

Section 8 – Alternatives to the Proposed Project

The following discussion considers alternatives to implementation of the Project. The discussion examines the potential environmental impacts resulting from each alternative. Through comparisons of these alternatives to the Project, the relative advantage(s) of each can be weighed and analyzed.

State *CEQA Guidelines* Section 15126.6 identifies the parameters within which consideration and discussion of alternatives to the proposed Project should occur. As stated in this section of the guidelines, alternatives must focus on those that 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.

8.1 Project Objectives

As stated previously in Section 3.2.7 of the DEIR, the objectives of the proposed Project are:

- Because the Project site is owned by two separate and unrelated land owners, develop the site to create two parcels, with a building on each parcel. One of the buildings will be for the operation of a logistics center and the other building will be for the operation of a use consistent with those uses permitted in the Business Manufacturing Park Zone; thereby accommodating the needs of both separate and unrelated land owners.
- Develop and operate a logistics center that takes advantage of existing City infrastructure and is adjacent to similar industrial, logistics and distribution center uses.
- Develop and operate a logistics center that is in close proximity to March Inland Port, State Route 215/State Route 60 and Interstate 10, to support the distribution of goods throughout the region and that also limits truck traffic disruption to residential areas within the City and neighboring jurisdictions.
- Develop and operate a logistics center that will attract quality tenants and will be economically competitive with other similar facilities in the region.
- Maximize efficient goods movement throughout the region by locating a logistics center in close proximity to the Ports of Los Angeles and Long Beach, enabling trucks servicing the site to achieve a minimum of two roundtrips per day.
- Develop and operate a logistics center that maximizes the use of one of the few remaining large industrial sites in the City and that is in proximity to the Ports of Los Angeles and Long Beach, to realize substantial unmet demand in the City and the region, allowing the City to compete on a domestic and international scale through the efficient and cost-effective movement of goods.
- Develop and operate a logistics center that meets industry standards for operational design criteria.

- Implement the Sycamore Canyon Business Park Specific Plan through development of a land use allowed by the Industrial land use designation and consistent with the development standards and criteria relevant to the site and proposed use.
- Facilitate the development of underutilized land currently planned for industrial uses that, maximizes the use of the site and responds to market demand within the Sycamore Canyon Business Park Specific Plan area for a logistics center.
- Provide a densely landscaped buffer between the Project site and the residential development to the north.
- Provide on-site conservation to mitigate for the loss of riparian/riverine resources.
- Positively contribute to the economy of the City through new capital investment, creation of new employment opportunities, including opportunities for highly trained workers, and expansion of the tax base.

8.2 Summary of the Project's Significant Unavoidable Impacts

The analysis in Section 5.0 determined that even with implementation of mitigation measures, significant environmental impacts will result from the construction and operation of the proposed Project. To satisfactorily provide the CEQA-mandated alternatives analysis, the alternatives considered must reduce any of the following Project-related significant unavoidable impacts:

- Air Quality: Long-term NO_x emission in excess of SCAQMD's regional significance threshold;
- Noise: Generation of short-term (construction) and long-term (operations) noise levels in excess of City standards; and
- Traffic: Exceeding a level of service on freeway segments on Interstate 15, project and cumulative impact.

8.3 Rationale for Alternative Selection

State *CEQA Guidelines* Section 15126.6(a) requires that an EIR "...describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." According to this section of the State *CEQA Guidelines*, "...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 City, as lead agency, is responsible for selecting a range of Project alternatives for examination, and there is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the "rule of reason" (*CEQA Guidelines* Section 15126.6 (a)). 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 an alternative. (*CEQA Guidelines* Section 15126.6 (f)(1)).

With respect to the selection of alternatives to be considered in an EIR, State *CEQA Guidelines* Section 15126.6(b) states "...the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." That is, each alternative must be capable of avoiding or substantially lessening any significant effects of the proposed Project.

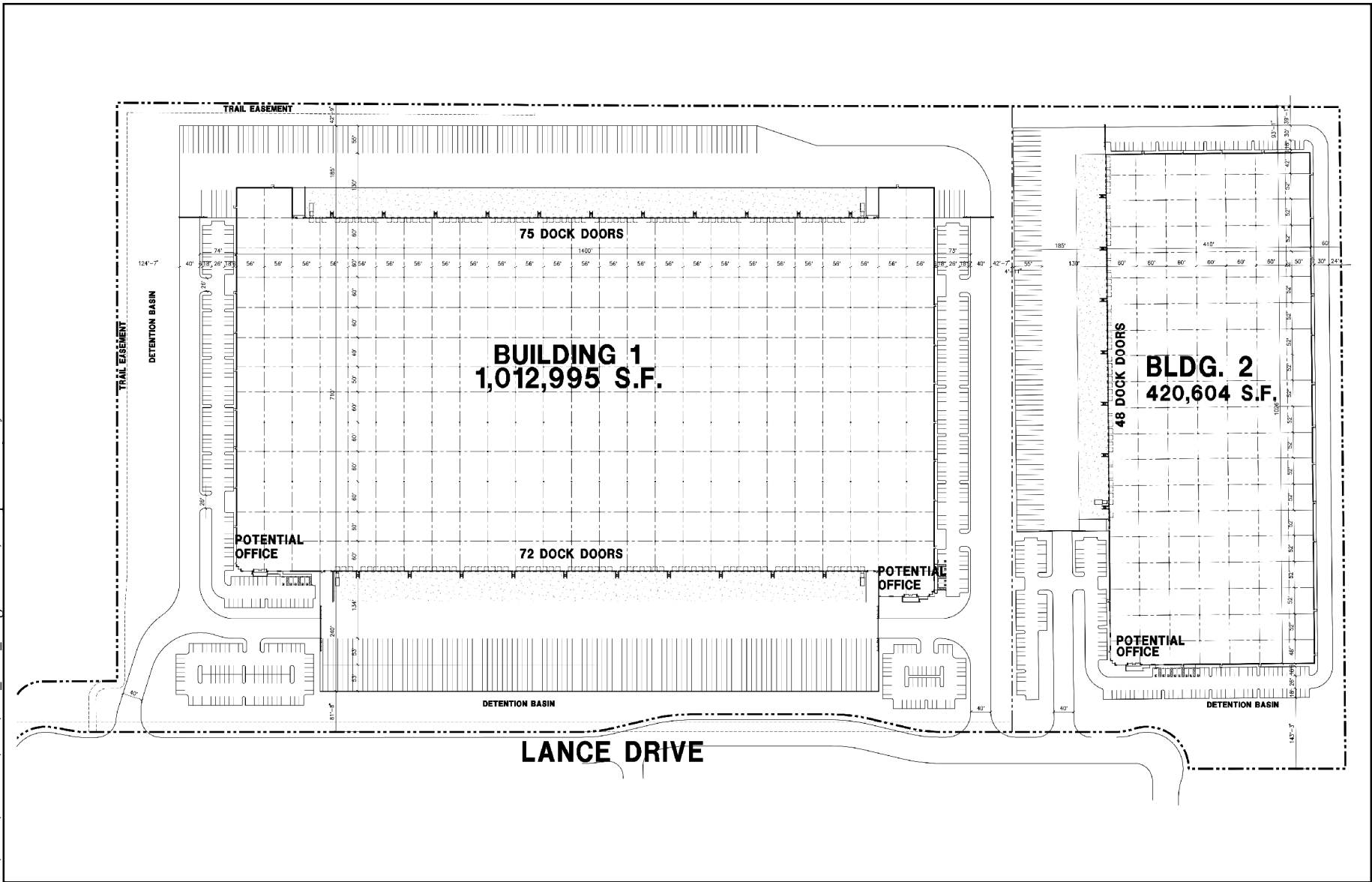
The rationale for selecting the alternatives to be evaluated, and a discussion of the "no project" alternative are also required (State *CEQA Guidelines*, Section 15126.6(e)). The "no project" alternative could take two forms: 1) no change from the existing uses (vacant land); or 2) development per the approved *Sycamore Canyon Business Park Specific Plan*, (i.e. no specific plan amendment, no general plan amendment, and no parcel map). Because both "no project" alternatives are significantly different, both alternatives will be evaluated in this section. The other alternatives evaluated in this DEIR were selected based on their ability to reduce or avoid air quality, noise (construction and operations), and traffic (freeway segment) impacts.

8.4 Alternatives Rejected from Further Consideration

Section 15126.6(c) of the State *CEQA Guidelines* specify that an EIR should identify alternatives that were considered by the lead agency, but were rejected during the scoping process and identify the reasons for eliminating the alternatives from further consideration. Section 15126.6(c) further indicates that a lead agency may eliminate an alternative from detailed consideration in an EIR if it fails to meet the basic Project objectives, is infeasible, or does not avoid significant environmental impacts. Three such alternatives were considered and rejected by the City.

8.4.1 Original Project as Submitted

The Project Applicant originally proposed a two building logistics center totaling 1.43 million square feet (**Figure 8-1 – Original Project**). During preparation of the DEIR, the Project applicant received feedback from the City of Riverside, encouraging additional setback and landscaping along the northern portion of the Project site and reduction in the size of the Building 2, due to various environmental impacts. Collectively, this information provided constructive feedback regarding initial City comments, preliminary understanding of the Project environmental impacts, and both local and generalized sentiment regarding the Project by the public. Based on consideration of this input, the applicant elected to redesign the Project to reduce environmental impacts, improve Project compatibility, and increase amenities, while still providing an economically feasible Project that meets the objectives identified in Section 8.1, above.



Source: HPA Architecture, July 2015.

Figure 8-1 - Original Project
Sycamore Canyon Business Park Buildings 1 and 2 DEIR



Not to Scale

Compared to the original project, the proposed Project would provide approximately 1.37 million square feet of logistics center and office space, which constitutes a reduction of approximately 58,430 square feet in the size of Building 2, which is an approximately 14 percent decrease in the size of Building 2 and an approximately four percent decrease in building size for the overall proposed Project. This reduction would proportionately reduce truck trips, reducing both truck traffic and truck related diesel emissions, compared to the original project. Similarly, less logistics center space would require less energy use for lighting, cooling/heating, and equipment use internal and external to the warehouse. Thus, Project-related energy consumption would be reduced in the proposed Project when compared to the original project. The proposed Project eliminates the on-site detention basins that were part of the original project and will use the regional water quality treatment facility (the “marsh”); thus, eliminating the nuisance and maintenance factors associated with on-site detention basins. The elimination of the detention basins and reduction in the size of Building 2 has, among other things, allowed for an increase in the Project’s setbacks from the residential areas to the north and west and the Sycamore Canyon Wilderness Park to the west, facilitated the inclusion of an on-site Mitigation Area along the western Project boundary to mitigate for the loss of riparian habitat, and allowed for the incorporation of additional aesthetic amenities (i.e. more trees along the northern and western boundaries) to improve the compatibility of the project with the existing land use setting. Economic benefits (employment, rents, and tax revenues) of the new Project are expected to be reduced proportionately to the reduction in square footage. Nevertheless, the Project would still provide economic benefits, and be economically feasible.

Based on the benefits of the new Project, the original 1.43 million square foot Project has been withdrawn from further consideration by the project applicant.

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8.4.2 Alternative Project Location

Pursuant to State *CEQA Guidelines* Section 15126.6(f)(2), alternate sites should be evaluated, if any feasible sites exist, where significant impacts can be lessened. Three alternative locations were considered and rejected by the City as discussed below.

Alternative Location 1: Palmyrita Avenue/Michigan Avenue

Alternative Location 1 consists of approximately 68 acres of undeveloped property located at the southeast corner of Palmyrita Avenue and Michigan Avenue, in the City of Riverside (**Figure 8-2 – Alternative Location 1**). Alternative Location 1 is in the Hunter Business Park Specific Plan and has a GP 2025 land use designation of Business /Office Park (B/OP) and is zoned Business and Manufacturing Park (BMP). Alternative Location 1 was rejected from further analysis in the DEIR because this site is owned by another developer and the Project Applicant cannot reasonably acquire, control, or otherwise have access to this alternative site. Additionally, Alternative Location 1 is located further from I-215 and SR-60 which could cause greater transportation impacts in terms of the number of impacted intersections and more circuitous routes. Thus, Alternative Location 1 is not a feasible alternative to the proposed Project.

Alternative Location 2: Meridian Business Park, Phase 3

The Meridian Business Park (Meridian) is a 1,290-acre master-planned commerce center located west of Interstate 215 (I-215) in unincorporated Riverside County. Meridian is under the jurisdiction of the March Joint Powers Authority (March JPA) and is designated for Commercial (COM), Destination Recreation (DR), Industrial (IND), Mixed Use (MU), Park/Recreation/Open Space (P/R/OS), and Public Facilities (PF) by the March JPA General Plan Land Use Plan. Property in Meridian is zoned: Business Park (BP), Commercial (COM), Industrial (IND), Mixed Use (MU), Office (OF), Park/Recreation/Open Space (P/R/OS), and Public Facility (PF).

Meridian Phase 3 (**Figure 8-3 – Alternative Location 2**) encompasses 409 acres, of which 134 acres are zoned for industrial development. Although Meridian has lots large enough for a logistics center, this location (Alternative Location 2) was rejected from further analysis in the DEIR. Alternative Location 2 was rejected from further analysis because this location is outside of the City's jurisdictional boundary, owned by another party, securing the needed entitlements for development would be speculative, and the Project Applicant cannot reasonably acquire, control, or otherwise have access to this alternative site. Thus, Alternative Location 2 is not a feasible alternative to the proposed project.

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LEGEND

- Alternate Location
- Riverside City Boundary

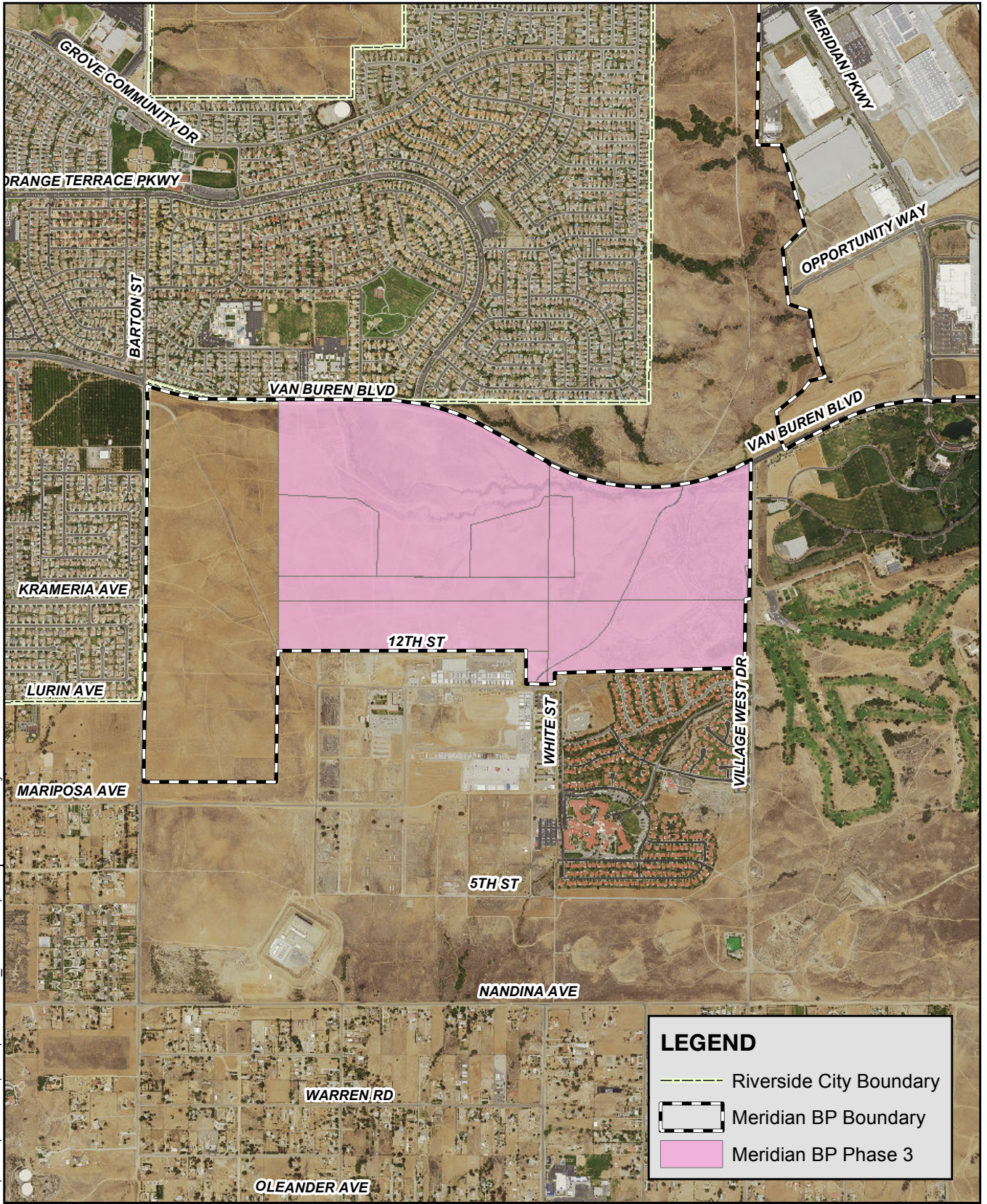
Sources: City of Riverside, 2012 (imagery); Riverside Co. GIS, 2016 (parcels).



0 800 1,600 Feet

Figure 8-2 - Alternate Location 1
Sycamore Canyon Business Park Buildings 1 and 2 DEIR

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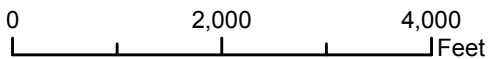
LEGEND

- Riverside City Boundary
- Meridian BP Boundary
- Meridian BP Phase 3

Sources: Meridian website, 2016;
Riverside Co. GIS, 2016 (parcels).

Figure 8-3 - Alternate Location 2

Sycamore Canyon Business Park Buildings 1 and 2 DEIR



Alternative Location 3: Property along Alessandro Boulevard within the Sycamore Canyon Business Park Specific Plan

Alternative locations along Alessandro Boulevard were considered in response to comments received at the Project's Scoping Meeting.¹ **Figure 8-4 – Alternative Location 3** shows the vacant² parcels within the *Sycamore Canyon Business Park Specific Plan (SCBPSP)* area. All of the vacant parcels along Alessandro Boulevard are owned by another entity. Additionally, these parcels are either currently under construction for another project or are too small for the proposed Project. The larger properties fronting Alessandro Boulevard are owned by at least two different property owners and oddly shaped, making assemblage difficult. These properties are also traversed by drainages under the jurisdiction of the U.S. Army Corps of Engineers and the California Department of Fish and Wildlife (ABC DEIR, p. 3.3-27) making development difficult. The other vacant parcels in the *SCBPSP* shown on **Figure 8-4** are not feasible locations because they are owned by another party and are too small for the proposed Project.

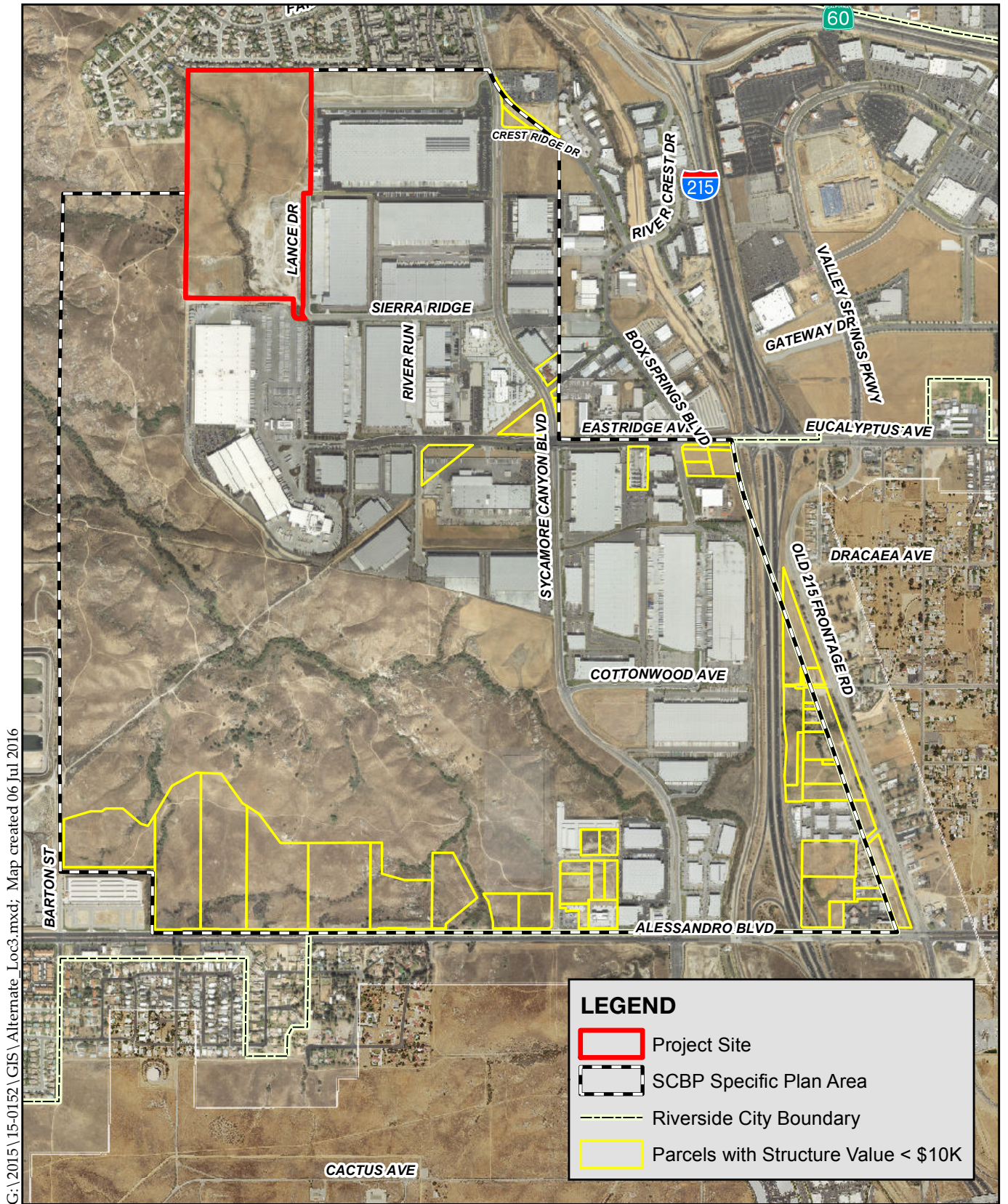
Therefore, an alternative site is not considered feasible as the applicant does not own or control another site of comparable size within the City of Riverside and an alternative site would likely fail to achieve the underlying purpose and objectives of the Project. In addition, an alternative site would likely not avoid the Project's significant impacts with regard to air quality or construction noise because these impacts are a function of the Project's use and size and are not location-specific. An alternative site in proximity to the proposed Project would also not avoid the significant traffic impact to level of service (LOS) on I-15 because traffic from an alternate location would use that interstate, which will operate at an unacceptable LOS without Project traffic. Thus, an alternative site was rejected from further consideration in this DEIR.

8.5 Description of Alternatives Evaluated in the DEIR

This section of the DEIR presents the analysis of three alternatives in comparison to the potential environmental effects associated with the proposed Project. In accordance with State *CEQA Guidelines* Section 15126.6(d), the discussion of the environmental effects of the alternatives may be less detailed than the discussion of the impacts of the proposed Project. Following a description of each alternative is a discussion of potential impacts to each of the environmental topics evaluated in this DEIR. A comparison of alternatives matrix is presented in Section 8.6.

¹ Copies of comment letters received in response to the NOP and notes from the Scoping meeting are included in Appendix A.

² Vacant parcels are defined as parcels for which the Riverside County Assessor's Roll show a structure value less than \$10,000.



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Sources: City of Riverside, 2012 (SP bnd., imagery); Riverisde Co. GIS, 2016 (parcels).





LEGEND	
	Project Site
	SCBP Specific Plan Area
	Riverside City Boundary
	Parcels with Structure Value < \$10K

Figure 8-4 - Alternate Location 3
Sycamore Canyon Business Park Buildings 1 and 2 DEIR



0 1,000 2,000 3,000
|-----|-----|-----|
Feet

8.5.1 Alternative 1: No Project, No Build

Pursuant to State *CEQA Guidelines* Section 15126.6(e)(3)(B), the No Project Alternative for a development project on identifiable property is the circumstance under which the proposed Project does not proceed, and the discussion of the No Project Alternative must compare the environmental effects from the Project site remaining in its existing state, versus the environmental effects that would occur if the proposed Project is approved. Accordingly, under the No Build Alternative, the site would remain in its existing condition and no development would occur.

8.5.1.1 Evaluation of Alternative 1: No Project/No Build

Aesthetics

Alternative 1 would retain the Project site's existing conditions. There would be no development that would modify the existing visual character of the Project site. Thus the impacts of development of the site, even those that are less than significant or beneficial, would be avoided. For these reasons, the impacts to aesthetics under Alternative 1 would be less than the proposed Project. However, the Project site would remain vacant, underutilized, and would not provide viable and productive uses to the area. There would be no trail parking at the southeast corner of the Project site and no improved trail or fire access road across the Project site. The illegal dumping that is occurring on the Project site would continue.

Agriculture and Forestry Resources

Alternative 1 would retain the Project site's existing conditions. The Project site does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, nor is it under a Williamson Act contract; however the site does contain Locally Important Farmland (**Figure 5.2-1 – Designated Farmland at the Project Site**). Agricultural uses are not permitted in the *SCBPSP* area, so even if the Project site remains undeveloped, it would not be able to be used for agriculture. Because the Project has no significant impacts with regard to agricultural and forestry resources, the impacts of Alternative 1 as compared to the Project would be similar to that of the proposed Project.

Air Quality

Since no construction activity would occur, Alternative 1 would not generate any short-term construction emissions. Further, no new long-term emissions would result from increased traffic and increased use of energy resources. Due to the avoidance of short-term and long-term criteria pollutant emissions, Alternative 1's air quality impact would be avoided compared to the proposed Project. Therefore, impacts associated with the Alternative 1 would be less than that of the proposed Project.

Biological Resources

Since no site preparation or construction activity would occur, Alternative 1 would not result in a change to the existing biology of the Project site. Under this Alternative, there would be no relocation of the ephemeral drainages to the proposed on-site Mitigation Area. In addition, existing and potential biological species would be able to continue to utilize the Project site as

habitat (including breeding and/or seasonal foraging habitat). Thus, impacts would be avoided compared to the proposed Project. Therefore, impacts associated with Alternative 1 would be less than that of the proposed Project.

Cultural Resources

Alternative 1 would retain the Project site's existing conditions. Because there would be no site preparation, grading, or construction, the three rock outcroppings would remain in place and not require relocation to another part of the Project site. Thus impacts would be avoided compared to the proposed Project.

Geology and Soils

Alternative 1 would not involve any development and/or grading on the Project site. Because no structures would be constructed, they would not be subjected to seismic events. However, the potential for soil erosion and loss of top soils would continue. Thus, impacts associated with Alternative 1 would be greater than that of the proposed Project.

Greenhouse Gas Emissions

Due to the avoidance of short-term and long-term GHG emissions, Alternative 1's impacts with regard to GHG emissions would be less than that of the proposed Project.

Hazards and Hazardous Materials

Alternative 1 would retain the Project site's existing conditions. Under this Alternative, there would be no potential to create a significant hazard to the public due to improper handling or use of hazardous materials or hazardous wastes during construction or operation of future development of the Project site. Therefore, impacts associated with the No Project/No Build Alternative would be less than that of the proposed Project. However, the Fire Access/Parks Maintenance Road (see **Figure 3-10 – Conceptual Site Plan**, that will be constructed by the Project will increase the ease of access and potential response times in the event of a fire in the Sycamore Canyon Wilderness Park. The Fire Access/Parks Maintenance Road will also allow the City of Riverside Parks, Recreation and Community Services Department easier access to clear brush within the Sycamore Canyon Wilderness Park for the safety of homes in the vicinity of the Park.

Hydrology and Water Quality

Alternative 1 would retain the Project site's existing conditions. Under Alternative 1 the existing hydrologic conditions would continue, and the existing storm drain facilities and storm flow patterns and capacity would remain. However, because the Project site drains into a regional water quality marsh, the potential for contamination of surface waters, such as the Santa Ana River, is the same as with the proposed Project. Thus, impacts associated with Alternative 1 would be the same as the proposed Project.

Land Use and Planning

Alternative 1 would retain the Project site's existing conditions. The Project site would not be developed and one of the few remaining large industrial sites in the City would remain vacant

and underutilized and certain goals and policies of the GP 2025 and the *SCBPSP* would not be realized. Therefore, impacts with regard to land use and planning would be worse than that of the proposed Project.

Mineral Resources

Since granite mining operations ceased on the Project site in the late 1980s – early 1990s, and the surrounding land uses (residential and the Sycamore Canyon Wilderness Park) are incompatible with mining operations, it is unlikely that an economically viable mining operation could take place at the Project site. Thus, under Alternative 1, impacts to mineral resources would be the same as that of the proposed Project.

Noise

Since no construction activity would occur, Alternative 1 would not have any short-term noise impacts. Ambient noise increases created by Project-related operations and traffic would also not occur. Therefore, under Alternative 1, impacts to noise would be avoided and less than that of the proposed Project.

Population/Housing

Alternative 1 would retain the Project site's existing conditions and no development would occur. Alternative 1 would not contribute to new employment positions or housing opportunities anticipated in the GP 2025 and other Regional Plans. Therefore, under Alternative 1, impacts to population/housing would be greater than the proposed Project.

Public Services

Alternative 1 would retain the Project site's existing conditions and no development would occur. Under this Alternative the fire access road proposed along the Project's southern boundary would not be constructed which could lower emergency response times for the Sycamore Canyon Wilderness Park; however, there would not be an increased demand for fire protection or police protection services due to the proposed Project buildings. Thus, impacts to fire and police protection services would be less than the proposed Project. Because Project implementation will not induce growth directly or indirectly, under Alternative 1 impacts with regard to other public services (i.e., schools, libraries, and community centers) would be the same as the proposed Project.

Recreation

Alternative 1 would retain the Project site's existing conditions. Under this alternative the trail parking at the southeast end of the Project site would not be provided and there would be no trail access across the southern portion of the Project site. Since these recreational amenities would not be provided with Alternative 1, impacts with regard to recreation would be greater than the proposed Project.

Transportation/Traffic

Because Alternative 1 would not increase site-generated traffic above current levels, impacts to transportation/traffic would be less than that of the proposed Project.

Relationship to Project Objectives

Under the Alternative 1 it is assumed no development would occur. The proposed Buildings 1 and 2, trail parking lot, trail and fire access to Sycamore Canyon Wilderness Park and the proposed off-site storm drain would not be realized. **Table 8-A – Ability to Achieve Project Objectives, Alternative 1 – No Project/No Build** identifies the Project objectives and whether or not Alternative 1 meets each objective.

Table 8-A –Alternative 1 (No Project Alternative) Ability to Meet Project Objectives

Project Objective	Alternative Meets Objective?
<p>Because the Project site is owned by two separate and unrelated land owners, develop the site to create two parcels, with a building on each parcel. One of the buildings will be for the operation of a logistics center and the other building will be for the operation of a use consistent with those uses permitted in the Business Manufacturing Park Zone; thereby accommodating the needs of both separate and unrelated land owners.</p>	<p>No. Alternative 1 will not develop and operate a logistics center nor would two buildings be constructed. Alternative 1 will not accommodate the intended uses of the land owners.</p>
<p>Develop and operate a logistics center that takes advantage of existing City infrastructure and is adjacent to similar industrial logistics and distribution center uses.</p>	<p>No. Alternative 1 will not develop and operate a logistics center adjacent to similar uses that can take advantage of existing City infrastructure.</p>
<p>Develop and operate a logistics center that is in close proximity to March Inland Port, State Route 215/State Route 60 and Interstate 10, to support the distribution of goods throughout the region and that also limits truck traffic distribution to residential areas within the City and neighboring jurisdictions.</p>	<p>No. Alternative 1 will not develop and operate a logistics center; thus this Alternative will not support the distribution of goods throughout the region.</p>
<p>Develop and operate a logistics center that will attract quality tenants and will be competitive with other similar facilities in the region.</p>	<p>No. Alternative 1 will not develop and operate a logistics center; thus this Alternative will not attract quality tenants or be regionally competitive.</p>
<p>Maximize efficient goods movement throughout the region by locating a logistics center in close proximity to the Ports of Los Angeles and Long Beach, enabling trucks servicing the site to achieve a minimum of two roundtrips per day.</p>	<p>No. Alternative 1 will not maximize efficient goods movement because it will not locate a logistics center in proximity to the ports.</p>

Project Objective	Alternative Meets Objective?
<p>Develop and operate a logistics center that maximizes the use of one of the few remaining large industrial sites in the City and that is in proximity to the Ports of Los Angeles and Long Beach, to realize substantial unmet demand in the City and the region, allowing the City to compete on a domestic and international scale through the efficient and cost-effective movement of goods.</p>	<p>No. Alternative 1 will not develop and operate a logistics center in the City in proximity to the ports. Thus this Alternative will not allow the City to compete on a domestic and international scale through the efficient and cost-effective movement of goods.</p>
<p>Develop and operate a logistics center that meets industry standards for operational design criteria.</p>	<p>No. Alternative 1 will not develop and operate a logistics center that meets industry standards for operational design criteria.</p>
<p>Implement the <i>Sycamore Canyon Business Park Specific Plan</i> through development of a land use allowed by the Industrial land use designation and consistent with the development standards and criteria relevant to the site and proposed use.</p>	<p>No. Alternative 1 will not implement the <i>Sycamore Canyon Business Park Specific Plan</i>.</p>
<p>Facilitate the development of underutilized land currently planned for industrial uses that, maximizes the use of the site and responds to market demand within the <i>Sycamore Canyon Business Park Specific Plan</i> area for a logistics center.</p>	<p>No. Alternative 1 will not facilitate the development of underutilized industrial land; thus this Alternative will not respond to the market demand in the <i>Sycamore Canyon Business Park Specific Plan</i> area.</p>
<p>Provide a densely landscaped buffer between the Project site and the residential development to the north.</p>	<p>Yes. Alternative 1 will meet this objective to some degree, in that the entire Project site becomes a buffer between and the residential development to the north and existing logistics uses to the south/ However Alternative 1 would not provide a densely landscaped buffer, simply disturbed vegetation per the existing conditions.</p>
<p>Provide an on-site mitigation area to mitigate for the loss of riparian/riverine resources.</p>	<p>No. Alternative 1 will not provide on-site mitigation.</p>
<p>Positively contribute to the economy of the City through new capital investment, creation of new employment opportunities, including opportunities for highly trained workers, and expansion of tax base.</p>	<p>No. Alternative 1 will not contribute to the economy of the City.</p>

Alternative 1 Conclusion

While all environmental impacts would be less than significant with Alternative 1, this Alternative would greatly underutilize the Project site and would only meet one of the Project objectives to some degree. Section 15126.6(f)(1) of the *State CEQA Guidelines* states that among the factors that may be taken into account when addressing the feasibility of alternatives, are site suitability and economic viability; Alternative 1 is neither suitable for the site nor economically viable. Although in the short-term this alternative may be feasible, over the long-term it is expected that the owners of the site would seek some productive use of this property and that the Project site would therefore be developed in some form. Therefore, since it can be reasonably anticipated that the site would not remain in an undeveloped state over the long term, Alternative 1 is not feasible, as its ability to be implemented would not appear to be feasible.

8.5.2 Alternative 2 – No Project/Specific Plan Build Alternative

Pursuant to *State CEQA Guidelines* Section 15126.6(e)(3)(C), the impacts of the No Project Alternative should also be evaluated by projecting what would reasonably be expected to occur in the foreseeable future if the proposed Project were not approved.

The GP 2025 designates the Project site for B/OP (Business/Office Park). Additionally, the *Sycamore Canyon Business Park Specific Plan* designates the Project site for Industrial, which permits the logistics center use proposed by the Project as well as industrial and business office use, manufacturing, publishing and printing, research office and laboratory uses. Under Alternative 2, the Project site would be developed with approximately 1.37 million SF of manufacturing uses. Alternative 2 would also include the on-site Mitigation Area on the western portion of the Project site and retain the trail and fire access at the southern portion of the Project site. **Table 8-A – Comparison of Alternative 2 (No Project/Specific Plan Build Alternative) to the Proposed Project** compares the Proposed Project to the No Project/Specific Plan Build Alternative.

**Table 8-B –Comparison of Alternative 2
 (No Project/Specific Plan Build Alternative) to the Proposed Project**

Component	Proposed Project	Alternative 2	Difference
Type of Development	Logistics Center	Manufacturing	NA
Total Building Size	1,375,169 SF	1,375,169 SF	NA
Projected Employment	860–1,335 ^a	2,063 ^b	728–1,203 greater
On Site Mitigation Area	Yes	No	NA
Width of Landscaping at the Northern Property Boundary	64 feet	64 feet	NA
Trail Parking, Trail, Fire Access Road	Yes	Yes	NA

Component	Proposed Project	Alternative 2	Difference
Trip Generation (No. Vehicles)			
Total Trips/Day	2,409	5,253	118% increase
Passenger Cars	1,492	3,215	115% increase
Trucks (total 2, 3, and 4+ Axle)	917	2,038	122% increase
2 Axle	156	326	109% increase
3 Axle	208	667	221% increase
4+ Axle	553	1,045	89% increase

Notes

- a Low end based on Based on an average of 1,598 SF or logistics space per employee per *Logistics Trends and Specific Industries that Will Drive Warehouse and Distribution Growth and Demand for Space*, March 2010 prepared by the NAIOP Research Foundation. (2010 NAIOP, Figure 3, p. 12). Number of employees calculated as follows: 1,375,174 total SF ÷ 1,598 SF/employee = 860 employees. Upper end based on the County of Riverside employee generation rate for light industrial uses of 1,030 SF per employee; number of employees calculated as follows: 1,375,174 total SF ÷ 1,030 SF/employee = 1,335 employees.
- b Based on 1.5 employees per 1,000 SF of building area per Table 8 of the *Sycamore Canyon Business Park Specific Plan*, calculated as follows: 1,375,169 SF ÷ 1,000 SF * 1.5 employees/1,000 SF = 2,063 employees.

8.5.2.1 Evaluation of Alternative 2 – No Project/Specific Plan Build Alternative

Aesthetics

Alternative 2 would result in the construction of approximately 1,375,169 SF of buildings for manufacturing use. As with the proposed Project, Alternative 2 (No Project/Specific Plan Build Alternative) would modify the visual character of the Project site through grading, vegetation removal, construction of industrial buildings, associated parking, walls, fencing, landscaping, trail parking, a trail, fire access road, and parking and security lighting. The grading concept would remain the same as the proposed Project so that the structures' comparable height to existing large scale light industrial uses in the Sycamore Canyon Business Park would preserve views of the Box Springs Mountains. Lighting under Alternative 2 would be shielded and directed downward and away from the adjacent residences and Sycamore Canyon Wilderness Park. Therefore, impacts resulting from implementation of Alternative 2 would be similar to the proposed Project.

Agriculture and Forestry Resources

The Project site and surrounding area does not contain any Prime Farmland, Farmland of Statewide Importance, Unique Farmland (Farmland for CEQA purposes), forest land, or timberland (**Figure 5.2-1 – Designated Farmland at the Project Site**). As with the proposed Project, development per Alternative 2 would eliminate approximately 68 acres of Locally Important Farmland; however agricultural uses are not permitted in the *SCBPSP* area and the Project site has not been farmed for decades. Therefore impacts resulting from the implementation of Alternative 2 would be similar to the proposed Project.

Air Quality

Development of Alternative 2 would result in grading the same portion of the Project site as the proposed Project, the same amount of paving, and construction of a building of similar size as the proposed Project. Because construction under Alternative 2 would use a similar mix of Tier 3 construction equipment, incorporate the same project design features and mitigation measures as the proposed Project; short-term construction impacts would be essentially the same as the proposed Project, and will not exceed SCAQMD thresholds. Similar to the proposed Project it is the long-term operational emissions that are of the most concern. As shown in **Table 5.3-D – Estimated Daily Project Operation Emissions**, the proposed Project will exceed the SCAQMD Daily Threshold for NO_x due to Project-related mobile emissions. Mobile emissions are a function of the number and types of vehicular trips as well as trip length or vehicle miles traveled (VMT). As shown in **Table 8-B – Comparison of Alternative 2 (No Project/Specific Plan Build Alternative) to the Proposed Project**, Alternative 2 would result in more passenger car and truck trips than the proposed Project. This, in turn may result in higher levels of VOC, NO_x, CO, PM-10 and PM-2.5 emissions when compared to the proposed Project depending upon the total VMT. Localized emissions of criteria pollutants may increase due to the increase in total trucks trips accessing the site; however, similar to the proposed Project, localized emissions are not anticipated to exceed the applicable SCAQMD LST and the impacts would be less than significant. Health risks associated with diesel exhaust would be increased compared to the proposed Project because the total daily truck trips and on-site truck activity will increase. However, similar to the proposed Project, health risks are not anticipated to exceed the applicable SCAQMD LST and the impacts would be less than significant.

Thus, air quality emissions and health risks may be greater, and would remain significant and unavoidable due to the long-term exceedance of NO_x emissions from operations.

Biological Resources

Because development of Alternative 2 would encompass the same footprint as the proposed Project impacts to biological resources would be the same. Alternative 2 would permanently impact suitable habitat for nesting birds and burrowing owls, and low quality raptor foraging habitat. Alternative 2 does not avoid impacts to approximately 1.67 acres of riparian/riverine resources located along the two ephemeral drainages present on the site or to waters under the jurisdiction of the U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board, and the California Department of Fish and Wildlife (CDFW as shown on **Figure 5.4.2 – USACE/RWQCB Jurisdictional Delineation Map** and **Figure 5.4-3 – CDFW Jurisdictional Delineation Map**. Because Alternative 2 would be required to comply with the provisions of the MSHCP and incorporate the same mitigation measures as the proposed Project, impacts would be similar to the proposed Project.

Cultural Resources

Because development of Alternative 2 would encompass the same footprint as the proposed Project, impacts to cultural resources would be the same. Site grading will permanently impact

three archaeological sites (bedrock milling features) that have been identified as tribal cultural resources within a tribal cultural landscape by one or more Native American Tribes. Alternative 2 would be required to implement the same mitigation measures as the Project, which includes relocation of all or a portion of the bedrock milling features to another location on the Project site. Impacts would be similar to the proposed Project.

Geology and Soils

Under Alternative 2 the Project site would be graded in substantially the same way to minimize visibility of the building(s) from the adjacent neighborhood through the use of elevational and building height differences. Alternative 2 would require the same geotechnical design considerations and require the same grading exceptions as the proposed Project. Therefore, impacts would be similar to the proposed Project.

Greenhouse Gas Emissions

Development of Alternative 2 would result in the same disturbance area (site footprint) as the proposed Project. Thus, the one-time construction-related GHG emissions from Alternative 2 were assumed to be the same as the Project. The same amount of trees would be planted in on-site Mitigation Area; therefore, the amount of CO₂e emissions sequestered from development of Alternative 2 would be similar to the proposed Project. Total GHG emissions from Alternative 2 (which includes amortized construction emissions and sequestration and operational emissions) may be greater than the proposed Project due to the increase in total traffic trip generation and potential increase in on-site stationary equipment used for manufacturing. However, the truck trip lengths are unknown and may not be traveling the same distance as the proposed Project (to and from the Ports). Because the BAU emissions for Alternative 2 would also include the same development as Alternative 2, it is anticipated that Alternative 2's GHG emissions reductions from the BAU may be similar to the proposed Project and would also achieve the City's RRG CAP reduction target for 2020 and hence the AB 32 reduction target for 2020. Alternative 2 would also comply with all present and future regulatory measures developed in accordance with AB 32 and CARB's Scoping Plan, and incorporates a number of Project design features that would further minimize GHG emissions, which are incorporated as mitigation measures **MM AQ 1** through **MM AQ 22**.

Therefore, GHG impacts associated with this Alternative are considered to be the similar to the proposed Project.

Hazards and Hazardous Materials

Development of Alternative 2 would be similar to the proposed Project. Any potential impacts associated with hazards and hazardous materials would be reduced to less than significant levels through adherence to laws and regulations, compliance with FAR Part 77, and consistency with the March Air Reserve Base/Inland Port Airport (MARB/APA) Land Use Consistency Plan. Thus, potential adverse impacts associated with hazards or hazardous materials are similar to that of the proposed Project.

Hydrology and Water Quality

Under Alternative 2 the same basic storm drain facilities would be constructed as those included with the proposed Project including the construction of the off-site storm drain in Lance Drive that ultimately connects to the 120-inch diameter storm drain in Eastridge Avenue. Drainage would be collected in on-site facilities that would be conveyed via the new storm drain in Lance Drive to the storm drain in Eastridge Avenue prior to being discharged into the existing stormwater runoff treatment basin, also referred to as the “marsh.” Under this alternative, there would be potential urban runoff from the Alternative’s paved areas. This potential impact is the same as the proposed Project and would also be reduced to less than significant levels through compliance with mandatory regulatory requirements. Therefore, impacts associated with Alternative 2 would be the same as that of the proposed Project.

Land Use and Planning

Similar to the Project, with approval of the proposed GP 2025 Circulation Element Amendment, the proposed *Sycamore Canyon Business Park Specific Plan* Amendment to the Circulation Plan, and the grading exception, all of which are part of the proposed Project, development of Alternative 2 would be consistent with the GP 2025 and SCBPSP. Development of the Project site for manufacturing is consistent with the GP 2025 Land Use designation of Business/Office Park and the zoning designation of BMP, Impacts would be similar to the proposed Project.

Mineral Resources

Alternative 2 would result in the development of a site previously used for granite mining operations prior to the late 1980s – early 1990s. As with the proposed Project, development of Alternative 2 would preclude the use of the Project site for mining operations. Impacts would be the same as the proposed Project.

Noise

Development of Alternative 2 would result in grading the same portion of the Project site as the proposed Project, the same amount of paving, and construction of a building the same size as the proposed Project. Because construction of Alternative 2 would use the same mix of construction equipment as the Project it would result in the same levels of short-term noise impacts and construction vibration as the proposed Project. As with the proposed Project, Alternative 2 would require a 12-foot tall temporary noise barrier along the Project site’s northern and western boundaries to reduce construction noise. However, even with the temporary wall and other construction noise mitigation measures, construction noise will result in a substantial increase in noise over the ambient noise level and impacts will be significant and unavoidable.

Alternative 2 would generate long-term noise from on-site operations and vehicular traffic on area streets. Operational noise will be generated from parking lots, rooftop-mounted equipment, diesel truck engines, exhaust systems, and loading and unloading of materials. As shown in **Table 8-B –Comparison of Alternative 2 (No Project/Specific Plan Build Alternative) to the Proposed Project**, Alternative 2 will generate approximately twice as many trips as the proposed Project. With twice as many vehicles using the Project site, the resulting

noise level will be approximately 3 dBA greater³ than the proposed Project. The average human ear can barely perceive a 3 dBA change (KA, p. 5); therefore this impact will be similar to the proposed Project. Due to the differences in topography between the Project site and the residences to the west, operational noise generated at the Project site will exceed the City's noise standards. Therefore, as with the proposed Project long term noise impacts from on-site operations under Alternative 2 will be significant and unavoidable.

Traffic generated by Alternative 2 will use the same roadways as Project-generated traffic. Because Alternative 2 will result in twice as many vehicles as the proposed Project, noise levels along area roadways will be approximately 3 dBA greater. The City considers a 5 dBA increase in noise to be substantial. As shown in **Table 5.12-L – Change in Existing Noise Levels at 50 feet from Centerline (Existing Plus Project Condition)** Project-generated noise will result in a less than 1 dBA increase above existing ambient noise levels for all evaluated roadway segments except Dan Kipper Drive west of Sycamore Canyon Boulevard (7.2 dBA increase) and Sierra Ridge Drive west of Sycamore Canyon Boulevard (2.7 dBA increase). Under Alternative 2, the increase in ambient noise level would be approximately 10 dBA along Dan Kipper Drive, which would sound twice as loud⁴ as the existing condition. There would be an approximate 6 dBA increase along Sierra Ridge Drive, which would be perceptible. Thus, in comparison to the proposed Project impacts with regard to a permanent increase above existing ambient noise levels would be greater; however, because there are no sensitive receptors in proximity to Dan Kipper Drive this impact could be less than significant..

Population/Housing

As shown in **Table 8-B –Comparison of Alternative 2 (No Project/Specific Plan Build Alternative) to the Proposed Project**, using the job projection rate from the *SCBPSP* Alternative 2 is expected to generate 2,063 permanent jobs. Although this is more jobs than the proposed Project, it is within the population projections used by SCAG for the 2016 RTP/SCS and the GP 2025. Jobs generated by Alternative 2 represent an increase of one percent over the number of jobs in 2012 and one percent of the jobs forecast for 2040. Given the small percentage of existing and projected jobs the Project represents and the overall unemployment rate, it is reasonable to anticipate that Project-related jobs will be filled by the local workforce. Alternative 2 does not propose housing. Impacts will be similar to the proposed Project.

Public Services

Because Alternative 2 does not propose housing and future jobs are expected to be filled by the local workforce, this alternative will not directly or indirectly result in the need for new or expanded schools, libraries, or community centers. Due to the nature of Alternative 2, impacts with regard to fire and police services would be similar to the proposed Project.

³ A doubling of an energy source, such as a doubled traffic volume would increase the noise level by 3 dBA (KA, p. 4).

⁴ A noise increase or decrease of 10 dBA sounds twice or half as loud. (KA, p. 5)

Recreation

Development of Alternative 2 will include trail parking at the southeast portion of the Project site and a fully improved trail along the southern portion of the Project. Construction of these facilities is considered a beneficial impact to recreational facilities. Because employment opportunities generated by development of Alternative 2 are expected to be filled by residents from the City and surrounding area, Alternative 2 will not result in an increased demand for parks or other recreational facilities. Impacts will be similar to the proposed Project.

Transportation/Traffic

As shown in shown in **Table 8-B –Comparison of Alternative 2 (No Project/Specific Plan Build Alternative) to the Proposed Project**, development of Alternative 2 would increase traffic levels on existing streets by approximately 5,253 daily trips, which is a 115 percent increase over the proposed Project. Trip distribution under Alternative 2 will be similar to that of the proposed Project, thus traffic will be doubled on area roadways in comparison to the proposed Project. As with the proposed Project, egress on Dan Kipper Drive will be limited.

In the existing traffic plus traffic from ambient growth plus cumulative development traffic plus Project traffic (E+A+C+P) condition, the only intersection that would operate at level of service (LOS) F is Sycamore Canyon Boulevard (NS)/Dan Kipper Drive (EW). Project-related delay at this intersection is 0.9 seconds. This is not a significant impact according to the City of Riverside Traffic Impact Analysis Guidelines because the delay is less than 1.0 second. Alternative 2 would double traffic at this intersection and result in a delay greater than 1.0 second, which would be a significant unavoidable impact because it is not feasible to widen this intersection.

The Eastride-Eucalyptus Interstate 15 (I-15) Northbound off-ramp is projected to fail in the E+A and E+A+C conditions without Alternative 2 traffic. This off-ramp will operate at an acceptable LOS with Alternative 2 traffic once the I-215 North Project is complete. The I-215 North Project is a Measure A project. However, since design has not commenced on the I-215 North Project and the City has no control over when design and construction will be completed, the addition of Alternative 2 traffic to this off-ramp is significant.

The Fair Isle-Box Springs I-215 Northbound on-ramp is projected to fail in the E+A+C condition without Alternative 2 traffic. This on-ramp will operate at an acceptable LOS with the addition of one mainline mixed flow lane for this on-ramp. However, this improvement is not programmed and it is not a part of Measure A or any other funding program. The City cannot control when improvements to the interstate system are made and there is no mechanism for the collection or payment of fair share fees. The addition of Alternative 2 traffic to this on-ramp is significant.

Relationship to Project Objectives

Under the Specific Plan Build Alternative, the Project site would be developed with two manufacturing buildings and supporting infrastructure would be constructed according to the land use and zoning for the Project site identified in the City's 2025 GP and *Sycamore Canyon*

Business Park Specific Plan. Table 8-C Alternative 2 (No Project/Specific Plan Build Alternative) Ability to Meet Project Objectives identifies the Project objectives and whether or not Alternative 2 meets each objective.

Table 8-C – Alternative 2 (No Project/Specific Plan Build Alternative) Ability to Meet Project Objectives

Project Objective	Alternative Meets Objective?
<p>Because the Project site is owned by two separate and unrelated land owners, develop the site to create two parcels, with a building on each parcel. One of the buildings will be for the operation of a logistics center and the other building will be for the operation of a use consistent with those uses permitted in the Business Manufacturing Park Zone; thereby accommodating the needs of both separate and unrelated land owners.</p>	<p>No. Alternative 2 would not develop and operate at least one logistics center. Two buildings would be constructed under this alternative for manufacturing purposes.</p>
<p>Develop and operate a logistics center that takes advantage of existing City infrastructure and is adjacent to similar industrial logistics and distribution center uses.</p>	<p>No. Under Alternative 2 a logistics center will not be developed. Alternative 2 proposes manufacturing uses.</p>
<p>Develop and operate a logistics center that is in close proximity to March Inland Port, State Route 215/State Route 60 and Interstate 10, to support the distribution of goods throughout the region and that also limits truck traffic distribution to residential areas within the City and neighboring jurisdictions.</p>	<p>No. Under Alternative 2 a logistics center will not be developed.</p>
<p>Develop and operate a logistics center that will attract quality tenants and will be competitive with other similar facilities in the region.</p>	<p>No. Alternative 2 will not develop and operate a logistics center; thus this Alternative will not attract quality tenants or be regionally competitive.</p>
<p>Maximize efficient goods movement throughout the region by locating a logistics center in close proximity to the Ports of Los Angeles and Long Beach, enabling trucks servicing the site to achieve a minimum of two roundtrips per day.</p>	<p>No. Alternative 2 will not maximize efficient goods movement because it will not locate a logistics center in proximity to the ports.</p>

Project Objective	Alternative Meets Objective?
Develop and operate a logistics center that maximizes the use of one of the few remaining large industrial sites in the City and that is in proximity to the Ports of Los Angeles and Long Beach, to realize substantial unmet demand in the City and the region, allowing the City to compete on a domestic and international scale through the efficient and cost-effective movement of goods.	No. Alternative 2 will not develop and operate a logistics center. Thus this Alternative will not allow the City to compete on a domestic and international scale through the efficient and cost-effective movement of goods.
Develop and operate a logistics center that meets industry standards for operational design criteria.	No. Alternative 2 will not develop and operate a logistics center.
Implement the <i>Sycamore Canyon Business Park Specific Plan</i> through development of a land use allowed by the Industrial land use designation and consistent with the development standards and criteria relevant to the site and proposed use.	Yes. Alternative 2 will implement the <i>Sycamore Canyon Business Park Specific Plan</i> because manufacturing uses are permitted.
Facilitate the development of underutilized land currently planned for industrial uses that, maximizes the use of the site and responds to market demand within the <i>Sycamore Canyon Business Park Specific Plan</i> area for a logistics center.	No. Alternative 2 will not respond to the market demand in the <i>Sycamore Canyon Business Park Specific Plan</i> area for a logistics center.
Provide a densely landscaped buffer between the Project site and the residential development to the north.	Yes. Alternative 2 would provide a densely landscaped buffer between the Project site and the residential development to the north.
Provide an on-site mitigation area to mitigate for the loss of riparian/riverine resources.	Yes. Alternative 2 would provide on-site mitigation.
Positively contribute to the economy of the City through new capital investment, creation of new employment opportunities, including opportunities for highly trained workers, and expansion of tax base.	Yes. Alternative 2 would positively contribute to the economy of the City and provide opportunities for highly trained workers and the expansion of the tax base.

Alternative 2 Conclusion

Because Alternative 2 (No Project/Specific Plan Development) will generate twice as many trips as the proposed Project, none of this alternative's environmental impacts would be decreased in comparison to the proposed Project. This alternative does not reduce or eliminate the Project's significant and unavoidable impacts to air quality, noise, or transportation/traffic. Because Alternative 2 proposes manufacturing, this alternative does not meet any of the

Project objectives associated with development and operation of a logistics center. Therefore, Alternative 2 is rejected as infeasible.

8.5.3 Alternative 3 – Reduced Density Alternative

Under the reduced density logistics alternative, the proposed development of the site would be scaled down by reducing the building floor area by 30 percent of that proposed in the original 1.43 million SF project. The reduction in floor area would lead to a proportional reduction in the building footprint (1,003,519 SF of floor area) and a corresponding decrease in Project parking area. This alternative assumes access to the site, trail and fire access to Sycamore Canyon Wilderness Park, and the on-site Mitigation Area would be the same as the proposed Project.

The reduced density alternative could be realized by scaling down both proposed buildings. If both buildings are scaled down, Building 1 would comprise approximately 709,096 SF, and Building 2 would comprise approximately 294,423 SF, for a total of 1,003,519 SF of floor area.

Table 8-D – Comparison of Alternative 3 (Reduced Density Alternative) to the Proposed Project shows a comparison of the Proposed Project to the Reduced Density Alternative.

**Table 8-D –Comparison of Alternative 3
(No Project/Specific Plan Build Alternative) to the Proposed Project**

Component	Proposed Project	Alternative 3	Difference
Type of Development	Logistics Center	Logistics Center	None
Total Building Size	1,375,169 SF	1,003,519 SF	30% decrease
Projected Employment	860–1,335 ^a	602–935 ^b	728–1,203 lesser
On Site Mitigation Area	Yes	Yes	NA
Width of Landscaping at the Northern Property Boundary	64 feet	50 feet	NA
Trail Parking, Trail, Fire Access Road	Yes	Yes	NA
Trip Generation (No. Vehicles)			
Total Trips/Day	2,409	1,686	30% decrease
Passenger Cars	1,492	1,044	30% decrease
Trucks (total 2, 3, and 4+ Axle)	917	642	30% decrease
2 Axle	156	109	30% decrease
3 Axle	208	146	30% decrease
4+ Axle	553	642	30% decrease

Notes

- a Low end based on Based on an average of 1,598 SF of logistics space per employee per *Logistics Trends and Specific Industries that Will Drive Warehouse and Distribution Growth and Demand for Space*, March 2010 prepared by the NAIOP Research Foundation. (2010 NAIOP, Figure 3, p. 12). Number of employees calculated as follows: 1,375,174 total SF ÷ 1,598 SF/employee = 860 employees. Upper end based on the County of Riverside employee generation rate for light industrial uses of 1,030 SF per employee; number of

Component	Proposed Project	Alternative 3	Difference
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employees calculated as follows: 1,375,174 total SF ÷ 1,030 SF/employee = 1,335 employees.

- b Assumes 30 percent fewer employees based on reduced building size.

8.5.3.1 Evaluation of Alternative 3

Aesthetics

Alternative 3 (Reduced Density Alternative) would result in the construction of approximately 1.0 million SF of buildings for logistics/distribution uses and reduce the square footage of each building by 30 percent compared to the proposed Project. As with the proposed Project, Alternative 3 would modify the visual character of the Project site through grading, vegetation removal, construction of buildings, associated parking, walls, fencing, landscaping, trail parking, a trail, fire access road, and parking and security lighting. The grading concept would remain the same as the proposed Project so that the structures' comparable height to existing residences would preserve views of the Box Springs Mountains. Lighting under Alternative 3 would be shielded and directed downward and away from the adjacent residences and Sycamore Canyon Wilderness Park. Therefore, impacts resulting from implementation of Alternative 3 would be similar to the proposed Project.

Agriculture and Forestry Resources

The Project site and surrounding area does not contain any Prime Farmland, Farmland of Statewide Importance, Unique Farmland (Farmland for CEQA purposes), forest land, or timberland (**Figure 5.2-1 – Designated Farmland at the Project Site**). As with the proposed Project, development under Alternative 3 would eliminate approximately 68 acres of Locally Important Farmland; however agricultural uses are not permitted in the SCBPSP area and the Project site has not been farmed for decades. Therefore, impacts resulting from the implementation of Alternative 3 would be similar to the proposed Project.

Air Quality

Alternative 3 would develop approximately 30 percent less building square footage and reduce truck traffic by approximately 30 percent, which in turn reduces air quality emissions by a similar amount. Air quality impacts related to construction would be similar to the proposed Project and will not exceed SCAQMD thresholds because the daily construction activity would be similar and the same site acreage would be disturbed. The long-term air quality impacts resulting from mobile sources would be reduced due to the reduction of building size, but would not avoid impacts resulting from NO_x emissions exceeding the SCAQMD daily regional thresholds, based on **Table 5.3-D**. Localized emissions of criteria pollutants would decrease due to the decrease in total trucks trips accessing the site. Like the proposed Project, localized emissions would not exceed the applicable SCAQMD LST and the impacts would be less than significant.

Health risks associated with diesel exhaust would be reduced compared to the proposed Project because the daily truck trips will decrease as a result of building size, thus decreasing impacts of toxic air contaminants. This impact would be less than that of the proposed Project, but would also be less than significant.

Therefore, under Alternative 3, impacts to air quality impacts would be less than the proposed Project, but would remain significant and unavoidable due to the long-term exceedance of NO_x emissions from operations.

Biological Resources

Although Alternative 3 would have a smaller footprint with regard to building sizes and parking area, this alternative would permanently impact suitable habitat for nesting birds and burrowing owls, and low quality raptor foraging habitat. Because the riparian/riverine resources and waters under the jurisdiction of the USACE, RWQCB, and CDFW (**Figure 5.4.2 – USACE/RWQCB Jurisdictional Delineation Map** and **Figure 5.4-3 – CDFW Jurisdictional Delineation Map**) bisect the Project site in a north-south direction, Alternative 3 would not completely avoid impacts to these resources. Because Alternative 3 would be required to comply with the provisions of the MSHCP and incorporate the same mitigation measures as the proposed Project, impacts would be similar to the proposed Project.

Cultural Resources

Although Alternative 3 would have a smaller footprint with regard to building sizes and parking area, this alternative would permanently impact the three bedrock milling sites that have been identified as tribal cultural resources within a tribal cultural landscape by one or more Native American Tribes. Because Alternative 3 would be required to implement the same mitigation measures as the Project, which includes relocation of all or a portion of the bedrock milling features to another location on the Project site, impacts would be similar to the proposed Project.

Geology and Soils

Under Alternative 3 the Project site would be graded substantially in the same way to minimize visibility of the building(s) from the adjacent neighborhood through the use of elevational and building height differences. This alternative would require the same geotechnical design considerations and require the same grading exceptions as the proposed Project.

Greenhouse Gas Emissions

Development of Alternative 3 would result in the same disturbance area (site footprint) as the proposed Project. Thus, the one-time construction-related GHG emissions from Alternative 3 were assumed to be the same as the Project. For the purposes of Alternative 3, the same amount of trees would be planted in on-site Mitigation Area; therefore, the amount of CO_{2e} emissions sequestered from development of Alternative 3 would be similar to the proposed Project. Total GHG emissions from Alternative 3 (which includes amortized construction emissions and sequestration and operational emissions) would be less than the proposed Project due to the decrease in total traffic trip generation and building size. Because the BAU

emissions for Alternative 3 would also include the same development as Alternative 3, it is anticipated that Alternative 3's GHG emissions reductions from the BAU may be similar to the proposed Project and would also achieve the City's RRG CAP reduction target for 2020 and hence the AB 32 reduction target for 2020. Alternative 3 would also comply with all present and future regulatory measures developed in accordance with AB 32 and CARB's Scoping Plan, and incorporates a number of Project design features that would further minimize GHG emissions, which are incorporated as mitigation measures **MM AQ 1** through **MM AQ 22**.

Therefore, GHG impacts associated with this Alternative are considered to be the similar to the proposed Project and less than significant.

Hazards and Hazardous Materials

Development of Alternative 3 would be similar to the proposed Project. Any potential impacts associated with hazards and hazardous materials would be reduced to less than significant levels through adherence to laws and regulations, compliance with FAR Part 77, and consistency with the March Air Reserve Base/Inland Port Airport (MARB/APA) Land Use Consistency Plan. Thus, potential adverse impacts associated with hazards or hazardous materials are similar to that of the proposed Project.

Hydrology and Water Quality

Under Alternative 3 the same basic storm drain facilities would be constructed as those included with the proposed Project including the construction of the off-site storm drain in Lance Drive that ultimately connects to the 120-inch diameter storm drain in Eastridge Avenue. Drainage would be collected in on-site facilities that would be conveyed via the new storm drain in Lance Drive to the storm drain in Eastridge Avenue prior to being discharged into the "marsh." Under this alternative, there would be potential urban runoff from the alternative's paved areas. This potential impact is the same as the proposed Project and would also be reduced to less than significant levels through compliance with mandatory regulatory requirements. Therefore, impacts associated with Alternative 3 would be the same as that of the proposed Project.

Land Use and Planning

Similar to the proposed Project, with approval of the GP2025 Circulation Element Amendment, *Sycamore Canyon Business Park Specific Plan* Amendment to the Circulation Plan, and the grading exception, all of which are part of the proposed Project, development of Alternative 3 would be consistent with the GP 2025 and *SCBPSP*. Development of the Project site for logistics/industrial uses at a reduced density is consistent with the GP 2025 Land Use designation of Business/Office Park and the zoning designation of BMP. Impacts would be similar to the proposed Project.

Mineral Resources

Alternative 3 would result in the development of a site previously used for granite mining operations prior to the late 1980s – early 1990s. As with the proposed Project, development of

Alternative 3 would preclude the use of the Project site for mining operations. Impacts would be the same as the proposed Project.

Noise

Alternative 3 would develop approximately 30 percent less building square footage and reduce trips by approximately 30 percent. Development of Alternative 3 would result in the same disturbance area (site footprint) as the proposed Project, therefore similar types and amounts of construction equipment will be used, and there would be no perceptible difference in construction noise levels under Alternative 3. As with the proposed Project, Alternative 3 would require a 12-foot tall temporary noise barrier along the Project site's northern and western boundaries to reduce construction noise. However, even with the temporary wall and other construction noise mitigation measures, construction noise will result in a substantial increase in noise over the ambient noise level and impacts will be significant and unavoidable.

Alternative 3 would generate long-term noise from on-site operations and vehicular traffic on area streets. As with the proposed Project, Alternative 3 operations will generate noise from vehicle movements within the proposed parking areas, idling trucks, loading and unloading activities, trash compactors and rooftop HVAC systems. The dominant operational noise for Alternative 3 will generally include noise associated with semi-trucks (tractor-trailers) entering and exiting the Project site and accessing dock areas, removal and hook-up of trailers, occasional truck air brakes, and vehicles associated with employees.. Point source noise decreases by 6 DBA for each doubling of distance between the noise source and receiver.

Operational noise will be generated from parking lots, rooftop-mounted equipment, diesel truck engines, exhaust systems, and loading and unloading of materials. As shown in **Table 8-D – Comparison of Alternative 3 (Reduced Density Alternative) to the Proposed Project**, Alternative 3 will generate approximately 30 percent fewer trips than the proposed Project. With 30 percent fewer vehicles using the Project site, the resulting noise level will be approximately 1 dBA less than the proposed Project. However, this is not enough of a reduction in operational noise for impacts under Alternative 3 to be less than significant.

In order to effectively attenuate noise, a continuous barrier that blocks the line of sight⁵ is needed between the noise source and the receiver. Due to the differences in topography between the Project site and the residences to the west, to be effective a barrier should be installed at the top of the slope on the resident's property. Because the Project applicant does not have control over the installation of noise barriers, long term noise impacts from on-site operations under Alternative 3 will be significant and unavoidable.

Traffic generated by Alternative 3 will use the same roadways as Project-generated traffic. Because Alternative 3 will result in 30 percent fewer trips noise levels along area roadways will be less than what is shown in **Table 5.12-L – Change in Existing Noise Levels at 50 feet from Centerline (Existing Plus Project Condition)**. Under Alternative 3, the projected

⁵ "Breaking the line" of sight refers to the location and height of a barrier. Transparent noise barriers are available that will preserve visibility.

increase in ambient noise along Dan Kipper Drive would be 6 dBA, which is less than the increase as a result of the Project. However, because this increase is more than 5 dBA over the existing ambient noise levels it is considered substantial but because there are no sensitive receptors in proximity to Dan Kipper Drive this impact would be less than significant.

Population/Housing

As shown in **Table 8-D –Comparison of Alternative 3 (Reduced Density Alternative) to the Proposed Project**, using the same job projection rates as the Project, Alternative 3 is expected to generate 602-935 permanent jobs, which is 30% less than the proposed Project. Jobs generated by Alternative 3 represent an increase of approximately one percent over the number of jobs in 2012 and less than one percent of the jobs forecast for 2040. Given the small percentage of existing and projected jobs the Project represents and the overall unemployment rate, it is reasonable to anticipate that Project-related jobs will be filled by the local workforce. Alternative 3 does not propose housing. Impacts will be similar to the proposed Project.

Public Services

Because Alternative 3 does not propose housing and future jobs are expected to be filled by the local workforce, this alternative will not directly or indirectly result in the need for new or expanded schools, libraries, or community centers. Due to the nature of Alternative 3, impacts with regard to fire and police services would be similar to the proposed Project.

Recreation

Development of Alternative 3 will also include trail parking and a fully improved trail to provide access to the Sycamore Canyon Wilderness Park. Construction of these facilities is considered a beneficial impact to recreation. Because employment opportunities generated by development of Alternative 3 are expected to be filled by residents from the City and surrounding area, Alternative 3 will not result in an increased demand for parks or other recreational facilities. Impacts will be similar to the proposed Project.

Transportation/Traffic

As shown in shown in **Table 8-D –Comparison of Alternative 3 (Reduced Density Alternative) to the Proposed Project**, development of Alternative 3 would decrease traffic levels on existing streets by approximately 723 daily trips, which is a 30 percent reduction from the proposed Project. Trip distribution under Alternative 3 will be similar to that of the proposed Project, thus traffic will be reduced on area roadways in comparison to the proposed Project. As with the proposed Project, egress on Dan Kipper Drive will be limited.

In the E+A+C+P condition, the only intersection that would operate at LOS F is Sycamore Canyon Boulevard (NS)/Dan Kipper Drive (EW). Project-related delay at this intersection is 0.9 seconds. Because Alternative 3 generates fewer trips the delay would be less. This is not a significant impact because the delay is less than 1.0 second.

The Eastride-Eucalyptus 1-15 Northbound off-ramp is projected to fail in the E+A and E+A+C conditions without Alternative 3 traffic. This off-ramp will operate at an acceptable LOS with

Alternative 3 traffic once the I-215 North Project is complete. However, because the completion date of the I-215 North project is unknown, this impact is significant.

The Fair Isle-Box Springs I-215 Northbound on-ramp is projected to fail in the E+A+C condition without Alternative 3 traffic. This on-ramp will operate at an acceptable LOS with the addition of one mainline mixed flow lane for this on-ramp. However, this improvement is not programmed and it is not a part of Measure A or any other funding program. The City cannot control when improvements to the interstate system are made and there is no mechanism for the collection or payment of fair share fees. The addition of Alternative 3 traffic to this on-ramp is significant.

Relationship to Project Objectives

Under the Reduced Density Alternative, the site would be developed as a smaller logistics center by reducing building floor area by approximately 30 percent. This reduction could be achieved by construction of two smaller buildings. **Table 8-E –Summary of Alternative 3 – Reduced Density Alternative Success at meeting Project Objectives** identifies the Project objectives and whether or not Alternative 3 meets each objective.

**Table 8-E –Alternative 3 (Reduced Density Alternative)
 Ability to Meet Project Objectives**

Project Objective	Alternative Meets Objective?
Because the Project site is owned by two separate and unrelated land owners, develop the site to create two parcels, with a building on each parcel. One of the buildings will be for the operation of a logistics center and the other building will be for the operation of a use consistent with those uses permitted in the Business Manufacturing Park Zone; thereby accommodating the needs of both separate and unrelated land owners.	Yes. Alternative 3 would develop and operate a logistics center consisting of two stand-alone buildings. However, because the largest building would be approximately 709,096 SF, this would not satisfy market demand for logistics centers, which is for buildings over one million SF.
Develop and operate a logistics center that takes advantage of existing City infrastructure and is adjacent to similar industrial logistics and distribution center uses.	Yes. Alternative 3 would develop and operate a logistics center that would use existing City infrastructure and is adjacent to similar uses. However, since the largest building would be approximately 709,096 SF, this would not satisfy the market demand for logistics centers. Thus, although Alternative 3 satisfies this objective it does so to a lesser degree than the proposed Project.

Project Objective	Alternative Meets Objective?
<p>Develop and operate a logistics center that is in close proximity to March Inland Port, State Route 215/State Route 60 and Interstate 10, to support the distribution of goods throughout the region and that also limits truck traffic distribution to residential areas within the City and neighboring jurisdictions.</p>	<p>Yes. Alternative 3 would develop and operate a logistics center in proximity to March Inland Port and area freeways that limits truck traffic in residential areas. (See Figure 5.16-5 – Project Trip Distribution (Trucks – Outbound) and Figure 5.16-6 – Project Trip Distribution (Trucks – Inbound))</p>
<p>Develop and operate a logistics center that will attract quality tenants and will be competitive with other similar facilities in the region.</p>	<p>No. Alternative 3 would not develop and operate a logistics center that will attract quality tenants, because market demand is for buildings greater than 1 million SF. Alternative 3 will not be competitive because there is a high availability of buildings in the 700,000 SF and 300,000 SF range.</p>
<p>Maximize efficient goods movement throughout the region by locating a logistics center in close proximity to the Ports of Los Angeles and Long Beach, enabling trucks servicing the site to achieve a minimum of two roundtrips per day.</p>	<p>Yes. Due to the location of the Project site in the proximity to I-215 and State Route 60, Alternative 3 would allow trucks servicing the site to achieve a minimum of two roundtrips per day. Thus, although Alternative 3 satisfies this objective it does so to a lesser degree than the proposed Project.</p>
<p>Develop and operate a logistics center that maximizes the use of one of the few remaining large industrial sites in the City and that is in proximity to the Ports of Los Angeles and Long Beach, to realize substantial unmet demand in the City and the region, allowing the City to compete on a domestic and international scale through the efficient and cost-effective movement of goods.</p>	<p>No. Alternative 3 would not meet the market demand for logistics centers with buildings greater than 1 million SF since the largest building would be approximately 709,096 SF. Alternative 3 would also not maximize the use of one of the few remaining large industrial sites in the City.</p>
<p>Develop and operate a logistics center that meets industry standards for operational design criteria.</p>	<p>Yes. Alternative 3 would develop and operate a logistics center that meets industry standards for operational design criteria. Thus, although Alternative 3 satisfies this objective it does so to a lesser degree than the proposed Project.</p>
<p>Implement the <i>Sycamore Canyon Business Park Specific Plan</i> through development of a land use allowed by the Industrial land use designation and consistent with the development standards and criteria relevant to the site and proposed use.</p>	<p>Yes. With approval of the proposed amendment to the <i>SCBPSP</i> Circulation Plan, Alternative 3 would be consistent with the Specific Plan's development standards. Thus, although Alternative 3 satisfies this objective it does so to a lesser degree than the proposed Project.</p>

Project Objective	Alternative Meets Objective?
Facilitate the development of underutilized land currently planned for industrial uses that, maximizes the use of the site and responds to market demand within the <i>Sycamore Canyon Business Park Specific Plan</i> area for a logistics center.	No. Alternative 3 reduces site coverage to 31 percent, which does not maximize site usage.
Provide a densely landscaped buffer between the Project site and the residential development to the north.	Yes. Alternative 3 would provide a landscaped buffer.
Provide an on-site mitigation area to mitigate for the loss of riparian/riverine resources.	Yes. Alternative 3 would provide on-site mitigation for riparian/riverine resources.
Positively contribute to the economy of the City through new capital investment, creation of new employment opportunities, including opportunities for highly trained workers, and expansion of tax base.	Yes. Alternative 3 would positively contribute to the economy through the construction of new buildings, creation of new employment opportunities, and the expansion of the tax base. Thus, although Alternative 3 satisfies this objective it does so to a lesser degree than the proposed Project.

Alternative 3 Conclusion

Because Alternative 3 (Reduced Density Alternative) reduces development by 30 percent in comparison to the propose Project, this alternative would have reduced impacts to air quality, greenhouse gas emissions, noise, and transportation/traffic. However, this alternative does not reduce the Project’s significant and unavoidable impacts to air quality, noise, or transportation/traffic to a less than significant level.

Although Alternative 3 meets most of the Project objectives, these objectives are met to a lesser degree than the proposed Project, because of scarcity of sites of this size, the attendant land cost of sites of this size, and the low Inland Empire market lease rates for product of this type, unless site coverage (the percentage of the site that is covered with buildings) reaches at least 45 percent(the reduced density alternative reduces site coverage from 45 percent to 31 percent), the rate of return from the lease would be too low to justify the cost and risk of investment. The feasibility of the reduced density alternative is further impacted by the loss of economies of scale in the construction of smaller buildings, which would drive the rate of return on the investment to below zero. Finally, a survey of industrial buildings in the Inland Empire submarket shows very low availability of buildings in the 1,000,000 square foot size range and greater and a high availability of buildings in the 700,000 square foot size range, and the 300,000 square foot size range, respectively. Due to all of these factors, a reasonable developer would not take the risk to develop the reduced density alternative. For these reasons, Alternative 3 is rejected as infeasible.

8.6 Comparison of Alternatives

Table 8-F – Comparison of Alternatives Matrix, below, compares the potential environmental impacts of each alternative and ranks each alternative as having impacts that are increased, similar, or reduced in comparison to the proposed Project.

Table 8-F – Comparison of Alternatives Matrix

Environmental Issue	Proposed Project	Alternative 1 No Project	Alternative 2 Specific Plan Build	Alternative 3 Reduced Density
Aesthetics	LTSM	Reduced	Similar	Similar
Agriculture and Forestry Resources	LTS	Similar	Similar	Similar
Air Quality	SU	Reduced, still SU	Increased	Reduced, still SU
Biological Resources	LTSM	Reduced	Similar	Similar
Cultural Resources	LTSM	Reduced	Similar	Similar
Geology and Soils	LTS	Reduced	Similar	Similar
Greenhouse Gas (GHG) Emissions	LTSM	Reduced	Increased	Reduced
Hazards and Hazardous Materials	LTSM	Reduced	Similar	Similar
Hydrology and Water Quality	LTS	Reduced	Similar	Similar
Land Use and Planning	LTS	Reduced	Similar	Similar
Mineral Resources	LTS	Reduced	Similar	Similar
Noise	SU	Reduced, still SU	Increased	Reduced, still SU
Population and Housing	LTS	Reduced	Similar	Similar
Public Services	LTS	Reduced	Similar	Similar
Recreation	LTS	Increased	Similar	Similar
Transportation / Traffic	SU	Reduced, still SU	Increased	Reduced, still SU
Utilities/Service Systems	LTS	Reduced	Similar	Similar

LTS = Less than Significant Impact

LTSM = Less than Significant Impact with Mitigation

SU = Significant and Unavoidable Impact

8.7 Environmentally Superior Alternative

Section 15126.6(e)(2) of the State *CEQA Guidelines*, requires the identification of the environmentally superior alternative. Of the alternatives evaluated above, Alternative 1 (No

Project, No Build) is the environmentally superior alternative, because the Project site would stay in its existing condition. Since no development would occur, Alternative 1 would eliminate the significant and unavoidable impacts to air quality, noise, and transportation/traffic. The State *CEQA Guidelines* also require the identification of another environmentally superior alternative if the No Project Alternative is the environmentally superior alternative.

Alternative 3 (Reduced Density Alternative) is environmentally superior to the proposed Project because this alternative would reduce impacts to air quality, GHG emissions, noise, and transportation/traffic by approximately 30 percent in comparison to the proposed Project. However, it would not reduce the significant and unavoidable impacts to air quality, noise, and transportation/traffic to less than significant. Alternative 3 would meet most of the Project objectives and would meet the basic Project objective of a logistics center with two stand-alone buildings to accommodate the intended uses of two separate and unrelated landowners; however, it would not meet the market demand for buildings greater than 1 million SF .

Although Alternative 3 meets most of the Project objectives, because of scarcity of sites of this size, the attendant land cost of sites of this size, and the low Inland Empire market lease rates for product of this type, unless site coverage reaches at least 45 percent the rate of return from the lease would be too low to justify the cost and risk of investment. Site coverage under Alternative 3 is only 31 percent. Thus, the feasibility of Alternative 3 is further impacted by the loss of economies of scale in the construction of a smaller building, which would drive the rate of return on the investment to below zero. Finally, a survey of industrial buildings in the Inland Empire submarket shows very low availability of buildings in the 1,000,000 square foot size range and greater and a high availability of buildings in the 700,000 square foot size range, and the 300,000 square foot size range, respectively. Due to all of these factors, a reasonable developer would not take the risk to develop the reduced density alternative. For these reasons, Alternative 3 is rejected as infeasible.

8.8 References

In addition to other documents, the following references were used in the preparation of this section of this DEIR:

- ABC DEIR City of Riverside, *Draft Environmental Impact Report Alessandro Business Center*, June 2009. (Available at <http://aquarius.riversideca.gov/plnimage/DocView.aspx?dbid=2&id=54499>, accessed July 20, 2016.)
- MJPA
Zoning March Joint Powers Authority, Zoning Map, updated March 24, 2014. (Available at http://marchjpa.com/documents/docs_forms/planning_zoningmap.pdf, accessed July 6, 2016.)
- KA Kunzman Associates, Inc., *Noise Impact Analysis for the Sycamore Canyon Business Park Warehouse*, August 1, 2016. (Appendix I)