

7. *Alternatives to the Proposed Project*

7.1 INTRODUCTION

7.1.1 Purpose and Scope

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Guidelines Section 15126.6). This chapter identifies potential alternatives to the proposed project and evaluates them, as required by CEQA.

Key provisions of the CEQA Guidelines on alternatives (Section 15126.6[a] through [f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in this Draft EIR (DEIR).

- “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” (15126.6[b]).
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact” (15126.6[e][1]).
- “The no project analysis shall discuss the existing conditions at the time the Notice of Preparation (NOP) is published, and at the time the environmental analysis is commenced, as well as what would reasonably be 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. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives” (15126.6[e][2]).
- “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project” (15126.6[f]).
- “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)” (15126.6[f][1]).
- “For alternative locations, “only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR” (15126.6[f][2][A]).
- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative” (15126.6[f][3]).



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For each development alternative, this analysis:

- Describes the alternative,
- Analyzes the impact of the alternative as compared to the proposed project,
- Identifies the impacts of the project that would be avoided or lessened by the alternative,
- Assesses whether the alternative would meet most of the basic project objectives,
- Evaluates the comparative merits of the alternative and the project.

Per the CEQA Guidelines Section 15126.6(d), additional significant effects of the alternatives are discussed in less detail than the significant effects of the project as proposed.

7.1.2 Project Objectives

Pursuant to CEQA Guidelines Section 15126.6(a), alternatives evaluated in an EIR are those that "...would feasibly attain most of the basic objectives of the project." As described in Section 3.2, *Statement of Objectives*, of Chapter 3, *Project Description*, the following vision statement and objectives have been established for the proposed project and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts:

Guiding Vision: Be an employment base and commercial and business hub for the San Gabriel Valley and Los Angeles metropolitan area.

- Maintain a diverse and prosperous economy consisting of a variety of industrial, professional, and commercial uses.
- Achieve a sustained economic viability that provides a tax base supportive of the City's growth potential, maintains fiscal viability, and funds capital improvement programs that serve present and future businesses.
- Provide the flexibility to respond to changing market conditions.
- Enhance the value of businesses and properties within the City such that additional investment is stimulated by providing a quality level of services, safety, security, infrastructure, and design.
- Achieve a professional appearance in the City marked by a functional quality in its buildings and structures, landscaping, signage, and utilities and infrastructure systems.
- Provide prudent public ownership and timely disposition of strategic properties to achieve the City's economic development and revitalization goals.
- Provide infrastructure and circulation systems that are properly sized to support future growth and are maintained in a timely fashion.
- Support the surrounding population through sponsorship of community-building programs, such as the Youth Activities League, and through a development review process that considers our neighbors and non-business uses.

7.1.3 Significant Impacts of the Project

As discussed above, a primary consideration in defining project alternatives is their potential to reduce or eliminate significant impacts compared to the proposed project. The impact analysis in Chapter 5 of this DEIR concludes that the following impacts would remain significant and unavoidable after mitigation for the proposed project:

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Air Quality

- **Impact 5.2-1:** Mitigation measures incorporated into future development projects for operation and construction phases would reduce criteria air pollutant emissions associated with theoretical buildout of the General Plan Update. Goals and policies are included in the General Plan Update that would facilitate continued City cooperation with the South Coast Air Quality Management District (SCAQMD) and Southern California Association of Governments to achieve regional air quality improvement goals; promotion of energy conservation design and development techniques; encouragement of alternative transportation modes; and implementation of transportation demand management strategies. However, no mitigation measures are available that would reduce impacts associated with inconsistency with the air quality management plan, and impacts would remain **significant and unavoidable** due to the magnitude of emissions that would be generated by the theoretical cumulative buildout of the City in accordance with the General Plan Update.
- **Impact 5.2-2:** Mitigation measures incorporated into future development projects for construction phases would reduce criteria air pollutant emissions associated with theoretical buildout of the General Plan Update. Goals and policies are included in the General Plan Update that would reduce air pollutant emissions. However, due to the magnitude of emissions that would be generated by future construction activities, no mitigation measures are available that would reduce impacts below SCAQMD's thresholds, and impacts would remain **significant and unavoidable**.
- **Impact 5.2-3:** Mitigation measures incorporated into future development projects for operation phases would reduce criteria air pollutant emissions associated with theoretical buildout of the General Plan Update. Goals and policies are included in the General Plan Update that would reduce air pollutant emissions. However, due to the magnitude of emissions generated by office, commercial, industrial and warehousing land uses, no mitigation measures are available that would reduce impacts below SCAQMD's thresholds. Mitigation Measure 6-1 requires preparation of a Climate Action Plan to reduce greenhouse gas (GHG) emissions impacts. Measures considered as part of the Climate Action Plan to reduce idling, natural gas use, and encourage use of alternative-fueled vehicles would also reduce criteria air pollutants within the City. However, operational phase criteria air pollutant impacts would remain **significant and unavoidable**.
- **Impact 5.2-4:** Goals and policies are included in the General Plan Update that would reduce concentrations of criteria air pollutant emissions and air toxics generated by new development. Review of projects by SCAQMD for permitted sources of air toxics would ensure health risks are minimized. Mitigation Measure 2-2 would ensure mobile sources of toxic air contaminants not covered under SCAQMD permits are considered during subsequent project-level environmental review. Development of individual projects may achieve the incremental risk thresholds established by SCAQMD. However, the incremental increase in health risk associated with individual projects is judged to be cumulatively considerable and would contribute to already elevated levels of cancer and noncancer health risks in the South Coast Air Basin, and impacts would remain **significant and unavoidable**.



Greenhouse Gas Emissions

- **Impact 5.6-1:** Theoretical buildout of the City of Industry in a post-2035 scenario would contribute to global climate change through direct and indirect GHG emissions. GHG emissions are considered substantial enough to result in a significant cumulative impact. Statewide GHG emissions reduction measures that are being implemented over the next 10 years would assist the City in reducing its community-wide GHG emissions. However, even with statewide measures, the City would fall short

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of the state's goal to reduce existing emissions by 15 percent from existing levels. Despite implementation of mitigation measures requiring the City to prepare and implement a plan to align the City's GHG reduction goals with the GHG reduction targets of Assembly Bill 32, impacts would remain **significant and unavoidable**.

Noise

- **Impact 5.10-3:** Mitigation Measure 10-1 (construction-related vibration) would reduce the potential impacts associated with construction activities to the extent feasible. However, due to the potential proximity of construction activities to sensitive uses and the potential longevity of construction activities, and despite the application of mitigation measures, construction-related vibration impacts would remain **significant and unavoidable**.
- **Impact 5.10-5:** Mitigation Measure 10-2 (construction-related noise) would reduce the potential impacts associated with construction activities to the extent feasible. However, due to the potential proximity of construction activities to sensitive uses and the potential longevity of construction activities and despite the application of mitigation measures, construction-related noise impacts would remain **significant and unavoidable**.

Transportation and Traffic

- **Impact 5.13-1:** Mitigation Measures 13-2 and 13-3 require the City of Industry to participate in relevant and applicable programs developed and adopted by Caltrans for I-10, I-605, and SR-60 freeway mainline lane improvements needed to mitigate direct, project-related impacts under the Existing (Year 2010) With Project and Post-2035 General Plan Buildout Conditions. However, because the improvements needed for the affected freeway mainline segments are under Caltrans's sole jurisdiction, the City cannot implement the freeway improvements itself. Therefore, a temporary or short-term impact may occur if the timing of the freeway improvements is uncertain (e.g., Caltrans does not have the total necessary funds to implement the freeway improvements at the time the City of Industry participates in the adopted Caltrans program). Consequently, impacts to freeway mainline segments as a result of implementation of the General Plan Update would remain **significant and unavoidable**.

7.2 ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING/PROJECT PLANNING PROCESS

The following is a discussion of the land use alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in this DEIR.

7.2.1 Alternative Development Area

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines Section 15126.6[f][2][A]). However, since the proposed project consists of a General Plan Update, an alternative development area analysis is not appropriate. More specifically, since the proposed project is specific to the City of Industry and its Sphere of Influence (SOI), no feasible alternative development area exists that could be used for meaningful analysis.

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7.2.2 No Project/No Development Alternative

The No Project/No Development Alternative assumes no new development would occur, restricting any growth within the City of Industry. No alterations to the City would occur (with the exception of previously-approved development), and all residential development and commercial and industrial uses would generally remain in their current conditions. No new roadway infrastructure improvements (local or regional) or other capital improvement programs would be funded or implemented. It is assumed that the current population (approximately 463 people) of the City would not change, though it should be recognized that the City cannot in reality control whether population growth occurs. Therefore, some minor population growth could occur within the City, to the extent that existing residential units could accommodate additional residents. Any population growth in the City would be accommodated through increasing the number of persons per household. Future conditions within the City, except for the impacts of regional growth, would generally be the same as existing conditions, which were described in the environmental setting section for each environmental topic in Chapter 5.

It should be noted that this is a purely hypothetical alternative that is not realistic given that even if the General Plan Update is not adopted by the City, property owners in Industry would retain the development rights they have under the current General Plan.

None of the impacts of the proposed General Plan Update would result under this alternative since new development would not be accommodated. This alternative would reduce the magnitude of impacts associated with implementation of the General Plan Update. In particular, this alternative would avoid the increased impacts to the local and regional circulation system that could occur as the development facilitated by the General Plan Update occurs. Other impacts that would be lower, but not eliminated, than would occur under the proposed project relate to air quality, greenhouse gas emissions, and noise. It should be noted however that existing land uses already result in significant air quality impacts. More specifically, existing land uses exceed various South Coast Air Quality Management District (SCAQMD) regional significance thresholds. Therefore, air quality would not improve even if no new development would occur.

Implementation of this alternative would not, on the other hand, provide additional jobs to the surrounding population through the variety of professional and employment-generating uses proposed under the General Plan Update. The employment growth that would be accommodated under the General Plan Update would help improve the jobs/housing balance of the San Gabriel Valley region, which is generally housing rich. Additionally, this alternative would not help meet one of the key project objectives, to provide infrastructure and circulation systems that are properly sized to support future growth and are maintained in a timely fashion. However, regional traffic growth would still occur, resulting in the potential for traffic impacts that would otherwise be mitigated by the proposed project. It should also be noted that this alternative would not achieve any of the objectives established for the proposed project. Therefore, this alternative has been rejected from further consideration.

7.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Based on the criteria listed above, the following three alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the basic objectives of the project but which may avoid or substantially lessen any of the significant effects of the project. These alternatives are analyzed in detail in the following sections.

- No Project/Existing General Plan Alternative
- Reduced Intensity Alternative
- Increased Office and Decreased Warehousing/Distribution Alternative



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An EIR must identify an “environmentally superior” alternative and where the No Project Alternative is identified as environmentally superior, the EIR is then required to identify as environmentally superior an alternative from among the others evaluated. Each alternative's environmental impacts are compared to the proposed project and determined to be environmentally superior, neutral, or inferior. However, only those impacts found significant and unavoidable are used in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project. As detailed above, significant unavoidable impacts for the proposed project include air quality, greenhouse gas emissions, noise, and transportation/traffic. Section 7.7 identifies the environmentally superior alternative.

The proposed project is analyzed in detail in Chapter 5 of this DEIR.

Alternatives Comparison

The following statistical analysis provides a summary/comparison of general socioeconomic theoretical buildout projections of the three alternatives and the proposed project. It is important to note that these are not growth projections. That is, they do not anticipate what is likely to occur by a certain time horizon, but rather provide a theoretical buildout scenario that would only occur if all the areas of the City were to develop to the probable capacities yielded by the three alternatives. The following statistics were developed as a tool to understand better the difference between the alternatives analyzed in this chapter. Table 7-1 identifies City-wide information regarding dwelling unit, population, and employment projections, and also provides the nonresidential square footage for the proposed project and each of the alternatives.

**Table 7-1
Statistical Summary Comparison**

	<i>Proposed Project</i>	<i>No Project/Existing General Plan Alternative</i>	<i>Reduced Intensity Alternative</i>	<i>Increased Office and Decreased Warehousing/ Distribution Alternative</i>
Commercial	12,569,136 SF	761,592	10,055,308 SF	16,492,596
Employment	98,701,614 SF	141,043,220	78,961,291 SF	74,251,514
Recreation and Open Space	840.6 Acres	751.6 Acres	840.6 Acres	840.6 Acres
Institutional	132.7 Acres	44.8 Acres	132.7 Acres	132.7 Acres
Dwelling Units	59	59	59	59
Population	463	463	463	463
Jobs	109,715	125,082	87,772	104,625

7.4 NO PROJECT/EXISTING GENERAL PLAN ALTERNATIVE

Section 15126.6(e) of the CEQA Guidelines requires that an EIR evaluate and analyze the impacts of the “No-Project” Alternative. When the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the no-project alternative is the continuation of the plan, policy, or operation into the future. Therefore, the No Project/Existing General Plan Alternative, as required by the CEQA Guidelines, analyzes the effects of continued implementation of the current Industry General Plan. This alternative assumes the current General Plan would remain the adopted long-range planning policy document for the City. Development would continue to occur in the City in accordance with the current General Plan and Zoning Code.

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Figure 3-5, *Current Land Use Plan*, shows the land use designations of the current General Plan. The current General Plan contains four land use designations: Industrial, Commercial, Institutional, and Recreation and Open Space. There are three General Plan/Area Plans that provide direction for the future use of the land within Industry's SOI (see Table 3-2, *General Plan Designations for Sphere of Influence*). As shown in Table 7-1, *Statistical Summary Comparison*, the current General Plan buildout would accommodate a total of 59 residential units, 761,592 square feet of commercial uses, 141,043,220 square feet of employment uses, 751.6 acres of recreation and open space, and 44.8 acres of institutional uses.

In relation to theoretical buildout of the proposed General Plan Update, this alternative would include the same number of dwelling units (59, which includes 57 dwelling units and 2 group homes) and population (463); approximately 11,807,544 fewer square feet of commercial uses; approximately 42,341,606 more square feet of employment uses; approximately 87.9 fewer acres of institutional uses; approximately 89 fewer acres of recreation and open space; and approximately 15,367 more jobs.

7.4.1 Environmental Assessment

Aesthetics

The types of impacts associated with degradation of scenic vistas, decreased visual quality, obstruction/alteration of scenic resources within a state- or locally designated scenic highway, and increased light and glare would be similar to the proposed project under this alternative, as the overall character of the theoretical buildout potential would be similar. Development intensities in some areas of the City would be increased under this alternative, since approximately 30.5 million more square feet of additional nonresidential square footage could be developed. As a result, building heights/bulk/massing would likely be increased but still be within that allowed by the City's Zoning Code.

As with the proposed General Plan Update, the No Project/Existing General Plan Alternative would not degrade the visual character of the City because development projects would be required to adhere to the existing plans, policies, and standards that are geared toward maintaining the aesthetic qualities of the City. The No Project/Existing General Plan Alternative would, however, increase potential light or glare sources due to the increased building intensities. Additionally, the policies related to aesthetics under the Land Use and Resource Management Elements of the General Plan Update would not be implemented under this alternative. However, any new improvements or developments would be subject to the City of Industry Zoning Code, which would ensure that aesthetics and light and glare impacts would not occur. Overall, the aesthetic impacts associated with this alternative would be similar (less than significant) to the proposed project, though slightly increased.

Air Quality

Compared to the proposed project, regional and local construction-related air pollutant emissions would substantially increase under this alternative due to the increase in nonresidential square footage (approximately 30.5 million square feet). As with the General Plan Update, due to the scale of development activity associated with theoretical buildout of this alternative, construction emissions would exceed the SCAQMD regional significance thresholds; cumulatively contribute to the nonattainment designations of the South Coast Air Basin (SoCAB) for PM₁₀ (entire basin), PM_{2.5} (entire basin), NO₂ (entire basin), and lead (Los Angeles County only); and expose sensitive receptors to elevated concentrations of air pollutants. Therefore, this alternative would substantially increase the proposed project's construction-related significant and unavoidable impact.



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Under the No Project/Existing General Plan Alternative, an increase of nonresidential land use square footage would result in a greater number of passenger vehicle and truck trips. As a result, mobile-source emissions would substantially increase. Intensification in nonresidential land uses under this alternative would also increase the number of stationary sources. As with the proposed project, operational pollutant emissions associated with this alternative are projected to substantially exceed (and increase in comparison to the proposed project) SCAQMD's regional thresholds for criteria pollutants for VOC, NO_x, CO, SO₂, PM₁₀, and PM_{2.5}. Overall, this alternative would substantially increase pollutant emissions from both mobile and stationary sources, and would not eliminate the proposed project's operations-related significant and unavoidable impact.

Additionally, the policies related to air quality under the Land Use, Circulation, Resource Management, and Safety Elements of the General Plan Update would not be implemented under this alternative.

In comparison to the General Plan Update, this alternative would substantially increase construction- and operations-related air quality impacts generated within the City, and significant and unavoidable short- and long-term impacts would remain.

Biological Resources

Impacts on biological resources under this alternative would be similar to those of the proposed project since the amount of area planned for development would not change. As with the proposed project, impacts on biological resources could occur in certain areas of the City (the vacant lot at 18800 Railroad Avenue [Lot D on Figure 5.3-1, *Vacant Land/Lots*] and the vacant 592-acre IBC site), as indicated in Section 5.3, *Biological Resources*. However, any future development of Lot D or other projects accommodated by this alternative that would disturb or impact riparian habitat would be required to prepare site-specific environmental documentation (e.g., jurisdictional delineation) in accordance with CEQA and the requirements of the applicable regulatory agency (e.g., CDFG, USFWS, Corps) to ensure that no impacts would occur or that impacts would be mitigated accordingly. Additionally, development on the IBC site would be required to adhere to the mitigation measures outlined in the 2004 IBC EIR or the 2009 IBC Supplemental EIR. Even though the intensity of development would also be greater for the No Project/Existing General Plan Alternative, impacts caused by development under this alternative are expected to be similar (less than significant with mitigation) to the proposed project since the same amount of acreage would be developed.

Cultural Resources

Under this alternative, development intensity would increase by approximately 30.5 million square feet of nonresidential land uses; however, the amount of undeveloped acreage available for development would remain the same. As a result, impacts to cultural resources would be expected to be substantially similar to those of the proposed project. Ground-disturbing activities associated with theoretical buildout of the No Project/Existing General Plan Alternative would continue to occur in order to accommodate new development. Consequently, the potential of encountering fossil-bearing soils and rock formations, destroying below-ground paleontological resources, and affecting archaeological sites and sites of cultural significance to Native Americans would be similar to the proposed project.

Additionally, the current General Plan does not contain policies supporting the preservation of historical and cultural resources. Therefore, this alternative does not give the City the policy guidance regarding new development, which could affect historical and cultural resources. However, cultural resources are governed on a site-by-site basis and the probability of uncovering new resources or of disturbing known resources is considered in project-level environmental reviews. Mitigation measures are developed for projects that have

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the potential to disturb cultural resources, to lessen or eliminate impacts. Therefore, implementation of the No Project/Existing General Plan Alternative would result in impacts similar to those of the General Plan Update, which are considered less than significant.

Geology and Soils

Earthquake hazards would be of similar magnitude under the No Project/Existing General Plan Alternative as under the proposed project because similar future development would still occur throughout the City. Other site-specific geological hazards for this alternative such as erosion, loss of topsoil, liquefaction, subsidence, landslides, and expansive soils, would also be similar to those of the proposed project. This alternative would, however, expose more structures and people to impacts related to geology and soils, since it would increase nonresidential development intensity by 30.5 million square feet and create approximately 15,367 more jobs than the General Plan Update. However, new development under both this alternative and the General Plan Update would be required to conform to the most current building and grading codes and standards, which include strict building specifications to ensure structural and foundational stability. In terms of geologic hazards, this alternative would have a similar impact (less than significant) to that of the proposed project, although slightly greater.

Greenhouse Gas Emissions

Development of an additional 30.5 million square feet of nonresidential land uses under this alternative would increase construction-related GHG. As with the proposed project, due to the scale of development activity associated with theoretical buildout of this alternative, emissions from construction-related activities would cumulatively contribute to climate change impacts. Therefore, this alternative would not eliminate the proposed project's construction-related significant and unavoidable impact. In fact, impacts would be substantially greater under this alternative.

Under this alternative, mobile- and stationary-source emissions, in addition to indirect emissions from energy usage from operation of the proposed project, would increase due to the development of an additional 30.5 million square feet of nonresidential land uses. The increase in these land uses would result in more vehicle trips generated upon theoretical buildout of the alternative and would increase the amount of GHG emitted, since mobile sources are the primary contributors of GHG. Additionally, GHG emissions from stationary sources and energy usage would increase compared to the proposed project due to the greater amount of building square footage that would be developed under this alternative. Overall, under the No Project/Existing General Plan Alternative, GHG emissions from stationary and mobile sources and energy use would be substantially greater compared to the proposed project. Due to the scale of development activity associated with theoretical buildout of this alternative, the land uses under this alternative would produce a substantial amount of GHG and would be considered to significantly contribute to the global climate change impact in California to a greater extent than the proposed project. Therefore, this alternative would not only eliminate the proposed project's operations-related significant and unavoidable impact, but would substantially increase impacts.

Hazards and Hazardous Materials

Impacts from hazards and hazardous materials would be similar to the proposed project, though slightly greater, because the No Project/Existing General Plan Alternative increases overall development intensity by 30.5 million square feet of nonresidential land uses. Consequently, impacts related to the routine transport, use, or disposal of hazardous materials, as well as those related to reasonably foreseeable upset conditions would be slightly increased. As with the proposed project, development under this alternative could expose more people to hazardous substances that may be present in soil or groundwater, and demolition activities



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could expose workers and the environment to asbestos-containing materials and/or lead-based paint and residues. In comparison to the proposed project, this alternative would expose a greater number of construction workers to the development of an additional 30.5 million square feet of nonresidential intensity. However, development under both the proposed project and this alternative would be required to adhere to federal, state, and local laws and regulations protecting humans and the environment from exposure to hazards. As with the proposed project, implementation of the existing regulations related to hazardous materials would reduce this impact to a less-than-significant level. For future developments on hazardous materials sites, appropriate remediation activities would be required before construction activities could be permitted.

Additionally, as with the proposed project, development in certain areas of the City associated with this alternative could expose people or structures to significant impacts related to fire risks (see Figure 5.7-1, *Fire Hazard Severity Zones*). However, future development under this alternative would be required to comply with the County of Los Angeles Fire Code. All building plans in the City must undergo a plan review by the Los Angeles County Fire Department (LACFD) to ensure compliance with the fire code. Therefore, impacts from fire hazards would be similar (less than significant) to the proposed project.

Furthermore, the policies related to hazards and hazardous materials under the Land Use, Circulation, Resource Management, and Safety Elements of the General Plan Update would not be implemented under this alternative.

Overall, the hazard-related impacts associated with this alternative would be similar (less than significant) to the proposed project, though slightly increased.

Hydrology and Water Quality

Similar to the proposed project, runoff from construction sites under this alternative would be subject to the National Pollutant Discharge Elimination System (NPDES) permit standards, which require the development of a Storm Water Pollution Prevention Plan (SWPPP) prior to grading activities, and implementation of the SWPPP during construction. As with the proposed project, projects implemented under this alternative would also be required to control pollutants in discharges of stormwater from postconstruction activities under Los Angeles County's MS4 permit (No. CAS6118036). In terms of water quality, this alternative would have a similar impact (less than significant) to the proposed project, although slightly greater.

Although building massing, bulk, and height would increase under this alternative as a result of an additional 30.5 million square feet of nonresidential land uses, the area planned for development would not change. Therefore, the increase in the quantity of runoff discharged under this alternative would be similar to that of the proposed project. As with the proposed project, individual development projects under this alternative would be subject to the provisions of the City's Municipal Code and to additional development review in order to ensure that they do not exceed the capacity of the storm drain system. Future development projects considered for approval under this alternative would also have to meet the following requirements for limiting impacts to the existing drainage system and to minimize impacts related to erosion, siltation, or flooding: preparation of a project-specific hydrology study and implementation of best management practices (BMPs) to minimize runoff and provide for infiltration of stormwater into the soil onsite. It is therefore expected that the net effect under this alternative would be similar to the proposed project, although slightly higher, and individual projects would not exceed the capacity of the storm drain system.

Additionally, development in certain areas (see Figure 5.8-4, *Dam Inundation Hazards*) of the City under this alternative could expose people or structures to significant impacts related to flood risks. However, as with the proposed project, impacts associated with these hazards would not be significant for the same reasons

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outlined in Section 5.8, *Hydrology and Water Quality*. This alternative would have less than significant impacts resulting from exposure to flooding as a result of a levee or dam, or effects of seiche, tsunami, or mudflow, similar to the proposed project (see Section 5.8).

Furthermore, the policies related to hydrology and water quality under the Resource Management and Safety Elements of the General Plan Update would not be implemented under this alternative. Policies outlined in these various elements would help to mitigate hydrology and water quality impacts.

Hydrology and water quality impacts overall would be slightly greater for this alternative in comparison to the proposed project, but impacts would remain less than significant.

Land Use and Planning

Under the No Project/Existing General Plan Alternative, development would continue to occur in the City in accordance with the current General Plan and its related land use map. Development intensities would be increased by approximately 30.5 million square feet of nonresidential land uses, although the location, designation, type, and distribution of land uses would remain relatively similar to that which would occur under the General Plan Update. In comparison to the No Project/Existing General Plan Alternative, the General Plan Update includes a refinement of land use designations, redesignation of certain areas to better correspond with existing economic and development plans, and increased policy direction for the City overall. Therefore, land use impacts under this alternative would generally be the same (less than significant) as the General Plan Update, though slightly increased.

Noise

Under this alternative there would be approximately 30.5 million square feet more of nonresidential development planned, thereby increasing potential short-term noise impacts to sensitive receptors from construction of this additional development potential. Additionally, the increase in construction activities would also increase potential short-term vibration impacts to sensitive receptors. As with the proposed project, due to the scale of development activity associated with theoretical buildout of this alternative and because construction activities associated with any individual development may still occur near existing sensitive receptors, and because noise disturbances may occur for prolonged periods of time, construction noise and vibration impacts from theoretical buildout of this alternative would be significant and unavoidable. Consequently, this alternative would substantially increase the significant and unavoidable construction noise and vibration impact.

This alternative would also increase long-term noise impacts from mobile and stationary sources. The greater amount of nonresidential land uses would increase the number of vehicle trips generated by new development and would therefore increase the alternative's contribution to traffic noise on local and regional roadways. The overall number of stationary sources would also increase under this alternative. Therefore, operational-related noise impacts would be greater under this alternative, but the level of impact (less than significant) would remain the same as for the proposed project.

Additionally, the policies related to noise under the Land Use and Safety Elements of the General Plan Update would not be implemented under this alternative. Noise-related policies outlined in these various elements would help to mitigate noise impacts.

Overall, this alternative would not eliminate the proposed project's significant and unavoidable construction-related noise and vibration impacts. On the contrary, this alternative would substantially increase short- and long-term noise impacts.



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Population and Housing

Under the No Project/Existing General Plan Alternative, nonresidential development intensity would be increased by approximately 30.5 million square feet compared to the proposed project. As shown in Table 7-1, theoretical buildout under this alternative would result in 15,367 more jobs than the proposed project. The number of units (59, which includes 57 dwelling units and 2 group homes) would stay the same, and so would the population (463). This alternative would improve the jobs/housing balance in the San Gabriel Valley subregion more than the proposed project. Similar to the General Plan Update, the No Project/Existing General Plan Alternative would not induce substantial population growth either directly or indirectly or displace existing housing or people. Therefore, this alternative would reduce impacts compared to the proposed project, and impacts would remain less than significant.

Public Services

Under this alternative, impacts associated with fire protection and law enforcement services would be greater than for the proposed project, since there would be approximately 30.5 million square feet more of nonresidential square footage and approximately 15,367 more jobs than the General Plan Update, and the amount of fire and police services required to serve the higher employment growth under this alternative would be higher. Additionally, the policies related to emergency services under the Land Use and Safety Elements of the General Plan Update would not be implemented under this alternative. Impacts from this alternative on the provision of fire and police services would not be significant, but would be slightly greater than for the proposed project. As with the proposed project, impacts to school services and facilities would be less than significant through the provision of SB 50 fees. Overall, impacts to public services would be similar (less than significant) to the proposed project, although slightly greater.

Transportation and Traffic

The No Project/Existing General Plan Alternative would generate a greater number of average daily trips (ADT) than the proposed project, because it would potentially develop approximately 30.5 million more square feet of nonresidential land use potential. The increased ADT would result in significant impacts to study-area intersection operations. However, as with the General Plan Update, all intersections would operate at an acceptable level of service (LOS) with implementation of the mitigation measures outlined in Section 5.13, *Transportation and Traffic*, and any other mitigation measures required to reduce traffic impacts caused by this alternative. Therefore, intersections under this alternative would operate at an acceptable LOS with implementation of mitigation measures. Additionally, because this alternative generates a greater number of trips and vehicle miles travelled (VMT), it would increase cumulatively considerable impacts on Caltrans facilities, including freeway mainline segments. Because of the magnitude of development under this alternative, cumulative impacts to freeway mainline segments would be significant and unavoidable, similar to the proposed project, although greater.

As with the proposed project, circulation improvements under this alternative would be required to adhere to roadway design standards that would preclude the construction of any unsafe features, and implementation of the alternative would not impact helicopter overflight patterns. With regard to alternative modes of transportation (i.e., walking, non-motorized modes of transportation, and public transit), this alternative would not include the plans and policies found in the General Plan Update. Additionally, other policies related to transportation and traffic in the Land Use, Circulation, and Resource Management Elements of the General Plan Update would not be implemented this alternative. These policies would help to mitigate traffic impacts. Overall, this alternative would result in increased traffic impacts in comparison to the General Plan Update.

7. Alternatives to the Proposed Project

Utilities and Service Systems

The No Project/Existing General Plan Alternative would increase overall nonresidential development intensity by approximately 30.5 million square feet of nonresidential land uses and employment by 15,367 more jobs. As a result, this alternative would result in greater utilities and service systems impacts (e.g., increased water, wastewater, natural gas, and electricity demand) than the proposed project. Additionally, the policies related to utilities and service systems under the Land Use and Resource Management Elements of the General Plan Update would not be implemented under this alternative. Impacts under this alternative would remain less than significant, although substantially greater.

7.4.2 Ability to Reduce Environmental Impacts

The No-Project/Existing General Plan Alternative would have similar impacts (less than significant) with regards to aesthetics, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, public services, and utilities and service systems, though greater for some of these. This alternative would not reduce or eliminate the project's significant air quality, GHG, noise, or traffic impacts. In fact, this alternative would increase impacts related to short- and long-term air quality, GHG, short- and long-term noise, and short-term traffic.

7.4.3 Ability to Achieve Project Objectives

This alternative would meet most of the project objectives, with the exception of the following:

- Maintain a diverse and prosperous economy consisting of a variety of industrial, professional, and commercial uses.
- Achieve a sustained economic viability that provides a tax base supportive of the City's growth potential, maintains fiscal viability, and funds capital improvement programs that serve present and future businesses.
- Provide the flexibility to respond to changing market conditions.



Additionally, as noted above, unlike the No Project/Existing General Plan Alternative, the General Plan Update includes a refinement of land use designations, redesignation of certain areas to better correspond with existing economic and development plans, and increased policy direction for the City overall.

7.5 REDUCED INTENSITY ALTERNATIVE

This alternative was evaluated for its potential to: 1) reduce air quality impacts related to short-term construction and long-term operation activities; 2) reduce noise- and vibration-related impacts related to short-term construction activities; 3) reduce greenhouse gas emission impacts related to long-term operation activities; and 3) reduce traffic impacts related to long-term operation activities.

The Reduced Intensity Alternative would reduce the remaining growth potential associated with the proposed General Plan Update by 20 percent. The 20 percent reduction was based on the total theoretical buildout of the General Plan Update and applied on a citywide basis. More specifically, this alternative would reduce total commercial square footage to 10,055,308 and total employment square footage to 78,961,291, compared to the proposed General Plan Update (see Table 7-1, *Statistical Summary Comparison*). Land use designations would remain the same, although allowable commercial and employment intensities would be reduced.

7. Alternatives to the Proposed Project

In relation to theoretical buildout of the proposed General Plan Update, this alternative would include the same number of dwelling units (59, which includes 57 dwelling units and 2 group homes) and population (463); the same amount of recreation and open space (840.6 acres) and institutional (132.7 acres) uses; approximately 2,513,828 fewer square feet of commercial uses; approximately 19,740,323 fewer square feet of employment uses; and approximately 21,943 fewer jobs.

7.5.1 Environmental Assessment

Aesthetics

The types of impacts associated with degradation of scenic vistas, decreased visual quality, obstruction/alteration of scenic resources within a state- or locally designated scenic highway, and increased light and glare would be similar to the proposed project under this alternative, since the overall character of the theoretical buildout potential would be similar. Development intensities in some areas of the City would be reduced under this alternative. As a result, building heights/bulk/massing would likely be reduced. As with the proposed General Plan Update, the Reduced Intensity Alternative would not degrade the visual character of the City because it would have plans and policies for maintaining the aesthetic qualities of the City. The Reduced Intensity Alternative would slightly reduce potential light or glare sources due to the reduced building intensities. However, as with the General Plan Update, any new improvements or developments under this alternative would be subject to the regulations outlined in the City's Zoning Code, which would ensure that aesthetics and light and glare impacts would not occur. Overall, the aesthetic impacts associated with the Reduced Intensity Alternative would be similar to the proposed project, though slightly reduced. Impacts would remain less than significant.

Air Quality

A 20 percent reduction in commercial and employment land use square footages would reduce construction-related air pollutant emissions compared to the proposed project. Regional and local construction-related pollutant emissions associated with this alternative would be slightly reduced. However, as with the General Plan Update, due to the scale of development activity associated with theoretical buildout of this alternative, construction emissions would exceed the SCAQMD regional significance thresholds; cumulatively contribute to the nonattainment designations of the SoCAB for PM₁₀ (entire basin), PM_{2.5} (entire basin), NO₂ (entire basin), and lead (Los Angeles County only); and expose sensitive receptors to elevated concentrations of air pollutants. Therefore, this alternative would reduce but not eliminate the proposed project's construction-related significant and unavoidable impact.

Under the Reduced Intensity Alternative, a 20 percent reduction in commercial and employment land uses would result in fewer passenger vehicle and truck trips. As result, mobile-source emissions would be reduced. A reduction in land uses would also reduce the amount of stationary sources. However, a 20 percent reduction in land uses would not reduce operational pollutant emissions from this alternative to under the SCAQMD's regional thresholds for criteria pollutants (VOC, NO_x, CO, SO₂, PM₁₀, and PM_{2.5}). In addition, this alternative would not improve the jobs/housing balance in the San Gabriel Valley region to the same extent as the proposed project, since this alternative would provide fewer jobs in the region, which is considered housing rich. As a result, this alternative would increase VMT in the SoCAB because residents in the region would have to travel farther for employment opportunities, though localized impacts would be reduced. Overall, this alternative would reduce criteria air pollutants and toxic air contaminants but would not eliminate the proposed project's significant and unavoidable operations-related air quality impacts.

7. Alternatives to the Proposed Project

Biological Resources

Impacts on biological resources would be similar for both the proposed General Plan Update and the Reduced Intensity Alternative, since the amount of area planned for development would not change. As with the proposed project, impacts on biological resources could occur in certain areas of the City (the vacant lot at 18800 Railroad Avenue [Lot D on Figure 5.3-1, *Vacant Land/Lots*] and the vacant 592-acre IBC site), as indicated in Section 5.3, *Biological Resources*. However, any future development of Lot D or other projects accommodated by this alternative that would disturb or impact riparian habitat would be required to prepare site-specific environmental documentation (e.g., jurisdictional delineation) in accordance with CEQA and the requirements of the applicable regulatory agency (e.g., CDFG, USFWS, Corps) to ensure that no impacts would occur or that impacts would be mitigated accordingly. Additionally, development on the IBC site would be required to adhere to the mitigation measures outlined in the 2004 IBC EIR or the 2009 IBC Supplemental EIR. Even though the intensity of development would be reduced under the Reduced Intensity Alternative, impacts caused by development under this alternative are expected to be similar (less than significant with mitigation) to the proposed project since the same amount of acreage would be developed.

Cultural Resources

Under this alternative, development intensity would be reduced by 20 percent; however, the amount of undeveloped acreage available for development would remain the same. Ground-disturbing activities associated with theoretical buildout of the Reduced Intensity Alternative would continue to occur in order to accommodate new development. Consequently, the potential of encountering fossil-bearing soils and rock formations, destroying below-ground paleontological resources, and affecting archaeological sites and sites of cultural significance to Native Americans would still occur, similar to the proposed project. However, cultural resources are governed on a site-by-site basis and the probability of uncovering new resources or of disturbing known resources is considered in project-level environmental reviews. Mitigation measures are developed for projects that have the potential to disturb cultural resources, to lessen or eliminate impacts. Therefore, implementation of the Reduced Intensity Alternative would result in impacts similar to those of the General Plan Update, which are considered to be less than significant.



Geology and Soils

Earthquake hazards would be of similar magnitude under the Reduced Intensity Alternative as compared to the proposed project, because future development would still occur throughout the City. Other site-specific geological hazards associated with erosion, loss of topsoil, liquefaction, subsidence, landslides, and expansive soils would be similar for this alternative relative to the proposed project. Compared to the General Plan Update, this alternative would expose fewer people to impacts related to geology and soils because it would decrease the number of jobs by approximately 21,943. New development under both this alternative and the General Plan Update would be required to conform to the most current building and grading codes and standards, which includes strict building specifications to ensure structural and foundational stability. In terms of geologic hazards, this alternative would have a similar impact (less than significant) to that of the proposed project, although slightly reduced.

Greenhouse Gas Emissions

A 20 percent reduction in nonresidential square footage would substantially reduce construction-related GHG emissions. However, due to the scale of development activity associated with theoretical buildout of this alternative, emissions from construction-related activities would cumulatively contribute to climate change impacts.

7. Alternatives to the Proposed Project

Under this alternative, mobile- and stationary-source emissions, in addition to indirect emissions from energy usage from operation of the proposed project, would also be reduced due to the reduction in commercial and employment square footage. The 20 percent reduction would result in fewer passenger vehicle and truck trips generated upon theoretical buildout of the alternative, and would reduce the amount of GHG emitted, as mobile sources are the primary contributors of GHG. Additionally, GHG emissions from stationary sources and energy usage would be reduced compared to the proposed project due to the reduction in building square footage. Overall, under the Reduced Intensity Alternative, GHG emissions from stationary and mobile sources and energy use would be reduced by approximately 20 percent compared to the proposed project. However, due to the scale of development activity associated with theoretical buildout of this alternative, the land uses under this alternative would still produce a substantial amount of GHG and would be considered to significantly contribute to the global climate change impact in California, although to a lesser extent than the proposed project. Therefore, this alternative would substantially reduce but not eliminate the proposed project's operations-related significant and unavoidable impact.

Hazards and Hazardous Materials

Impacts from hazards and hazardous materials would be similar to the proposed project, though slightly reduced, because the Reduced Intensity Alternative reduces overall development intensity by 20 percent. Consequently, impacts related to the routine transport, use, or disposal of hazardous materials, as well as those related to reasonably foreseeable upset conditions would be slightly reduced, though already less than significant for the proposed project. As with the proposed project, development under the Reduced Intensity Alternative could expose people to hazardous substances that may be present in soil or groundwater, and demolition activities could expose workers and the environment to asbestos-containing materials and/or lead-based paint and residues. In comparison to the proposed project, this alternative would expose fewer construction workers because of the 20 percent reduction in nonresidential development intensity. However, development under both the proposed project and this alternative would be required to adhere to federal, state, and local laws and regulations protecting humans and the environment from exposure to hazards. As with the proposed project, implementation of the existing regulations related to hazardous materials would reduce this impact to a less than significant level. For future developments on hazardous materials sites, appropriate remediation activities would be required before construction activities could be permitted.

Additionally, as with the proposed project, development in certain areas of the City associated with this alternative could expose people or structures to significant impacts related to fire risks (see Figure 5.7-1, *Fire Hazard Severity Zones*). However as with the proposed project, development under this alternative would be required to comply with the County of Los Angeles Fire Code. All building plans in the City must undergo a plan review by LACFD to ensure compliance with the fire code. Therefore, impacts from fire hazards would be similar (less than significant) to the proposed project.

Overall, impacts under this alternative related to hazards and hazardous materials would be similar (less than significant) to the proposed project, although slightly reduced.

7. Alternatives to the Proposed Project

Hydrology and Water Quality

Although nonresidential intensity would be reduced under this alternative by 20 percent, similar alterations to drainage and hydrological patterns would occur. Similar to the proposed project, runoff from construction sites under this alternative would be subject to NPDES permit standards, which require the development of a SWPPP prior to grading activities and implementation of the SWPPP during construction. As with the proposed project, projects implemented under this alternative would also be required to control pollutants in discharges of stormwater from postconstruction activities under Los Angeles County's MS4 permit (No. CAS6118036). In terms of water quality, this alternative would have a less than significant impact, similar to the proposed project.

The increase in the quantity of runoff discharged under this alternative would be similar to that of the proposed project. As with the proposed project, individual development projects under this alternative would be subject to the provisions of the City's Municipal Code and to additional development review in order to ensure that they do not exceed the capacity of the storm drain system. Future development projects considered for approval under this alternative would also have to meet the following requirements for limiting impacts to the existing drainage system and to minimize impacts related to erosion, siltation, or flooding: preparation of a project-specific hydrology study and implementation of BMPs to minimize runoff and provide for infiltration of stormwater into the soil onsite. It is therefore expected that the net effect under this alternative would be similar to the proposed project, and individual projects would not exceed the capacity of the storm drain system.

Development in certain areas (see Figure 5.8-4, *Dam Inundation Hazards*) of the City could expose people or structures to significant flood risks. However, as with the proposed project, impacts associated with this hazard would not be significant for the same reasons outlined in Section 5.8, *Hydrology and Water Quality*. This alternative would have less than significant impacts resulting from exposure to flooding as a result of a levee or dam, or effects of seiche, tsunami, or mudflow, similar to the proposed project (see Section 5.8).

Hydrology and water quality impacts overall would be similar for this alternative in comparison to the proposed project and impacts would remain less than significant.

Land Use and Planning

Under the Reduced Intensity Alternative, development intensities would be reduced by 20 percent, but the location, designation, type and distribution of land uses would remain similar to that which would occur under the General Plan Update. Therefore, land use impacts under this alternative would be generally the same as the General Plan Update. Impacts would remain less than significant.

Noise

Under this alternative there would be 20 percent less nonresidential development planned, thereby eliminating potential short-term noise impacts to sensitive receptors from construction of these developments. Additionally, the reduction in construction activities would also reduce potential short-term vibration impacts to sensitive receptors. However, due to the scale of development activity associated with theoretical buildout of this alternative and because construction activities associated with any individual development may still occur near existing sensitive receptors, and because noise disturbances may occur for prolonged periods of time, construction noise and vibration impacts from theoretical buildout of this alternative would remain significant and unavoidable. Consequently, this alternative would substantially reduce but not eliminate the project's significant and unavoidable construction noise and vibration impact.



7. Alternatives to the Proposed Project

This alternative would also reduce long-term noise impacts from mobile and stationary sources. The reduction of nonresidential land uses would reduce the number of vehicle trips generated by new development and would therefore reduce the alternative's contribution to traffic noise on local and regional roadways. The overall number of stationary sources would also be reduced under this alternative. Therefore, operations-related noise impacts would be reduced under this alternative, but the level of impact (significant and unavoidable) would remain the same as compared to the proposed project.

Population and Housing

Under the Reduced Intensity Alternative, nonresidential development intensity would be reduced by 20 percent, as compared to the proposed project. As shown in Table 7-1, theoretical buildout under this alternative would result in 21,943 fewer jobs than the proposed project. The number of dwelling units (59, which includes 57 dwelling units and 2 group homes) would stay the same, and so would the population (463). As with the General Plan Update, this alternative would not induce substantial population growth (directly or indirectly) or involve the displacement of housing or people. However, this alternative would not improve the jobs/housing balance in the San Gabriel Valley subregion to the same extent as the proposed project. The benefits of providing additional jobs in a housing-rich area would be less under this alternative than the proposed project. Therefore, the Reduced Intensity Alternative would have similar or slightly greater impacts compared to the proposed project, but impacts would remain less than significant.

Public Services

Under this alternative, impacts associated with fire protection and law enforcement services would be reduced compared to the proposed project, since there would be 20 percent less development and approximately 21,943 fewer jobs than the General Plan Update. As with the proposed project, impacts from this alternative on the provision of fire and police services would not be significant, though slightly reduced. Additionally, as with the proposed project, impacts to school services and facilities would be less than significant through the provision of SB 50 fees. In general, impacts to public services would be slightly less than the proposed project, but would remain similar (less than significant) to the proposed project.

Transportation and Traffic

The Reduced Intensity Alternative would generate approximately 20 percent fewer ADT than the Land Use Plan of the General Plan Update. However, under the General Plan Update, all intersections would operate at an acceptable LOS with implementation of the mitigation measures outlined in Section 5.13, *Transportation and Traffic*, and therefore intersections under this alternative would also operate at an acceptable LOS. Additionally, because this alternative reduces VMT and trips by 20 percent, it would reduce impacts on Caltrans facilities, including freeway mainline segments. However, because of the magnitude of development that would occur under this alternative, impacts to freeway mainline segments would remain significant and unavoidable, similar to the proposed project.

Furthermore, under this alternative, circulation improvements would adhere to roadway design standards that would preclude the construction of any unsafe features, and implementation of the alternative would not impact helicopter overflight patterns. With regard to alternative modes of transportation (e.g., walking, non-motorized modes of transportation, and public transit), this alternative would still include the plans and policies for alternative forms of transportation found in the General Plan Update.

Overall, this alternative would substantially reduce but not eliminate the proposed project's significant and unavoidable cumulative impact on Caltrans freeway segments.

7. Alternatives to the Proposed Project

Utilities and Service Systems

Under the Reduced Intensity Alternative, overall nonresidential development intensity would be reduced by 20 percent. As shown in Table 7-1, compared to the proposed project, theoretical buildout under the Reduced Intensity Alternative would result in 2,513,828 and 19,740,323 less square footage of commercial and employment uses, respectively. This decrease would lead to 21,943 fewer jobs under this alternative. As a result, the Reduced Density Alternative would result in slightly fewer utilities and service systems impacts (e.g., decreased water, natural gas, and electricity demand) than the proposed project. However, as with the proposed project, impacts would remain less than significant.

7.5.2 Ability to Reduce Environmental Impacts

The Reduced Intensity Alternative would have similar impacts (less than significant) with regard to aesthetics, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, public services, and utilities and service systems, though slightly reduced for some of these. This alternative would reduce project-related significant and unavoidable impacts associated with air quality, GHG, noise and traffic, but would not eliminate these impacts.

7.5.3 Ability to Achieve Project Objectives

This alternative would meet all of the objectives of the proposed project, with the exception of one of the City's key objectives, to provide flexibility to respond to changing market conditions. Additionally, this alternative does not accommodate as many opportunities for employment growth in order to improve the jobs/housing ratio in the San Gabriel Valley Council of Governments subregion, which is considered housing rich.



7.6 INCREASED OFFICE AND DECREASED WAREHOUSING/DISTRIBUTION ALTERNATIVE

This alternative was evaluated for its potential to: 1) reduce air quality impacts related to long-term operation activities and 2) reduce greenhouse gas emissions impacts related to long-term operation activities.

The Increased Office and Decreased Warehousing/Distribution Alternative would increase the amount of office square footage and decrease the amount of warehousing/distribution square footage associated with the proposed General Plan Update. The increase and reduction were based on the total theoretical buildout of the General Plan Update and applied on a citywide basis. This alternative would increase total commercial square footage to 16,492,596 and reduce total employment square footage to 74,251,514, compared to the proposed General Plan Update (see Table 7-1, *Statistical Summary Comparison*). Specifically, the office use of the commercial land use designation would increase by 25 percent, and the warehousing/distribution use of the employment land use designation would decrease by 25 percent. All other uses and associated square footages within the Commercial and Employment land use designations would remain the same. Land use designations would also remain the same, although allowable commercial and employment intensities would be increased and reduced, respectively.

In relation to theoretical buildout of the proposed General Plan Update, this alternative would include the same number of dwelling units (59, which includes 57 dwelling units and 2 group homes) and population (463); the same amount of recreation and open space (840.6 acres) and institutional (132.7 acres) uses; approximately 3,923,460 more square feet of commercial uses; approximately 24,450,100 fewer square feet of employment uses; and approximately 5,090 fewer jobs.

7. Alternatives to the Proposed Project

7.6.1 Environmental Assessment

Aesthetics

The types of impacts associated with degradation of scenic vistas, decreased visual quality, obstruction/alteration of scenic resources within a state- or locally designated scenic highway, and increased light and glare would be similar to the proposed project under this alternative, since the overall character of the theoretical buildout potential would be similar. Although this alternative would include more office square footage and less warehousing/distribution square footage, development intensities would be similar to the proposed project. As a result, building heights/bulk/massing would be similar. As with the proposed General Plan Update, the Increased Office and Decreased Warehousing/Distribution Alternative would not degrade the visual character of the City, since it would have plans and policies for maintaining the aesthetic qualities of the City. The impacts from light or glare sources would also be similar. As with the proposed project, any new improvements or developments under this alternative would be subject to the City's Zoning Code, which would ensure that aesthetics and light and glare impacts would not occur. Overall, the aesthetic impacts associated with this alternative would be similar (less than significant) to the proposed project.

Air Quality

Construction-related air pollutant emissions under this alternative would be similar to the General Plan Update since the total amount of nonresidential square footage would be the same. Therefore, regional and local construction-related pollutant emissions associated with this alternative would be similar. However, as with the General Plan Update, due to the scale of development activity associated with theoretical buildout of this alternative, construction emissions would exceed the SCAQMD regional significance thresholds; cumulatively contribute to the nonattainment designations of the SoCAB for PM₁₀ (entire basin), PM_{2.5} (entire basin), NO₂ (entire basin), and lead (Los Angeles County only); and expose sensitive receptors to elevated concentrations of air pollutants. Therefore, this alternative would not eliminate the proposed project's construction-related significant and unavoidable impact.

This alternative would significantly reduce the amount of truck trips generated by proposed warehousing/distribution land uses, which would in turn significantly reduce the amount of diesel emissions in comparison to the proposed project. While office land uses may have a higher trip generation rate than warehousing/distribution uses (see Table 5.13-5, *Project Trip Generation Rates*), resulting in more passenger vehicle trips, overall VMT would be reduced because of the longer truck trip length associated with regional truck trips (associated with goods movement) compared to commute trip lengths (associated with office commutes by employees) in the SoCAB. The swap in nonresidential land uses (office for warehousing/distribution) would not increase the amount of stationary sources in comparison to the proposed project, since the overall nonresidential square footage would stay the same.

Consequently, criteria air pollutants (VOC, NO_x, CO, SO₂, PM₁₀, and PM_{2.5}) and toxic air contaminants would be reduced under this alternative. However, due to the magnitude of development, this alternative would not eliminate the proposed project's significant and unavoidable operations-related air quality impacts.

Biological Resources

Impacts on biological resources would be similar for both the proposed General Plan Update and the Increased Office and Decreased Warehousing/Distribution Alternative, since the amount of area planned for development would not change. As with the proposed project, impacts on biological resources could occur in certain areas of the City (the vacant lot at 18800 Railroad Avenue [Lot D on Figure 5.3-1, *Vacant Land/Lots*] and the vacant 592-acre IBC site), as indicated in Section 5.3, *Biological Resources*. However, any future

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development of Lot D or other projects accommodated by this alternative that would disturb or impact riparian habitat would be required to prepare site-specific environmental documentation (e.g., jurisdictional delineation) in accordance with CEQA and the requirements of the applicable regulatory agency (e.g., CDFG, USFWS, Corps) to ensure that no impacts would occur or that impacts would be mitigated accordingly. Additionally, development on the IBC site would be required to adhere to the mitigation measures outlined in the 2004 IBC EIR or the 2009 IBC Supplemental EIR. Impacts caused by development under this alternative are expected to be similar (less than significant with mitigation) to the proposed project since the same amount of acreage would be developed.

Impacts on biological resources under this alternative would be similar to those of the proposed project since the amount of area planned for development would not change. As with the proposed project, impacts on biological resources could occur in certain areas of the City (the vacant lot at 18800 Railroad Avenue [Lot D on Figure 5.3-1, *Vacant Land/Lots*] and the vacant 592-acre IBC site), as indicated in Section 5.3, *Biological Resources*. However, any future development of Lot D or other projects accommodated by this alternative that would disturb or impact riparian habitat would be required to prepare site-specific environmental documentation (e.g., jurisdictional delineation) in accordance with CEQA and the requirements of the applicable regulatory agency (e.g., CDFG, USFWS, Corps) to ensure that no impacts would occur or that impacts would be mitigated accordingly. Additionally, development on the IBC site would be required to adhere to the mitigation measures outlined in the 2004 IBC EIR or the 2009 IBC Supplemental EIR. Even though the intensity of development would also be greater for the No Project/Existing General Plan Alternative, impacts caused by development under this alternative are expected to be similar (less than significant with mitigation) to the proposed project since the same amount of acreage would be developed.

Cultural Resources

Under this alternative, development intensity would be similar to the proposed project and the amount of undeveloped acreage available for development would remain the same. As a result, impacts to cultural resources would be expected to be substantially similar to those of the proposed project. Ground-disturbing activities associated with theoretical buildout of the Increased Office and Decreased Warehousing/Distribution Alternative would continue to occur in order to accommodate new development. Consequently, the potential of encountering fossil-bearing soils and rock formations, destroying below-ground paleontological resources, and affecting archaeological sites and sites of cultural significance to Native Americans would still occur, similar to the proposed project. However, cultural resources are governed on a site-by-site basis and the probability of uncovering new resources or of disturbing known resources is considered in project-level environmental reviews. Mitigation measures are developed for projects that have the potential to disturb cultural resources, to lessen or eliminate impacts. Therefore, implementation of this alternative would result in impacts similar (less than significant) to those of the General Plan Update.

Geology and Soils

Earthquake hazards would be of similar magnitude under the Increased Office and Decreased Warehousing/Distribution Alternative as under the proposed project, because future development would still occur throughout the City. Other site-specific geological hazards associated with erosion, loss of topsoil, liquefaction, subsidence, landslides, and expansive soils would also be similar for this alternative and the proposed project. Compared to the General Plan Update, this alternative would also expose slightly fewer people to impacts related to geology and soils, since it would decrease the number of jobs by approximately 5,090. New development under both this alternative and the General Plan Update would be required to conform to the most current building and grading codes and standards, which includes strict building



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specifications to ensure structural and foundational stability. In terms of geologic hazards, this alternative would have a similar impact (less than significant) as the proposed project, although slightly reduced.

Greenhouse Gas Emissions

Although office use would increase and warehousing/distribution use would decrease under this alternative, the total amount of nonresidential square footage that could be developed under this alternative would not change in comparison to the proposed project. As with the proposed project, due to the scale of development activity associated with theoretical buildout of this alternative, emissions from construction-related activities would cumulatively contribute to climate change impacts. Therefore, this alternative would not eliminate the proposed project's construction-related significant and unavoidable impact.

This alternative would significantly reduce the amount of truck trips generated by proposed warehousing/distribution land uses. While office land uses may have a higher trip generation rate than warehousing/distribution uses (see Table 5.13-5, *Project Trip Generation Rates*), resulting in more passenger vehicle trips, overall VMT would be reduced because of the longer truck trip length associated with regional truck trips (associated with goods movement) compared to commute trip lengths (associated with office commutes by employees) in the SoCAB. Consequently, mobile-source GHG emissions would be reduced under this alternative. However, due to the scale of development activity associated with theoretical buildout of this alternative, the land uses under this alternative would still produce a substantial amount of GHG and would significantly contribute to the global climate change impact in California, although to a lesser extent than the proposed project. Therefore, this alternative would substantially reduce but not eliminate the proposed project's operations-related significant and unavoidable impact.

Hazards and Hazardous Materials

Impacts from hazards and hazardous materials would be similar to the proposed project, though slightly reduced, because the amount of warehousing/distribution uses would be decreased by 25 percent under this alternative. Consequently, impacts related to the routine transport, use, or disposal of hazardous materials, as well as those related to reasonably foreseeable upset conditions would be slightly reduced, though already less than significant for the proposed project. As with the proposed project, development under this alternative could expose people to hazardous substances that may be present in soil or groundwater, and demolition activities could expose workers and the environment to asbestos-containing materials and/or lead-based paint and residues. However, development under both the proposed project and this alternative would be required to adhere to federal, state, and local laws and regulations protecting humans and the environment from exposure to hazards. As with the proposed project, implementation of the existing regulations related to hazardous materials would reduce this impact to a less than significant level. For future developments on hazardous materials sites, appropriate remediation activities would be required before construction activities could be permitted.

Additionally, as with the proposed project, development in certain areas of the City associated with this alternative could expose people or structures to significant impacts related to fire risks (see Figure 5.7-1, Fire Hazard Severity Zones). However, as with the proposed project, development under this alternative would be required to comply with the County of Los Angeles Fire Code. All building plans in the City must undergo a plan review by LACFD to ensure compliance with the Fire Code. Therefore, impacts from fire hazards would be similar (less than significant) to the proposed project.

Overall, impacts related to hazards and hazardous materials under this alternative would be similar (less than significant) to those of the proposed project, though slightly reduced.

7. Alternatives to the Proposed Project

Hydrology and Water Quality

Although office use would increase and warehousing/distribution use would decrease under this alternative, similar alterations to drainage and hydrological patterns would occur. Similar to the proposed project, runoff from construction sites under this alternative would be subject to the NPDES permit standards, which require the development of a SWPPP prior to grading activities and implementation of the SWPPP during construction. As with the proposed project, projects implemented under this alternative would also be required to control pollutants in discharges of stormwater from postconstruction activities under Los Angeles County's MS4 permit (No. CAS6118036). In terms of water quality, this alternative would have a similar impact (less than significant) to the proposed project.

The increase in the quantity of runoff discharged under this alternative would be similar to that of the proposed project since the amount of land coverage would not change. As with the proposed project, individual development projects under this alternative would be subject to the provisions of the City's Municipal Code and to additional development review in order to ensure that they do not exceed the capacity of the storm drain system. Future development projects considered for approval under this alternative would also have to meet the following requirements for limiting impacts to the existing drainage system and minimizing impacts related to erosion, siltation, or flooding: preparation of a project-specific hydrology study and implementation of BMPs to minimize runoff and provide for infiltration of stormwater into the soil onsite. It is therefore expected that the net effect under this alternative would be similar to the proposed project, and individual projects would not exceed the capacity of the storm drain system.

Additionally, development in certain areas (see Figure 5.8-4, *Dam Inundation Hazards*) of the City under this alternative could expose people or structures to significant flood risks. However, as with the proposed project, impacts associated with this hazard would not be significant for the same reasons outlined in Section 5.8, *Hydrology and Water Quality*. This alternative would have less than significant impacts resulting from exposure to flooding as a result of a levee or dam, or effects of seiche, tsunami, or mudflow, similar to the proposed project (see Section 5.8).

Hydrology and water quality impacts overall would be similar (less than significant) to the proposed project.

Land Use and Planning

With the exception of an increase in office uses and a decrease in warehousing/distribution uses under this alternative, the development intensities, locations and distribution of land uses would remain relatively similar to what would occur under the General Plan Update. Therefore, land use impacts under this alternative would be the same (less than significant) as the proposed project.

Noise

As with the General Plan Update, the total amount of nonresidential square footage would be the same under this alternative, but with a different mix of office and warehousing/distribution land uses; therefore, short-term construction-related noise and vibration impacts would be similar to the proposed project. However, due to the scale of development activity associated with theoretical buildout of this alternative, and because construction activities associated with any individual development may still occur near existing sensitive receptors, and because noise disturbances may occur for prolonged periods of time, construction noise and vibration impacts from theoretical buildout of this alternative would remain significant and unavoidable. Consequently, this alternative would not eliminate the project's significant and unavoidable construction noise and vibration impact.



7. Alternatives to the Proposed Project

This alternative would also have similar long-term noise impacts from mobile and stationary sources. The increase in office uses and decrease in warehousing/distribution uses would increase the number of passenger vehicle trips that would be generated by new office development, but would reduce the number of truck trips associated with warehousing/distribution uses. Therefore, the net difference in the type of vehicle/truck trips that would be generated would not reduce the proposed project's contribution to traffic noise on local and regional roadways. The overall number of stationary sources would be similar to the General Plan Update. Therefore, operational-related noise impacts would be similar (less than significant) to the proposed project.

Population and Housing

Under the Increased Office and Decreased Warehousing/Distribution Alternative, nonresidential development intensity would be similar to the proposed project, but with more office uses and less warehousing/distribution uses. As shown in Table 7-1, theoretical buildout under this alternative would result in 5,090 fewer jobs than the proposed project. The number of dwelling units (59, which includes 57 dwelling units and 2 group homes) would stay the same, as would the population (463). As with the General Plan Update, this alternative would not induce substantial population growth (directly or indirectly) or require displacement of housing or people. However, this alternative would not improve the jobs/housing balance in the San Gabriel Valley subregion to the same extent as the proposed project. The benefits of providing additional jobs in a housing-rich area would be less under this alternative than the proposed project. Therefore, the Increased Office and Decreased Warehousing/Distribution Alternative would have similar or slightly greater impacts compared to the proposed project, and impacts would remain less than significant.

Public Services

Under this alternative, nonresidential development intensity would be similar to the proposed project, but with more office and less warehousing/distribution uses. Similar to the proposed project, impacts associated with fire protection and law enforcement services under this alternative would not be significant since the overall nonresidential square footage development would be the same, just with a different mix. Additionally, as with the proposed project, impacts to school services and facilities would be less than significant through the provision of SB 50 fees. In general, impacts to public services would remain similar (less than significant) to the proposed project.

Transportation and Traffic

The Increased Office and Decreased Warehousing/Distribution Alternative would generate a greater number of ADT than the proposed project. The increase in office uses and decrease in warehousing/distribution uses would increase the number of passenger vehicle trips that would be generated by new office development, but would reduce the number of truck trips associated with warehousing/distribution uses. As a result, the ADT generated on local and regional roadways would increase under this alternative, as office uses have a higher trip generation than warehousing/distribution uses (see Table 5.13-5, *Project Trip Generation Rates*). The increased ADT would result in greater impacts to study-area intersection operations compared to the proposed project. However, as with the General Plan Update, all intersections would operate at an acceptable LOS with implementation of the mitigation measures outlined in Section 5.13, *Transportation and Traffic*, and any other mitigation measures required to reduce traffic impacts caused by the additional ADT that would be generated under this alternative. Therefore, intersections under this alternative would operate at an acceptable LOS with implementation of mitigation measures. Additionally, because this alternative generates a greater number of VMT and trips, it would increase cumulatively considerable impacts on Caltrans facilities, including freeway mainline segments. Because of the magnitude of development that would occur under this alternative, cumulative impacts to freeway mainline segments would be significant and unavoidable, similar to the proposed project.

7. Alternatives to the Proposed Project

As with the proposed project, circulation improvements under this alternative would be required to adhere to roadway design standards that would preclude the construction of any unsafe features, and implementation of the alternative would not impact helicopter overflight patterns. With regards to alternative modes of transportation (e.g., walking, non-motorized modes of transportation, and public transit), this alternative would still include the plans and policies for alternative forms of transportation found in the General Plan Update.

Overall, this alternative would increase the proposed project's significant and unavoidable cumulative impact on Caltrans freeway segments.

Utilities and Service Systems

Under the Increased Office and Decreased Warehousing/Distribution Alternative, overall nonresidential development intensity would be the same as with the proposed project. As shown in Table 7-1, compared to the proposed project, theoretical buildout under this alternative would result in 5,090 fewer jobs than the proposed project. As a result, this alternative would result in slightly fewer utilities and service systems impacts (e.g., decreased water, wastewater, natural gas, and electricity demand) than the proposed project. However, as with the proposed project, impacts would remain less than significant.

7.6.2 Ability to Reduce Environmental Impacts

The Increased Office and Decreased Warehousing/Distribution Alternative would have similar impacts (less than significant) with regard to aesthetics, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, public services, and utilities and service systems. This alternative would reduce project-related significant and unavoidable impacts associated with air quality and GHG, but would not eliminate these impacts nor would it eliminate the proposed project's short- and long-term significant noise impacts, and it would increase the proposed project's significant short-term traffic impacts.

7.6.3 Ability to Achieve Project Objectives

This alternative would meet most of the project objectives, with the exception of the following:

- Provide the flexibility to respond to changing market conditions.

Because of its location and key role in the local and regional goods movement, Industry has experienced an increase in and need for warehouse/distribution uses in the region. Therefore, this alternative would impede Industry from meeting this key objective because it would substantially lessen the City's ability to respond to changing market conditions and to meet the regional need for warehouse/distribution uses.

7.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the "environmentally superior alternative" when significant environmental impacts result from the proposed project. In cases where the "No Project" Alternative is environmentally superior to the proposed project, an environmentally superior development alternative should be identified as well. Table 7-2 summarizes the impacts associated with each alternative as compared to the proposed project. Table 7-3 provides a comparison of the ability of each of the alternatives to meet the objectives established for the proposed project.



7. Alternatives to the Proposed Project

CEQA requires an analysis of a reasonable range of alternatives, not an exhaustive range, and “reasonable” is based on the potential significant impacts of the project as proposed. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts” (CEQA Guidelines Section 15126.6[c]).

Based on the preceding analysis, the Reduced Intensity Alternative has been identified as the environmentally superior alternative. This alternative would reduce project-related significant and unavoidable impacts associated with air quality, GHG, noise and traffic, but would not eliminate these impacts. Although this alternative meets the majority of the objectives established for the proposed project, it does not meet one of the City’s key objectives to provide the flexibility to respond to changing market conditions. As concluded above, this alternative would impede Industry from meeting this key objective since it would substantially lessen the City’s ability to respond to changing market conditions and to meet the regional need for warehouse/distribution uses.

**Table 7-2
Summary of Impacts of Alternatives Compared to the Proposed Project**

Environmental Impact	Proposed Project	Project Alternatives		
		No Project/Existing General Plan Alternative	Reduced Intensity Alternative	Increased Office and Decreased Warehousing/Distribution Alternative
Aesthetics	LS	=	=	=
Air Quality				
Short-Term	S	>	<	=
Long-Term	S	>	<	<
Biological Resources	LS	=	=	=
Cultural Resources	LS	=	=	=
Geology and Soils	LS	=	=	=
Greenhouse Gas Emissions	S	>	<	<
Hazards and Hazardous Materials	LS	=	=	=
Hydrology and Water Quality	LS	=	=	=
Land Use and Planning	LS	=	=	=
Noise				
Short-Term	S	>	<	=
Long-Term	LS	>	<	=
Population and Housing	LS	<	=	=
Public Services	LS	=	=	=
Transportation/Traffic				
Short-Term	S	>	<	=
Long-Term	LS	=	=	>
Utilities and Service Systems	LS	>	=	=

< Impacts would be less than those of the proposed project

> Impacts would be greater than those of the proposed project

= Impacts would be similar to the proposed project

LS Less than Significant Impact

S Significant Impact (if not indicated, impacts could be mitigated to less than significant)

* Eliminates a significant impact

7. Alternatives to the Proposed Project

**Table 7-3
Ability of Each Alternative to Meet the Project Objectives**

<i>Project Objective</i>	<i>No Project/ Existing General Plan Alternative</i>	<i>Reduced Intensity Alternative</i>	<i>Increased Office and Decreased Warehousing/ Distribution Alternative</i>
Maintain a diverse and prosperous economy consisting of a variety of industrial, professional, and commercial uses.	No	Yes	Yes
Achieve a sustained economic viability that provides a tax base supportive of the City's growth potential, maintains fiscal viability, and funds capital improvement programs that serve present and future businesses.	No	Yes	Yes
Provide the flexibility to respond to changing market conditions.	No	Yes	No
Enhance the value of businesses and properties within the City such that additional investment is stimulated by providing a quality level of services, safety, security, infrastructure, and design.	Yes	No	Yes
Achieve a professional appearance in the City marked by a functional quality in its buildings and structures, landscaping, signage, and utilities and infrastructure systems.	Yes	Yes	Yes
Provide prudent public ownership and timely disposition of strategic properties to achieve the City's economic development and revitalization goals.	Yes	Yes	Yes
Provide infrastructure and circulation systems that are properly sized to support future growth and are maintained in a timely fashion.	Yes	Yes	Yes
Support the surrounding population through sponsorship of community-building programs, such as the Youth Activities League, and through a development review process that considers our neighbors and non-business uses.	Yes	Yes	Yes



7. Alternatives to the Proposed Project

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