
VI. ALTERNATIVES TO THE PROPOSED PROJECT

The State CEQA Guidelines require that EIRs include the identification and evaluation of a reasonable range of alternatives that are designed to reduce the significant environmental impacts of the project while still meeting the general project objectives. The State CEQA Guidelines also set forth the intent and extent of alternatives analysis to be provided in an EIR. Those considerations are discussed below.

Alternatives to the Proposed Project

Section 15126.6(a) of the CEQA Guidelines states: *“An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparable merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.”*

Purpose

Section 15126.6(b) of the CEQA Guidelines states: *“Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, 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 project objectives, or would be more costly.”*

Significant Impacts of the Project

As described in Section IV.B (Air Quality), Section IV.C (Greenhouse Gas Emissions), and Section IV.E (Transportation), the proposed Project would have the following significant and unavoidable impacts:

- Air Quality – b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard
- Greenhouse Gas Emissions – a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment
- Transportation – b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)

No other significant Project impacts remain with implementation of the proposed mitigation measures for the environmental issue areas listed below. Impacts associated with the following

topics would be significant without implementation of mitigation measures, but would be reduced to a less-than-significant level if the mitigation measures listed in the EIR are implemented.

- Air Quality – c) Expose sensitive receptors to substantial pollutant concentrations
- Aesthetics – d) Create a new source of substantial light or glare which would adversely affect day or nighttime views
- Biological Resources – d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites
- Cultural Resources – b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; c) Disturb any human remains, including those interred outside of dedicated cemeteries
- Geology and Soils – f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature
- Hazards and Hazardous Materials – b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment
- Tribal Cultural Resources – ai) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); aii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe

Selection of a Reasonable Range of Alternatives

Section 15126.6(c) of the CEQA Guidelines states: *“The range of potential alternatives to the proposed Project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination. Additional information explaining the choice of alternatives may be included in the administrative record. 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.”*

Project Objectives

As stated above, the range of potential alternatives to each of the proposed Project shall include those that could feasibly accomplish most of the basic objectives of the Project. The objectives of each of the proposed Project are as follows:

- To redevelop and maximize the buildout potential of an underutilized property and reduce existing blight thereby providing for a range of potential uses including light industrial, manufacturing, warehouse or e-commerce.
- Construct an infill development of up to approximately 500,000 square feet exhibiting quality design, consistency with the designated land use and zoning and compatibility with the surrounding land uses.
- Develop a Project that is consistent with the Milpitas General Plan and the surrounding uses.
- Attract new employment-generating businesses to Milpitas to help create more equal jobs-housing balance in Milpitas and reducing the need for residents to commute outside the area for employment.
- Implement the City of Milpitas desire to create new uses that generate additional revenue and help Milpitas and other public agencies achieve fiscal balance.
- Develop a logistics center that is in close proximity to nearby truck routes and freeways, minimizing vehicle miles travelled on the streets in order to facilitate the efficient movement of goods, which is recognized as a strong benefit for local and regional economic growth.
- Satisfy the substantial demand for a logistics center building that is both physically and economically feasible to construct and operate, that is attractive to potential users and economically competitive with other geographic markets.
- To help improve the quality of life for Milpitas residents through job creation, revenue generation and other associated Project benefits.
- Generate local employment opportunities, both in short-term construction employment and long-term Project employment.

Refer to Table VI-1 at the end of this EIR Section for an analysis of whether or not the Alternatives analyzed in comparison to the proposed Project meet the Project Objectives.

Overview of Selected Alternatives

The alternatives to be analyzed in comparison to the proposed Project include:

Alternative A No Project Alternative

Alternative B Reduced Project Alternative

Alternatives Considered but Rejected as Infeasible

As described above, Section 15126.6(c) of the CEQA Guidelines requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible for detailed study, and briefly explain the reasons underlying the lead agency's determination. Furthermore, Section 15126.6(f)(1) states that “[a]mong 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 or control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.”

Based on preliminary evaluations, additional alternatives to the proposed Project were considered but eliminated from further evaluation for the various reasons described below, such as the alternatives resulting in greater adverse environmental impacts than the proposed Project or not meeting Project objectives.

An alternative involving commercial uses such as retail, and commercial services, restaurants, or professional office, lodging, or medical was rejected as infeasible as it would not meet most of the Project objectives, nor would it be permitted within the Heavy Industrial (M2) zoning designation. Any alternatives including residential, open space, or park uses on the Project site were dismissed because they would not meet any of the Project objectives and they would not be consistent with the General Plan land use designation.

An off-site alternative was rejected as infeasible because the project applicant does not own any other property that would be feasible for this project or that could accommodate the size of this project in the City of Milpitas and cannot “reasonably acquire, control or otherwise have access to [an] alternative site” (refer to §15126.[f][1] of the CEQA Guidelines).

Assumptions and Methodology

The anticipated means for implementation of the alternatives can influence the assessment and/or probability of impacts for those alternatives. For example, a project may have the potential to generate significant impacts, but considerations in project design may also afford the opportunity to avoid or reduce such impacts. The alternatives analysis is presented as a comparative analysis to the proposed Project and assumes that all applicable mitigation measures proposed for the Project would apply to each alternative. The following alternatives analysis compares the potential significant environmental impacts of two alternatives with those of the proposed Project for the environmental topics analyzed in detail in Sections IV.B – IV.E of the Draft EIR and the Initial Study (Appendix A).

A. ALTERNATIVE A: NO PROJECT ALTERNATIVE

Section 15126.6(e) of the CEQA Guidelines requires that a “No Project Alternative” be evaluated among the project alternatives. Section 15126.6(e)(2) requires that the No Project Alternative analysis “discuss the existing conditions...as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and policies and consistent with the available infrastructure and community services.” As noted in Section 15126.6, an EIR for “a development project on identifiable property” typically analyzes a No Project Alternative (i.e., “the circumstance under which the project does not proceed. Such a discussion would compare the environmental effects of the property remaining in its existing state against environmental effects that would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this ‘no project’ consequence should be discussed.”)

Under the CEQA-required “No Project Alternative” (Alternative A), the existing conditions at the Project site would predominantly remain as they are. The existing four office buildings and research/development facilities ranging from one to two stories in height, representing 397,009 square feet would not be demolished and the proposed Project’s 491,040-square foot tilt-up concrete creative industrial building with two supporting offices would not be constructed. Alternative A includes the following existing uses and associated square footage:

- Office – 162,090 square feet
- Manufacturing – 20,000 square feet
- Warehouse – 45,643 square feet¹
- Lab and Manufacturing – 169,276 square feet

The FAR for the No Project Alternative is .31. Building No. 1 would remain as a single-story and Building Nos. 2, 3, and 4 would remain at two stories. Ingress and egress would continue to be provided along South Milpitas Boulevard and Gibraltar Drive.

The analysis of Alternative A assumes the continuation of existing physical conditions on the site, as well as development of the related projects described in Section III.C (Related Projects). The potential environmental impacts associated with Alternative A are described below and are compared to the environmental impacts associated with the proposed Project.

¹ Existing Building No. 1 at the Project site includes 45,643 square feet of office and warehouse uses. For the purposes of analysis of the No Project Alternative, Building No. 1 would consist of 45,643 square feet of warehouse use only so as to limit ancillary office space for the No Project Alternative to below 50 percent as permitted in the M2 zone.

Aesthetics

Under Alternative A, no demolition of existing buildings, grading, or development would occur on the Project site and the existing aesthetic characteristics would remain unchanged. Under this Alternative, there would be no impact to scenic vistas, and no impact to the existing visual character or quality of public views of the site and its surroundings. Similar to the proposed Project, under this Alternative, there would be no impact to scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. Under this Alternative there would be no new sources of light or glare on the site, and therefore this Alternative would result in no impact, compared to the Project's less-than-significant impact with mitigation related to light and glare. While the proposed Project's significant aesthetic impacts can be mitigated to less-than-significant levels, impacts to aesthetics under Alternative A would be less compared to the proposed Project.

Air Quality

No demolition, grading, or construction (other than retrofitting Building No. 1 to convert office space to warehouse) would occur under Alternative A. In addition, no air pollutant emissions (i.e., respirable particulate matter [PM₁₀], carbon monoxide [CO], nitrogen oxides [NO_x]) related to grading would be generated under this Alternative. Under this Alternative it is assumed the existing on-site buildings could be occupied. Both the Project and Alternative A would not conflict with or obstruct implementation of the applicable air quality plan, and the associated impacts would be less than significant. Both the Project and Alternative A would result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard. This impact is considered significant and unavoidable as an operational impact under the Project and Alternative A. The Project could potentially expose sensitive receptors to substantial pollutant concentrations during construction. However, these potentially significant impacts related to fugitive dust emissions during Project construction would be reduced to a less-than-significant level after mitigation, whereas this impact would not occur under Alternative A. The Project would result in a less-than-significant impact related to other emissions (such as those leading to odors) because the Project is a warehouse facility, and construction and operation would not be expected to generate significant odors. Similar to the Project, Alternative A would have a less-than-significant impact to related to other emissions such as those leading to odors.

Biological Resources

Because the Project site would not be developed under Alternative A, no demolition, grading or development (other than retrofitting Building No. 1 to convert office space to warehouse) would occur and no trees or vegetation would be removed from the site. Thus, similar to the proposed Project, Alternative A would have no impacts related to the special-status wildlife species, sensitive natural communities, and jurisdictional waters. Under this Alternative there would be no impact to any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, compared to the Project's less-than-significant impact. This

Alternative would also have no impact with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, compared to the proposed Project's less-than-significant impact. However, since there would be no tree or vegetation removal under Alternative A, there would be no impact to the movement of any native resident or wildlife species, or invasive non-native plant species on the Project site. These impacts are less-than-significant with mitigation for the proposed Project. While the proposed Project's significant biological resources impacts can be mitigated to less-than-significant levels, impacts to biological resources under Alternative A would be less compared to the proposed Project.

Cultural Resources

Under Alternative A, no demolition or ground-disturbing activities would occur at the site. Since no demolition or ground-disturbing activities would occur, Alternative A would result in no impacts to historical resources, archaeological resources, and human remains, compared to the Project's no impact to historical resources, less-than-significant impact with mitigation related to archaeological resources, and less-than-significant impact with mitigation related to human remains. While the proposed Project's significant cultural resources impacts can be mitigated to less-than-significant levels, impacts to unknown cultural resources under Alternative A would be less compared to the proposed Project.

Geology and Soils

The Project site would still be subjected to ground shaking and related hazards under both Alternative A and the proposed Project. Since no grading or ground disturbing activities would take place under Alternative A, no impact to paleontological resources could occur during excavation into native geologic formations below existing fill material, where fossils may be buried and physical destruction of fossils could occur. Under the proposed Project, this impact would be reduced to less-than-significant with mitigation. While the Project's significant geology and soils impact can be completely mitigated and reduced to less-than-significant levels, geology and soils impacts associated with Alternative A would be less compared to the proposed Project.

Greenhouse Gas Emissions

This Alternative would not include any new development (other than retrofitting Building No. 1 to convert office space to warehouse), and thus would not generate any significant construction related GHG emissions. However, it is assumed that under this Alternative the existing buildings could be occupied; therefore, there could be potential sources of near-term or long-term GHG emissions. By comparison, the Project would result in new development and associated construction and operational emissions of GHGs would exceed applicable thresholds, which would be a significant impact. While mitigation is recommended that would implement GHG-reduction measures, these measures would not reduce the Project's contribution to a less-than-significant level, and impacts would remain significant and unavoidable. Similar to the Project, Alternative A would also have significant and unavoidable

impacts related to GHG emissions. The Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases, resulting in a less-than-significant impact, which would be similar under Alternative A as well.

Hazards and Hazardous Materials

Because no new land uses would be built on the site and no new residents or employees would be at the site under Alternative A, this Alternative would result in no impact related to the creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, compared to the Project's less-than-significant impacts with mitigation. Because no grading of the Project site would occur under Alternative A, workers and/or the public would not be exposed to potentially contaminated soil during construction and/or operation of the Project, nor would workers and/or the public be potentially exposed to hazardous building materials (e.g., lead paint, asbestos) during demolition of existing structures. Under the proposed Project, this impact would be less-than-significant with mitigation. Similar to the Project, under this Alternative, there would be no impact when it comes to emitting hazardous emissions within one-quarter mile of an existing or proposed school. Also similar to the proposed Project, there would be no impact to the thresholds associated with airport proximity and wildland fires under this Alternative. Under this Alternative, impacts to an adopted emergency response plan or emergency evacuation plan would be less than significant, similar to the proposed Project.

Noise

No demolition, grading, or construction (other than retrofitting Building No. 1 to convert office space to warehouse) would occur under Alternative A. Construction and operational noise impacts associated with the proposed Project were found to be less than significant, and would remain less than significant under Alternative A. The Project site is located approximately four miles from the nearest airport, and the proposed Project would not expose people working at the site to excessive aircraft noise, resulting in a less-than-significant impact. This impact would remain less than significant under Alternative A, since the distance from the airport would not change.

Transportation

No demolition, grading, or construction (other than retrofitting Building No. 1 to convert office space to warehouse) would occur under Alternative A. Similar to the proposed Project, Alternative A would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, and impacts would be less than significant. Alternative A would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), nor would it result in inadequate emergency access, therefore resulting in less-than-significant impacts, similar to the proposed Project. The proposed Project would result in approximately 3,303 daily trips, 348 AM peak hour trips, and 88 PM peak hour trips. Alternative A would result in approximately 2,402 daily trips, 313 AM peak hour trips, and 321

PM peak hour trips. The VTA's (Santa Clara Valley Transportation Authority) Vehicle Miles Travelled (VMT) screening tool was applied to the No Project Alternative and found a home-work VMT per employee of 15.98, which is slightly lower than the proposed Project's VMT rate of 16.19 (both are for the baseline (2019) case). Therefore, Alternative A would generate slightly lower VMT per employee than the proposed Project (15.98 versus 16.19). Alternative A would result in fewer overall daily trips compared to the proposed Project but would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) related to Vehicle Miles Travelled (VMT), and impacts would be significant and unavoidable, similar to the proposed Project.

Tribal Cultural Resources

Under Alternative A, no demolition or ground-disturbing activities would occur at the Project site. Since no demolition or ground-disturbing activities would occur, Alternative A would result in no impacts to unknown tribal cultural resources, compared to the Projects less-than-significant impacts with mitigation. While the proposed Project's significant tribal cultural resources impacts can be mitigated to less-than-significant levels, impacts to unknown tribal cultural resources under Alternative A would be less compared to the proposed Project.

Relationship of the Alternative to the Project Objectives

Alternative A would not meet all of the Project objectives (see Table VI-1).

B. REDUCED PROJECT ALTERNATIVE

The Reduced Project Alternative was selected to evaluate the comparative environmental benefits of constructing a project with less building square footage. Similar to the proposed Project, Alternative B would involve demolition and removal of the existing four office buildings and research/development facilities that are currently developed on-site. Also similar to the proposed Project, this Alternative would involve construction of a new single-story, tilt-up concrete creative industrial building with two supporting offices, and surface parking on all sides of the building, therefore providing the same on-site circulation as the proposed Project. However, under this Alternative, the Project's building area would be reduced by 121,532 square feet, which is an approximately 25 percent reduction in building area compared to the proposed Project. Under this Alternative, 364,600 square feet of warehouse space would be provided and 3,680 square feet of office space, as compared to the Project's proposal of approximately 486,130 square feet of warehouse space and 4,910 square feet of office space. The FAR for Alternative B would be .29 compared to the proposed Project's FAR of .38. Alternative B would also involve the same amount of tree removal as the proposed Project with the removal of 88 trees, as well as the same level of landscaping. Under this Alternative, the amount of grading and impervious surfaces would be the same as the proposed Project, as this Alternative approximates 100,800 cubic yards of soil to be moved around on-site, with balanced grading of the site as well.

The potential environmental impacts associated with Alternative B are described below and are compared to the environmental impacts associated with the proposed Project.

Aesthetics

Under Alternative B, all impacts to aesthetics would be similar to those of the proposed Project. Under this Alternative, there would be a less-than-significant impact to scenic vistas, and to the existing visual character or quality of public views of the site and its surroundings. Under this Alternative, there would also be no impact to scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. Since this Alternative would involve demolition of the existing buildings on-site, and construction of the proposed warehouse with reduced square footage, new sources of light or glare would still be introduced on-site, and impacts would be similar to those identified under the proposed Project. Similar to the proposed Project, significant impacts to aesthetics associated with Alternative B would be completely mitigated by implementing the mitigation measures listed in Table II-1 and included in the Initial Study (Appendix A).

Air Quality

Air quality impacts during construction would be slightly less under this Alternative than the proposed Project because this Alternative involves less development. Long-term operational air quality impacts from stationary emissions would also be less under this Alternative compared to the proposed Project. This is because Alternative B involves fewer square feet of development, resulting in less natural gas and electricity consumption and associated air pollution than the

Project. Alternative B would not conflict with or obstruct implementation of the applicable air quality plan, and would result in a less-than-significant impact, which is similar to the Project. Also similar to the Project, Alternative B would result in significant and unavoidable impacts related to a cumulatively considerable net increase of any criteria pollutant for which the Project region is in non-attainment under an applicable federal or state ambient air quality standard. Both the Project and Alternative B would have a less-than-significant impact with mitigation when it comes to exposing sensitive receptors to substantial pollutant concentrations. Impacts associated with other emissions (such as those leading to odors) affecting a substantial number of people would be less than significant for both the Project and Alternative B.

Biological Resources

The development of Alternative B would reduce the building square footage of the Project, but it would not significantly alter the amount of site preparation and grading activities that would be required. As with the proposed Project, site preparation and grading activities under Alternative B would require the removal of the existing vegetation that is located on the Project site. Under this Alternative, the same 88 trees would be removed. Similar to the proposed Project, if conducted during the breeding season (February through August), vegetation removal and construction activities could directly impact nesting birds by removing trees or vegetation that support active nests. These impacts are similar to those identified under the proposed Project, and can be completely mitigated by implementing the mitigation measures listed in Table II-1 and included in the Initial Study (Appendix A).

Cultural Resources

Under Alternative B, cultural resources impacts would be similar to the proposed Project because roughly the same amount of grading and ground-disturbing activities would be required. Therefore, should the site contain historical resources, unknown archaeological resources, or unknown human remains, implementation of Alternative B would result in similar cultural resource impacts compared to the proposed Project. These impacts can be mitigated to less-than-significant levels via the mitigation measures listed in Table II-1 and included in the Initial Study (Appendix A).

Geology and Soils

The Project site would still be subjected to ground shaking and related hazards under both Alternative B and the proposed Project. Since grading and ground-disturbing activities associated with Alternative B would be similar to the proposed Project, a potentially significant impact to unknown paleontological resources could occur during excavation into native geologic formations below existing fill material, where fossils may be buried and physical destruction of fossils could occur. Similar to the proposed Project, this impact would be reduced to less-than-significant levels after mitigation. Alternative B would also require compliance with applicable building codes and be subject to the geotechnical report recommendations which would ensure that no significant earth resource impacts would be created under this Alternative. Therefore, similar to the proposed Project, significant geology and soils impacts under Alternative B can be

completely mitigated and reduced to less-than-significant levels via the mitigation measures listed in Table II-1 and included in the Initial Study (Appendix A).

Greenhouse Gas Emissions

Overall, GHG emissions would be less than they would be under the proposed Project because there would be less development under this Alternative. Under this Alternative, the total building area developed would be less than the Project; therefore, this Alternative would generate a reduced amount of construction and operational GHG emissions compared to the Project. However, because of the size of the Project, total GHG emissions would exceed applicable thresholds, which would be a significant impact. GHG-reduction mitigation recommended for the Project would reduce but not eliminate this impact, and the impact would remain significant and unavoidable. While Alternative B would also be subject to the same GHG-reduction measures as the project, GHG impacts would remain significant and unavoidable like the Project. Alternative B would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases, and impacts would be less than significant, similar to the Project.

Hazards and Hazardous Materials

The reduction in building square footage associated with Alternative B is not anticipated to substantially change the hazards and hazardous materials impacts associated with the Project. Implementation of Alternative B would result in less-than-significant impacts related to the routine use, transport and disposal of hazardous materials, similar to the Project. Also similar to the proposed Project, under this Alternative, there would be no impact when it comes to emitting hazardous emissions within one-quarter mile of an existing or proposed school. Also similar to the proposed Project, there would be no impact associated with airport proximity and wildland fires under this Alternative. Implementation of Alternative B would also result in less-than-significant impacts to an adopted emergency response plan or emergency evacuation plan. Alternative B would result in significant but mitigatable impacts related to accidental release of hazardous materials, which is similar to the impacts associated with the Project. Like the proposed Project, Alternative B's significant hazards and hazardous materials impacts can also be completely mitigated and reduced to less-than-significant levels via the mitigation measures listed in Table II-1 and included in the Initial Study (Appendix A).

Noise

The reduction in building square footage associated with Alternative B is not anticipated to substantially change the noise impacts associated with the Project. Although less construction would be associated with Alternative B due to a reduction in square footage, this Alternative would still result in less-than-significant impacts related to construction noise, similar to the proposed Project. Also similar to the proposed Project, Alternative B would result in less-than-significant operational noise impacts. Construction-related vibration levels for the proposed Project are not anticipated to exceed 0.3 in/sec PPV at the nearest structures, resulting in a less-than-significant impact. This impact would also remain less than significant under

Alternative B. The Project site is located approximately four miles from the nearest airport, and the proposed Project would not expose people working at the site to excessive aircraft noise, resulting in a less-than-significant impact. This impact would remain less than significant under Alternative B, since the distance from the airport would not change. Overall impacts related to noise would be less under Alternative B than under the proposed Project, but would remain less-than-significant, like the proposed Project.

Transportation

Compared to the proposed Project, Alternative B would result in approximately 25 percent fewer daily vehicle trips as well as approximately 25 percent fewer trips during the AM and PM peak hours. Alternative B would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities, and impacts would be less than significant. Alternative B would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), nor would it result in inadequate emergency access, therefore resulting in less than significant impacts. Alternative B would conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b) related to VMT, and impacts would be significant and unavoidable, similar to the proposed Project. Although Alternative B would result in similar impacts as the proposed Project, those impacts would all be reduced in nature. However, Alternative B would not reduce the Project's significant and unavoidable impacts related to VMT.

Tribal Cultural Resources

Under Alternative B, tribal cultural resource impacts would be similar to the proposed Project because roughly the same amount of grading and ground-disturbing activities would be required. Therefore, should the site contain any tribal cultural resources, implementation of Alternative B would result in similar tribal cultural resource impacts compared to the proposed Project. These impacts can be mitigated to less-than-significant levels via the mitigation measures listed in Table II-1 and included in the Initial Study (Appendix A).

Relationship of the Alternative to the Project Objectives

Alternative B would meet most of the Project objectives, although to a lesser degree (see Table VI-1).

C. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of the proposed Project and the alternatives, Section 15126.6 of the CEQA Guidelines requires that an “environmentally superior” alternative be selected and the reasons for such a selection disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of significant impacts. Identification of the environmentally superior alternative is an informational procedure and the alternative selected may not be the alternative that best meets the goals or needs of the City and/or Project applicant. Section 15126.6(e)(2) of the CEQA Guidelines also requires that if the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

Based on the analysis provided above and in the Alternatives Comparison Table (see Table VI-1), it has been determined that Alternative B (Reduced Project Alternative) would be the environmentally superior alternative. Although Alternative B would not eliminate any significant impacts of the Project, some of the effects of the Project’s significant impacts would be lessened. Additionally, Alternative B would not meet all of the Project objectives.

Table VI-1. Alternatives Comparison

IMPACT AREA	PROPOSED PROJECT	ALTERNATIVE A (No Project Alternative)	ALTERNATIVE B (Reduced Project Alternative)
Aesthetics			
Have a substantial adverse effect on a scenic vista?	Less than Significant	No Impact	Less than Significant
Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No Impact	No Impact	No Impact
In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less than Significant	No Impact	Less than Significant
Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less than Significant with Mitigation	No Impact	Less than Significant with Mitigation
Air Quality			
Conflict with or obstruct implementation of the applicable air quality plan?	Less than Significant	Less than Significant	Less than Significant
Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard?	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable
Expose sensitive receptors to substantial pollutant concentrations?	Less than Significant with Mitigation	No Impact	Less than Significant with Mitigation
Result in other emissions (such as those leading to odors) affecting a substantial number of people?	Less than Significant	Less than Significant	Less than Significant

IMPACT AREA	PROPOSED PROJECT	ALTERNATIVE A (No Project Alternative)	ALTERNATIVE B (Reduced Project Alternative)
Biological Resources			
Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	No Impact	No Impact	No Impact
Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	No Impact	No Impact	No Impact
Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No Impact	No Impact	No Impact
Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Less than Significant with Mitigation	No Impact	Less than Significant with Mitigation
Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less than Significant	No Impact	Less than Significant
Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	Less than Significant	No Impact	Less than Significant

IMPACT AREA	PROPOSED PROJECT	ALTERNATIVE A (No Project Alternative)	ALTERNATIVE B (Reduced Project Alternative)
Cultural Resources			
Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	No Impact	No Impact	No Impact
Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	Less than Significant with Mitigation	No Impact	Less than Significant with Mitigation
Disturb any human remains, including those interred outside of dedicated cemeteries?	Less than Significant with Mitigation	No Impact	Less than Significant with Mitigation
Geology and Soils			
Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	No Impact	No Impact	No Impact
Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: ii) Strong seismic ground shaking?	Less than Significant	Less than Significant	Less than Significant
Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: iii) Seismic-related ground failure, including liquefaction?	Less than Significant	Less than Significant	Less than Significant
Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: iv) Landslides?	No Impact	No Impact	No Impact
Result in substantial soil erosion or the loss of topsoil?	Less than Significant	No Impact	Less than Significant

IMPACT AREA	PROPOSED PROJECT	ALTERNATIVE A (No Project Alternative)	ALTERNATIVE B (Reduced Project Alternative)
Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	Less than Significant	Less than Significant	Less than Significant
Be located on expansive soil, as defined in Table 18.1 B of the Uniform Building Code, creating substantial direct or indirect risks to life or property?	Less than Significant	Less than Significant	Less than Significant
Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	No Impact	No Impact	No Impact
Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less than Significant with Mitigation	No Impact	Less than Significant with Mitigation
Greenhouse Gas Emissions			
Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable
Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less than Significant	Less than Significant	Less than Significant
Hazards and Hazardous Materials			
Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than Significant	Less than Significant	Less than Significant
Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less than Significant with Mitigation	Less than Significant	Less than Significant with Mitigation

IMPACT AREA	PROPOSED PROJECT	ALTERNATIVE A (No Project Alternative)	ALTERNATIVE B (Reduced Project Alternative)
Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	No Impact	No Impact	No Impact
Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less than Significant	Less than Significant	Less than Significant
For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	No Impact	No Impact	No Impact
Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less than Significant	Less than Significant	Less than Significant
Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	No Impact	No Impact	No Impact
Noise			
Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less than Significant	Less than Significant	Less than Significant
Generation of excessive groundborne vibration or groundborne noise levels?	Less than Significant	Less than Significant	Less than Significant

IMPACT AREA	PROPOSED PROJECT	ALTERNATIVE A (No Project Alternative)	ALTERNATIVE B (Reduced Project Alternative)
For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	Less than Significant	Less than Significant	Less than Significant
Transportation			
Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Less than Significant	Less than Significant	Less than Significant
Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	Significant and Unavoidable	Significant and Unavoidable	Significant and Unavoidable
Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than Significant	Less than Significant	Less than Significant
Result in inadequate emergency access?	Less than Significant	Less than Significant	Less than Significant
Tribal Cultural Recourses			
Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: i) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	Less than Significant with Mitigation	No Impact	Less than Significant with Mitigation

IMPACT AREA	PROPOSED PROJECT	ALTERNATIVE A (No Project Alternative)	ALTERNATIVE B (Reduced Project Alternative)
<p>Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p> <p>ii) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?</p>	<p>Less than Significant with Mitigation</p>	<p>No Impact</p>	<p>Less than Significant with Mitigation</p>
<p>Ability to Meet the Basic Objectives of the Project</p>			
<p>To redevelop and maximize the buildout potential of an underutilized property and reduce existing blight thereby providing for a range of potential uses including light industrial, manufacturing, warehouse or e-commerce</p>	<p>Yes</p>	<p>No</p>	<p>Yes, but to a lesser extent</p>
<p>Construct a 490,000 square foot infill development exhibiting quality design, consistency with the designated land use and zoning and compatibility with the surrounding land uses.</p>	<p>Yes</p>	<p>No</p>	<p>No</p>

IMPACT AREA	PROPOSED PROJECT	ALTERNATIVE A (No Project Alternative)	ALTERNATIVE B (Reduced Project Alternative)
Develop a Project that is consistent with the Milpitas General Plan and the surrounding uses.	Yes	Yes	Yes
Attract new employment-generating businesses to Milpitas to help create more equal jobs-housing balance in Milpitas and reducing the need for residents to commute outside the area for employment.	Yes	Yes	Yes, but to a lesser extent
Implement the City of Milpitas desire to create new uses that generate additional revenue and help Milpitas and other public agencies achieve fiscal balance.	Yes	No	Yes, but to a lesser extent
Develop a logistics center that is in close proximity to nearby truck routes and freeways, minimizing vehicle miles travelled on the streets in order to facilitate the efficient movement of goods, which is recognized as a strong benefit for local and regional economic growth.	Yes	No	Yes, but to a lesser extent
Satisfy the substantial demand for a logistics center building that is both physically and economically feasible to construct and operate, that is attractive to potential users and economically competitive with other geographic markets.	Yes	No	Yes, but to a lesser extent

IMPACT AREA	PROPOSED PROJECT	ALTERNATIVE A (No Project Alternative)	ALTERNATIVE B (Reduced Project Alternative)
To help improve the quality of life for Milpitas residents through job creation, revenue generation and other associated Project benefits.	Yes	No	Yes, but to a lesser extent
Generate local employment opportunities, both in short-term construction employment and long-term Project employment.	Yes	No	Yes, but to a lesser extent

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