

## Section 9.0: Alternatives Analysis

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In accordance with Section 15126.6 of the CEQA Guidelines, an EIR must contain “a range of reasonable alternatives to the project, or the location of the project, which could feasibly attain most of the basic objectives of the project”, as well as an evaluation of the “comparative merits of the alternatives”. The discussion of alternatives shall focus on alternatives that “would avoid or substantially lessen any of the significant effects of the project, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly”.

### 9.1 SUMMARY OF PROPOSED AMENDMENT AND OBJECTIVES

This SEIR analyzes the potential environmental effects associated with the approval and implementation of a proposed Amendment to the Guasti Plaza Specific Plan, which regulates development on 78.4 acres between Archibald and Turner Avenues, south of the I-10 Freeway and north of the UPRR tracks and the Ontario International Airport. The project site for the proposed Residential Overlay Zone is an approximately 11.72-acre site bounded by Turner Avenue on the east, New Guasti Road on the north, proposed Biane Lane on the west, and the UPRR tracks on the south. The proposed Specific Plan Amendment would allow the development of residential uses on the site, with a maximum of 500 units, as an alternative development scenario to the planned 450,000 square feet of office uses. Also, 100 of the proposed dwelling units may be constructed on 9 acres east of Archibald Avenue as an alternative to planned office and commercial uses in this area.

The objectives with the amended Guasti Plaza Specific Plan would largely remain the same, except for the addition of meeting housing needs associated with the proposed Amendment. These objectives are as follows:

- To create a high quality, commercial mixed-use development which can attract a viable balance of office, hotel, commercial and residential uses.
- To eliminate the condition of blight which exists in the area and to rehabilitate, preserve, enhance and reuse the major historically significant buildings within the original Guasti community. Buildings to be retained will be adapted for use as office space, restaurants, specialty retail and a hotel/conference center. They will create a focal point and activity center for the City of Ontario.
- To allow the construction of architecturally compatible new uses, taking advantage of the site’s prime location between the San Bernardino Freeway and the Ontario International Airport.
- To provide planned roadways, infrastructure, utility and service programs that can meet the expanding needs of the project site as they evolve.
- To implement a streetscape/landscape program which emphasizes the use of existing trees and landscape and supplements these with other plantings to reinforce the historic themes already found in the community.
- To provide compatible land uses with all surrounding properties, including the Ontario International Airport.
- To develop a plan which includes sufficient flexibility to meet changing business, housing, and market needs over the long term build-out period of the project, while assuring the City of Ontario that the development standards and goals are met.

### 9.2 SUMMARY OF SIGNIFICANT IMPACTS

The evaluation of the proposed Amendment’s potential environmental impacts is provided in Section 4.0, *Environmental Analysis*, of this SEIR and concludes that future residential development under the proposed Amendment would result in adverse environmental impacts associated with transportation and

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circulation, air quality, noise, geology and soils, hydrology and water quality, biological resources, cultural resources, hazards and human health, public services and recreation, and GHG emissions. Implementation of standard conditions and the recommended mitigation measures would reduce most of the impacts to less than significant levels. Traffic impacts would remain significant until off-site roadway and intersection improvements are built by the City and adjacent developments. This impact would be significant but short-term. Pollutant emissions from future development would also contribute to existing violations of O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> air quality standards. Noise impacts on future residents would be significant and unavoidable, since exterior noise levels at the site would exceed City standards for residential uses. GHG emissions from future development would contribute to climate change. These impacts would remain significant even after mitigation.

### 9.3 ALTERNATIVES ANALYSIS

This section considers several alternatives to the proposed Specific Plan Amendment. These alternatives are discussed below.

- **No Project Alternative.** The No Project Alternative anticipates that no Specific Plan Amendment would be approved, and no residential, commercial or any other development would occur on the project site. The project site would remain in its existing condition, being largely vacant, except for a relocatable trailer used by the US Post Office. This alternative assumes that the existing conditions on the site would remain indefinitely.
- **Existing Specific Plan.** As a subset of the No Project Alternative, the Existing Specific Plan Alternative would not allow residential uses on the site, but would continue to allow future development in accordance with the adopted Guasti Plaza Specific Plan. The site is planned for 450,000 square feet of office uses in the current Specific Plan and the impacts of this development have been analyzed in the EIR for the Specific Plan and the EIR for the Guasti Redevelopment Plan. This development scenario would still be allowed under the proposed Specific Plan Amendment.
- **Lower Density Alternative.** Under this alternative, the project site would be developed with residential land uses under the proposed Amendment, but at a lower density. This alternative seeks to reduce the potential impacts of the proposed Specific Plan Amendment that would be generated according to the size of proposed development. With a lower density residential development on the site, this alternative could reduce potential traffic, noise, air quality, public service and utility impacts and GHG emissions. The proposal could be scaled down to 166 single-family homes, 261 apartment units, or 297 condominium units under SCAQMD's screening thresholds. Development of 261 multi-family units on the site is considered under this alternative, since the applicant proposes to initially develop a rental product for future conversion to condominiums.
- **Alternative Sites.** Under this alternative, vacant parcels in other areas of the City, which may accommodate the 500 residential units proposed for the project site, are considered as potential alternative sites for the project. These include existing vacant sites in other areas of the City, which have been proposed for residential development under approved Specific Plans and tract maps. This alternative would move the demand-driven impacts of the proposal to other sites but would not reduce them. Also, the alternative sites present a different set of constraints to development or would lead to environmental impacts based on the presence of environmental resources at each site. Thus, they do not necessarily avoid or reduce the impacts associated with the proposed Amendment and future residential development on the site.

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### **9.3.1 No Project Alternative**

The No Project Alternative is included pursuant to the requirements of CEQA and the CEQA Guidelines. Under the No Project Alternative, it is assumed that the proposed Amendment would not be approved and future residential development or any other development would not occur on the site. Rather, the existing conditions on-site would remain unchanged indefinitely. Thus, the project site would remain largely undeveloped, with the US Post Office operating out of the trailer.

Retaining the project site in its existing condition would result in the elimination of all short-term construction and long-term development impacts, including potential for generation of air pollution, noise, and traffic. If the proposed Specific Plan Amendment is not approved and no changes in existing land uses occur, it can be assumed that existing environmental conditions would remain consistent with those identified in Section 2.0, *Environmental Setting*, of this SEIR and under the Environmental Setting subsections under each issue area in Section 4.0, *Environmental Impact Analysis*. No new environmental impacts would occur on-site or would be generated under this alternative.

However, it is unlikely that the site would remain largely undeveloped indefinitely, as it is planned for urban land uses under TOP and Guasti Plaza Specific Plan. While this alternative means that no development would occur on the site and environmental impacts would be avoided, this alternative would not meet any of the Specific Plan objectives related to utilization of the project site. Under this alternative, the property owner would have to retain the site as largely undeveloped land. Without development within the project site, the owner would not be able to obtain a reasonable return on investment and the City would have to pay the property owner for the land if it would not allow any development on the site. This alternative would require that the City designate the majority of the site as Open Space if it wants to keep the site in its existing condition indefinitely.

The environmental impacts of this alternative are briefly discussed below, along with a comparison of impacts with the proposed Amendment.

#### **Environmental Analysis of Alternative**

The No Project Alternative generally assumes that no new environmental impacts would occur on-site, since changes to existing conditions would not occur and no development would be permitted on the site. The environmental effects that may be expected under the No Project Alternative are discussed by issue area below.

**Land Use and Planning** – The project site would remain in its existing condition and would not be developed with urban or other uses. No City approval or permit would be needed to accommodate this alternative. Under the No Project Alternative, no new development would occur within the project site, which may impact adjacent land uses. Thus, no impacts on adjacent land uses would occur under this alternative. This alternative would not implement the development anticipated on the site under the Guasti Plaza Specific Plan. No impacts on land use and planning are expected under this alternative, which would be less than those of the proposed Amendment.

**Population and Housing** – While there is a relocatable trailer on the site, this structure is not used as a residence but as a post office. And with no new housing units to be built, no increase in the resident population of the City would occur. In addition, no new commercial retail or office development is expected, and no new employment opportunities would be

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generated. The existing US Post Office will also remain in place. No impact on population, housing or employment is expected under this alternative, which would be less than those of the proposed Amendment.

**Transportation and Circulation** – No new trips would be added to existing traffic volumes on the surrounding or nearby roadways and freeways, under this alternative. Existing traffic volumes would be maintained. Trip generation is limited to those generated by the US Post Office. This impact is less than that anticipated with the proposed Amendment. However, improvements to planned roadways on and near the site (Turner Avenue, Old Guasti Road, and Biane Lane) would not occur, which could affect traffic flows in the area. While less adverse impacts would occur under this alternative than the proposed Amendment, this alternative would not implement the City's Functional Roadway Classification Plan. No impacts on traffic and circulation are expected under this alternative, which would be less than those of the proposed Amendment.

**Air Quality** – The project site generates limited vehicular emissions and stationary emissions from the US Post Office. The project site is currently contributing to PM<sub>10</sub> and fugitive dust levels in the area due to the bare soils on the site. During high winds, this creates nuisance impacts to adjacent land uses. This impact would continue under the No Project Alternative. Without development, grading and site preparation would not be necessary, thereby eliminating any associated construction emissions. Also, with no new development, no new vehicle emissions and stationary emissions from the site would be generated. No air quality impacts are expected under this alternative, which would be less than what would occur under the proposed Amendment.

**Noise** – The project site generates noise from vehicles going to and from the US Post Office. This would continue under the No Project Alternative. No construction, vehicle or stationary noise impacts associated with future development on the project site would occur under this alternative. No residents would be exposed to airport, train and freeway noise. No noise impacts are expected under this alternative, which would be less than what would occur under the proposed Amendment.

**Geology and Soils** – No changes in topography would occur under this alternative, because no construction, grading, and excavation activities are proposed. No new development would be exposed to the seismic and geologic hazards on the site. No impacts on geology and soils are expected under this alternative, which would be less than that anticipated under the proposed Amendment.

**Hydrology and Water Quality** – No changes to existing drainage patterns would occur, and no improvements to on-site and off-site drainage are expected under this alternative. At the same time, no urban land uses would be introduced to the site, which may increase runoff volumes and generate pollutants entering the storm drain system. No impacts are expected under this alternative, which would be less than the impacts anticipated under the proposed Amendment.

**Biological Resources** – Existing on-site vegetation would remain on the site and the site's use as a foraging, nesting, and habitat area for burrowing owls, California mastiff bats, and migratory birds would continue under this alternative. No new vegetation would be introduced. No impacts are expected under this alternative, which would be less than what would occur under the proposed Amendment.

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**Cultural Resources** – No ground disturbance activities and no impacts to paleontological or archaeological resources would occur. The relocatable trailer is not an historic structure and no significant adverse impact on cultural resources would occur under this alternative. Impacts under this alternative are expected to be less than those of the proposed Amendment. While the reuse and rehabilitation of the remaining historic structures along the alignment of Pepper Tree Lane is expected to occur with future residential development under the proposed Amendment, if the No Project Alternative is implemented, the historical structures are still expected to be rehabilitated as part of the overall implementation of the Guasti Plaza Specific Plan and the approved Interpretive Plan and Conservation Plan. Thus, the impacts of this alternative on cultural resources would be less than the impacts of the proposed Amendment.

**Public Services and Recreation** – The project site's demand for police protection services and fire protection services is limited. The site also has no demand for school, park, and library services. This would continue under the No Project Alternative. No impacts on public services and recreation are expected under this alternative, which would be less than what would occur under the proposed Amendment.

**Utilities** – The underdeveloped site generates a limited demand for utility services, mainly from the US Post Office. This would continue under the No Project Alternative. Existing sewer deficiency in Philadelphia Avenue would remain. No impacts on utilities are expected under this alternative, which would be less than what would occur under the proposed Amendment.

**Hazards and Human Health** – There is no hazardous materials use currently occurring on the project site. No hazardous material users would be introduced to the project site under the No Project Alternative. Also, no land uses would be exposed to railroad, airport and pipeline hazards. No impacts on hazards and human health are expected under this alternative, which would be less than what would occur under the proposed Amendment.

**Aesthetics** – The project site is largely vacant, with a relocatable trailer and scattered trees. Views of the San Gabriel Mountains are available on-site and from adjacent properties. The site would remain underdeveloped under this alternative. No new structures or landscaping would be introduced on-site. Also, no new sources of light and glare would be introduced. The visual characteristics of the site would remain the same as existing, under the No Project Alternative. No impacts are expected under this alternative, which would be less than what would occur under the proposed Amendment.

**Greenhouse Gases and Climate Change** – GHG emissions at the site are limited to those generated by vehicle trips to and from the US Post Office and energy and water use and waste disposal by post office operations. No change in greenhouse gas emissions would occur.

The analysis shows that the No Project Alternative would have less impact on the existing environment than future residential development proposed under the Amendment on most environmental issue areas. This is mainly due to the preservation of existing environmental conditions and the lack of future development on the site. However, retaining existing conditions on the site indefinitely would not meet any of the Specific Plan and TOP objectives as they relate to the redevelopment of the project site and the Specific Plan area.

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### **9.3.2 Existing Specific Plan Alternative**

As a subset of the No Project Alternative, the Existing Specific Plan Alternative assumes that future development on the project site would be subject to existing land use regulations applicable to the project site. The Existing Specific Plan Alternative assumes that future development would take place on-site, as allowed under the Guasti Plaza Specific Plan. This future development would consist of 450,000 square feet of office uses. This development scenario would still be allowed under the proposed Specific Plan Amendment.

Under this alternative, future development on the site would be consistent with the Land Use Concept in the Guasti Plaza Specific Plan and the Project Area Plan. This alternative assumes that the project site would be developed with 3 office buildings, a parking structure, and 4 mixed use commercial/office structures, along with the reuse of the historic structures along the alignment of Pepper Tree Lane.

The environmental impacts of this alternative have been addressed in the EIR for the Guasti Plaza Specific Plan, as well as in Section 4.0 of this SEIR, and are briefly discussed below, along with a comparison of impacts with the proposed Amendment.

#### **Environmental Analysis of Alternative**

The project site would be subject to future commercial development activities under this alternative, to include approximately 450,000 square feet of office uses. The environmental effects that may be expected under the Existing Specific Plan Alternative are discussed by issue area below.

**Land Use and Planning** – Under this alternative, the project site would be developed with office uses, in accordance with the Guasti Plaza Specific Plan. A Specific Plan Amendment would not be needed because this alternative is consistent with the Guasti Plaza Specific Plan. Potential impacts under this alternative would be considered less than significant and less than the proposed Amendment.

**Population and Housing** – With new housing units on the project site, no increase in the resident population of the site or the housing stock of the City would occur under this alternative. However, employment would be created on-site. The EIR for the Specific Plan estimates 1,287 potential jobs from future office uses. Impacts under this alternative would be considered less than significant but no greater than the impacts of the proposed Amendment.

**Transportation and Circulation** – With the development of 450,000 square feet of office uses, this alternative is expected to result in 8,287 new vehicle trips, which is 4,962 more vehicle trips than proposed residential land uses (or 5,294 trips more, if internal capture of the residential uses is counted). Area roadways would have to handle greater traffic volumes under this alternative. Impacts under this alternative would be considered significant and would require mitigation. As with the proposed Amendment, until off-site roadway and intersection improvements are completed by the City, traffic impacts would remain significant and adverse in the short-term. Impacts under this alternative would be greater than the impacts of the proposed Amendment.

**Air Quality** – The development of office uses on the project site would result in construction, vehicular, and stationary air pollutant emissions. These emissions would be greater than residential uses under the proposed Amendment since more vehicle trips are expected from commercial uses. Employees and visitors would be exposed to diesel exhaust from freeway

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traffic, nearby trains, and airplanes under this alternative. Impacts under this alternative would be considered significant and would require mitigation. As with the proposed Amendment, ground disturbance may be limited and the construction phasing prolonged to reduce construction impacts to below SCAQMD daily thresholds. However, long-term air quality impacts will remain significant and unavoidable even after mitigation. Air quality impacts would be greater than the proposed Amendment.

**Noise** – Construction, vehicle and stationary noise impacts would be generated by office land uses under this alternative, similar to the proposed Amendment. With the same floor area, construction impacts would be the same. With more commercial vehicle trips, vehicle noise impacts would be greater under this alternative. Stationary noise could also be greater from outdoor mechanical equipment for office uses. However, no residents would be exposed to noise from freeway traffic, nearby trains, and airplanes under this alternative, as none would be present on the site. Impacts under this alternative would be considered significant and would require mitigation, but noise impacts would be less under this alternative than the proposed Amendment.

**Geology and Soils** – Future office development on the site would lead to ground disturbance activities and exposure of future employees and visitors of the site to geologic and seismic hazards. No significant changes in topography would occur under this alternative, as associated with grading and excavation activities for future development. The extent of grading and excavation would be the same because the same size project site would be developed. Development under this alternative would be exposed to the same geologic hazards as the proposed Amendment. This impact is similar to what would occur under the proposed Amendment and would also be significant, requiring mitigation.

**Hydrology and Water Quality** – With future office development on the project site, changes to existing drainage patterns would occur, as runoff would be directed into the storm drain system serving the site. Flood hazards would be eliminated by storm drain system improvements that would accompany development. The introduction of impervious surfaces would result in increased runoff volumes and rates from the site. With office uses built on the site, more sources of stormwater pollutants would be generated from parking lots and landscaped areas. Impacts are expected to be the same what would occur with residential uses under the proposed Amendment. Impacts under this alternative would also be considered significant and would require mitigation.

**Biological Resources** – Existing vegetation on the site would be removed as part of future grading and excavation activities to build new development, with existing trees to be preserved or transplanted. Future office development on the site would include the introduction of new vegetation in the form of landscaping materials. The development of the site with office uses would have the same impacts on biological resources as residential development under the proposed Amendment since the same 11.72 acres of existing plant and animal habitats would be disturbed and the same trees to be preserved. Impacts would be similar to what would occur under the proposed Amendment and would be significant, requiring mitigation.

**Cultural Resources** – The development of the project site with office uses under the Existing Specific Plan Alternative would include the rehabilitation of existing historic structures and their reuse as part of the historic interpretive programs for the Guasti community. Impacts to the historic structures and unknown archaeological and paleontological resources under this alternative would be the same as what would occur under the proposed Amendment, since the

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disturbance area or project site would remain the same. Potential impacts would be significant, requiring mitigation.

**Public Services and Recreation** – The demand for public services under this alternative would include police and fire protection services and only an indirect demand for school services. A decrease in demand for police protection services is expected under this alternative, when compared to residential land uses. Demand for library services and parks would not be directly generated by future office uses. Thus, the Existing Specific Plan Alternative is expected to have less impact on public services than what would occur under the proposed Amendment. Impacts under this alternative would be considered less than significant, with payment of development impact fees.

**Utilities and Service Systems** – With no housing units, office uses anticipated under this alternative is expected to result in a lower demand for water, sewer, natural gas, and cable services but a greater demand for solid waste disposal and electrical power. Impacts on storm drainage and telephone services are expected to remain the same. Connections to existing infrastructure systems would be needed and utility line extensions and upgraded facilities would be constructed on or near the project site, similar to residential development under the proposed Amendment. Impacts on utilities would be less than significant and less than what would occur under the proposed Amendment.

**Hazards and Human Health** – The development of office uses on the site, as anticipated under this alternative, is not likely to include hazardous material users and generators. Compliance with existing regulations would not create significant impacts to public health and safety during construction and maintenance activities. Mitigation would be needed to reduce potential impacts. However, no residents would be exposed to hazards associated with the nearby UPRR railroad tracks, the jet fuel lines, and airport operations. Impacts would be less than what is anticipated with residential uses under the proposed Amendment.

**Aesthetics** – Office development on the site, as anticipated under this alternative, would reflect the development anticipated under the Guasti Plaza Specific Plan. The change in land use and building architecture does not necessarily mean greater or less impacts on visual quality or aesthetics. Office development on the site would lead to the same obstruction of views of the mountains to the north. Sources of light and glare would also be created. With non-residential development under this alternative, exterior lighting sources would be greater. This alternative would have greater impacts than that expected under the proposed Amendment. However, impacts under this alternative would be considered less than significant, with compliance with the development and design standards in the Specific Plan and the mitigation measures in the Specific Plan EIR.

**Greenhouse Gases and Climate Change** – Office development on the site would generate GHG emissions at the site due to vehicle trips, energy and water use and waste disposal by future office uses. Greenhouse gas emissions are also likely to be higher under this alternative than future residential development due to more vehicle trips to and from office development.

The analysis shows that the Existing Specific Plan Alternative would have the same impacts as the proposed Amendment on population and housing, geology, hydrology biological and cultural resources, and aesthetics. This alternative would have greater impacts on traffic and circulation and GHG emissions than the proposed Amendment. Impacts on land use, air quality, noise, public

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services and recreation, utilities, and hazards and human health would be less, due to the absence of residential uses on the site and the associated resident exposure to nearby hazards.

This alternative would meet the Specific Plan's objectives for redevelopment of the project site and preservation of historic structures, except for meeting housing demand as proposed by the Amendment.

### **9.3.3 Lower Density Residential Alternative**

This alternative would allow a lower density of residential development on the site than what is considered under the proposed Amendment. A Specific Plan Amendment would be needed to allow 261 multi-family units on the site, to replace the 450,000 square feet of office uses. This alternative is being considered to reduce the level of impacts on traffic, air quality, noise, public service and utilities demand, GHG emissions, and hazard exposure from future residential development under the proposed Amendment. This alternative considers 261 apartment units on the site, using SCAQMD's screening thresholds. This need not necessarily reduce the size and number of buildings or the development footprint, as larger dwelling units may be constructed than planned under the Amendment. The development of only 261 apartment units would also allow for larger common open space areas on the site. However, the same roadway and utility infrastructure improvements would be constructed as part of this alternative.

The reduced development density proposed under this alternative could reduce the environmental impacts from future residential development on the site. The lower intensity of development would reduce demand-driven impacts below those anticipated from the proposed Amendment. The environmental impacts of this alternative are briefly discussed below, along with a comparison of impacts with the proposed Amendment.

#### **Environmental Analysis of Alternative**

The decrease in residential units that would be developed on the project site under this alternative would lead to a decrease in potential demand-driven environmental impacts. The environmental effects that may be expected under the Lower Density Residential Alternative are discussed below.

**Land Use and Planning** – Under this alternative, a lower density residential development would be developed on the project site. Future residential development would be limited to 261 multi-family dwelling units and the rehabilitation and reuse of existing historic structures. Similar to the proposed Amendment, a Specific Plan Amendment would be needed to allow residential uses on the site. Impacts would be less than significant under this alternative and would be the same as the impacts of the proposed Amendment.

**Population and Housing** – With fewer residential units, a lower resident population would occur under this alternative than with residential uses under the proposed Amendment. The 261 dwelling units under this alternative would generate fewer residents (523 residents versus the Amendment's 1,001 residents) on-site. The decrease in housing and population would mean less impact would occur under this alternative than the proposed Amendment. Also, impacts would be less than significant.

**Transportation and Circulation** – With fewer residential units, trip generation from the site would only be 1,736 trips per day, which is less than the proposed Amendment. With fewer vehicles generated by this alternative, less traffic congestion on area roadways and the nearby I-10 Freeway is expected. This alternative would still include construction of the proposed

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roadway system for the area. Thus, traffic impacts under this alternative would be less than what would occur under the proposed Amendment. Impacts under this alternative would be considered significant and would require mitigation. As with the proposed Amendment, until off-site roadway and intersection improvements are completed by the City, traffic impacts would remain significant and adverse in the short-term.

**Air Quality** – Future residential development under this alternative would result in air pollutant emissions associated with construction, vehicle use, stationary activities/equipment, and power and gas generation. However, with fewer residential units, emissions associated with construction, vehicle trips and stationary emissions would be less under this alternative than with residential uses under the proposed Amendment. Fewer residents would also be exposed to diesel exhaust from freeway traffic, nearby trains, and airport operations if development is clustered into the northern half of the site. Air quality impacts will remain significant due to existing violations of ozone and particulate matter standards in the basin.

**Noise** – Vehicle noise generated from 261 apartment units would be less under this alternative than those of residential development under the proposed Amendment. This is mainly due to the decrease in the number of dwelling units built on the site, translating to fewer sources of vehicle and stationary noise sources. The noise impacts under this alternative would be less than what would occur under the proposed Amendment. Fewer residents would also be exposed to noise and vibration from freeway traffic, nearby trains, and airport operations if development was clustered into the center of the site. Exterior noise levels would still exceed City standards and noise impacts will be significant.

**Geology and Soils** – No significant changes in topography would occur under this alternative, as associated with grading and excavation activities for future development. The extent of grading and excavation would be the same because the entire project site would still be developed. Future residential development under this alternative would be exposed to the same geologic hazards as development under the proposed Amendment. Mitigation would reduce impacts to less than significant levels. This impact is similar to what would occur under the proposed Amendment.

**Hydrology and Water Quality** – Changes to existing drainage patterns would occur as runoff from streets is directed into the off-site storm drainage facilities. The development of fewer residential units would result in a lower potential for urban stormwater pollutants, which would impact stormwater quality. With the same storm drainage improvements, flood hazards would also be eliminated. Mitigation would reduce impacts to less than significant levels. Impacts would be less than what would occur under the proposed Amendment.

**Biological Resources** – The development of the site with a lower density residential development would have the same impacts on biological resources as the proposed Amendment because the entire project site would still be disturbed and developed. Existing habitat areas on the site would be removed as part of future grading and excavation activities, although existing trees would be preserved or transplanted in accordance with the tree preservation program of the Specific Plan. Future development would still introduce landscaping materials into the site, similar to what would occur under the proposed Amendment. Mitigation would reduce impacts to less than significant levels.

**Cultural Resources** – This alternative would also be accompanied by the preservation of existing historic structures through their rehabilitation and reuse for the historic interpretive program for the Guasti community, similar to the proposed Amendment. Thus, impacts to

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historic structures and unknown archaeological and paleontological resources on the site under this alternative would be similar to what would occur with commercial or residential development under the proposed Amendment. Impacts would be significant, requiring mitigation.

**Public Services and Recreation** – The Lower Density Residential Alternative would develop the site with fewer residential units. This would lead to a decrease in demand for schools, library, parks, police, and fire protection services. Approximately 87 students would require school services, less than 53 percent of the student generation of residential uses under the proposed Amendment. In addition, demands for parks, library, and medical services would also be less. These impacts would be less than what would occur with residential development under the proposed Amendment but greater than the demand of office uses under the proposed Amendment. Impacts under this alternative would be considered less than significant, with payment of development impact fees.

**Utilities and Service Systems** – With less intensive residential development, this alternative is expected to have a lower demand for utility services than residential development under the proposed Amendment. Demands for water, sewage treatment, storm drainage, power, gas, telephone, and cable services would still occur and would be less than demand from 500 residential units. Utility line extensions and connections to existing infrastructure systems would still be needed, similar to the proposed Amendment. However, impacts on utility services would be less than what would occur with residential uses under the proposed Amendment. Impacts under this alternative would be considered less than significant.

**Hazards and Human Health** – Similar to the proposed Amendment, construction and maintenance of future residential development under this alternative would use hazardous material in limited quantities and compliance with existing regulations would not create significant impacts to public health and safety. With the same residential land use as allowed under the proposed Amendment, the potential for hazardous material use on the site would be the same, assuming the decrease in dwelling units is replaced with landscaped areas or common areas requiring maintenance. Thus, potential impacts associated with hazards and human health would be the same as those anticipated under the proposed Amendment. Mitigation would be needed to reduce adverse impacts. However, fewer residents would be exposed to hazards associated with the nearby UPRR railroad tracks, the jet fuel lines, and airport operations. Impacts under this alternative would be less than those of residential uses under the proposed Amendment.

**Aesthetics** – The proposed lower density residential development under this alternative would still lead to a change in the visual quality of the site. With fewer residential units, a decrease in the number of structures that would be built on the site or small structures could be expected. With a lower overall density of development, less obstruction of the views of the San Gabriel Mountains to the north may occur. Also, more open areas may be provided throughout the site or at the site perimeter. Fewer sources of light and glare may be introduced. Therefore, less impact on aesthetics and visual quality is expected under this alternative than the proposed Amendment. Impacts would be considered less than significant, with compliance with the proposed residential development and design standards and the mitigation measures in the Specific Plan EIR.

**Greenhouse Gases and Climate Change** – The 261 apartment units under this alternative site would generate GHG emissions due to vehicle trips, energy and water use and waste

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disposal. Greenhouse gas emissions would be less under this alternative, with fewer dwelling units and vehicle trips.

The analysis shows that the Lower Density Residential Alternative would have less impact than the proposed Amendment on the majority of the environmental issues: population and housing, transportation, air quality, noise, hydrology, utilities, public services, hazards and human health, aesthetics, and GHG emissions. The alternative would have the same impacts as the proposed Amendment as they relate to land use, geology, biological resources, and cultural resources.

This alternative would lead to the redevelopment of the project site and the preservation of existing historic structures. It would also meet housing demand, although to a lesser degree.

### **9.3.4 Alternative Sites**

Where consideration of alternate sites is warranted for a proposed project, CEQA requires that the analysis first consider if any of the significant effects of the project would be avoided or substantially lessened if the project was located at another site. Only the locations that avoid or substantially lessen significant effects need to be considered. If no alternative sites are feasible, reasons for this conclusion must be included in the EIR. The EIR need not discuss sites which are infeasible, remote, or speculative.

There are vacant lands in the City of Ontario, which may serve as alternative sites for the 500 dwelling units that would be allowed within Guasti Plaza under the proposed Amendment. Several of the vacant sites in Ontario have been proposed for development under various specific plans and tentative tract maps. Based on consultation with City staff, potential alternative sites in the City that can accommodate the proposed 500 dwelling units include vacant parcels within adopted Specific Plans planned for commercial uses. These include:

- Piemonte - APNs 210-204-10, 11, 16 & 19 (18.07 acres of vacant land south of 4<sup>th</sup> Street and west of Milliken Avenue)
- Ontario Center Specific Plan - APN 210-182-09 (11.57 acres on southwest corner of 4th Street and Haven Avenue)
- Meredith Specific Plan - APN 110-311-26 (174.06 acres east of Vineyard Avenue, between the I-10 Freeway and 4<sup>th</sup> Street)

In addition, there are vacant or agricultural parcels throughout the New Model Colony and within adopted Specific Plans that are proposed for high-density residential developments and that may serve as alternative sites for the 500 dwelling units. These include:

- Northeast corner of Euclid and Eucalyptus Avenues
- Southeast corner of Schaefer and Euclid Avenues
- Southwest corner of Schaefer and Hamner Avenues
- Southwest corner of Edison and Hamner Avenues (Esperanza Specific Plan)

This alternative assumes that 500 residential units would be developed on these alternative sites and the Guasti Plaza Specific Plan would not be amended. This alternative would move the demand-driven impacts of future residential development to other sites but would not reduce them. Also, the alternative sites present a different set of constraints to development or would lead to environmental impacts based on the presence of environmental resources at each site. Thus, they do not necessarily avoid or reduce the impacts associated with future residential development under the proposed Amendment.

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The analysis of the environmental impacts of this alternative, as discussed below, is provided for discussion purposes only since the applicant does not own any or all of these sites.

### **Environmental Analysis of Alternative**

Future residential development at the alternative sites would avoid impacts on the project site but would introduce impacts to another site. This would also not necessarily prevent~~ing the~~ future commercial development of the project site, unless the project site is designated and preserved as common open space in the Guasti Plaza Specific Plan. The environmental effects that may be expected under the Alternative Site are discussed below.

**Land Use and Planning** – The alternative sites are designated for commercial or residential development under the applicable Specific Plan. A Specific Plan Amendment would be needed for alternative sites planned for commercial uses (Piemonte, Ontario Center, and Meredith) to accommodate the same residential development proposed as part of the Amendment. Alternative sites in the New Model Colony are planned for high-density residential uses and would require adoption of a Specific Plan prior to development. The land use impacts are expected to be the same as the impacts of residential development under the proposed Amendment and would be less than significant.

**Population and Housing** – With the same residential development on the alternative sites as the proposed Amendment, the same increase in the City's population (1,001 residents) and housing stock (500 new housing units) would occur under this alternative. Impacts are expected to be the same as those of residential development under the proposed Amendment and would be considered less than significant.

**Transportation and Circulation** – The trip generation of future residential development would be the same on the alternative sites as on the project site. However, future residential development on the alternative sites would impact a different set of roadways and intersections. Depending on the existing traffic volumes at the roadways and intersections near the alternative sites, different traffic and roadway improvements would be needed under this alternative. Within the New Model Colony where development is less intensive and traffic volumes are low, new vehicle trips would have less traffic impacts on area intersections than those anticipated under the proposed Amendment. However, impacts under this alternative would still be considered significant and would require construction of abutting roadway improvements and payment of traffic impact fees. As with the proposed Amendment, until off-site roadway and intersection improvements are completed by the City, traffic impacts would remain significant and adverse in the short-term.

**Air Quality** - The air pollutant emissions associated with future residential development on the alternative sites would be the same as those generated by residential development under the proposed Amendment. Sensitive receptors (such as a residential development, schools, medical centers, etc.) which are located near the alternative sites may be subject to adverse air quality impacts associated with construction emissions. This is present on the Piemonte and Ontario Center alternative sites. Future residential development on the Meredith alternative could be located along the I-10 Freeway and would be exposed to diesel truck emissions. Thus, air quality impacts on future residents and sensitive receptors are expected to be greater than the impacts of the proposed Amendment. At the same time, less exposure to pollutants from train emissions would occur on future residents at alternative sites. Impacts

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on the alternative sites would be less than the proposed Amendment but would still be considered significant and would require mitigation.

**Noise** – The noise impacts associated with future residential development on the alternative sites would be similar to what may be expected under the proposed Amendment, as they relate to construction and vehicle noise generated by the project. Future residential development on the Meredith alternative site could be located along the I-10 Freeway. Thus, freeway noise impacts on future residents at this alternative site are expected to be greater than the impacts of the proposed Amendment. At the same time, less exposure to noise and vibration from trains and airplanes would occur on future residents at alternative sites, even for the alternative site located near the Chino Airport east of Euclid Avenue. Noise impacts at the alternative sites would be less than those of the proposed Amendment but would still be considered significant and would require mitigation.

**Geology and Soils** – The topography at the alternative sites is relatively flat, similar to the project site. No earthquake fault rupture, liquefaction or landslide hazards are present on alternative sites, although on-site geologic conditions are different at each alternative site. Future residents at the alternative sites are not expected to be exposed to major geologic hazards. Additionally, compliance with site-specific geotechnical recommendations and pertinent California Building Code regulations would ensure the structural integrity of future development. This impact is the same as the impact of the proposed Amendment. Impacts would be less than significant.

**Hydrology and Water Quality** – Changes to existing drainage patterns would occur as the alternative sites are developed and runoff from the alternative sites are directed into off-site drainage facilities. Storm drain infrastructure would need to be constructed to serve development at alternative sites that do not have these facilities, as in the New Model Colony. The same residential development on alternative sites would result in the same potential for urban pollutants which would impact stormwater quality. Thus, impacts would be the same as what would occur under the proposed Amendment. Impacts would be considered less than significant.

**Biological Resources** – Similar to the proposed Amendment, existing vegetation on the alternative sites would be removed as part of grading and excavation activities. New vegetation would be introduced in the form of landscaping materials. The alternative sites are highly disturbed or are utilized for agricultural uses and are not expected to support native vegetation. However, a biological assessment would be necessary to ensure that no sensitive plant and animal species are affected by clearing and grading activities. The alternative sites do not support mature trees as present on the project site. With preservation of existing on-site trees, the potential impacts of future residential development on the alternative sites are expected to be the same as those expected from development under the proposed Amendment. Impacts could be significant, requiring mitigation.

**Cultural Resources** – Development of the alternative sites would lead to ground disturbance, similar to the proposed Amendment. Due to the site-specific nature of cultural resources, it is not known if significant cultural resources are present on the alternative sites. There are no structures on the alternative sites which may be historically significant. However, a potential for the presence of foundation remains or buried resources is possible. A cultural assessment would be needed to determine potential impacts to archaeological and cultural resources on alternative sites. Absent this information, potential impacts to cultural resources on the

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alternative sites could be the same to what would occur under the proposed Amendment. Also, these impacts could be significant, requiring mitigation.

**Public Services and Recreation** – The demand for public services on the alternative sites would be similar to that expected from residential development under the proposed Amendment, since the same 500 dwelling units would be developed. Locating the project at an alternative site would still create the same demand for police and fire services, school and library services, parks and recreation, and other public service providers in the City. Impacts under this alternative are expected to be the same as the impacts of the proposed Amendment. Impacts would be considered less than significant, with payment of development impact fees and development review by the Ontario Police and Fire Departments.

**Utilities and Service Systems** – With the same residential development, this alternative is expected to generate the same demand for utility services as the proposed Amendment. Connections to existing infrastructure systems would be needed for the Piemonte, Ontario Center and Meredith alternative sites but utility lines and facilities would need to be extended to serve the alternative sites in the New Model Colony, where infrastructure systems are incomplete. Impacts on utilities are expected to be the same as the impacts of the proposed Amendment and are considered less than significant.

**Hazards and Human Health** – Similar to the proposed Amendment, compliance with existing hazardous material regulations would not create significant impacts to public health and safety. With the same residential development, the same potential for hazardous material use would occur on alternative sites. However, future residential at alternative sites would not be exposed to hazards associated with aircraft and train operations and the jet fuel lines near the project site. Impacts associated with hazards and human health are expected to be less on alternative sites than those anticipated under the proposed Amendment. Impacts under this alternative would be considered less than significant.

**Aesthetics** – Future residential development on the alternative sites would result in the same development as proposed on the project site. Thus, changes in visual quality are expected to be the same. Views of the mountains to the north would still be available on public roadways and open areas at alternative sites. New sources of light and glare would also be created, similar to the proposed Amendment, but would not have direct impacts to aircraft operations at the Ontario International Airport. Impacts would be less and considered less than significant under this alternative.

**Greenhouse Gases and Climate Change** – Future residential development on the alternative sites would still generate GHG emissions. These emissions would be the same as the GHG emissions of future residential development under the proposed Amendment due to the same size and type of development.

The alternative sites offer different advantages in terms of avoiding or reducing the potential environmental impacts of the proposed Amendment on site-specific resources. The alternative sites also bring in their own site-specific characteristics and constraints that could affect future development. The analysis shows that the Alternative Sites would have less impact than the proposed Amendment as they relate to air quality, noise, human health and hazards, and aesthetics due to their location away from the freeway, railroad tracks, airport, and jet fuel lines. All other impacts would remain similar to the proposed Amendment.

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This alternative would not meet the project objectives of developing a walkable, mixed-use community at Guasti Plaza, although it would help create the same mixed-use development at the alternative sites.

### 9.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Table 9-1, *Comparison of Alternatives*, summarizes the potential environmental impacts of the Amendment and the alternatives by issue area, to compare the impacts of the different alternatives with the potential impacts of the proposed Amendment. CEQA requires that the EIR identify the environmentally superior alternative among all of the alternatives considered, including the proposed Amendment. If the No Project Alternative is selected as environmentally superior, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

**TABLE 9-1  
COMPARISON OF ALTERNATIVES**

<b>Proposed Amendment</b>	<b>No Project</b>	<b>Existing Specific Plan</b>	<b>Lower Density Residential</b>	<b>Alternative Sites</b>
<b>Land Use and Planning</b> 500 dwelling units for 450,000 square feet of office uses	<b>No new development or land uses would occur on the largely vacant site (less impact)</b>	<b>450,000 square feet of office uses; consistent with Specific Plan (less impact)</b>	261 apartment units (same impact)	500 dwelling units (same impact)
<b>Population and Housing</b> 500 housing units with 1,001 residents and loss of potential 1,287 jobs	<b>No new housing units, no new residents and no jobs created (less impact)</b>	1,287 jobs created (same impact)	<b>261 new housing units; 523 residents (less impact)</b>	Same 500 housing units with 1,001 residents (same impact)
<b>Transportation and Circulation</b> 3,325 new residential trips or 2,993 trips with internal capture; increase in traffic volumes on area streets and intersections	<b>No new vehicle trips and no change in traffic volumes (less impact)</b>	8,287 commercial trips or 4,962 more vehicle trips than residential uses (5,294 trips more if internal capture counted); greater roadway traffic volumes (greater impact)	<b>1,562 vehicle trips; less roadway traffic volumes (less impact)</b>	Same 3,325 new vehicle trips but affecting different roadways and intersections; or 2,993 trips if in mixed use development (same impact)
<b>Air Quality</b> Construction, vehicle, and stationary emissions from new residential uses; resident exposure to diesel exhaust	<b>Fugitive dust nuisance; no new construction, vehicle, or stationary emissions (less impact)</b>	Same construction but more vehicle and stationary emissions; less resident exposure to diesel exhaust (greater impact)	<b>Less construction, vehicle, and stationary, emissions from new development (less impact)</b>	<b>Same pollutant emissions but less exposure to diesel exhaust (less impact)</b>
<b>Noise</b> Construction, vehicle, and stationary noise impacts from new development; resident exposure to	<b>No construction noise; no vehicle and stationary noise (less impact)</b>	<b>Same construction but vehicle and stationary noise; less resident exposure to freeway,</b>	<b>Less construction, vehicle, and stationary noise from new development; fewer residents exposed to</b>	<b>Same construction, vehicle, and stationary noise but less exposure of residents to freeway,</b>

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TABLE 9-1  
COMPARISON OF ALTERNATIVES

Proposed Amendment	No Project	Existing Specific Plan	Lower Density Residential	Alternative Sites
freeway, train and airport noise		train and airport noise (less impact)	train vibration (less impact)	train and airport noise and vibration (less impact)
<b>Geology and Soils</b> Soil disturbance due to grading activities	<b>No grading activities; no changes in topography</b> (less impact)	Soil disturbance due to grading activities (same impact)	Soil disturbance due to grading activities (same impact)	Soil disturbance due to grading activities (same impact)
<b>Hydrology and Water Quality</b> Changes in the existing drainage pattern; construction of storm drain lines, creation of urban stormwater pollutants	<b>Maintain existing natural drainage patterns, no construction of storm drains, no urban pollutants</b> (less impact)	Changes in the existing drainage pattern; construction of storm drain lines, new sources of urban stormwater pollutants (same impact)	<b>Changes in the existing drainage pattern; construction of storm drain lines, fewer sources of urban stormwater pollutants</b> (less impact)	Changes in the existing drainage pattern; construction of needed storm drain lines; creation of stormwater pollutants (same impact)
<b>Biological Resources</b> Except for trees, existing vegetation would be removed and landscaping materials introduced	<b>No change in existing vegetation; burrowing owl and raptor foraging area preserved</b> (less impact)	Except for trees, existing vegetation would be removed and landscaping materials introduced (same impact)	Except for trees, existing vegetation would be removed and landscaping materials introduced (same impact)	Existing vegetation would be removed and landscaping materials introduced (same impact)
<b>Cultural Resources</b> Rehabilitation and reuse of existing historic structures	<b>No soil disturbance</b> (less impact)	Rehabilitation and reuse of existing historic structures (same impact)	Rehabilitation and reuse of existing historic structures (same impact)	Potential for cultural resources on alternative sites (same impact)
<b>Public Services and Recreation</b> Commercial and residential development would require police and fire services, while residential development would require school, library and park services	<b>No change in demand for public services</b> (less impact)	<b>No direct demand for school, park, and library services</b> (less impact)	<b>Decreased demand for school, library; parks, fire and police protection services due to less housing units</b> (less impact)	Same residential development would require school, police, fire, library, parks, and other public services (same impact)
<b>Utilities</b> Utility services and connections needed to serve residential development	<b>No increase in demand for utility services</b> (less impact)	<b>Less demand for some utilities and more demand for others</b> (less impact)	<b>Decrease in dwelling units would have less demand for utility services</b> (less impact)	Utility services and connections needed to serve residential development (same impact)
<b>Hazards and Hazardous Materials</b> Limited hazardous	<b>No hazardous material use or resident exposure to</b>	<b>Hazardous material use for construction and maintenance of</b>	<b>Limited hazardous material use for construction and</b>	<b>Same potential for hazardous material use by 500 residential</b>

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TABLE 9-1  
COMPARISON OF ALTERNATIVES

Proposed Amendment	No Project	Existing Specific Plan	Lower Density Residential	Alternative Sites
material use for construction and maintenance of residential or office commercial development	hazards would occur (less impact)	office uses; less resident exposure to train, jet fuel and airport hazards (less impact)	maintenance; less resident exposure to trains, jet fuel lines, and airport operations (less impact)	units but less resident exposure to trains, jet fuel lines, and airport operations (less impact)
<b>Aesthetics</b> Visual change to residential development; new sources of light and glare	No changes to visual characteristics of the site; no new sources of light and glare (less impact)	Higher office buildings; new sources of light and glare (greater impact)	Lower development intensity; fewer sources of light and glare (less impact)	Visual change from vacant land to residential development; new sources of light and glare but would not affect airport operations (less impact)
<b>Greenhouse Gases and Climate Change</b> GHG emissions contributing to climate change	No change in GHG emission from US Post Office (less impact)	Greater GHG emissions due to more vehicle trips (greater impact)	Less GHG emissions due to fewer dwelling units and vehicle trips (less impact)	Same GHG emissions with same size and type of development (same impact)

The environmental analysis of alternatives above indicates that, through a comparison of potential impacts from each of the alternatives and the proposed Amendment, the **No Project Alternative** could be considered superior because no new environmental impacts would be introduced to the area and the project site. However, the existing conditions at the site are not superior to the proposed Amendment. Retaining the site in its vacant condition would not promote redevelopment of the site, as planned under the Guasti Plaza Specific Plan. If existing conditions remain indefinitely, the majority of the site would not be in use and would remain fenced in. The US Post Office will continue to operate out of a relocatable trailer. The proposed improvements on adjacent roadways would also not occur under this alternative, resulting in the permanent underdeveloped conditions of the site and roadway and infrastructure network within and adjacent to the site. This alternative would also not meet any of the project objectives for the comprehensive redevelopment of the site or TOP's anticipated mixed use development within Guasti Plaza.

Aside from the No Project Alternative, the **Lower Density Residential Alternative** would also be considered environmentally superior. The Lower Density Residential Alternative would result in only 261 apartment units on the site (239 dwelling units less than what would be allowed for the residential development proposed under the Amendment). Thus, the Lower Density Residential Alternative would result in less impact than the proposed Amendment on the majority of the environmental issues: population and housing, transportation, air quality, noise, hydrology, utilities, public services and recreation, hazards and human health, aesthetics, and GHG emissions. The alternative would have the same impacts as the proposed Amendment as they relate to land use, geology, biological resources, and cultural resources. Thus, the environmental impacts of this alternative would generally be less than the impacts associated with the proposed Amendment and the other alternatives. The Lower Density Residential Alternative would also reduce the number of residents exposed to diesel

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exhaust, noise, and hazards from the nearby freeway, railroad tracks, jet fuel lines, and airport operations.

However, the proposed Amendment would result in environmental impacts which could be avoided or reduced to less than significant levels by incorporation of the recommended mitigation measures, except for traffic, air quality, and noise and GHG emissions. The Lower Density Residential Alternative would reduce the impacts of the proposal through the reduction in dwelling units but would not reduce potential traffic impacts to below a level of insignificance until off-site roadway and intersection improvements are implemented by the City and adjacent developments, similar to the proposed Amendment. While SCAQMD thresholds would not be exceeded, air pollutant emissions would still be generated by this alternative, which would contribute to existing violations of clean air standards in the basin. Also, major noise sources will remain the same, even if exposure will be confined to fewer residents. GHG emissions from this alternative would contribute to climate change, even if at reduced levels. Thus, the Lower Density Residential Alternative would not necessarily reduce these significant and adverse impacts and does not offer any specific environmental benefit over the proposed Amendment.