduce vehicle miles traveled in the region by entitling a warehouse project in a region with ample available labor (Objective No. 7).

## **7.5 “REDUCED DENSITY OPTION ONE” ALTERNATIVE**

### **DESCRIPTION OF ALTERNATIVE**

The Reduced Density Option One Alternative would reduce development of the Project by 30 percent. The Site boundaries would remain the same as the Project and the proposed uses would be similar to the Project's Warehousing and Manufacturing Option. This alternative would also be configured as seven separate buildings with the remaining areas improved with landscaping and surface parking spaces. Given the 30 percent reduction in development, it is assumed that the building footprints and required parking spaces would be slightly reduced, and thus providing slightly more pervious landscaping areas on-site.

The Reduced Density Option One Alternative was selected for analysis due to its reduction in the amount of industrial development compared to the Project. A 30 percent reduction in development could potentially lessen the significant impacts identified for the Project related to air quality (regional and cumulative operational NO<sub>x</sub> emissions and consistency with the 2016 AQMP), and



GHG (emissions and GHG plan consistency). Note, the Warehousing and Manufacturing Option was utilized as the Project under this analysis, rather than the Warehouse Only Option, because it generates more air quality emissions of the two development scenarios.

Table 7-1, *Comparison of Proposed Project and Reduced Density Option One Alternative Buildout*, provides a comparison of the Project to the Reduced Density Option One Alternative.

**Table 7-1**  
**Comparison of Proposed Project and Reduced Density Option One Alternative Buildout**

Land Use	Buildout (square feet)	
	Proposed Project – Warehousing and Manufacturing Option	Reduced Density Option One Alternative
Manufacturing	80,289	56,202
Warehousing	306,422	214,495
High-Cube Cold Storage Warehouse	76,605	53,624
<b>Total</b>	<b>463,316</b>	<b>324,321</b>

The following discussion evaluates the potential environmental impacts associated with the Reduced Density Option One Alternative, as compared to impacts from the Project.

## **IMPACT COMPARISON TO THE PROPOSED PROJECT**

### **Land Use and Relevant Planning**

This alternative would develop 30 percent less square feet of manufacturing and warehousing uses on-site. Similar to the Project, this alternative would not require amendments to the General Plan or Zoning Code and would also require the following land use approvals and permits: Use Permit, Minor Use Permit, Variance, Sign Permit, and Grading/Building Permits.

As such, the Reduced Density Option One Alternative would have similar land use impacts as the Project and would be neither environmentally superior nor inferior to the Project regarding land use and relevant planning.

### **Aesthetics/Light and Glare**

Both the Project and the Reduced Density Option One Alternative would have short-term visual impacts associated with demolition, grading, and construction activities. Although this alternative would result in 30 percent less development, construction-related impacts to the visual character/quality of the area would only nominally reduce, if not be similar, to that of the Project.

Under this alternative, the long-term visual character of the Site and its surroundings would be altered to a nominally lesser degree than the Project, since the Site would be developed with 324,321 square feet of warehousing and manufacturing uses, rather than 463,316 square feet under the Project. However, it would be difficult to visually see a difference in building intensity based on a



30-percent reduction. Additionally, the industrial buildings, landscaping, internal roadways and walkways, and signage would be designed similarly under both scenarios. As such, the visual character and quality of the industrial business park under this alternative would be similar to the Project.

Overall, this alternative would be neither environmentally superior or inferior to the Project given that short- and long-term aesthetic/light and glare impacts would not be substantially different.

## **Biological Resources**

This alternative would reduce total building square footage by approximately 138,995 square feet, but would still result in a similar disturbance footprint as the Project (i.e., seven warehousing/manufacturing buildings with hardscape and landscape improvements). Additionally, similar to the Project, this alternative would not result in impacts to special status plant, wildlife species, or sensitive vegetation communities, and construction impacts related to migratory birds would be reduced to less than significant levels with mitigation incorporated.

Therefore, this alternative would be neither environmentally superior nor inferior to the Project regarding potential impacts to biological resources, given it would involve similar ground-disturbing activities within the same development area.

## **Tribal and Cultural Resources**

The limits of the Site would be the same under the Project and the Reduced Density Option One Alternative. Although total building square footage would be reduced by 30 percent, portions of the Site would still be excavated for the seven building pad foundations and the entire Site would still be graded to implement the proposed hardscape and landscape improvements. As such, the less than significant impacts to cultural and tribal cultural resources identified under the Project would be similar under this alternative.

The Reduced Density Option One Alternative would be neither environmentally superior nor inferior to the Project regarding potential impacts to cultural and tribal cultural resources, given it would involve similar ground-disturbing activities within the same development area.

## **Geology and Soils**

Given that the Site limits would remain the same under the Project and the Reduced Density Option One Alternative, none of the site-specific geologic conditions and hazards would be altered under this alternative. However, reducing overall development by 138,995 square feet would proportionally reduce the number of workers on-site. As such, this alternative would expose fewer people to potential adverse effects associated with seismic, geologic, and soil hazards. The less than significant impacts identified under the Project would be further reduced under this alternative.

As such, this alternative would be environmentally superior to the Project, given that fewer workers would be exposed to geologic and soil hazards on-site.



## **Hydrology and Water Quality**

Similar to the Project, this alternative would be required to comply with National Pollutant Discharge Elimination System requirements to reduce water quality impacts. This alternative also would result in exposed soils to wind and water erosion from grading and excavation activities. Although construction would take a slightly shorter period of time, the overall grading impact area for exposed soils would be the same as the Project. As such, short-term construction impacts would be similar under both scenarios.

The Project and this alternative would implement stormwater drainage infrastructure and associated water quality BMPs to minimize impacts during long-term operations. However, given the 138,995-square foot reduction in development, this alternative would have slightly more pervious landscaping areas on-site and a proportional reduction in runoff volumes. Thus, the less than significant hydrology and water quality impacts identified under the Project would be further reduced under this alternative.

As such, this alternative would be environmentally superior to the Project regarding hydrology and water quality.

## **Hazards and Hazardous Materials**

Construction activities associated with the Project and the Reduced Density Option One Alternative could similarly release hazardous materials into the environment through reasonably foreseeable upset and accident conditions. However, this alternative would reduce development intensity by 30 percent, and thus likely require a shorter construction period and less overall construction. As such, less than significant impacts (with mitigation incorporated) related to hazards and hazardous materials utilized during construction would be reduced in comparison to the Project. In addition, long-term operational impacts related to the transport, use, and/or storage of hazardous materials under this alternative would be commensurately reduced as well.

This alternative would be environmentally superior to the Project given that less hazardous materials would be utilized during construction and operational activities.

## **Traffic and Circulation**

This alternative would reduce warehousing and manufacturing use by approximately 138,995 square feet. Therefore, this alternative would have a proportionate reduction of average daily trips and traffic and circulation impacts within the Project vicinity in comparison to the Project. Therefore, the less than significant traffic and circulation impacts that would occur with the Project would be reduced under this alternative.

This alternative would be environmentally superior to the Project regarding traffic and circulation impacts due to reduced traffic volumes.

## **Air Quality**

The 30-percent reduction in development density under this alternative would result in fewer short-term air quality emissions associated with construction activities, including demolition, grading,



building, worker trips, and truck haul trips. Comparatively, this alternative's construction-related air quality impacts would be less than the Project, given the reduction in development and commensurately lower intensity of construction/building activities. Short-term construction air quality impacts under this alternative would be reduced but would still require mitigation to remain less than significant.

According to Table 5.9-6, *Long-Term Operational Air Emissions – Warehousing and Manufacturing Option*, the Project would exceed SCAQMD's regional significance threshold for operational NO<sub>x</sub> emissions, mostly due to a substantial increase in mobile emissions from average daily trips. Due to this alternative's 138,995-square foot reduction in building development and associated daily trips, long-term air quality impacts from mobile and area source pollutant emissions generated under the Reduced Density Option One Alternative would be proportionally reduced in comparison to the Project. However, this alternative would not avoid the significant and unavoidable impacts associated with operational NO<sub>x</sub> emissions and consistency with the 2016 AQMP.

As such, the Reduced Density Option One Alternative would be environmentally superior to the Project regarding air quality impacts since it would result in a reduction in short- and long-term pollutant emissions.

## **Greenhouse Gas Emissions**

Based on Table 5.10-2, *Projected Annual Greenhouse Gas Emissions – Warehousing and Manufacturing Option*, the Project would generate approximately 9,502 metric tons carbon dioxide equivalent per year (MTCO<sub>2</sub>eq/yr) and would substantially exceed the 3,000-MTCO<sub>2</sub>eq/yr significance threshold. Although this alternative would reduce development by 30 percent, a 324,321-square foot business center would still exceed the GHG significance threshold due to the substantial increase in mobile GHG emissions from generated vehicle and truck trips. Thus, this alternative would not avoid the significant and unavoidable impacts associated with GHG emissions and GHG plan consistency.

Overall, this alternative would be environmentally superior to the Project regarding GHG emissions impacts.

## **Noise**

Compared to the Project, short-term noise impacts from demolition, grading, and construction activities associated with the Reduced Density Option One Alternative would be proportionally reduced by approximately 30 percent. Therefore, less than significant short-term noise impacts associated with the Project would be reduced under this alternative.

Long-term operational noise impacts associated with the alternative would also be reduced in comparison to the Project. The 30-percent reduction in development intensity would proportionally reduce average daily trips and associated noise impacts from vehicular travel on the surrounding roadway network. As such, mobile source noise impacts under this alternative would be reduced in comparison to the Project.

Overall, this alternative is considered environmentally superior regarding short- and long-term noise impacts in comparison to the Project.



## **Public Services and Utilities**

Compared to the Project, impacts related to public services and utilities under the Reduced Density Option One Alternative would be commensurately reduced given that development intensity would be reduced by 30 percent. Water and dry utility demands and wastewater and solid waste generation on-site would be proportionally reduced. Thus, the less than significant public services and utilities impacts identified under the Project would be further reduced under this alternative.

The Reduced Density Option One Alternative is considered environmentally superior to the Project.

## **ABILITY TO MEET PROJECT OBJECTIVES**

The Reduced Density Option One Alternative would meet most of the project objectives but not to the extent of the Project. The former Colorama Wholesale Nursery would be demolished and an industrial business park would be developed consistent with the General Plan and designed to be compatible with existing surrounding uses (Objectives No. 1, 3, and 4). The alternative would also develop a warehouse project that is adjacent to existing infrastructure and available public services and facilities (Objective No. 6).

However, the 30-percent reduction in development intensity would not maximize employment opportunities or attract high-quality industrial businesses as much as the Project as currently proposed (Objectives No. 2 and 5). The reduction in building square footage would also reduce this alternative's ability to provide as many jobs as the Project for skilled construction and labor trades or reduce vehicle miles traveled associated with worker commutes (Objectives No. 7 and 8).

## **7.6 “REDUCED DENSITY OPTION TWO” ALTERNATIVE**

### **DESCRIPTION OF ALTERNATIVE**

The Reduced Density Option Two Alternative would involve a 50 percent reduction in development in comparison to the Project's Warehousing and Manufacturing Option. The limits of the Site would remain the same and the proposed uses would be similar to the proposed Warehousing and Manufacturing Option. Similar to the Project, the Reduced Density Option Two Alternative would also be configured as seven separate building with the remaining areas utilized for additional surface parking and landscaping. The building footprints and required parking spaces on-site would be reduced given the 50 percent reduction in building square footage, and thus providing more pervious landscaping areas.

The Reduced Density Option Two Alternative was selected for analysis, in addition to Reduced Density Option One Alternative, due to its more substantial reduction in the amount of industrial development in an effort to avoid significant and unavoidable impacts. This 50 percent development reduction could potentially lessen the significant impacts identified for the Project related to air quality (regional and cumulative operational NO<sub>x</sub> emissions and consistency with the 2016 AQMP), and GHG (emissions and GHG plan consistency). The reduced size would generate substantially less employee vehicle trips and truck trips, which could result in a decrease in impacts to surrounding roadway facilities. Note, similar to Reduce Density Option One Alternative, the



Warehousing and Manufacturing Option was utilized as the Project under this analysis, rather than the Warehouse Only Option, because it generates more air quality emissions of the two development scenarios.

Table 7-2, *Comparison of Proposed Project and Reduced Density Option Two Alternative Buildout*, provides a comparison of the Project to the Reduced Density Option Two Alternative.

**Table 7-2  
Comparison of Proposed Project and Reduced Density Option Two Alternative Buildout**

Land Use	Buildout (square feet)	
	Proposed Project – Warehousing and Manufacturing Option	Reduced Density Option Two Alternative
Manufacturing	80,289	40,145
Warehousing	306,422	153,211
High-Cube Cold Storage Warehouse	76,605	38,303
<b>Total</b>	<b>463,316</b>	<b>231,659</b>

The following discussion evaluates the potential environmental impacts associated with the Reduced Density Option Two Alternative, as compared to impacts from the Project.

## **IMPACT COMPARISON TO THE PROPOSED PROJECT**

### **Land Use and Relevant Planning**

Under the Reduced Density Option Two Alternative, there would be approximately 50 percent less square feet of manufacturing and warehousing buildings. Similar to the Project, this alternative would not require amendments to the General Plan or Zoning Code and would also require the following land use approvals and permits: Use Permit, Minor Use Permit, Variance, Sign Permit, and Grading/Building Permits.

The Reduced Density Option Two Alternative would have similar land use impacts as the Project and would be neither environmentally superior nor inferior to the Project regarding land use and relevant planning.

### **Aesthetics/Light and Glare**

Short-term visual impacts associated with demolition, grading, and construction activities that would occur with the Project would similarly occur with the Reduced Density Option Two Alternative. However, construction-related impacts to the visual character/quality of the area would be slightly less than the Project, as this alternative would likely require a shorter construction period and less overall construction.

The long-term visual character of the Site and its surroundings would be altered with the Reduced Density Option Two Alternative, to a lesser degree than the Project, since the Site would be



developed with 231,659 square feet of warehousing and manufacturing buildings, compared to 463,316 square feet under the Project. This alternative would include slightly more landscaped areas and fewer parking spaces as the required parking would be reduced with the 50 percent reduction in building square footage. 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 reduced visible hardscape (building massing). Thus, the less than significant construction and operational aesthetics/light and glare impacts identified under the Project would be reduced under this alternative.

This alternative is considered environmentally superior in comparison to the Project given that short-term and long-term aesthetic/light and glare impacts would be reduced with a 50 percent reduction in building square footage.

## **Biological Resources**

Project implementation would result in less than significant impacts, as the Project does not contain special status species, sensitive natural communities, or jurisdictional waters and wetlands. Impacts to migratory birds would also be reduced to a less than significant level with the implementation of mitigation. Under the Reduced Density Option Two Alternative, total building square footage would be reduced by approximately 231,659 square feet, but would still result in a similar disturbance footprint as the Project (i.e., seven warehousing/manufacturing buildings with hardscape and landscape improvements). Similar to the Project, this alternative would not result in impacts to special status plant, wildlife species, or sensitive vegetation communities, and construction impacts related to migratory birds would be reduced to less than significant levels with mitigation incorporated.

As such, this alternative would be neither environmentally superior nor inferior to the Project regarding potential impacts to biological resources, given it would involve similar ground-disturbing activities within the same development area.

## **Tribal and Cultural Resources**

No cultural or tribal cultural resources were identified on the Site. However, in compliance with the Municipal Code, standard conditions of approval have been incorporated into the Project in the event buried resources are encountered during ground-disturbing activities. Under the Reduced Density Option Two Alternative, total building square footage would be reduced by 50 percent. However, portions of the Site would still be excavated for building pad foundation and the entire Site would still be graded to implement the proposed hardscape and landscape improvements. As such, the less than significant impacts to cultural and tribal cultural resources identified under the Project would be similar under this alternative.

The Reduced Density Option Two Alternative would be neither environmentally superior nor inferior to the Project regarding potential impacts to cultural and tribal cultural resources, given it would involve similar ground-disturbing activities within the same development area.



## **Geology and Soils**

None of the geologic conditions and hazards affecting the Project would be altered as a result of the Reduced Density Option Two Alternative. However, reducing overall development by 231,659 square feet would proportionally reduce the number of workers on-site. As such, this alternative would expose fewer people to potential adverse effects associated with seismic, geologic, and soil hazards. The less than significant impacts identified under the Project would be further reduced under this alternative.

As such, this alternative would be environmentally superior to the Project, given that fewer workers would be exposed to geologic and soil hazards on-site.

## **Hydrology and Water Quality**

Similar to the Project, the Reduced Density Option Two Alternative would result in grading and excavation within the 23.27-acre Site that would expose soils to wind and water erosion. This Alternative would require similar National Pollutant Discharge Elimination System compliance measures to reduce water quality impacts to a less than significant level. Although construction would likely take a shorter period of time, the overall grading impact area for exposed soils would be the same as the Project. As such, short-term construction impacts would be similar under both scenarios.

The Project would implement stormwater drainage infrastructure and associated water quality BMPs to minimize impacts during long-term operations. It is expected that a similar range of improvements would be required under the Reduced Density Option Two Alternative. However, given the 50 percent reduction in building square footage, this alternative would result in slightly more pervious landscaping areas on-site and a proportional reduction in runoff volumes and required water quality BMPs. Thus, the less than significant hydrology and water quality impacts identified under the Project would be further reduced under this alternative.

As such, this alternative would be environmentally superior to the Project regarding hydrology and water quality.

## **Hazards and Hazardous Materials**

Similar to the Project, construction activities associated with the Reduced Density Option Two Alternative could release hazardous materials into the environment through reasonably foreseeable upset and accident conditions. However, this alternative would likely require a shorter construction period and less overall construction. As such, less than significant impacts (with mitigation incorporated) related to hazards and hazardous materials utilized during construction would be reduced in comparison to the Project. Since development intensity would reduce by 50 percent, it is also expected that long-term operational impacts regarding the transport, use, and/or storage of hazardous materials would be commensurately reduced as well. Thus, the less than significant operational impacts related to hazardous materials would also be reduced under this alternative.

This alternative would be environmentally superior to the Project given that less hazardous materials would be utilized during operational activities.



## Traffic and Circulation

Under the Reduced Density Option Two Alternative, warehousing and manufacturing use would be reduced by approximately 231,659 square feet. Therefore, this alternative would have a proportionate reduction of average daily trips compared to the Project. Comparatively, the traffic and circulation impacts under this alternative would be less than the Project. Therefore, the less than significant traffic and circulation impacts that would occur with the Project would be reduced under this alternative.

This alternative would be environmentally superior to the Project regarding traffic and circulation impacts due to reduced traffic volumes.

## Air Quality

Table 5.9-4, presents the anticipated daily short-term construction emissions generated by the Project and indicates that less than significant impacts would occur with mitigation incorporated. Short-term air quality impacts from demolition, grading, and construction activities would also occur with the Reduced Density Option Two Alternative. Comparatively, the construction-related air quality impacts would be less than the 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 reduced but would still require mitigation to remain less than significant.

Development of the proposed Warehousing and Manufacturing Option would exceed the SCAQMD's regional operational NO<sub>x</sub> emission thresholds, as indicated in Table 5.9-6. 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 localized significance thresholds, result in CO hotspots at any study intersection, nor result in a significant health risk to nearby sensitive residences or workers. Long-term air quality impacts from mobile and area source pollutant emissions would occur with the Reduced Density Option Two Alternative, although to a lesser degree (50 percent less than the Project). Due to the substantial decrease in building square footage and Project-generated trips, this alternative would proportionally decrease operational NO<sub>x</sub> emissions to below the SCAQMD's regional NO<sub>x</sub> threshold of 55 pounds per day.

As such, the Reduced Density Option Two Alternative would be environmentally superior to the Project regarding air quality impacts since it would result in a reduction in short-term and long-term operational air pollutant emissions, and avoid the Project's significant and unavoidable impacts related to operational air quality emissions and 2016 AQMP consistency.

## Greenhouse Gas Emissions

As indicated in Table 5.10-2, the Project's Warehousing and Manufacturing Option would generate approximately 9,502.10 MTCO<sub>2</sub>eq/yr, which exceeds the 3,000 MTCO<sub>2</sub>eq/yr threshold of significance. Thus, significant and unavoidable short-term and operational GHG emission impacts would occur with the Project. GHG emissions from construction and operational activities would also occur with the Reduced Density Option Two Alternative, although to a lesser degree than the Project as a result of shorter construction period and activities, and 50 percent less average daily



trips at full buildout. Overall, the combined construction and operational GHG emissions would be less than that of the Project.

The Reduced Density Option Two Alternative would be environmentally superior to the Project regarding GHG emissions due to decreased mobile emissions. However, this alternative would not avoid the significant and unavoidable impacts associated with GHG emissions and GHG plan consistency.

## **Noise**

Construction noise associated with the Project would result in less than significant impacts 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 Option Two Alternative due to construction of the proposed building and improvements. Comparatively, given that this alternative would reduce development intensity by 50 percent, construction-related noise and vibration impacts would be less than the Project. Therefore, less than significant short-term noise impacts associated with the Project would be reduced under this alternative.

During long-term operations, the Project would generate less than significant mobile source noise impacts. Long-term noise impacts from vehicular travel on the surrounding roadway network would also occur with the Reduced Density Option Two Alternative, although to a lesser degree than the Project because 50 percent fewer vehicle trips would be generated. Therefore, mobile source noise impacts under this alternative would also be reduced in comparison to the Project.

Project implementation would result in less than significant impacts from stationary noise sources. Under the Reduced Density Option Two Alternative, stationary noise sources are expected to decrease since development intensity would be reduced by 50 percent. Therefore, less than significant noise impacts from stationary noise sources under the Project would be further reduced under this alternative.

Overall, this alternative is considered environmentally superior regarding short- and long-term noise impacts in comparison to the Project.

## **Public Services and Utilities**

Under the Reduced Density Option Two Alternative, impacts related to public services and utilities would be commensurately reduced compared to the Project given that development intensity would be reduced by 50 percent. Water and dry utility demands and wastewater and solid waste generation on-site would be proportionally reduced. Thus, the less than significant public services and utilities impacts identified under the Project would be further reduced under this alternative.

The Reduced Density Option Two Alternative is considered environmentally superior to the Project.



## **ABILITY TO MEET PROJECT OBJECTIVES**

The Reduced Density Option Two Alternative would meet most of the Project objectives but not to the extent of the Project. The existing vacant Colorama Wholesale Nursery site would be demolished and an industrial business park in conformance with applicable goals, objectives, and policies of the General Plan would be developed in place of the former commercial nursery (Objective No. 1 and 4). This alternative would entitle a warehouse use that is adjacent to existing infrastructure and available public services and facilities (Objective No. 6). The industrial business park would also be architecturally designed with landscaping, signage, and operational characteristics compatible with neighboring uses (Objective No. 3). However, the Reduced Density Option Two Alternative's reduction in development intensity by approximately 231,659 square feet would not attract as many high-quality industrial businesses (Objective No. 2); would not maximize employment opportunities (Objective No. 5), including those for skilled construction and labor trades (Objective No. 8); and would not reduce vehicle miles traveled to the extent of the Project (Objective No. 7).

### **7.7 “ENVIRONMENTALLY SUPERIOR” ALTERNATIVE**

Table 7-3, *Comparison of Alternatives*, summarizes the comparative analysis presented above (i.e., the alternatives compared to the Project). Review of Table 7-3 indicates the No Project Alternative is the environmentally superior alternative, as it would avoid or lessen the majority of impacts associated with development of the Project. According to *CEQA Guidelines* Section 15126.6(e), “if the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” Accordingly, the Reduced Density Option Two Alternative is identified as the environmentally superior alternative.

As concluded above, the Reduced Density Option Two Alternative would meet most of the project objectives and would avoid the Project's significant and unavoidable air quality and greenhouse gas emission impacts. An industrial business park would replace the former Colorama Wholesale Nursery and would be developed in compliance with applicable goals, objectives, and policies of the General Plan. This alternative would entitle a warehouse use that is adjacent to existing infrastructure and available public services and facilities. The industrial business park would also be architecturally designed with landscaping, signage, and operational characteristics compatible with neighboring uses. However, the Reduced Density Option Two Alternative's reduction in development intensity by approximately 231,659 square feet would not attract as many high-quality industrial businesses; would not maximize employment opportunities, including those for skilled construction and labor trades; and would not reduce vehicle miles traveled to the extent of the Project.



**Table 7-3  
Comparison of Alternatives**

Sections	No Project Alternative	Reduced Density Option One Alternative	Reduced Density Option Two Alternative
Land Use and Relevant Planning	=	=	=
Aesthetics/Light and Glare	^	=	∇
Biological Resources	∇	=	=
Cultural and Tribal Cultural Resources	∇	=	=
Geology and Soils	∇	∇	∇
Hydrology and Water Quality	=	∇	∇
Hazards and Hazardous Materials	∇	∇	∇
Traffic and Circulation	∇	∇	∇
Air Quality*	∇	∇*	∇
Greenhouse Gas Emissions*	∇	∇*	∇
Noise	∇	∇	∇
Public Services and Utilities	∇	∇	∇
^ Indicates an impact that is greater than the Project (environmentally inferior). ∇ Indicates an impact that is less than the Project (environmentally superior). = Indicates an impact that is equal to the Project (neither environmentally superior nor inferior). * Indicates a significant and unavoidable impact.			



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