

6 Alternatives

6.1 Introduction

Pursuant to the California Environmental Quality Act (CEQA) Guidelines, an Environmental Impact Report (EIR) is required to “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project” (14 CCR 15126.6[a]). An EIR “must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation” (14 CCR 15126.6[a]). This alternatives discussion is required even if these alternatives “would impede to some degree the attainment of the project objectives, or would be more costly” (14 CCR 15126.6[b]).

The CEQA Guidelines further provide that the range of alternatives is guided by a “rule of reason,” such that only those alternatives necessary to permit a reasoned choice are included (14 CCR 15126.6[f]). The EIR need only examine alternatives that could feasibly attain most of the basic objectives of the project. “Among the factors that may be taken into account when addressing feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries ... and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site.”

The inclusion of an alternative in an EIR does not constitute definitive evidence that the alternative is in fact “feasible.” The final decision regarding the feasibility of alternatives lies with the decision maker for a given project, who must make the necessary findings addressing the potential feasibility of an alternative, including whether it meets most of the basic project objectives or reduces the severity of significant environmental effects pursuant to CEQA (California Public Resources Code, Section 21081; see also 14 CCR 15091).

Beyond these factors, the Guidelines require the analysis of a “no project” alternative and an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the “no project” alternative, then the EIR shall identify an environmental superior alternative among the other alternatives.

6.2 Project Objectives

In developing the alternatives to be addressed in this chapter, consideration was given to the ability to meet the basic objectives of the proposed West Campus Upper Plateau Project (Project) and eliminate or substantially reduce the identified significant environmental impacts. As stated in Recirculated Chapter 3, Project Description, of this Environmental Impact Report (EIR), the proposed Project requests a General Plan Amendment, Specific Plan, Zoning Amendment, Tentative Tract Map, two Plot Plans, and a Development Agreement to redevelop the former munitions bunkers of the March AFB, along with a conservation easement over the Conservation Easement. The primary objectives of the Project include the following:

- Provide increased job opportunities for residents through the provision of employment-generating businesses
- Provide open space amenities to serve the region
- Provide an active park consistent with the 2009 Safety Study prepared by March JPA

- Complete the buildout of the roadway infrastructure by extending Cactus Avenue to the Specific Plan Area from its existing terminus, extending Barton Street from Alessandro Boulevard to Grove Community Drive, and extending Brown Street from Alessandro Boulevard to Cactus Avenue
- Remove and redevelop a majority of the former munitions storage area of the March AFB
- Encourage the use of alternative modes of transportation through the provision of a pedestrian and bicycle circulation system that is safe, convenient, and comfortable
- Implement the terms and conditions agreed upon in the September 12, 2012, Settlement Agreement entered into between and among the CBD, the San Bernardino Valley Audubon Society, March JPA, and LNR Riverside LLC, as the complete settlement of the claims and actions raised in *Center for Biological Diversity v. Jim Bartel, et al.* to preserve open space through establishing a Conservation Easement

6.3 Alternatives Considered but Rejected

As set forth in CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration are the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. The following discussion presents information on alternatives to the Project that were considered but rejected. These alternatives are not discussed in further detail and have been eliminated from further consideration.

6.3.1 Alternate Site

In accordance with CEQA Guidelines, Section 15126.6(f)(2), the March JPA attempted to identify a feasible alternative off-site location within the Project area that could be available for the development of the Project. Pursuant to CEQA Guidelines, Section 15126.6(f)(2)(A), the key question and first step in analysis of the off-site location is whether any of the significant effects of the Project would be avoided or substantially lessened by moving the Project to another location.

After a review of available contiguous open spaces of approximately 369.60 acres (similar to the Specific Plan Area) within the Project vicinity, no large-scale additional sites that could accommodate the proposed Project exist. Further, the CBD Settlement Agreement specifically identifies the Conservation Easement for placement under the conservation easement (Appendix S).

Additionally, neither the March JPA nor the Project applicant have ownership of 369.60 acres elsewhere within the Project vicinity such that the Specific Plan Area could be developed on an alternate site. Therefore, off-site locations capable of accommodating the entire Project are considered infeasible, and no off-site location alternatives were carried forward in this analysis.

6.3.2 All Residential Alternative

The Project site is within the boundaries of the March ARB/Inland Port ALUCP and the March JPA General Plan areas. An all-residential project would not meet the basic Project objectives to provide increased job opportunities for residents through the provision of employment-generating businesses or to implement the terms and conditions

of the CBD Settlement Agreement (Appendix S). Further, the CBD Settlement Agreement specifically identifies the Conservation Easement for placement under the conservation easement.

March JPA's General Plan currently designates the Project site as Business Park (BP) and Park/Recreation/Open Space (P/R/OS). The Project site has not previously been given a zoning designation by March JPA. The General Plan does not include land zoned for new residential uses because the purpose of the jurisdiction is to increase employment opportunities within the region through the construction of employment-based land uses. Describing its Housing Element, the March JPA General Plan states the "land use plan identifies no new housing areas, and creates an employment center within the housing rich environment of western Riverside County." Additionally, the March JPA General Plan Housing Profile report states: "No housing opportunities are identified within the March JPA Planning Area due to land use compatibility issues related to the continued military activities of the Air Force Reserves and aviation operations."

Furthermore, as shown in Figure 4.10-2, ALUC Compatibility Map, in Recirculated Section 4.10, Land Use and Planning, the Project site is located in the C1 Primary Approach/Departure Zone and C2 Flight Corridor Zone, which requires approval from the Riverside County Airport Land Use Commission due to the Project site's proximity to the March ARB/Inland Port Airport. The C1 Zone is subject to high to moderate noise and moderate accident potential risk. Both C1 and C2 Flight Corridor Zones include safety requirements and restrictions within the policies of the ALUCP. The ALUCP requires new residential development in these zones to have sound attenuation features incorporated into the structures sufficient to reduce interior noise levels from exterior aviation-related sources to no more than CNEL 40 dB. This requirement is intended to reduce the disruptiveness of loud individual aircraft noise events upon uses in this zone and represents a higher standard than the CNEL 45 dB standard set by state and local regulations and countywide ALUC policy.

Given the failure to meet basic Project objectives, this alternative was considered but rejected.

6.4 Alternatives Under Consideration

This section discusses the alternatives to the Project, including the No Project Alternative, under consideration. The No Project Alternative, which is a required element of an EIR pursuant to Section 15126.6(e) of the CEQA Guidelines, examines the environmental effects that would occur if the Project were not to proceed. The other alternatives are discussed as part of the "reasonable range of alternatives" selected by the lead agency.

Under the Specific Plan buildout scenario analyzed in this Draft Final EIR, the Campus Development would be developed with ten Business Park parcels, six Mixed Use parcels, three Industrial parcels, two Public Facility parcels, and three open space parcels. These parcels would be created, designated, and graded. Buildings B and C would be constructed on two of the Industrial Parcels. The remaining parcels would be developed with square footages as allowed under the Specific Plan. The Specific Plan also includes a 60.28-acre park west of the Barton Street extension under the Specific Plan buildout scenario. The recreational amenities analyzed include a playground, multiuse sports fields that could be used for soccer, football, and field hockey, and trails with cardio stops for recreational users. The Specific Plan also includes installation of utility and roadway networks connecting to and throughout the Specific Plan Area, the construction of a new sewer lift station, the construction of a new electrical substation, and the construction of a new 0.5 million gallon (MG) reclaimed water tank.

The following alternatives are addressed in this section, followed by a more detailed discussion of each:

- **Alternative 1 – No Project:** Under Alternative 1, development of the Project would not occur as discussed in Recirculated Chapter 3, Project Description, of this Draft Final EIR. The Project site would remain unchanged, and no development activity would occur. As a result, the proposed General Plan Amendment, Specific Plan, Zoning Amendment, Tentative Tract Map, two Plot Plans, and a Development Agreement to redevelop the former munitions bunkers of the March AFB would not be necessary, as no new development would occur on the Project site that would trigger such actions. Alternative 1 would have no workforce or vehicle trips compared to the proposed Project. Additionally, the Conservation Easement would not be placed under a conservation easement.
- **Alternative 2 – Reduced Development Alternative:** Under Alternative 2, the Reduced Development Alternative, approximately 45.34 acres of the Project’s Business Park (approximately 70% of the Project’s total Business Park acreage) would be designated Open Space instead, as shown in Revised Figure 6-1, Alternative 2 – Reduced Development Area Alternative. Under Alternative 2, the seven Business Park parcels to the north (approximately 3^{4.51} acres) and the southern half of the Business Park parcels to the south would not be developed (leaving one Business Park parcel to the south of 10.93 acres). This would result in a reduction of the developable acreage in the Campus Development by approximately 18% and an increase in Open Space by approximately 60% in the Specific Plan Area compared to the proposed Project.
- **Alternative 3 – Restricted Industrial Building Size Alternative:** Under Alternative 3, Restricted Industrial Building Size Alternative, the development of the 56.27-acre Industrial parcel to the north of Building B would be restricted to a minimum of two separate industrial buildings with a maximum floor area ratio (FAR) of 0.40. Under the Project’s proposed Specific Plan, the Industrial zone has a maximum FAR of 0.50. Therefore, under the proposed Project, the 56.27-acre Industrial parcel could be developed with a single industrial building totaling 1,225,000 square feet. However, under Alternative 3, a two-building layout on 56.27 acres with a 0.40 FAR would each result in two buildings, each being 490,225 square feet. Therefore, Alternative 3 would result in a reduction of 244,550 square feet of potential industrial development (approximately 20% of the potential industrial development for the 56.27-acre Industrial parcel).
- **Alternative 4 – Reduced Cultural Resource Impact Alternative:** Under Alternative 4, Barton Street would be realigned to the east to avoid a known cultural resource site that otherwise would be directly impacted under the proposed Project during construction activities. To avoid this known cultural resource, Alternative 4 would realign the portion of Barton Street that extends north from the emergency access only roadway from Cactus Avenue to the east. Realigning Barton Street to the east would result in Barton Street bisecting the proposed mixed-Use parcels west of Airman Drive and the Business Park parcel located on the northwest corner of Arflight Drive. Therefore, Alternative 4 would result in a 1.9-acre reduction of Mixed-Use area and a 4.35-acre reduction of Business Park area compared to the proposed Project. Additionally, by realigning this portion of Barton Street, there would an increase of 2.16 acres of Open Space to the west of Barton Street compared to the proposed Project. Alternative 4 would result in a slight reduction in workforce and total trips compared to the proposed Project.
- **Alternative 5 – Non-Industrial Alternative:** Under Alternative 5, the Non-Industrial Alternative, the parcels adjacent to Barton Street would be designated Commercial Retail. Unlike the Project, these parcels would have access to Barton Street to provide neighborhood commercial services. With the exception of the Public Facility and Park/Recreation/Open Space parcels, the remaining acreage within the Specific Plan Area would be designated Office Park. The Project’s three Industrial parcels would be divided into 15 Office Park parcels under Alternative 5. See Figure 6-2, Alternative 5 – Non-Industrial Alternative. Development under Alternative 5 would involve smaller, but more numerous buildings compared to the Project. The maximum height of

Alternative 5's buildings would be 45 feet compared with the Project's 50 feet. Under Alternative 5, warehousing and other industrial activities would not be permitted under either the Commercial Retail or Office Park designations. Table 6-13 details the development square footages by land use for the Project and Alternative 5. Compared to the Project, Alternative 5 represents an approximately 7.4% decrease in the total amount of building square footage but the same amount of development square footage.

In accordance with the CEQA Guidelines Section 15126.6(d), the discussion of the environmental effects of the alternatives may be less detailed than the discussion of the impacts of the Project. Table 6-1 provides a summary of the comparison of the impacts of the alternatives with the Project; an analysis of the Environmentally Superior Alternative is provided in Section 6.5. Pursuant to the CEQA Guidelines previously stated, as well as the Project objectives, a range of alternatives to the Project are considered and evaluated in this EIR. To summarize these Project alternatives, as suggested in CEQA Guidelines Section 15126.6(d), a matrix was prepared to summarize and compare the impacts of each Project alternative (Table 6-1).

Table 6-1. Comparison of Project and Alternatives Impacts

Environmental Topic	Project Impact	Alternative 1 No Project	Alternative 2 Reduced Development	Alternative 3 Restricted Industrial Building Size	Alternative 4 Reduced Cultural Resource Impact	Alternative 5 Non- Industrial Alternative
Aesthetics	Less than Significant with Mitigation	▼ No Impact	▼ LTS with Mitigation	= LTS with Mitigation	▼ LTS with Mitigation	▼ <u>LTS with Mitigation</u>
Air Quality	Significant and Unavoidable	▼ No Impact	▼ SUI	▼ SUI	▼ SUI	▲ <u>SUI</u>
Biological Resources	Less than Significant with Mitigation	▼ No Impact	▼ LTS with Mitigation	= LTS with Mitigation	▼ LTS with Mitigation	= <u>LTS with Mitigation</u>
Cultural Resources	Significant and Unavoidable	▼ No Impact	▼ SUI	= SUI	▼ SUI	= <u>SUI</u>
Energy	Less than Significant with Mitigation	▼ No Impact	▼ LTS with Mitigation	▼ LTS with Mitigation	▼ LTS with Mitigation	▲ <u>LTS with Mitigation</u>
Geology and Soils	Less than Significant with Mitigation	▼ No Impact	▼ LTS with Mitigation	= LTS with Mitigation	▼ LTS with Mitigation	= <u>LTS with Mitigation</u>
Greenhouse Gas Emissions	Less than Significant with Mitigation	▼ No Impact	▼ LTS with Mitigation	▼ LTS with Mitigation	▼ LTS with Mitigation	▲ <u>LTS with Mitigation</u>
Hazards/ Hazardous Materials	Less than Significant with Mitigation	▼ No Impact	▼ LTS with Mitigation	▼ LTS with Mitigation	▼ LTS with Mitigation	= <u>LTS with Mitigation</u>

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Environmental Topic	Project Impact	Alternative 1 No Project	Alternative 2 Reduced Development	Alternative 3 Restricted Industrial Building Size	Alternative 4 Reduced Cultural Resource Impact	Alternative 5 Non- Industrial Alternative
Hydrology/ Water Quality	Less than Significant with Mitigation	▼ No Impact	▼ LTS with Mitigation	= LTS with Mitigation	▼ LTS with Mitigation	≡ <u>LTS with Mitigation</u>
Land Use/ Planning	Less than Significant with Mitigation	▼ No Impact	▼ LTS with Mitigation	▼ LTS with Mitigation	▼ LTS with Mitigation	≡ <u>LTS with Mitigation</u>
Noise	Significant and Unavoidable	▼ No Impact	▼ SUI	▼ SUI	▼ SUI	▼ <u>LTS</u>
Population and Housing	Less than Significant	▼ No Impact	▼ LTS	▼ LTS	▼ LTS	≡ <u>LTS</u>
Public Services	Less than Significant with Mitigation	▼ No Impact	▼ LTS with Mitigation	▼ LTS with Mitigation	▼ LTS with Mitigation	▲ <u>LTS with Mitigation</u>
Recreation	Less than Significant	▼ No Impact	▼ LTS	▼ LTS	▼ LTS	▲ <u>LTS</u>
Transportation	Less than Significant with Mitigation	▼ No Impact	▼ LTS with Mitigation	▼ LTS with Mitigation	▼ LTS with Mitigation	▲ <u>SUI</u>
Tribal Cultural Resources	Significant and Unavoidable	▼ No Impact	▼ SUI	= SUI	▼ SUI	≡ <u>SUI</u>
Utilities/ Service Systems	Less than Significant	▼ No Impact	▼ LTS	▼ LTS	▼ LTS	▲ <u>LTS</u>
Wildfire	Less than Significant with Mitigation	▼ No Impact	▼ LTS with Mitigation	▼ LTS with Mitigation	▼ LTS with Mitigation	≡ <u>LTS with Mitigation</u>

Notes:

Green – No Impact or Less than Significant, Yellow – Less than Significant with Mitigation, Red – Significant and Unavoidable

▲ Impacts would be greater than those of the proposed Project.

= Impacts would be comparable to those of the proposed Project

▼ Impacts would be reduced when compared to those of the proposed Project.

6.4.1 Existing Conditions

Existing development within the Project site consists of a water tower, asphalt paved and dirt access roads, seven buildings in various states of abandonment, chain-link fencing, and ~~16~~14 bunkers that were previously used for munitions storage by the Air Force. All the bunkers are currently used by Pyro Spectaculars, Inc. for the storage of

fireworks. The remainder of the Project site is generally unoccupied. While the Specific Plan Area encompasses existing development and previously disturbed land, the Conservation Easement primarily consists of open space and undeveloped land.

6.4.2 Alternative 1 – No Project

Under Alternative 1, development of the Project would not occur as discussed in Recirculated Chapter 3, Project Description of this ~~Draft~~ Final EIR. The Project site would remain unchanged, and no development activity would occur. As a result, the proposed General Plan Amendment, Specific Plan, Zoning Amendment, Tentative Tract Map, two Plot Plans, and a Development Agreement to redevelop the former munitions bunkers of the March AFB would not be necessary, as no new development would occur on the Project site that would trigger such actions. Alternative 1 would have no workforce or vehicle trips compared to the proposed Project. Additionally, the Conservation Easement would not be placed under a conservation easement.

6.4.2.1 Environmental Analysis

Aesthetics

As discussed in Section 4.1, Aesthetics, implementation of the proposed Project would not have a substantial adverse effect on a scenic vista or substantially degrade the existing visual character or quality of public views of the site and its surroundings with implementation of mitigation measure **MM-AES-1** (Construction Equipment Staging and Screening). Impacts would be less than significant, and no mitigation is required. With the implementation of **MM-AES-2** (Exterior Lighting Point-by-point Photometric Study Approval) and **MM-AES-3** (Solar Photovoltaic System Approval), the Project's impacts as a new source of substantial light or glare would be reduced to less than significant with mitigation incorporated.

Under Alternative 1, the Project site would remain in its current condition, and no development would occur. There would be no impact on scenic vistas. The visual character and quality of public views both of and from the site would remain unchanged. No new sources of substantial light or glare would be introduced to the site. Therefore, because no development would occur as a result of Alternative 1, there would be **no aesthetics impacts**. This Alternative would result in a **significant reduction** in aesthetics impacts when compared to the proposed Project.

Air Quality

As discussed in Recirculated Section 4.2, Air Quality, implementation of the proposed Project would result in potentially significant air quality impacts. With implementation of **MM-AQ-1 through MM-AQ-4**, the Specific Plan Area's construction air quality impacts would be reduced to less than significant levels. The Specific Plan Area's daily regional emissions from operations would exceed the SCAQMD thresholds of significance for emissions of VOCs, NO_x, CO, ~~and PM₁₀, and PM_{2.5}~~ and would, therefore, per SCAQMD criteria, be cumulatively potentially significant, and mitigation is required. **MM-AQ-52 through MM-AQ-2715** are designed to reduce Specific Plan Area operational-source VOCs, NO_x, CO, ~~and PM₁₀, and PM_{2.5}~~ emissions. ~~There is no way to meaningfully quantify these reductions in CalEEMod, and therefore no numeric emissions credit has been taken in the analysis. As such~~ However, even with application of **MM-AQ-52 through MM-AQ-2715**, the Specific Plan's operational-source emissions impacts would be significant and unavoidable. Since Specific Plan operations would exceed the SCAQMD thresholds of significance, the Project would also conflict with the AQMP, thereby resulting in an additional significant and unavoidable impact. The construction and operation of the Specific Plan would not exceed applicable LST, CO hotspot, or HRA thresholds and impacts would be less than significant. The Specific Plan Area's odor and other emissions impacts would be less than significant.

Under Alternative 1, the Project site would remain in its current condition, and no development would occur. The Project site would continue to operate under existing conditions, and the air quality conditions would remain the same. Therefore, because no additional emissions would occur under Alternative 1, there would be **no air quality impacts**. This Alternative would result in a **significant reduction** in air emissions when compared to the proposed Project.

Biological Resources

As discussed in Section 4.3, Biological Resources, implementation of the proposed Project would result in potentially significant biological impacts. The Specific Plan Area's effect on special status plant and wildlife species, direct impacts on burrowing owl, San Diego black tailed jackrabbit, coast horned lizard, coastal whiptail, orange-throated whiptail, and western yellow bat, Cooper's hawk, Lawrence's goldfinch, northern harrier, sharp-shinned hawk, yellow warbler, and California horned lark and indirect impacts on Least Bell's Vireo and Stephens' Kangaroo Rat, would be reduced to less than significant with the implementation of **MM-BIO-1** (Best Management Practices), **MM-BIO-2** (Least Bell's Vireo), **MM-BIO-3** (Operation-Related Indirect Impacts to Special-Status Wildlife), **MM-BIO-4** (Stephens' Kangaroo Rat Avoidance), **MM-BIO-5A** (Burrowing Owl Avoidance and Mitigation Measures)/**MM-BIO-5B** (Burrowing Owl Relocation and Mitigation Plan), **MM-BIO-6** (San Diego Black-Tailed Jackrabbit), and **MM-BIO-7** (Nesting Bird Avoidance and Minimization Measures). The Specific Plan Area's effect on riparian habitat or other sensitive natural communities would be reduced to less than significant with implementation of **MM-BIO-8** (Upland Vegetation Communities) and **MM-BIO-9** (Aquatic Resources Mitigation). The Specific Plan Area's effect on state or federally protected wetlands would be reduced to less than significant with implementation of **MM-BIO-9**. The Specific Plan would have less than significant impacts to the movement of fish/wildlife, wildlife corridors, or native wildlife nursery sites. The Specific Plan's conflicts with local policies/ordinances protecting biological resources would be reduced to less than significant with the implementation of **MM-BIO-1** through **MM-BIO-9**. The Specific Plan's conflicts with an adopted HCP or other conservation plan would be reduced to less than significant with implementation of **MM-BIO-4**, **MM-BIO-5A/MM-BIO-5B**, **MM-BIO-6**, and **MM-BIO-9**. As such, with implementation of **MM-BIO-1** through **MM-BIO-9**, the Project's impacts to biological resources would be reduced to less than significant levels.

Alternative 1 would not result in any potential impacts to biological resources because no construction or site disturbance would occur. Alternative 1 would not impact special-status species, riparian habitat, or state or federally protected wetlands and would not interfere with the movement of fish/wildlife, wildlife corridors or native wildlife nursery sites. Further, Alternative 1 would not conflict with local policies/ordinances protecting bio resources or an adopted HCP or other conservation plan. Therefore, Alternative 1 would have **no impacts** on biological resources. This Alternative would result in a **significant reduction** in impacts to biological resources when compared to the proposed Project.

Cultural Resources

As discussed in Section 4.4, Cultural Resources, implementation of the proposed Project would result in potentially significant impacts to cultural resources. However, even with the implementation of **MM-CUL-1** through **MM-CUL-118** and **MM-CUL-13**, the Project's impacts to historical and archaeological resources would be significant and unavoidable. With implementation of **MM-CUL-129**, the Project's impacts to human remains would be less than significant.

Alternative 1 would not result in any impacts related to cultural resources because no construction or site disturbance would occur. Therefore, Alternative 1 would have **no impacts** on cultural resources (historic resources, archaeological resources, and human remains). This Alternative would result in a **significant reduction** in impacts to cultural resources when compared to the proposed Project.

Energy

As discussed in Section 4.5, Energy, construction and operation of the Specific Plan would not result in wasteful, inefficient, or unnecessary consumption of energy or conflict with or obstruct a state or local plan for renewable energy or energy efficiency and the Project's energy impacts would be less than significant, with the incorporation of MM-GHG-1 through MM-GHG-1211 and MM-AQ-1 through MM-AQ-27. These mitigation measures would further reduce the Specific Plan Area's energy use impacts to less than significant levels.

Under Alternative 1, the Project site would remain in its current condition, and no development would occur. The Project site would continue to operate under existing conditions, and the demand for energy would remain the same. Therefore, because no additional demand for energy would occur under Alternative 1, there would be **no energy impacts**. This Alternative would result in a **significant reduction** in energy impacts when compared to the proposed Project.

Geology and Soils

As discussed in Section 4.6, Geology and Soils, implementation of the Specific Plan would result in potentially significant impacts to geology and soils. The Specific Plan Area would have less than significant impacts with regard to strong seismic ground shaking, seismic-related ground failure, and expansive soils. With the implementation of **MM-GEO-1** (Slope Stability), the Specific Plan's impacts related to landslides and unstable soil would be reduced to less than significant. The Specific Plan Area's impacts to paleontological resources and site or unique geologic features would be reduced to less than significant with incorporation of **MM-GEO-2** (Paleontological Resources).

Alternative 1 would not result in any direct impacts related to geology and soils because no construction or site disturbance would occur. No construction or operational activities would take place that could expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking, seismic related ground failure, landslides, or unstable or expansive soils. Alternative 1 would not impact any paleontological resources or site or unique geologic features. Therefore, Alternative 1 would have **no impacts** to geology and soils. This Alternative would result in a **significant reduction** in impacts to geology and soils when compared to the proposed Project.

Greenhouse Gas Emissions

As discussed in Section 4.7, Greenhouse Gas Emissions, implementation of the Specific Plan would result in potentially significant GHG impacts because it could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. However, with implementation of **MM-GHG-1** through **MM-GHG-1211**, the Specific Plan would be consistent with the applicable plans, including the County CAP, and GHG impacts would be reduced to less than significant levels. Additionally, the Specific Plan would not conflict with any of the Senate Bill 32/2017 Scoping Plan elements since any regulations adopted would apply directly or indirectly to the Project. Furthermore, the proposed Project represents 0.901.24% of the anticipated increase in jobs for the WRCOG region, and therefore, would not result in long-term operational employment growth that exceeds planned growth projections in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) or an Air Quality Management Plan, or result in employment growth that would substantially add to traffic congestion.

Under Alternative 1, the Specific Plan Area would remain in its current condition, and no development would occur. The Specific Plan Area would continue to remain under existing conditions, and the GHG emissions would remain the same. Therefore, because no additional emissions would occur under Alternative 1, there would

be **no GHG impacts**. This Alternative would result in a **significant reduction** in GHG impacts when compared to the proposed Project.

Hazards and Hazardous Materials

As discussed in Recirculated Section 4.8, Hazards and Hazardous Materials, implementation of the Specific Plan would result in potentially significant hazard and hazardous materials impacts. During construction within the Specific Plan Area, implementation of **MM-HAZ-1** would reduce the Project's impacts involving the routine transport, use, or disposal of hazardous materials. During operations, the Specific Plan would have a less than significant impact with regards to reasonably foreseeable upset and accident conditions involving the release of hazardous materials. Given the proximity of the neighboring preschool at Community Grove Church, **MM-HAZ-2** is required to reduce potentially significant impacts associated with Project uses emitting and/or handling hazardous materials within one-quarter mile of an existing or planned school. With implementation of **MM-HAZ-3**, the Project's proximity to March ARB/Inland Port Airport would not result in a safety hazard or excessive noise for people residing or working in the Project area. **MM-FIRE-1** would reduce the Project's impacts involving wildland fires. With implementation of **MM-HAZ-1**, **MM-HAZ-2**, **MM-HAZ-3**, and **MM-FIRE-1**, the Project's hazards and hazardous materials impacts would be reduced to less than significant levels.

Alternative 1 would not result in any direct impacts related to hazards and hazardous materials because no construction or site disturbance would occur. With no construction or operations, Alternative 1 would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, 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, emit or handling hazardous materials within one-quarter mile of an existing or planned school, result in a safety hazard or excessive noise for people residing or working in the Project area due to its proximity to March ARB/Inland Port Airport, or expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. As no construction would occur, fire suppression and adherence to March ARB/Inland Port ALUCP and any ALUC review and approval of proposed plans would not be necessary. Therefore, Alternative 1 would have **no hazards and hazardous materials impacts**. This Alternative would result in a **significant reduction** in hazards and hazardous materials impacts when compared to the proposed Project.

Hydrology and Water Quality

As discussed in Section 4.9, Hydrology and Water Quality, implementation of the Specific Plan would result in potentially significant impacts to hydrology and water quality. With implementation of **MM-HYD-1** (Interim Soil Stabilization Plan) and **MM-HYD-2** (Water Quality Management Plan), the Project's impacts to surface or groundwater quality would be reduced to less than significant levels. In addition, implementation of the Storm Water Pollution Prevention Plan (SWPPP) in conformance with the Construction General Permit would reduce potential discharge of polluted runoff from construction sites. Further, Project design features would ensure that post-construction runoff velocities would be less than existing conditions and would not substantially alter the existing drainage pattern of the site or area. The Project's impacts to groundwater supplies and recharge would be less than significant. With implementation of **MM-HYD-3** (Hydrology/Drainage Study), the Project's impacts related to on- or off-site erosion or siltation and runoff water would be reduced to less than significant. Further the Project would have a less than significant impact related to risk releasing of pollutants due to inundation, impeding or redirecting flood flows, or conflicting with or obstructing implementation of a water quality control plan or sustainable groundwater management plan.

Alternative 1 would not result in any direct impacts related to hydrology and water quality because no construction or site disturbance would occur. Alternative 1 would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, affect groundwater supplies or recharge or alter the existing drainage pattern of the site. Alternative 1 would not have pollutants on site that could be released in the event of inundation. Finally, Alternative 1 would not conflict with, or obstruct the implementation of a water quality control plan or sustainable groundwater management plan. Therefore, Alternative 1 would have **no impacts** to hydrology and water quality. This Alternative would result in a **significant reduction** in hydrology and water quality impacts when compared to the proposed Project.

Land Use and Planning

As discussed in Recirculated Section 4.10, Land Use and Planning, with implementation of **MM-AQ-1** through **MM-AQ-2745**, **MM-BIO-1** through **MM-BIO-9**, **MM-CUL-1** through **MM-CUL-139**, **MM-GEO-1**, **MM-GEO-2**, **MM-GHG-1** through **MM-GHG-1241**, **MM-HAZ-1** through **MM-HAZ-3**, **MM-HYD-1** through **MM-HYD-3**, **MM-TRA-1** and **MM-TRA-2**, and **MM-FIRE-1** through **MM-FIRE-3**, the Project would be generally consistent ~~or partially consistent~~ with the March JPA General Plan Goals and policies, as well as the Draft Environmental Justice Element. March JPA designates the Project site as Business Park (BP), Industrial (IND), and Park/Recreation/Open Space (P/R/OS) land uses in the March JPA General Plan. The Project site has not previously been given a zoning designation by March JPA; therefore, the Project proposes zoning consistent with the proposed General Plan Amendment and Specific Plan designations of Mixed Use, Business Park (BP), Industrial (IND), Parks/Recreation/Open Space (P/R/OS), and Public Facility for the site. The Project proposes adoption of Specific Plan SP-9 consistent with applicable requirements in California Government Code Sections 65450–65457 and March JPA Development Code Chapter 9.13. The Project would be consistent with the March Development Code and the Riverside County ALUCP. Furthermore, the proposed Project would be consistent with the guiding principles, goals, and policies of Southern California Association of Governments’ (SCAG’s) Connect SoCal and the County Good Neighbor Policy for Logistics and Warehouse/Distribution Uses. As such, with incorporation of mitigation, the Project would result in less than significant land use impacts through conflicts with plans adopted for the purpose of avoiding or mitigating an environmental effect.

Under Alternative 1, the March JPA General Plan amendment and zoning designation would not be implemented, and the existing March JPA General Plan land use and zoning designations would remain. Alternative 1 would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the site adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, Alternative 1 would have **no land use and planning impacts**. This Alternative would result in a **significant reduction** in land use and planning impacts when compared to the proposed Project.

Noise

As discussed in Section 4.11, Noise, the Project would not generate substantial temporary or permanent increase in ambient noise levels, with the exception of traffic noise level increases along a non-sensitive roadway segment: Cactus Avenue east of Meridian Parkway (Segment #13). Therefore, the Project would have a significant and unavoidable noise impact and no feasible mitigation measures are available to reduce Project-related significant traffic noise increases along Segment #13. All other noise and vibration impacts associated with construction and operation of the Project would be less than significant.

Alternative 1 would not result in any construction or introduce any new land uses or vehicle trips with the potential to generate noise. The existing noise conditions at the Project site and in the vicinity of the Project site would remain unchanged. Therefore, Alternative 1 would have **no noise impacts**. This Alternative would result in a **significant reduction** in noise impacts when compared to the proposed Project.

Population and Housing

As discussed in Section 4.12, Population and Housing, Under the buildout scenario, it is anticipated that the Project would ~~create employ~~ approximately ~~2,600~~ 3,622 full-time ~~job~~ employees. Based on the County's unemployment rate, this EIR assumes that the Project's employees would be primarily existing residents of Riverside County. The anticipated number of jobs generated by the Project would be a nominal addition to the County's existing and projected labor force. Thus, the employment growth that would be attributed to the Project is consistent with SCAG's overall growth projections and would not result in a substantial increase of unplanned population growth. Therefore, the Project would have a less than significant impact related to population and housing, and no mitigation is required.

Alternative 1 would not result in any direct impacts related to population and housing because nothing would be built as a result of Alternative 1, and employees would not be introduced to the area. No construction or development activities would take place that could generate an increase in population or housing; therefore, Alternative 1 would have **no impacts** to population and housing compared to the Project. This Alternative would result in a **significant reduction** in impacts to population and housing when compared to the proposed Project.

Public Services

As discussed in Section 4.13, Public Services, with the implementation of **MM-FIRE-1**, the Project's impacts to fire services would be reduced to less than significant. The Project's impacts to police services, schools, parks and other public facilities would be less than significant, and no mitigation is required.

Alternative 1 would not result in any direct impacts related to public services because nothing would be built as a result of Alternative 1, and employees would not be introduced to the area. No construction or development activities would take place that could generate an increase in the demand for public services; therefore, Alternative 1 would have **no public services impacts**. This Alternative would result in a **significant reduction** in impacts to public services when compared to the proposed Project.

Recreation

As discussed in Section 4.14, Recreation, it is likely that the majority of the Campus Development's future employees are already residents of the nearby communities and are already using the local parks and recreational facilities. There could be an increase in demand for recreational facilities but because the Project's employees and surrounding neighborhoods would have access to the proposed 60.28-acre Park, any increased demand would not result in the need to construct additional recreational facilities under the Specific Plan buildout scenario. The recreational amenities analyzed include a playground, multiuse sports fields that could be used for soccer, football, and field hockey, and trails with cardio stops for recreational users. The impacts related to the Park's construction have been included in all of the analyses in this ~~Draft~~ Final EIR. Additionally, the currently existing service roads within the Conservation Easement, as depicted by the red lines on Figure 3-4, would continue to be utilized by the public for passive recreation as authorized by the March JPA, consistent with the terms of the CBD Settlement Agreement (Appendix S). Therefore, the Project would result in less than significant impacts to recreational facilities and no mitigation is required.

Alternative 1 would not result in any direct impacts related to recreational activities as it would not introduce employees to the area that would increase the demand for recreational facilities. The currently existing service roads within the Project site would continue to be utilized by the public for passive recreation as authorized by the March JPA, consistent with the terms of the CBD Settlement Agreement (Appendix S). As such, Alternative 1 would result in **no recreational impacts**. However, it should be noted that Alternative 1 would not result in the additional 60.28 acres of active and passive park uses, which would be beneficial to recreational users in the area. This Alternative would result in **some reduction** in impacts to recreation when compared to the proposed Project.

Transportation

As discussed in Section 4.15, Transportation, with the incorporation of **MM-TRA-1** (Construction Traffic Management Plan), Project construction impacts on the circulation system would be reduced to less than significant. With implementation of **MM-TRA-2** (Traffic Safety Plan for Barton Street), the Project's operational impacts on the circulation system would be less than significant. The Specific Plan Area's impact on VMT would be *less than significant*. Although the Specific Plan Area is not anticipated to have a significant VMT impact, **MM-AQ-219** further reduces VMT by requiring all tenants to implement or otherwise participate in a Transportation Demand Management program, including on-site transit pass sales and discounted passes, shuttle service to/from public transit and commercial/food establishments, if warranted, guarantee a ride home, and "commuter club" to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk or take transit to work. Additionally, **MM-GHG-11** requires the Project to provide funding for the installation of a bus shelter on Alessandro Boulevard. The Project's potential to increase hazards due to design features or incompatible uses would be reduced to *less than significant* with implementation of **MM-TRA-1** and **MM-TRA-2**.

Alternative 1 would not result in any direct or indirect impacts related to the circulation network because no development would occur, and no new vehicle trips or additional VMT would be introduced to the Project area. As such, Alternative 1 would have **no transportation impacts**. This Alternative would result in a **significant reduction** in transportation impacts when compared to the proposed Project.

Tribal Cultural Resources

As discussed in Section 4.16, Tribal Cultural Resources, implementation of the proposed Project would result in potentially significant impacts to tribal cultural resources. However, even with implementation of **MM-CUL-1** through **MM-CUL-138**, the Project's impacts to tribal cultural resources would remain *significant and unavoidable*.

Alternative 1 would not result in any direct impacts related to tribal cultural resources because no construction or site disturbance would occur. No construction or development activities would take place that could impact potential tribal cultural resources; therefore, the Alternative 1 would have **no tribal cultural resources impacts**. This Alternative would result in a **significant reduction** in impacts to tribal cultural resources when compared to the proposed Project.

Utilities and Service Systems

As discussed in Section 4.17, Utilities and Service Systems, the Project would have less than significant impacts to facilities providing water, wastewater, storm water, electric power, natural gas, and telecommunications. There are sufficient water supplies available and wastewater treatment capacity to serve the Project, resulting in less than significant impacts. The Project would have a less than significant impact on solid waste infrastructure and capacity and would comply with federal, state, and local management and reduction statutes and regulations related to solid

waste. Therefore, the Project impacts to utilities and service systems would be less than significant and no mitigation is required.

Alternative 1 would not result in any direct impacts related to water, wastewater, storm water, electric power, natural gas, telecommunications and solid waste services because no development would occur, and employees would not be introduced to the area. No construction or development activities would take place that could generate an increase in needed water, wastewater, storm water, electric power, natural gas, telecommunications and solid waste services; therefore, Alternative 1 would have **no utility and service systems impacts**. This Alternative would result in a **significant reduction** in impacts to utilities and service systems when compared to the proposed Project.

Wildfire

As discussed in Section 4.18, Wildfire, the Project site is near lands classified as Very High Fire Hazard Severity Zone (FHSZ) and implementation of the proposed Project would result in potentially significant wildfire impacts. However, with implementation of **MM-FIRE-1** through **MM-FIRE-3** as well as **MM-HYD-3**, the Project's potential to facilitate wildfire spread, exacerbate wildfire risk, or expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes would be reduced to less than significant levels.

Alternative 1 would not result in any direct impacts related to wildfire because nothing would be built as a result of Alternative 1, and therefore Alternative 1 would not expose people or structures to significant risks related to wildfire. As such, Alternative 1 would have **no wildfire impacts**. This Alternative would result in a **significant reduction** in impacts associated with wildfire when compared to the proposed Project.

6.4.2.2 Project Objectives

Under Alternative 1, the land on the Project site would remain vacant, and no new construction would be developed on the Project site. Additionally, the Conservation Easement would not be placed under a conservation easement. As shown in Table 6-2, Alternative 1 does not meet any objective.

Table 6-2. Summary of Alternative 1 Success at Meeting Project Objectives

Project Objective	Does Alternative 1 Meet Objective?
1. Provide increased job opportunities for residents through the provision of employment-generating businesses.	No. Under Alternative 1, no buildings would be constructed and therefore no new employment opportunities would be provided. The site would remain undeveloped and not provide for any employment opportunities.
2. Provide open space amenities to serve the region.	No. Under Alternative 1, no additional open space amenities would be provided.
3. Provide an active park consistent with the 2009 Safety Study prepared by March JPA.	No. Under Alternative 1, no active park would be provided.
4. Complete the buildout of the roadway infrastructure by extending Cactus Avenue to the Specific Plan Area from its existing terminus, extending Barton Street from Alessandro Boulevard to Grove Community Drive, and extending Brown Street from Alessandro Boulevard to Cactus Avenue.	No. Under Alternative 1, buildout of the roadway infrastructure would not occur.

Table 6-2. Summary of Alternative 1 Success at Meeting Project Objectives

Project Objective	Does Alternative 1 Meet Objective?
5. Remove and redevelop a majority of the former munitions storage area of the March AFB.	No. Under Alternative 1, the former munitions storage area of the March AFB would not be removed and/or redeveloped.
6. Encourage the use of alternative modes of transportation through the provision of a pedestrian and bicycle circulation system, which is both safe and comfortable.	No. Under Alternative 1, a new pedestrian and bicycle circulation system would not be developed.
7. Implement the terms and conditions agreed upon in the September 12, 2012, Settlement Agreement entered into between and among the CBD, the San Bernardino Valley Audubon Society, March JPA, and LNR Riverside LLC, as the complete settlement of the claims and actions raised in <i>Center for Biological Diversity v. Jim Bartel, et al.</i> to preserve open space through establishing a Conservation Easement.	No. Under Alternative 1, the Conservation Easement would not be placed under a conservation easement in contravention to the terms and conditions of the CBD Settlement Agreement.

6.4.3 Alternative 2 – Reduced Development Alternative

Under Alternative 2, the Reduced Development Alternative, approximately 45.34 acres of the Project's Business Park (approximately 70% of the Project's total Business Park acreage) would be designated Open Space instead, as shown in Figure 6-1. Under Alternative 2, the seven Business Park parcels to the north (approximately 34.51 acres) and the southern half of the Business Park parcels to the south would not be developed (leaving one Business Park parcel to the south at 10.93 acres in size). This would result in a reduction of the developable acreage in the Campus Development by approximately 18% and an increase in Open Space by approximately 60% in the Specific Plan Area compared to the proposed Project. Alternative 2's smaller development footprint would result in an approximately 911% workforce reduction (3,208 jobs~~2,360 employees~~) and approximately 30% reduction in total trips (24,728 trips) compared to the proposed Project.

Table 6-3. Alternative 2 Buildout Land Uses

Use	Alternative 2 (acres)	Proposed Project (acres)	Alternative 2 vs. Proposed Project (acres)
Specific Plan Area			
Business Park	19.98	65.32	-45.34
Industrial	143.31	143.31	0
Mixed Use	42.22	42.22	0
Public Facility	2.84	2.84	0
Open Space	123.34	78	+45.34
Streets	37.91	37.91	0
<i>Subtotal</i>	369.60	369.60	0
Conservation Easement			
Open Space	445.43	445.43	0
Existing WMWD Water Tank			
Public Facility	2.87	2.87	0

Table 6-3. Alternative 2 Buildout Land Uses

Use	Alternative 2 (acres)	Proposed Project (acres)	Alternative 2 vs. Proposed Project (acres)
Total Net Acres	817.90	817.90	0

6.4.3.1 Environmental Analysis

Aesthetics

As discussed in Section 4.1, Aesthetics, implementation of the proposed Project would not have a substantial adverse effect on a scenic vista or substantially degrade the existing visual character or quality of public views of the site and its surroundings with implementation of **MM-AES-1** (Construction Equipment Staging and Screening). Impacts would be less than significant, and no mitigation is required. With the implementation of **MM-AES-2** (Exterior Lighting Point-by-point Photometric Study Approval) and **MM-AES-3** (Solar Photovoltaic System Approval), the Project's impacts as a new source of substantial light or glare would be reduced to less than significant with mitigation incorporated.

Under Alternative 2, the Specific Plan Area would be built out in the same manner as the proposed Project; however, 45.34 acres of Business Park (approximately 70% of the Project's Business Park area) would be designated Open Space instead, resulting in a corresponding reduction in workforce and total trips. This would result in a reduction of the developable acreage in the Campus Development by approximately 18%. Given Alternative 2's smaller development footprint, public views from the residential land uses to the north and south of the Project site would have more open space than the Project. Alternative 2 would have a less than significant impact on a scenic vista, the existing visual character, and the quality of public views of the site and its surroundings with implementation of **MM-AES-1**. Given Alternative 2's smaller development footprint, Alternative 2's potential impacts to scenic vistas, existing visual character and quality of public views would be similar but reduced when compared to the proposed Project. Alternative 2 would introduce fewer new sources of substantial light or glare than the Project but would still require implementation of **MM-AES-2** and **MM-AES-3** to reduce Alternative 2's light and glare impacts to less than significant. In summary, Alternative 2 would result in **fewer aesthetic impacts** than the proposed Project.

Air Quality

As discussed in Recirculated Section 4.2, Air Quality, implementation of the proposed Project would result in potentially significant air quality impacts. With implementation of **MM-AQ-1 through MM-AQ-4**, the Specific Plan Area's construction air quality impacts would be reduced to less than significant levels. The Specific Plan Area's daily regional emissions from operations would exceed the SCAQMD thresholds of significance for emissions of VOCs, NO_x, CO, and PM₁₀, and PM_{2.5} and would, therefore, per SCAQMD criteria, be cumulatively potentially significant and mitigation is required. **MM-AQ-52 through MM-AQ-2715** are designed to reduce Specific Plan Area operational-source VOCs, NO_x, CO, and PM₁₀, and PM_{2.5} emissions. ~~There is no way to meaningfully quantify these reductions in CalEEMod, and therefore no numeric emissions credit has been taken in the analysis. As such~~ However, even with application of **MM-AQ-52 through MM-AQ-2715**, Specific Plan Area operational-source emissions impacts would be significant and unavoidable. Since Specific Plan Area operations would exceed the SCAQMD thresholds of significance, the Project would also conflict with the AQMP, an additional significant and unavoidable impact. The construction and operation of the Specific Plan Area would not exceed applicable LST, CO

hotspot, or HRA thresholds and impacts would be less than significant. The Specific Plan Area's odor and other emissions impacts would be less than significant.

Under Alternative 2, the Specific Plan Area would be built out in the same manner as the proposed Project; however, 45.34 acres of Business Park (approximately 70% of the Project's Business Park area) would be designated Open Space instead, resulting in a corresponding reduction in workforce and total trips. Given Alternative 2's smaller development footprint, construction and operations emissions under Alternative 2 would be similar but reduced compared to the proposed Project but would still be potentially significant. With implementation of **MM-AQ-1 through MM-AQ-4**, Alternative 2's construction air quality impacts would be reduced to less than significant levels. Under Alternative 2, operational activities would be less intense than those associated with the proposed Project, thereby resulting in fewer vehicle trips and associated air emissions. However, Alternative 2's reduced development and vehicle trips would not reduce operational air emissions to levels below the SCAQMD thresholds of significance for emissions of VOCs, NO_x, CO, and PM₁₀, and PM_{2.5}. Even with application of **MM-AQ-52 through MM-AQ-2715**, Alternative 2 operational-source emissions impacts would be significant and unavoidable. Since Alternative 2 operations would exceed the SCAQMD thresholds of significance, Alternative 2 would also conflict with the AQMP, an additional significant and unavoidable impact. The construction and operation of Alternative 2 would not exceed applicable LST, CO hotspot, or HRA thresholds and impacts would be less than significant. Similar to the Project, Alternative 2's odor and other emissions impacts would be *less than significant*. In summary, Alternative 2 would result in **reduced air quality impacts** compared to the Project but would still result in **significant and unavoidable** air quality impacts.

Biological Resources

As discussed in Section 4.3, Biological Resources, implementation of the proposed Project would result in potentially significant biological impacts. The Specific Plan Area's effect on special status plant and wildlife species, direct impacts on burrowing owl, San Diego black tailed jackrabbit, coast horned lizard, coastal whiptail, orange-throated whiptail, and western yellow bat, Cooper's hawk, Lawrence's goldfinch, northern harrier, sharp-shinned hawk, yellow warbler, and California horned lark and indirect impacts on Least Bell's Vireo and Stephens' Kangaroo Rat, would be reduced to less than significant with the implementation of **MM-BIO-1** (Best Management Practices), **MM-BIO-2** (Least Bell's Vireo), **MM-BIO-3** (Operation-Related Indirect Impacts to Special-Status Wildlife), **MM-BIO-4** (Stephens' Kangaroo Rat Avoidance), **MM-BIO-5A** (Burrowing Owl Avoidance and Mitigation Measures)/**MM-BIO-5B** (Burrowing Owl Relocation and Mitigation Plan), **MM-BIO-6** (San Diego Black-Tailed Jackrabbit), and **MM-BIO-7** (Nesting Bird Avoidance and Minimization Measures). The Specific Plan Area's effect on riparian habitat or other sensitive natural communities would be reduced to less than significant with implementation of **MM-BIO-8** (Upland Vegetation Communities) and **MM-BIO-9** (Aquatic Resources Mitigation). The Specific Plan Area's effect on state or federally protected wetlands would be reduced to less than significant with implementation of **MM-BIO-9**. The Specific Plan would have less than significant impacts to the movement of fish/wildlife, wildlife corridors, or native wildlife nursery sites. The Specific Plan's conflicts with local policies/ordinances protecting biological resources would be reduced to less than significant with the implementation of **MM-BIO-1** through **MM-BIO-9**. The Specific Plan's conflicts with an adopted HCP or other conservation plan would be reduced to less than significant with implementation of **MM-BIO-4**, **MM-BIO-5A/MM-BIO-5B**, **MM-BIO-6**, and **MM-BIO-9**. As such, with implementation of **MM-BIO-1** through **MM-BIO-9**, the Project's impacts to biological resources would be reduced to less than significant levels.

Under Alternative 2, the Specific Plan Area would be built out in the same manner as the proposed Project; however, 45.34 acres of Business Park (approximately 70% of the Project's Business Park area) would be designated Open Space instead, resulting in a corresponding reduction in workforce and total trips. Given Alternative 2's smaller development footprint, impacts to biological resources under Alternative 2 would be similar but reduced compared

to the proposed Project, but would still be potentially significant. Alternative 2's effect on special status plant and wildlife species, direct impacts on burrowing owl, San Diego black tailed jackrabbit, coast horned lizard, coastal whiptail, orange-throated whiptail, and western yellow bat, Cooper's hawk, Lawrence's goldfinch, northern harrier, sharp-shinned hawk, yellow warbler, and California horned lark and indirect impacts on Least Bell's Vireo and Stephens' Kangaroo Rat, would be reduced to less than significant with the implementation of **MM-BIO-1** through **MM-BIO-7**. Alternative 2's effect on riparian habitat or other sensitive natural communities would be reduced to less than significant with implementation of **MM-BIO-8** and **MM-BIO-9**. Alternative 2's effect on state or federally protected wetlands would be reduced to less than significant with implementation of **MM-BIO-9**. Alternative 2 would have less than significant impacts to the movement of fish/wildlife, wildlife corridors, or native wildlife nursery sites. Alternative 2's conflicts with local policies/ordinances protecting biological resources would be reduced to less than significant with the implementation of **MM-BIO-1** through **MM-BIO-9**. Alternative 2's conflicts with an adopted HCP or other conservation plan would be reduced to less than significant with implementation of **MM-BIO-4**, **MM-BIO-5A/MM-BIO-5B**, **MM-BIO-6**, and **MM-BIO-9**. In summary, given Alternative 2's smaller development footprint, Alternative 2 would have *fewer biological resources impacts* compared to the proposed Project.

Cultural Resources

As discussed in Section 4.4, Cultural Resources, implementation of the proposed Project would result in potentially significant impacts to cultural resources. However, even with the incorporation of **MM-CUL-1** through **MM-CUL-118** and **MM-CUL-13**, the Project's impacts to historical and archaeological resources would be significant and unavoidable. With implementation of **MM-CUL-129**, impacts to human remains would be less than significant.

Under Alternative 2, the Specific Plan Area would be built out in the same manner as the proposed Project; however, 45.34 acres of Business Park (approximately 70% of the Project's Business Park area) would be designated Open Space instead, resulting in a corresponding reduction in workforce and total trips. No new buildings and/or grading would be introduced on this 45.34 acres. Without grading on this portion of the Project site, there is less likelihood of encountering previously unidentified cultural, historic and/or archaeological resources. Given Alternative 2's smaller development footprint, impacts to cultural resources under Alternative 2 would be similar but reduced compared to the proposed Project, but would still be potentially significant. Even with the incorporation of **MM-CUL-1** through **MM-CUL-118** and **MM-CUL-13**, Alternative 2's impacts to historical and archaeological resources would be significant and unavoidable. With implementation of **MM-CUL-129**, Alternative 2's impacts to human remains would be less than significant. In summary, given Alternative 2's smaller development footprint, Alternative 2 would have *fewer cultural resources impacts* compared to the proposed Project, but would still result in *significant and unavoidable* impacts to historical and archaeological resources.

Energy

As discussed in Section 4.5, Energy, construction and operation of the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy or conflict with or obstruct a state or local plan for renewable energy or energy efficiency and the Project's energy impacts would be less than significant, with the incorporation of **MM-GHG-1** through **MM-GHG-1211** and **MM-AQ-1** through **MM-AQ-27**. ~~These mitigation measures would further reduce the Project's energy use impacts to less than significant.~~

Under Alternative 2, the Specific Plan Area would be built out in the same manner as the proposed Project; however, 45.34 acres of Business Park would not be developed and would be designated Open Space, resulting in a corresponding reduction in workforce and total trips. Given Alternative 2's smaller development footprint, Alternative 2 would consume less energy compared to the proposed Project and Alternative 2's energy impacts would be less

than significant. With the incorporation of **MM-GHG-1** through **MM-GHG-1211**, and **MM-AQ-1** through **MM-AQ-27** would further reduce Alternative 2's energy impacts would be less than significant. In summary, given Alternative 2's smaller development footprint, Alternative 2 would have **fewer energy impacts** compared to the proposed Project.

Geology and Soils

As discussed in Section 4.6, Geology and Soils, implementation of the proposed Project would result in potentially significant impacts to geology and soils. The Specific Plan Area would have less than significant impacts with regard to strong seismic ground shaking, seismic-related ground failure, and expansive soils. With the implementation of **MM-GEO-1** (Slope Stability), the Project's impacts related to landslides and unstable soil would be reduced to less than significant. The Specific Plan Area's impacts to paleontological resources and site or unique geologic features would be reduced to less than significant with incorporation of **MM-GEO-2** (Paleontological Resources).

Under Alternative 2, the Specific Plan Area would be built out in the same manner as the proposed Project; however, 45.34 acres of Business Park would not be developed and would be designated Open Space, resulting in a corresponding reduction in workforce and total trips. Given Alternative 2's smaller development footprint, Alternative 2's impacts to geology and soils would be similar but reduced compared to the proposed Project but would still be potentially significant. Alternative 2 would have less than significant impacts with regard to strong seismic ground shaking, seismic-related ground failure, and expansive soils. With the implementation of **MM-GEO-1**, Alternative 2's impacts related to landslides and unstable soil would be reduced to less than significant. Alternative 2's impacts to paleontological resources and site or unique geologic features would be reduced to less than significant with incorporation of **MM-GEO-2**. In summary, because Alternative 2 would have a smaller development footprint, Alternative 2 would have **fewer impacts to geology and soils** compared to the proposed Project.

Greenhouse Gas Emissions

As discussed in Section 4.7, Greenhouse Gas Emissions, implementation of the proposed Project would result in potentially significant GHG impacts because it could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. However, with implementation of **MM-GHG-1** through **MM-GHG-1211**, the Project would be consistent with the applicable plans, including the County CAP, and GHG impacts would be reduced to *less than significant* levels. Additionally, the Project would not conflict with any of the Senate Bill 32/2017 Scoping Plan elements since any regulations adopted would apply directly or indirectly to the Project. Furthermore, the proposed Project represents 0.901.24% of the anticipated increase in jobs for the WRCOG region, and therefore, would not result in long-term operational employment growth that exceeds planned growth projections in the RTP/SCS or an Air Quality Management Plan, or result in employment growth that would substantially add to traffic congestion.

Under Alternative 2, the Specific Plan Area would be built out in the same manner as the proposed Project; however, 45.34 acres of Business Park would not be developed and would be designated Open Space, resulting in a corresponding reduction in workforce and total trips. Given Alternative 2's smaller development footprint, Alternative 2's GHG emissions impacts would be similar but reduced compared to the proposed Project but would still be potentially significant because Alternative 2 could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. With implementation of **MM-GHG-1** through **MM-GHG-1211**, Alternative 2 would be consistent with the applicable plans, including the County CAP, and GHG impacts would be reduced to less than significant levels. In summary, given Alternative 2's smaller development footprint, Alternative 2 would have **fewer GHG impacts** compared to the proposed Project.

Hazards and Hazardous Materials

As discussed in Recirculated Section 4.8, Hazards and Hazardous Materials, implementation of the proposed Project would result in potentially significant hazard and hazardous materials impacts. During construction of the Specific Plan Area, implementation of **MM-HAZ-1** would reduce the Project's impacts involving the routine transport, use, or disposal of hazardous materials. During operations, the Project would have a less than significant impact with regards to reasonably foreseeable upset and accident conditions involving the release of hazardous materials. Given the proximity of the neighboring preschool at Community Grove Church, **MM-HAZ-2** is required to reduce potentially significant impacts associated with Project uses emitting and/or handling hazardous materials within one-quarter mile of an existing or planned school. With implementation of **MM-HAZ-3**, the Project's proximity to March ARB/Inland Port Airport would not result in a safety hazard or excessive noise for people residing or working in the Project area. **MM-FIRE-1** would reduce the Project's impacts involving wildland fires. With implementation of **MM-HAZ-1**, **MM-HAZ-2**, **MM-HAZ-3**, and **MM-FIRE-1**, the Project's hazards and hazardous materials impacts would be reduced to less than significant levels.

Under Alternative 2, the Specific Plan Area would be built out in the same manner as the proposed Project; however, 45.34 acres of Business Park would not be developed and would be designated Open Space, resulting in a corresponding reduction in workforce and total trips. Given Alternative 2's smaller development footprint, Alternative 2's impacts related to hazards and hazardous materials would be similar but reduced compared to the proposed Project but would still be potentially significant. During Alternative 2 construction, implementation of **MM-HAZ-1** would reduce Alternative 2's impacts involving the routine transport, use, or disposal of hazardous materials. During operations, Alternative 2 would have a less than significant impact with regards to reasonably foreseeable upset and accident conditions involving the release of hazardous materials. The development footprint under Alternative 2 would still introduce new uses within proximity of the preschool, and as such, **MM-HAZ-2** would still be required under Alternative 2. With implementation of **MM-HAZ-3**, Alternative 2's proximity to March ARB/Inland Port Airport would not result in a safety hazard or excessive noise for people residing or working in the Project area. **MM-FIRE-1** would reduce Alternative 2's impacts involving wildland fires to less than significant levels. In summary, given Alternative 2's smaller development footprint, Alternative 2 would have *fewer impacts related to hazards and hazardous materials* compared to the proposed Project.

Hydrology and Water Quality

As discussed in Section 4.9, Hydrology and Water Quality, implementation of the proposed Project would result in potentially significant impacts to hydrology and water quality. With implementation of **MM-HYD-1** (Interim Soil Stabilization Plan) and **MM-HYD-2** (Water Quality Management Plan), the Project's impacts to surface or groundwater quality would be reduced to *less than significant* levels. In addition, implementation of the Storm Water Pollution Prevention Plan (SWPPP) in conformance with the Construction General Permit would reduce potential discharge of polluted runoff from construction sites. Further, Project design features would ensure that post-construction runoff velocities would be less than existing conditions and would not substantially alter the existing drainage pattern of the site or area. The Project's impacts to groundwater supplies and recharge would be less than significant. With implementation of **MM-HYD-3** (Hydrology/Drainage Study), the Project's impacts related to on- or off-site erosion or siltation and runoff water would be reduced to less than significant. Further the Project would have a less than significant impact related to risk releasing of pollutants due to inundation, impeding or redirecting flood flows, or conflicting with or obstructing implementation of a water quality control plan or sustainable groundwater management plan.

Under Alternative 2, the Specific Plan Area would be built out in the same manner as the proposed Project; however, 45.34 acres of Business Park would not be developed and would be designated Open Space, resulting in a corresponding reduction in workforce and total trips. Given Alternative 2's smaller development footprint, Alternative 2's impacts to hydrology and water quality would be similar but reduced compared to the proposed Project but would still be potentially significant. With implementation of **MM-HYD-1** and **MM-HYD-2**, Alternative 2's impacts to surface or groundwater quality would be reduced to less than significant levels. In addition, implementation of the SWPPP in conformance with the Construction General Permit would reduce potential discharge of polluted runoff from construction sites. Further, Project design features would ensure that post-construction runoff velocities would be less than existing conditions and would not substantially alter the existing drainage pattern of the site or area. Alternative 2's impacts to groundwater supplies and recharge would be less than significant. With implementation of **MM-HYD-3**, Alternative 2's impacts related to on- or off-site erosion or siltation and runoff water would be reduced to less than significant. Further, Alternative 2 would have a less than significant impact related to risk releasing of pollutants due to inundation, impeding or redirecting flood flows, or conflicting with or obstructing implementation of a water quality control plan or sustainable groundwater management plan. In summary, given Alternative 2's smaller development footprint, Alternative 2 would have ***fewer impacts to hydrology and water quality*** compared to the proposed Project.

Land Use and Planning

As discussed in Recirculated Section 4.10, Land Use and Planning, with implementation of **MM-AQ-1** through **MM-AQ-2715**, **MM-BIO-1** through **MM-BIO-9**, **MM-CUL-1** through **MM-CUL-139**, **MM-GEO-1**, **MM-GEO-2**, **MM-GHG-1** through **MM-GHG-1211**, **MM-HAZ-1** through **MM-HAZ-3**, **MM-HYD-1** through **MM-HYD-3**, **MM-TRA-1** and **MM-TRA-2**, and **MM-FIRE-1** through **MM-FIRE-3**, the Project would be generally consistent or partially consistent with the March JPA General Plan Goals and policies, as well as the Draft Environmental Justice Element. March JPA designates the Project site as Business Park (BP), Industrial (IND), and Park/Recreation/Open Space (P/R/OS) land uses in the March JPA General Plan. The Project site has not previously been given a zoning designation by March JPA; therefore, the Project proposes zoning consistent with the proposed General Plan Amendment and Specific Plan designations of Mixed Use, Business Park (BP), Industrial (IND), Parks/Recreation/Open Space (P/R/OS), and Public Facility for the site. The Project proposes adoption of Specific Plan SP-9 consistent with applicable requirements in California Government Code Sections 65450–65457 and March JPA Development Code Chapter 9.13. The Project would be consistent with the March Development Code and the Riverside County ALUCP. Furthermore, the proposed Project would be consistent with the guiding principles, goals, and policies of SCAG's Connect SoCal and the County Good Neighbor Policy for Logistics and Warehouse/Distribution Uses. As such, with incorporation of mitigation, the Project would result in less than significant land use impacts through conflicts with plans adopted for the purpose of avoiding or mitigating an environmental effect.

Under Alternative 2, the Specific Plan Area would be built out in the same manner as the proposed Project; however, 45.34 acres of Business Park would not be developed and would be designated Open Space, resulting in a corresponding reduction in workforce and total trips. Given Alternative 2's smaller development footprint, Alternative 2's land use and planning impacts would be similar but reduced compared to the proposed Project. With implementation of **MM-AQ-1** through **MM-AQ-2715**, **MM-BIO-1** through **MM-BIO-9**, **MM-CUL-1** through **MM-CUL-139**, **MM_GEO-1**, **MM-GEO-2**, **MM-GHG-1** through **MM-GHG-1211**, **MM-HAZ-1** through **MM-HAZ-3**, **MM-HYD-1** through **MM-HYD-3**, **MM-TRA-1** and **MM-TRA-2**, and **MM-FIRE-1** through **MM-FIRE-3**, Alternative 2 would be generally consistent or partially consistent with the March JPA General Plan Goals and policies, as well as the Draft Environmental Justice Element. Similar to the proposed Project, Alternative 2 would propose zoning consistent with the proposed General Plan Amendment and Specific Plan designations of Mixed Use, Business Park (BP), Industrial (IND), Parks/Recreation/Open Space (P/R/OS), and Public Facility for the site. Alternative 2 would also propose adoption of

Specific Plan SP-9 consistent with applicable requirements in California Government Code Sections 65450–65457 and March JPA Development Code Chapter 9.13. Alternative 2 would be consistent with the March Development Code and the Riverside County ALUCP. Alternative 2 would be consistent with the guiding principles, goals, and policies of SCAG’s Connect SoCal and the County Good Neighbor Policy for Logistics and Warehouse/Distribution Uses. In summary, given Alternative 2’s smaller development footprint, Alternative 2 would result in less than significant land use impacts and **fewer land use and planning impacts** compared to the proposed Project.

Noise

As discussed in Section 4.11, Noise, the Project would not generate substantial temporary or permanent increase in ambient noise levels, with the exception of traffic noise level increases along a non-sensitive roadway segment: Cactus Avenue east of Meridian Parkway (Segment #13). Therefore, the Project would have a significant and unavoidable noise impact and no feasible mitigation measures are available to reduce Project-related significant traffic noise increases along Segment #13. All other noise and vibration impacts associated with construction and operation of the Project would be less than significant.

Under Alternative 2, the Specific Plan Area would be built out in the same manner as the proposed Project; however, 45.34 acres of Business Park would not be developed and would be designated Open Space, resulting in a corresponding reduction in workforce and total trips. Given Alternative 2’s smaller development footprint, Alternative 2’s noise impacts would be similar but reduced compared to the proposed Project; however, as shown in the attached Appendix R-1 to this EIR, even with a smaller scale development, the incremental noise level increase at Segment #13 would exceed the established threshold through Opening Year (2028). Alternative 2’s incremental noise level increase would be less than significant by Horizon Year (2045). Overall, Alternative 2 would still result in significant noise impacts along Segment #13. Therefore, Alternative 2 would have a significant and unavoidable noise impact and no feasible mitigation measures are available to reduce Alternative 2’s significant traffic noise increases along Segment #13. All other noise and vibration impacts associated with construction and operation of Alternative 2 would be less than significant. In summary, given Alternative 2’s smaller development footprint and corresponding reduction in total trips, Alternative 2 would have **fewer noise impacts** compared to the proposed Project but would still result in **significant and unavoidable noise** impacts.

Population and Housing

As discussed in Section 4.12, Population and Housing, Under the buildout scenario, it is anticipated that the Project would ~~create~~ employ approximately ~~2,600~~ 3,622 full-time ~~job~~ employees. Based on the County’s unemployment rate, this EIR assumes that the Project’s employees will be primarily existing residents of Riverside County. The anticipated number of jobs generated by the Project would be a nominal addition to the County’s existing and projected labor force. Thus, the employment growth that would be attributed to the Project is consistent with SCAG’s overall growth projections and would not result in a substantial increase of unplanned population growth. Therefore, the Project would have a less than significant impact related to population and housing and no mitigation is required.

Under Alternative 2, the Specific Plan Area would be built out in the same manner as the proposed Project; however, 45.34 acres of Business Park, which would have employed approximately 240 employees, would not be developed and would be designated Open Space. Alternative 2 would ~~create~~ employ approximately 911% fewer ~~job~~ employees compared to the proposed Project. Therefore, Alternative 2 would have **fewer population and housing impacts** compared to the proposed Project.

Public Services

As discussed in Section 4.13, Public Services, with the implementation of **MM-FIRE-1**, the Project's impacts to fire services would be reduced to less than significant. The Project's impacts to police services, schools, parks and other public facilities would be less than significant and no mitigation is required.

Under Alternative 2, the Specific Plan Area would be built out in the same manner as the proposed Project; however, 45.34 acres of Business Park would not be developed and would be designated Open Space, resulting in a corresponding reduction in workforce and total trips. Given Alternative 2's smaller development footprint and reduced workforce, Alternative 2's impacts on public services would be similar but reduced compared to the proposed Project but would still be potentially significant. With the implementation of **MM-FIRE-1**, Alternative 2's impacts to fire services would be reduced to less than significant. Alternative 2's impacts to police services, schools, parks and other public facilities would be less than significant and no mitigation is required. In summary, Alternative 2 would have *fewer impacts to public services* compared to the proposed Project.

Recreation

As discussed in Section 4.14, Recreation, it is likely that the majority of the Campus Development's future employees are already residents of the nearby communities and are already using the local parks and recreational facilities. There could be an increase in demand for recreational facilities but because the Project's employees and surrounding neighborhoods would have access to the proposed 60.28-acre Park, any increased demand would not result in the need to construct additional recreational facilities under the Specific Plan buildout scenario. The recreational amenities analyzed include a playground, multiuse sports fields that could be used for soccer, football, and field hockey, and trails with cardio stops for recreational users. The impacts related to the Park's construction have been included in all of the analyses in this ~~Draft~~ Final EIR. Additionally, the currently existing service roads within the Conservation Easement, as depicted by the red lines on Figure 3-4, would continue to be utilized by the public for passive recreation as authorized by the March JPA, consistent with the terms of the CBD Settlement Agreement (Appendix S). Therefore, the Project would result in less than significant impacts to recreational facilities and no mitigation is required.

Under Alternative 2, the Specific Plan Area would be built out in the same manner as the proposed Project; however, 45.34 acres of Business Park would not be developed and would be designated Open Space, resulting in a corresponding reduction in workforce and total trips. Given Alternative 2's smaller development footprint and reduced workforce, Alternative 2's impacts on recreation would be similar but reduced compared to the proposed Project. Alternative 2 would result in a reduced demand on recreational resources compared to the proposed Project. Therefore, Alternative 2 would have *fewer recreational impacts* compared to the proposed Project.

Transportation

As discussed in Section 4.15, Transportation, with the incorporation of **MM-TRA-1** (Construction Traffic Management Plan), Project construction impacts on the circulation system would be reduced to less than significant. With implementation of **MM-TRA-2** (Traffic Safety Plan for Barton Street) the Project's operational impacts on the circulation system would be less than significant. The Specific Plan Area's impact on VMT would be less than significant. Although the Specific Plan Area is not anticipated to have a significant VMT impact, **MM-AQ-219** further reduces VMT by requiring all tenants to implement or otherwise participate in a Transportation Demand Management program, including on-site transit pass sales and discounted passes, shuttle service to/from public transit and commercial/food establishments, if warranted, guarantee a ride home, and "commuter club" to manage subsidies or incentives for

employees who carpool, vanpool, bicycle, walk or take transit to work. Additionally, **MM-GHG-11** requires the Project to provide funding for the installation of a bus shelter on Alessandro Boulevard. The Project's potential to increase hazards due to design features or incompatible uses would be reduced to less than significant with implementation of **MM-TRA-1** and **MM-TRA-2**.

Under Alternative 2, the Specific Plan Area would be built out in the same manner as the proposed Project; however, 45.34 acres of Business Park would not be developed and would be designated Open Space, resulting in a corresponding reduction in workforce and total trips. Given that Alternative 2 would result in a 70% reduction in square footage to the Business Park land use, excluding the Business Park square footage associated with the Mixed Use area, the total non-Mixed Use Business Park square footage under Alternative 2 would be reduced to 384,121 square feet. This constitutes a reduction of 896,282 square feet from the Traffic Study prepared for the proposed Project. As shown in Table 6-4, Alternative 2 would generate a total of 1,263 AM peak hour trips, 2,237 PM peak hour trips, and a daily total of 24,728 trips.

Table 6-4. Alternative 2 Trip Generation Summary

Land Use	Quantity Units	AM Peak Hour			PM Peak Hour			Week-day Daily	Saturday Peak Hour		
		In	Out	Total	In	Out	Total		In	Out	Total
Building B: High-Cube Fulfillment	1,250.000 TSF	–	–	–	–	–	–	–	–	–	–
Passenger Cars	–	99	30	129	50	130	180	2188	5	3	8
Trucks	–	18	5	23	7	19	26	474	1	0	1
Total Trips	–	117	35	152	57	149	206	2662	6	3	9
Building C: High-Cube Fulfillment	587.000 TSF	–	–	–	–	–	–	–	–	–	–
Passenger Cars	–	47	14	61	24	61	85	1028	2	1	3
Trucks	–	9	3	12	3	9	12	222	0	0	0
Total Trips	–	56	17	73	27	70	97	1250	2	1	3
High-Cube Cold Storage Warehouse	500.000 TSF	–	–	–	–	–	–	–	–	–	–
Passenger Cars	–	38	2	40	10	36	46	686	1	1	2
Trucks	–	5	11	16	8	8	16	376	0	0	0
Total Trips	–	43	13	56	18	44	62	1062	1	1	2
Remaining Industrial: High-Cube Fulfillment	725.561 TSF	–	–	–	–	–	–	–	–	–	–
Passenger Cars	–	58	17	75	29	75	104	1270	3	2	5
Trucks	–	11	3	14	4	11	15	276	0	0	0
Total Trips	–	59	20	89	33	86	119	1546	3	2	5
Business Park	384.121 TSF	–	–	–	–	–	–	–	–	–	–
Office Cars	97.236 TSF	122	22	144	22	110	132	968	28	24	52
Office Cars	18.000 TSF	28	5	34	6	27	33	224	5	4	9
Business Park Warehouse	268.885 TSF	–	–	–	–	–	–	–	–	–	–
Warehouse Cars	–	21	5	26	70	247	317	3192	7	4	11

Table 6-4. Alternative 2 Trip Generation Summary

Land Use	Quantity Units	AM Peak Hour			PM Peak Hour			Week-day Daily	Saturday Peak Hour		
		In	Out	Total	In	Out	Total		In	Out	Total
Warehouse Trucks	–	9	2	11	2	8	10	154	2	1	3
Business Park (Mixed Use, 75%)	482.765 TSF	–	–	–	–	–	–	–	–	–	–
Office Cars	144.830 TSF	203	36	239	39	187	226	1602	41	35	76
Business Park Warehouse	337.936 TSF	–	–	–	–	–	–	–	–	–	–
Warehouse Cars	–	26	6	32	88	311	399	4012	9	5	14
Warehouse Trucks	–	11	3	14	3	11	14	194	2	1	3
Total Business Park Trips	–	420	79	500	230	901	1131	10346	94	74	168
Retail (Mixed Use, 25%)	160.921 TSF	–	–	–	–	–	–	–	–	–	–
Cars	–	173	106	279	409	426	835	10866	760	730	1490
Pass-by-Reduction	–	0	0	0	-164	-164	-327	-4348	-304	-292	-596
Total Retail Trips	–	173	106	279	245	262	508	6518	456	438	894
Active Park	42.20 AC	137	137	274	95	95	190	2110	187	203	390
Public Park	18.08 AC	6	6	12	4	4	8	90	19	20	39
Total Park Trips	–	143	143	286	99	99	198	2200	206	223	429
Total Passenger Cars	–	958	386	1345	682	1545	2228	23888	763	740	1503
Internal Trip Reduction	–	-86	-86	-172	-42	-42	-84	-856	-21	-21	-42
Total Trucks	–	63	27	90	27	66	93	1696	5	2	7
Alternative 2 Total Trips	–	935	327	1263	667	1569	2237	24728	747	721	1468

Source: Appendix R-2.

When comparing the trip generation rates between Alternative 2 and the proposed Project, as shown in Table 6-5, Alternative 2 would result in a trip reduction of 10,586 trips.

Table 6-5. Alternative 2 Trip Generation Comparison

Project	AM Peak Hour			PM Peak Hour			Weekday Daily	Saturday Peak Hour		
	In	Out	Total	In	Out	Total		In	Out	Total
Project Traffic Study	1353	408	1761	902	2486	3389	35314	844	798	1642
Alternative 2	935	327	1263	667	1569	2237	24728	747	721	1468
Comparison	-418	-81	-498	-235	-917	-1152	-10586	-97	-77	-174

Source: Appendix R-2.

As with the proposed Project, with the incorporation of **MM-TRA-1**, Alternative 2 construction impacts on the circulation system would be reduced to less than significant. With implementation of **MM-TRA-2**, Alternative 2's operational impacts on the circulation system would be less than significant. Alternative 2's impact on VMT would be less than significant. Although Alternative 2 is not anticipated to have a significant VMT impact, **MM-AQ-219** further reduces VMT by requiring all tenants to implement or otherwise participate in a Transportation Demand Management program, including on-site transit pass sales and discounted passes, shuttle service to/from public transit and commercial/food establishments, if warranted, guarantee a ride home, and "commuter club" to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk or take transit to work. Additionally, **MM-GHG-11** requires Alternative 2 to provide funding for the installation of a bus shelter on Alessandro Boulevard. Alternative 2's potential to increase hazards due to design features or incompatible uses would be reduced to less than significant with implementation of **MM-TRA-1** and **MM-TRA-2**. During construction, fewer construction worker vehicle and equipment trips would be generated because less construction activities would occur. Because of the smaller development footprint, there would also be a reduction in employee trips during operation of the Alternative 2. Therefore, Alternative 2 would have **fewer transportation impacts** compared to the proposed Project.

Tribal Cultural Resources

As discussed in Section 4.16, Tribal Cultural Resources, implementation of the proposed Project would result in potentially significant impacts to tribal cultural resources. However, even with implementation of **MM-CUL-1** through **MM-CUL-138**, the Project's impacts to tribal cultural resources would remain *significant and unavoidable*.

Under Alternative 2, the Specific Plan Area would be built out in the same manner as the proposed Project; however, 45.34 acres of Business Park would not be developed and would be designated Open Space, resulting in a corresponding reduction in workforce and total trips. Given Alternative 2's smaller development footprint, impacts to tribal cultural resources under Alternative 2 would be similar but reduced compared to the proposed Project, but would still be potentially significant. Even with the incorporation of **MM-CUL-1** through **MM-CUL-138**, Alternative 2's impacts to tribal cultural resources would be significant and unavoidable. No new buildings and/or grading would be introduced on the 45.34 acres. Without grading on this portion of the Project site, there is less likelihood of encountering previously unidentified tribal cultural resources. In summary, implementation of Alternative 2 may result in **fewer tribal cultural resources impacts** when compared to the proposed Project but would still be **significant and unavoidable**.

Utilities and Service Systems

As discussed in Section 4.17, Utilities and Service Systems, the Project would have less than significant impacts to facilities providing water, wastewater, storm water, electric power, natural gas, and telecommunications. There are sufficient water supplies available and wastewater treatment capacity to serve the Project, resulting in less than significant impacts. The Project would have a less than significant impact on solid waste infrastructure and capacity and would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, the Project impacts to utilities and service systems would be less than significant and no mitigation is required.

Under Alternative 2, the Specific Plan Area would be built out in the same manner as the proposed Project; however, 45.34 acres of Business Park would not be developed and would be designated Open Space, resulting in a corresponding reduction in workforce and total trips. Given Alternative 2's smaller development footprint and reduced workforce, Alternative 2's operational activities would be less intense and therefore introduce fewer employees and a reduced demand for water, wastewater, electric power, telecommunications infrastructure, and solid waste services when compared to the proposed Project. Alternative 2 would have **fewer impacts to utilities and service systems** compared to the proposed Project.

Wildfire

As discussed in Section 4.18, Wildfire, the Project site is near lands classified as Very High Fire Hazard Severity Zone (FHSZ) and implementation of the proposed Project would result in potentially significant wildfire impacts. However, with implementation of **MM-FIRE-1** through **MM-FIRE-3**, as well as **MM-HYD-3**, the Project's potential to facilitate wildfire spread, exacerbate wildfire risk, or expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes would be reduced to less than significant levels.

Under Alternative 2, the Specific Plan Area would be built out in the same manner as the proposed Project; however, 45.34 acres of Business Park would not be developed and would be designated Open Space, resulting in a corresponding reduction in workforce and total trips. Given Alternative 2's smaller development footprint and reduced workforce, Alternative 2's wildfire impacts would be similar but reduced compared to the proposed Project but would still be potentially significant. With implementation of **MM-FIRE-1** through **MM-FIRE-3**, as well as **MM-HYD-3**, Alternative 2's potential to facilitate wildfire spread, exacerbate wildfire risk, or expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes would be reduced to less than significant levels. The 45.34 acres of open space would serve as additional buffer area between to the Specific Plan Area and Conservation Easement. Therefore, Alternative 2 would have **reduced wildfire impacts** compared to the proposed Project.

6.4.3.2 Project Objectives

Under Alternative 2, the Specific Plan Area would be built out in the same manner as the proposed Project; however, 45.34 acres of Business Park (approximately 70% of the Project's Business Park area) would be designated Open Space instead, resulting in a corresponding reduction in workforce and total trips. As shown in Table 6-6, Alternative 2 meets each Project objective.

Table 6-6. Summary of Alternative 2 Success at Meeting Project Objectives

Project Objective	Does Alternative 2 Meet Objective?
1. Provide increased job opportunities for residents through the provision of employment-generating businesses.	Yes. Alternative 2 would provide increased job opportunities through the provision of employment-generating businesses. Alternative 2 would achieve this objective to a lesser extent than the Project.
2. Provide open space amenities to serve the region.	Yes. Alternative 2 would provide open space amenities to serve the region. Alternative 2 would achieve this objective to a greater extent than the Project.
3. Provide an active park consistent with the 2009 Safety Study prepared by March JPA.	Yes. Alternative 2 would provide the same 60.28-acre Park as the proposed Project. Alternative 2 would fully achieve this Project objective.
4. Complete the buildout of the roadway infrastructure by extending Cactus Avenue to the Specific Plan Area from its existing terminus, extending Barton Street from Alessandro Boulevard to Grove Community Drive, and extending Brown Street from Alessandro Boulevard to Cactus Avenue.	Yes. Alternative 2 would provide all the same roadway infrastructure as the proposed Project. As such, Alternative 2 would fully achieve this Project objective.
5. Remove and redevelop a majority of the former munitions storage area of the March AFB.	Yes. Alternative 2 would remove and redevelop a majority of the former munitions storage area. As such, Alternative 2 would fully achieve this Project objective.
6. Encourage the use of alternative modes of transportation through the provision of a pedestrian and bicycle circulation system, which is both safe and comfortable.	Yes. Under Alternative 2, the buildout would include the provision of new roadways that could accommodate all modes of travel, including pedestrian and bicycle movement.
7. Implement the terms and conditions agreed upon in the September 12, 2012, Settlement Agreement entered into between and among the CBD, the San Bernardino Valley Audubon Society, March JPA, and LNR Riverside LLC, as the complete settlement of the claims and actions raised in <i>Center for Biological Diversity v. Jim Bartel, et al.</i> to preserve open space through establishing a Conservation Easement.	Yes. Alternative 2 would place the Conservation Easement under a conservation easement. As such, Alternative 2 would fully achieve this Project objective.

6.4.4 Alternative 3 – Restricted Industrial Building Size Alternative

Under Alternative 3, Restricted Industrial Building Size Alternative, the development of the 56.27-acre Industrial parcel to the north of Building B would be restricted to a minimum of two separate industrial buildings with a maximum floor area ratio (FAR) of 0.40. Under the Project's proposed Specific Plan, the Industrial zone would have a maximum FAR of 0.50. Therefore, under the proposed Project, the 56.27-acre Industrial parcel could be developed with a single industrial building totaling 1,225,000 square feet. However, under Alternative 3, a two-building layout on 56.27 acres with a 0.40 FAR would result in two buildings, each being 490,225 square feet. Therefore, Alternative 3 would result in a reduction of 244,550 square feet of potential industrial development

(approximately 20% of the potential industrial development for the 56.27-acre Industrial parcel). Alternative 3's reduced industrial development would result in an approximately 69.5% workforce reduction (3,430 jobs~~2,450 employees~~) and 1.5% reduction in total trips (34,792 trips). Land use acreages under Alternative 3 would be the same as the proposed Project (Table 6-7).

Table 6-7. Alternative 3 Buildout Land Uses

Use	Alternative 3 (acres)	Proposed Project (acres)	Alternative 3 vs. Proposed Project (acres)
Specific Plan Area			
Business Park	65.32	65.32	0
Industrial	143.31	143.31	0
Mixed Use	42.22	42.22	0
Public Facility	2.84	2.84	0
Open Space	78	78	0
Streets	37.91	37.91	0
<i>Subtotal</i>	369.60	369.60	0
Conservation Easement			
Open Space	445.43	445.43	0
Existing WMWD Water Tank			
Public Facility	2.87	2.87	0
Total Net Acres	817.90	817.90	0

6.4.4.1 Environmental Analysis

Aesthetics

As discussed in Section 4.1, Aesthetics, implementation of the proposed Project would not have a substantial adverse effect on a scenic vista or substantially degrade the existing visual character or quality of public views of the site and its surroundings with implementation of **MM-AES-1** (Construction Equipment Staging and Screening). Impacts would be less than significant, and no mitigation is required. With the implementation of **MM-AES-2** (Exterior Lighting Point-by-point Photometric Study Approval) and **MM-AES-3** (Solar Photovoltaic System Approval), the Project's impacts as a new source of substantial light or glare would be reduced to less than significant with mitigation incorporated.

Alternative 3 would have the same development footprint as the proposed Project; however, Alternative 3 would result in a reduction of 244,550 square feet of potential industrial development, and a corresponding reduction in workforce and vehicle trips, as compared to the proposed Project. Although Alternative 3 reduces industrial development, Alternative 3's potential impacts to scenic vistas, existing visual character and quality of public views would be similar to the proposed Project because the 56.27-acre Industrial parcel is centrally located within the Campus Development and would be screened by the surrounding Business Park, Mixed Use, and Industrial development. Alternative 3 would have a less than significant impact on a scenic vista, the existing visual character, and the quality of public views of the site and its surroundings with implementation of **MM-AES-1**. Alternative 3 would likely introduce a similar number of new sources of substantial light or glare than the Project and would still require implementation of **MM-AES-2** and **MM-AES-3** to reduce Alternative 3's light and glare impacts to less

than significant. In summary, notwithstanding Alternative 3's reduced industrial development, Alternative 3 would result in **similar aesthetic impacts** compared to the proposed Project.

Air Quality

As discussed in Recirculated Section 4.2, Air Quality, implementation of the proposed Project would result in potentially significant air quality impacts. With implementation of **MM-AQ-1 through MM-AQ-4**, the Specific Plan Area's construction air quality impacts would be reduced to less than significant levels. The Specific Plan Area's daily regional emissions from operations would exceed the SCAQMD thresholds of significance for emissions of VOCs, NO_x, CO, ~~and PM₁₀, and PM_{2.5}~~ and would, therefore, per SCAQMD criteria, be cumulatively potentially significant and mitigation is required. ~~MM-AQ-52 through MM-AQ-2715 are designed to reduce Specific Plan Area operational-source VOCs, NO_x, CO, and PM₁₀, and PM_{2.5} emissions. There is no way to meaningfully quantify these reductions in CalEEMod, and therefore no numeric emissions credit has been taken in the analysis. As such~~ However, even with application of **MM-AQ-52 through MM-AQ-2715**, Specific Plan Area operational-source emissions impacts would be significant and unavoidable. Since Specific Plan Area operations would exceed the SCAQMD thresholds of significance, the Project would also conflict with the AQMP, an additional significant and unavoidable impact. The construction and operation of the Specific Plan Area would not exceed applicable LST, CO hotspot, or HRA thresholds and impacts would be less than significant. The Specific Plan Area's odor and other emissions impacts would be less than significant.

Alternative 3 would have the same development footprint as the proposed Project; however, Alternative 3 would result in a reduction of 244,550 square feet of potential industrial development, and a corresponding reduction in workforce and vehicle trips, as compared to the proposed Project. Given Alternative 3's reduced industrial development, construction and operations emissions under Alternative 3 would be similar but reduced compared to the proposed Project but would still be potentially significant. With implementation of **MM-AQ-1 through MM-AQ-4**, Alternative 3's construction air quality impacts would be reduced to less than significant levels. Under Alternative 3, operational activities would be less intense than those associated with the proposed Project, thereby resulting in fewer vehicle trips and associated air emissions. However, Alternative 3's reduced development and vehicle trips would not reduce operational air emissions to levels below the SCAQMD thresholds of significance for emissions of VOCs, NO_x, CO, ~~and PM₁₀, and PM_{2.5}~~. Even with application of **MM-AQ-52 through MM-AQ-2715**, Alternative 3 operational-source emissions impacts would be significant and unavoidable. Since Alternative 3 operations would exceed the SCAQMD thresholds of significance, Alternative 3 would also conflict with the AQMP, an additional significant and unavoidable impact. The construction and operation of Alternative 3 would not exceed applicable LST, CO hotspot, or HRA thresholds and impacts would be less than significant. Similar to the Project, Alternative 3's odor and other emissions impacts would be less than significant. In summary, Alternative 3 would result in **fewer air quality impacts** compared to the Project but would still result in **significant and unavoidable** air quality impacts.

Biological Resources

As discussed in Section 4.3, Biological Resources, implementation of the proposed Project would result in potentially significant biological impacts. The Specific Plan Area's effect on special status plant and wildlife species, direct impacts on burrowing owl, San Diego black tailed jackrabbit, coast horned lizard, coastal whiptail, orange-throated whiptail, and western yellow bat, Cooper's hawk, Lawrence's goldfinch, northern harrier, sharp-shinned hawk, yellow warbler, and California horned lark and indirect impacts on Least Bell's Vireo and Stephens' Kangaroo Rat, would be reduced to less than significant with the implementation of **MM-BIO-1** (Best Management Practices), **MM-BIO-2** (Least Bell's Vireo), **MM-BIO-3** (Operation-Related Indirect Impacts to Special-Status Wildlife), **MM-BIO-4** (Stephens' Kangaroo Rat Avoidance), **MM-BIO-5A** (Burrowing Owl Avoidance and Mitigation Measures)/**MM-BIO-5B** (Burrowing Owl

Relocation and Mitigation Plan), **MM-BIO-6** (San Diego Black-Tailed Jackrabbit), and **MM-BIO-7** (Nesting Bird Avoidance and Minimization Measures). The Specific Plan Area's effect on riparian habitat or other sensitive natural communities would be reduced to less than significant with implementation of **MM-BIO-8** (Upland Vegetation Communities) and **MM-BIO-9** (Aquatic Resources Mitigation). The Specific Plan Area's effect on state or federally protected wetlands would be reduced to less than significant with implementation of **MM-BIO-9**. The Specific Plan would have less than significant impacts to the movement of fish/wildlife, wildlife corridors, or native wildlife nursery sites. The Specific Plan's conflicts with local policies/ordinances protecting biological resources would be reduced to less than significant with the implementation of **MM-BIO-1** through **MM-BIO-9**. The Specific Plan's conflicts with an adopted HCP or other conservation plan would be reduced to less than significant with implementation of **MM-BIO-4**, **MM-BIO-5A/MM-BIO-5B**, **MM-BIO-6**, and **MM-BIO-9**. As such, with implementation of **MM-BIO-1** through **MM-BIO-9**, the Project's impacts to biological resources would be reduced to less than significant levels.

Alternative 3 would have the same development footprint as the proposed Project; however, Alternative 3 would result in a reduction of 244,550 square feet of potential industrial development, and a corresponding reduction in workforce and vehicle trips, as compared to the proposed Project. Since Alternative 3 has the same development footprint as the proposed Project, impacts to biological resources under Alternative 3 would be similar compared to the proposed Project, and would be potentially significant. Alternative 3's effect on special status plant and wildlife species, direct impacts on burrowing owl, San Diego black tailed jackrabbit, coast horned lizard, coastal whiptail, orange-throated whiptail, and western yellow bat, Cooper's hawk, Lawrence's goldfinch, northern harrier, sharp-shinned hawk, yellow warbler, and California horned lark and indirect impacts on Least Bell's Vireo and Stephens' Kangaroo Rat, would be reduced to less than significant with the implementation of **MM-BIO-1** through **MM-BIO-7**. Alternative 3's effect on riparian habitat or other sensitive natural communities would be reduced to less than significant with implementation of **MM-BIO-8** and **MM-BIO-9**. Alternative 3's effect on state or federally protected wetlands would be reduced to less than significant with implementation of **MM-BIO-9**. Alternative 3 would have less than significant impacts to the movement of fish/wildlife, wildlife corridors, or native wildlife nursery sites. Alternative 3's conflicts with local policies/ordinances protecting biological resources would be reduced to less than significant with the implementation of **MM-BIO-1** through **MM-BIO-9**. Alternative 3's conflicts with an adopted HCP or other conservation plan would be reduced to less than significant with implementation of **MM-BIO-4**, **MM-BIO-5A/MM-BIO-5B**, **MM-BIO-6**, and **MM-BIO-9**. In summary, notwithstanding Alternative 3's reduced industrial development, Alternative 3 would have *similar biological resources impacts* compared to the proposed Project.

Cultural Resources

As discussed in Section 4.4, Cultural Resources, implementation of the proposed Project would result in potentially significant impacts to cultural resources. However, even with the incorporation of **MM-CUL-1** through **MM-CUL-118** and **MM-CUL-13**, the Project's impacts associated with historical and archaeological resources would be significant and unavoidable. With implementation of **MM-CUL-129**, impacts to human remains would be less than significant.

Alternative 3 would have the same development footprint as the proposed Project; however, Alternative 3 would result in a reduction of 244,550 square feet of potential industrial development, and a corresponding reduction in workforce and vehicle trips, as compared to the proposed Project. Since Alternative 3 has the same development footprint as the proposed Project, impacts to cultural resources under Alternative 3 would be similar compared to the proposed Project, and would be potentially significant. Even with the incorporation of **MM-CUL-1** through **MM-CUL-118** and **MM-CUL-13**, Alternative 3's impacts to historical and archaeological resources would be *significant and unavoidable*. With implementation of **MM-CUL-129**, Alternative 3's impacts to human remains would be *less than significant*. In summary, notwithstanding Alternative 3's reduced industrial development, Alternative 3 would have

similar cultural resources impacts compared to the proposed Project and would result in *significant and unavoidable* impacts to historical and archaeological resources.

Energy

As discussed in Section 4.5, Energy, construction and operation of the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy or conflict with or obstruct a state or local plan for renewable energy or energy efficiency and the Project's energy impacts would be less than significant, with the incorporation of MM-GHG-1 through MM-GHG-1211 and MM-AQ-1 through MM-AQ-27. These mitigation measures would further reduce the Project's energy impacts to less than significant.

Alternative 3 would have the same development footprint as the proposed Project; however, Alternative 3 would result in a reduction of 244,550 square feet of potential industrial development, and a corresponding reduction in workforce and vehicle trips, as compared to the proposed Project. Given Alternative 3's reduced industrial development, Alternative 3 would consume less energy compared to the proposed Project and Alternative 3's energy impacts would be less than significant. With the incorporation of MM-GHG-1 through MM-GHG-1211, and MM-AQ-1 through MM-AQ-27 would further reduce Alternative 3's energy impacts to less than significant. In summary, given Alternative 3's reduced industrial development, Alternative 3 would have *fewer energy impacts* compared to the proposed Project.

Geology and Soils

As discussed in Section 4.6, Geology and Soils, implementation of the proposed Project would result in potentially significant impacts to geology and soils. The Specific Plan Area would have less than significant impacts with regard to strong seismic ground shaking, seismic-related ground failure, and expansive soils. With the implementation of **MM-GEO-1** (Slope Stability), the Project's impacts related to landslides and unstable soil would be reduced to less than significant. The Specific Plan Area's impacts to paleontological resources and site or unique geologic features would be reduced to less than significant with incorporation of **MM-GEO-2** (Paleontological Resources).

Alternative 3 would have the same development footprint as the proposed Project; however, Alternative 3 would result in a reduction of 244,550 square feet of potential industrial development, and a corresponding reduction in workforce and vehicle trips, as compared to the proposed Project. Since Alternative 3 has the same development footprint as the proposed Project, Alternative 3's impacts to geology and soils would be similar compared to the proposed Project and would be potentially significant. Alternative 3 would have less than significant impacts with regard to strong seismic ground shaking, seismic-related ground failure, and expansive soils. With the implementation of **MM-GEO-1**, Alternative 3's impacts related to landslides and unstable soil would be reduced to less than significant. Alternative 3's impacts to paleontological resources and site or unique geologic features would be reduced to less than significant with incorporation of **MM-GEO-2**. In summary, notwithstanding Alternative 3's reduced industrial development, Alternative 3 would have *similar impacts to geology and soils* compared to the proposed Project.

Greenhouse Gas Emissions

As discussed in Section 4.7, Greenhouse Gas Emissions, implementation of the proposed Project would result in potentially significant GHG impacts because it could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. However, with implementation of **MM-GHG-1** through **MM-GHG-1211**, the Project would be consistent with the applicable plans, including the County CAP, and GHG impacts would be

reduced to less than significant levels. Additionally, the Project would not conflict with any of the Senate Bill 32/2017 Scoping Plan elements since any regulations adopted would apply directly or indirectly to the Project. Furthermore, the proposed Project represents ~~0.90~~1.24% of the anticipated increase in jobs for the WRCOG region, and therefore, would not result in long-term operational employment growth that exceeds planned growth projections in the RTP/SCS or an Air Quality Management Plan, or result in employment growth that would substantially add to traffic congestion.

Alternative 3 would have the same development footprint as the proposed Project; however, Alternative 3 would result in a reduction of 244,550 square feet of potential industrial development, and a corresponding reduction in workforce and vehicle trips, as compared to the proposed Project. Given Alternative 3's reduced industrial development, Alternative 3's GHG emissions impacts would be similar but reduced compared to the proposed Project but would still be potentially significant because Alternative 3 could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. With implementation of **MM-GHG-1** through **MM-GHG-~~1211~~**, Alternative 3 would be consistent with the applicable plans, including the County CAP, and GHG impacts would be reduced to less than significant levels. In summary, given Alternative 3's reduced industrial development, Alternative 3 would have *fewer GHG impacts* compared to the proposed Project.

Hazards and Hazardous Materials

As discussed in Recirculated Section 4.8, Hazards and Hazardous Materials, implementation of the proposed Project would result in potentially significant hazard and hazardous materials impacts. During construction of the Specific Plan Area, implementation of **MM-HAZ-1** would reduce the Project's impacts involving the routine transport, use, or disposal of hazardous materials. During operations, the Project would have a less than significant impact with regards to reasonably foreseeable upset and accident conditions involving the release of hazardous materials. Given the proximity of the neighboring preschool at Community Grove Church, **MM-HAZ-2** is required to reduce potentially significant impacts associated with Project uses emitting and/or handling hazardous materials within one-quarter mile of an existing or planned school. With implementation of **MM-HAZ-3**, the Project's proximity to March ARB/Inland Port Airport would not result in a safety hazard or excessive noise for people residing or working in the Project area. **MM-FIRE-1** would reduce the Project's impacts involving wildland fires. With implementation of **MM-HAZ-1**, **MM-HAZ-2**, **MM-HAZ-3**, and **MM-FIRE-1**, the Project's hazards and hazardous materials impacts would be reduced to less than significant levels.

Alternative 3 would have the same development footprint as the proposed Project; however, Alternative 3 would result in a reduction of 244,550 square feet of potential industrial development, and a corresponding reduction in workforce and vehicle trips, as compared to the proposed Project. Given Alternative 3's reduced industrial development, Alternative 3's impacts related to hazards and hazardous materials would be similar but reduced compared to the proposed Project but would still be potentially significant. During Alternative 3 construction, implementation of **MM-HAZ-1** would reduce Alternative 3's impacts involving the routine transport, use, or disposal of hazardous materials. During operations, Alternative 3 would have a less than significant impact with regards to reasonably foreseeable upset and accident conditions involving the release of hazardous materials. The development footprint under Alternative 3 would still introduce new uses within proximity of the preschool, and as such, **MM-HAZ-2** would still be required under Alternative 3. With implementation of **MM-HAZ-3**, Alternative 3's proximity to March ARB/Inland Port Airport would not result in a safety hazard or excessive noise for people residing or working in the Project area. **MM-FIRE-1** would reduce Alternative 3's impacts involving wildland fires to *less than significant* levels. In summary, given Alternative 3's reduced industrial development, Alternative 3 would have *fewer impacts related to hazards and hazardous materials* compared to the proposed Project.

Hydrology and Water Quality

As discussed in Section 4.9, Hydrology and Water Quality, implementation of the proposed Project would result in potentially significant impacts to hydrology and water quality. With implementation of **MM-HYD-1** (Interim Soil Stabilization Plan) and **MM-HYD-2** (Water Quality Management Plan), the Project's impacts to surface or groundwater quality would be reduced to less than significant levels. In addition, implementation of the Storm Water Pollution Prevention Plan (SWPPP) in conformance with the Construction General Permit would reduce potential discharge of polluted runoff from construction sites. Further, Project design features would ensure that post-construction runoff velocities would be less than existing conditions and would not substantially alter the existing drainage pattern of the site or area. The Project's impacts to groundwater supplies and recharge would be less than significant. With implementation of **MM-HYD-3** (Hydrology/Drainage Study), the Project's impacts related to on- or off-site erosion or siltation and runoff water would be reduced to less than significant. Further the Project would have a less than significant impact related to risk releasing of pollutants due to inundation, impeding or redirecting flood flows, or conflicting with or obstructing implementation of a water quality control plan or sustainable groundwater management plan.

Alternative 3 would have the same development footprint as the proposed Project; however, Alternative 3 would result in a reduction of 244,550 square feet of potential industrial development, and a corresponding reduction in workforce and vehicle trips, as compared to the proposed Project. Since Alternative 3 has the same development footprint as the proposed Project, Alternative 3's impacts to hydrology and water quality would be similar compared to the proposed Project and would be potentially significant. With implementation of **MM-HYD-1** and **MM-HYD-2**, Alternative 3's impacts to surface or groundwater quality would be reduced to less than significant levels. In addition, implementation of the SWPPP in conformance with the Construction General Permit would reduce potential discharge of polluted runoff from construction sites. Further, Project design features would ensure that post-construction runoff velocities would be less than existing conditions and would not substantially alter the existing drainage pattern of the site or area. Alternative 3's impacts to groundwater supplies and recharge would be less than significant. With implementation of **MM-HYD-3**, Alternative 3's impacts related to on- or off-site erosion or siltation and runoff water would be reduced to less than significant. Further, Alternative 3 would have a less than significant impact related to risk releasing of pollutants due to inundation, impeding or redirecting flood flows, or conflicting with or obstructing implementation of a water quality control plan or sustainable groundwater management plan. In summary, notwithstanding Alternative 3's reduced industrial development, Alternative 3 would have **similar impacts to hydrology and water quality** compared to the proposed Project.

Land Use and Planning

As discussed in Recirculated Section 4.10, Land Use and Planning, with implementation of **MM-AQ-1** through **MM-AQ-2715**, **MM-BIO-1** through **MM-BIO-9**, **MM-CUL-1** through **MM-CUL-139**, **MM-GEO-1**, **MM-GEO-2**, **MM-GHG-1** through **MM-GHG-1211**, **MM-HAZ-1** through **MM-HAZ-3**, **MM-HYD-1** through **MM-HYD-3**, **MM-TRA-1** and **MM-TRA-2**, and **MM-FIRE-1** through **MM-FIRE-3**, the Project would be generally consistent or partially consistent with the March JPA General Plan Goals and policies, as well as the Draft Environmental Justice Element. March JPA designates the Project site as Business Park (BP), Industrial (IND), and Park/Recreation/Open Space (P/R/OS) land uses in the March JPA General Plan. The Project site has not previously been given a zoning designation by March JPA; therefore, the Project proposes zoning consistent with the proposed General Plan Amendment and Specific Plan designations of Mixed Use, Business Park (BP), Industrial (IND), Parks/Recreation/Open Space (P/R/OS), and Public Facility for the site. The Project proposes adoption of Specific Plan SP-9 consistent with applicable requirements in California Government Code Sections 65450–65457 and March JPA Development Code Chapter 9.13. The Project would be consistent with the March Development Code and the Riverside County ALUCP.

Furthermore, the proposed Project would implement the guiding principles, goals, and policies of SCAG's Connect SoCal and the County Good Neighbor Policy for Logistics and Warehouse/Distribution Uses. As such, with incorporation of mitigation, the Project would result in less than significant land use impacts through conflicts with plans adopted for the purpose of avoiding or mitigating an environmental effect.

Alternative 3 would have the same development footprint as the proposed Project; however, Alternative 3 would result in a reduction of 244,550 square feet of potential industrial development, and a corresponding reduction in workforce and vehicle trips, as compared to the proposed Project. Given Alternative 3's reduced industrial development, Alternative 3's land use and planning impacts would be similar but reduced compared to the proposed Project. With implementation of **MM-AQ-1** through **MM-AQ-2715**, **MM-BIO-1** through **MM-BIO-9**, **MM-CUL-1** through **MM-CUL-139**, **MM-GEO-1**, **MM-GEO-2**, **MM-GHG-1** through **MM-GHG-1211**, **MM-HAZ-1** through **MM-HAZ-3**, **MM-HYD-1** through **MM-HYD-3**, **MM-TRA-1** and **MM-TRA-2**, and **MM-FIRE-1** through **MM-FIRE-3**, Alternative 3 would be generally consistent or partially consistent with the March JPA General Plan Goals and policies, as well as the Draft Environmental Justice Element. Similar to the proposed Project, Alternative 3 would propose zoning consistent with the proposed General Plan Amendment and Specific Plan designations of Mixed Use, Business Park (BP), Industrial (IND), Parks/Recreation/Open Space (P/R/OS), and Public Facility for the site. Alternative 3 would also propose adoption of Specific Plan SP-9 consistent with applicable requirements in California Government Code Sections 65450–65457 and March JPA Development Code Chapter 9.13. Alternative 3 would be consistent with the March Development Code and the Riverside County ALUCP. Alternative 3 would be consistent with the guiding principles, goals, and policies of SCAG's Connect SoCal and the County Good Neighbor Policy for Logistics and Warehouse/Distribution Uses. In summary, given Alternative 3's reduced industrial development, Alternative 3 would result in less than significant land use and planning impacts and have **fewer land use and planning impacts** compared to the proposed Project.

Noise

As discussed in Section 4.11, Noise, the Project would not generate substantial temporary or permanent increase in ambient noise levels, with the exception of traffic noise level increases along a non-sensitive roadway segment: Cactus Avenue east of Meridian Parkway (Segment #13). Therefore, the Project would have a significant and unavoidable noise impact and no feasible mitigation measures are available to reduce Project-related significant traffic noise increases along Segment #13. All other noise and vibration impacts associated with construction and operation of the Project would be less than significant.

Alternative 3 would have the same development footprint as the proposed Project; however, Alternative 3 would result in a reduction of 244,550 square feet of potential industrial development, and a corresponding reduction in workforce and vehicle trips, as compared to the proposed Project. As construction and grading activities would be nearly the same under Alternative 3, noise levels would be similar to those of the proposed Project during construction. Given Alternative 3's reduced industrial development, Alternative 3's operational noise impacts would be similar but reduced compared to the proposed Project; however, as shown in the attached Appendix R-1 to this EIR, even with a smaller scale development, the incremental noise level increase at Segment #13 would exceed the established threshold. As such, Alternative 3 would still result in significant noise impacts along Segment #13. Therefore, Alternative 3 would have a significant and unavoidable noise impact and no feasible mitigation measures are available to reduce Alternative 3's significant traffic noise increases along Segment #13. All other noise and vibration impacts associated with construction and operation of Alternative 3 would be less than significant. In summary, given Alternative 3's reduced industrial development, Alternative 3 would have **fewer noise impacts** compared to the proposed Project, but would still result in **significant and unavoidable noise** impacts.

Population and Housing

As discussed in Section 4.12, Population and Housing, Under the buildout scenario, it is anticipated that the Project would ~~create~~ employ approximately ~~2,600~~ 3,622 full-time ~~job~~ employees. Based on the County's unemployment rate, this EIR assumes that the Project's employees will be primarily existing residents of Riverside County. The anticipated number of jobs generated by the Project would be a nominal addition to the County's existing and projected labor force. Thus, the employment growth that would be attributed to the Project is consistent with SCAG's overall growth projections and would not result in a substantial increase of unplanned population growth. Therefore, the Project would have a less than significant impact related to population and housing and no mitigation is required.

Alternative 3 would have the same development footprint as the proposed Project; however, Alternative 3 would result in a reduction of 244,550 square feet of potential industrial development, and a corresponding reduction in workforce and vehicle trips, as compared to the proposed Project. Alternative 3 would ~~create~~ employ approximately 65% fewer ~~job~~ employees compared to the proposed Project. Therefore, Alternative 3 would have **fewer population and housing impacts** compared to the proposed Project.

Public Services

As discussed in Section 4.13, Public Services, with the implementation of **MM-FIRE-1**, the Project's impacts to fire services would be reduced to less than significant. The Project's impacts to police services, schools, parks and other public facilities would be less than significant and no mitigation is required.

Alternative 3 would have the same development footprint as the proposed Project; however, Alternative 3 would result in a reduction of 244,550 square feet of potential industrial development, and a corresponding reduction in workforce and vehicle trips, as compared to the proposed Project. Given Alternative 3's reduced industrial development and reduced workforce, Alternative 3's impacts on public services would be similar but reduced compared to the proposed Project but would still be potentially significant. With the implementation of **MM-FIRE-1**, Alternative 3's impacts to fire services would be reduced to less than significant. Alternative 3's impacts to police services, schools, parks and other public facilities would be less than significant and no mitigation is required. In summary, Alternative 3 would have **fewer impacts to public services** compared to the proposed Project.

Recreation

As discussed in Section 4.14, Recreation, it is likely that the majority of the Campus Development's future employees are already residents of the nearby communities and are already using the local parks and recreational facilities. There could be an increase in demand for recreational facilities but because the Project's employees and surrounding neighborhoods would have access to the proposed 60.28-acre Park, any increased demand would not result in the need to construct additional recreational facilities under the Specific Plan buildout scenario. The recreational amenities analyzed include a playground, multiuse sports fields that could be used for soccer, football, and field hockey, and trails with cardio stops for recreational users. The impacts related to the Park's construction have been included in all of the analyses in this ~~Draft~~ Final EIR. Additionally, the currently existing service roads within the Conservation Easement, as depicted by the red lines on Figure 3-4, would continue to be utilized by the public for passive recreation as authorized by the March JPA, consistent with the terms of the CBD Settlement Agreement (Appendix S). Therefore, the Project would result in less than significant impacts to recreational facilities and no mitigation is required.

Alternative 3 would have the same development footprint as the proposed Project; however, Alternative 3 would result in a reduction of 244,550 square feet of potential industrial development, and a corresponding reduction in workforce and vehicle trips, as compared to the proposed Project. Given Alternative 3's reduced industrial development and reduced workforce, Alternative 3's impacts on recreation would be similar but reduced compared to the proposed Project. Alternative 3 would result in a reduced demand on recreational resources compared to the proposed Project. Therefore, Alternative 3 would have *fewer recreational impacts* compared to the proposed Project.

Transportation

As discussed in Section 4.15, Transportation, with the incorporation of **MM-TRA-1** (Construction Traffic Management Plan), Project construction impacts on the circulation system would be reduced to less than significant. With implementation of **MM-TRA-2** (Traffic Safety Plan for Barton Street), the Project's operational impacts on the circulation system would be less than significant. The Specific Plan Area's impact on VMT would be less than significant. Although the Specific Plan Area is not anticipated to have a significant VMT impact, **MM-AQ-219** further reduces VMT by requiring all tenants to implement or otherwise participate in a Transportation Demand Management program, including on-site transit pass sales and discounted passes, shuttle service to/from public transit and commercial/food establishments, if warranted, guarantee a ride home, and "commuter club" to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk or take transit to work. Additionally, **MM-GHG-11** requires the Project to provide funding for the installation of a bus shelter on Alessandro Boulevard. The Project's potential to increase hazards due to design features or incompatible uses would be reduced to less than significant with implementation of **MM-TRA-1** and **MM-TRA-2**.

Alternative 3 would have the same development footprint as the proposed Project; however, Alternative 3 would result in a reduction of 244,550 square feet of potential industrial development, and a corresponding reduction in workforce and vehicle trips, as compared to the proposed Project.

Given that Alternative 3 would consist of a reduction of 244,550 square feet of High-Cube Fulfillment Center use, the total High-Cube Fulfillment Center square footage for Alternative 3 would be 481,011 square feet. As shown in Table 6-8, Alternative 3 would generate a total of 1,730 AM peak hour trips, 3,349 PM peak hour trips, and a daily total of 34,792 trips.

Table 6-8. Alternative 3 Trip Generation Summary

Land Use	Quantity Units	AM Peak Hour			PM Peak Hour			Week-day Daily	Saturday Peak Hour		
		In	Out	Total	In	Out	Total		In	Out	Total
Building B: High-Cube Fulfillment	1,250.000 TSF	–	–	–	–	–	–	–	–	–	–
Passenger Cars	–	99	30	129	50	130	180	2188	5	3	8
Trucks	–	18	5	23	7	19	26	474	1	0	1
Total Trips	–	117	35	152	57	149	206	2662	6	3	9
Building C: High-Cube Fulfillment	587.000 TSF	–	–	–	–	–	–	–	–	–	–
Passenger Cars	–	47	14	61	24	61	85	1028	2	1	3
Trucks	–	9	3	12	3	9	12	222	0	0	0
Total Trips	–	56	17	73	27	70	97	1250	2	1	3
High-Cube Cold Storage Warehouse	500.000 TSF	–	–	–	–	–	–	–	–	–	–
Passenger Cars	–	38	2	40	10	36	46	686	1	1	2
Trucks	–	5	11	16	8	8	16	376	0	0	0
Total Trips	–	43	13	56	18	44	62	1062	1	1	2
Remaining Industrial: High-Cube Fulfillment	481.011 TSF	–	–	–	–	–	–	–	–	–	–
Passenger Cars	–	38	11	49	19	50	69	842	2	1	3
Trucks	–	7	2	9	3	7	10	182	0	0	0
Total Trips	–	45	13	58	22	57	79	1024	2	1	3
Business Park	1,280.403 TSF	–	–	–	–	–	–	–	–	–	–
Office Cars	324.121 TSF	405	75	480	75	366	441	3228	93	79	172
Office Cars	60.000 TSF	95	17	112	19	90	109	744	17	15	32
Business Park Warehouse	896.282 TSF	–	–	–	–	–	–	–	–	–	–

Table 6-8. Alternative 3 Trip Generation Summary

Land Use	Quantity Units	AM Peak Hour			PM Peak Hour			Week-day Daily	Saturday Peak Hour		
		In	Out	Total	In	Out	Total		In	Out	Total
Warehouse Cars	–	69	16	85	233	825	1058	10640	41	35	79
Warehouse Trucks	–	29	7	36	8	28	36	512	6	3	9
Business Park (Mixed Use, 75%)	482.765 TSF	–	–	–	–	–	–	–	–	–	–
Office Cars	144.830 TSF	203	36	239	39	187	226	1602	41	35	76
Business Park Warehouse	337.936 TSF	–	–	–	–	–	–	–	–	–	–
Warehouse Cars	–	26	6	32	88	311	399	4012	9	5	14
Warehouse Trucks	–	11	3	14	3	11	14	194	2	1	3
Total Business Park Trips	–	838	160	998	465	1818	2283	20932	191	151	342
Retail (Mixed Use, 25%)	160.921 TSF	–	–	–	–	–	–	–	–	–	–
Cars	–	173	106	279	409	426	835	10866	760	730	1490
Pass-by-Reduction	–	0	0	0	-164	-164	-327	-4348	-304	-292	-596
Total Retail Trips	–	173	106	279	245	262	508	6518	456	438	894
Active Park	42.20 AC	137	137	274	95	95	190	2110	187	203	390
Public Park	18.08 AC	6	6	12	4	4	8	90	19	20	39
Total Park Trips	–	143	143	286	99	99	198	2200	206	223	429
Total Passenger Cars	–	1336	456	1792	901	2417	3319	33688	855	814	1669
Internal Trip Reduction	–	-86	-86	-172	-42	-42	-84	-856	-21	-21	-42
Total Trucks	–	79	31	110	32	82	114	1960	9	4	13
Alternative 3 Total Trips	–	1329	401	1730	891	2457	3349	34792	842	797	1640

Source: Appendix R-2.

When comparing the trip generation rates between Alternative 3 and the proposed Project, as shown in Table 6-9, Alternative 3 would result in a trip reduction of 522 trips.

Table 6-9. Alternative 3 Trip Generation Comparison

Project	AM Peak Hour			PM Peak Hour			Weekday Daily	Saturday Peak Hour		
	In	Out	Total	In	Out	Total		In	Out	Total
Project Traffic Study	1353	408	1761	902	2486	3389	35314	844	798	1642
Alternative 3	1329	401	1730	891	2457	3349	34792	843	797	1640
Comparison	-24	-7	-31	-11	-29	-40	-522	-1	-1	-2

Source: Appendix R-2.

As with the proposed Project, with the incorporation of **MM-TRA-1**, Alternative 3 construction impacts on the circulation system would be reduced to less than significant. With implementation of **MM-TRA-2**, Alternative 3's operational impacts on the circulation system would be less than significant. Alternative 3's impact on VMT would be **less than significant**. Although Alternative 3 is not anticipated to have a significant VMT impact, **MM-AQ-219** further reduces VMT by requiring all tenants to implement or otherwise participate in a Transportation Demand Management program, including on-site transit pass sales and discounted passes, shuttle service to/from public transit and commercial/food establishments, if warranted, guarantee a ride home, and "commuter club" to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk or take transit to work. Additionally, **MM-GHG-11** requires Alternative 3 to provide funding for the installation of a bus shelter on Alessandro Boulevard. Alternative 3's potential to increase hazards due to design features or incompatible uses would be reduced to less than significant with implementation of **MM-TRA-1** and **MM-TRA-2**. During construction, fewer construction worker vehicle and equipment trips would be generated because less construction activities would occur. Because of the reduced industrial development, there would also be a reduction in employee trips during operation of the Alternative 3. Therefore, Alternative 3 would have **fewer transportation impacts** compared to the proposed Project.

Tribal Cultural Resources

As discussed in Section 4.16, Tribal Cultural Resources, implementation of the proposed Project would result in potentially significant impacts to tribal cultural resources. However, even with implementation of **MM-CUL-1** through **MM-CUL-138**, the Project's impacts to tribal cultural resources would remain *significant and unavoidable*.

Alternative 3 would have the same development footprint as the proposed Project; however, Alternative 3 would result in a reduction of 244,550 square feet of potential industrial development, and a corresponding reduction in workforce and vehicle trips, as compared to the proposed Project. Given Alternative 3's similar development footprint, impacts to tribal cultural resources under Alternative 3 would be similar compared to the proposed Project, and would also be potentially significant. Even with the incorporation of **MM-CUL-1** through **MM-CUL-138**, Alternative 3's impacts to tribal cultural resources would be significant and unavoidable. Therefore, implementation of Alternative 3 would result in **similar significant and unavoidable tribal cultural resources impacts** when compared to the proposed Project.

Utilities and Service Systems

As discussed in Section 4.17, Utilities and Service Systems, the Project would have less than significant impacts to facilities providing water, wastewater, storm water, electric power, natural gas, and telecommunications. There are sufficient water supplies available and wastewater treatment capacity to serve the Project, resulting in less than significant impacts. The Project would have a less than significant impact on solid waste infrastructure and capacity

and would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, the Project impacts to utilities and service systems would be less than significant, and no mitigation is required.

Alternative 3 would have the same development footprint as the proposed Project; however, Alternative 3 would result in a reduction of 244,550 square feet of potential industrial development, and a corresponding reduction in workforce and vehicle trips, as compared to the proposed Project. Given Alternative 3's reduced industrial development, Alternative 3's operational activities would be less intense and therefore introduce fewer employees and a reduced demand for water, wastewater, electric power, telecommunications infrastructure, and solid waste services when compared to the proposed Project. Alternative 3 would have **fewer impacts to utilities and service systems** compared to the proposed Project.

Wildfire

As discussed in Section 4.18, Wildfire, the Project site is near lands classified as Very High Fire Hazard Severity Zone (FHSZ) and implementation of the proposed Project would result in potentially significant wildfire impacts. However, with implementation of **MM-FIRE-1** through **MM-FIRE-3**, as well as **MM-HYD-3**, the Project's potential to facilitate wildfire spread, exacerbate wildfire risk, or expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes would be reduced to less than significant levels.

Alternative 3 would have the same development footprint as the proposed Project; however, Alternative 3 would result in a reduction of 244,550 square feet of potential industrial development, and a corresponding reduction in workforce and vehicle trips, as compared to the proposed Project. Given Alternative 3's reduced industrial development, Alternative 3's wildfire impacts would be similar but reduced compared to the proposed Project but would still be potentially significant. With implementation of **MM-FIRE-1** through **MM-FIRE-3**, as well as **MM-HYD-3**, Alternative 3's potential to facilitate wildfire spread, exacerbate wildfire risk, or expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes would be reduced to less than significant levels. Therefore, Alternative 3 would have **reduced wildfire impacts** compared to the proposed Project.

6.4.4.2 Project Objectives

Alternative 3 would have the same development footprint as the proposed Project; however, Alternative 3 would result in a reduction of 244,550 square feet of potential industrial development, and a corresponding reduction in workforce and vehicle trips, as compared to the proposed Project. As shown in Table 6-10, Alternative 3 meets each Project objective.

Table 6-10. Summary of Alternative 3 Success at Meeting Project Objectives

Project Objective	Does Alternative 3 Meet Objective?
1. Provide increased job opportunities for residents through the provision of employment-generating businesses.	Yes. Alternative 3 would provide increased job opportunities through the provision of employment-generating businesses. Alternative 3 would achieve this objective to a lesser extent than the Project.
2. Provide open space amenities to serve the region.	Yes. Alternative 3 would provide open space amenities to serve the region. Alternative 3 would fully achieve this Project objective.

Table 6-10. Summary of Alternative 3 Success at Meeting Project Objectives

Project Objective	Does Alternative 3 Meet Objective?
3. Provide an active park consistent with the 2009 Safety Study prepared by March JPA.	Yes. Alternative 3 would provide the same 60.28-acre Park as the proposed Project. Alternative 3 would fully achieve this Project objective.
4. Complete the buildout of the roadway infrastructure by extending Cactus Avenue to the Specific Plan Area from its existing terminus, extending Barton Street from Alessandro Boulevard to Grove Community Drive, and extending Brown Street from Alessandro Boulevard to Cactus Avenue.	Yes. Alternative 3 would provide all the same roadway infrastructure as the proposed Project. As such, Alternative 3 would fully achieve this Project objective.
5. Remove and redevelop a majority of the former munitions storage area of the March AFB.	Yes. Alternative 3 would remove and redevelop a majority of the former munitions storage area. As such, Alternative 3 would fully achieve this Project objective.
6. Encourage the use of alternative modes of transportation through the provision of a pedestrian and bicycle circulation system, which is both safe and comfortable.	Yes. Under Alternative 3, the buildout would include the provision of new roadways that could accommodate all modes of travel, including pedestrian and bicycle movement. As such, Alternative 3 would fully achieve this Project objective.
7. Implement the terms and conditions agreed upon in the September 12, 2012, Settlement Agreement entered into between and among the CBD, the San Bernardino Valley Audubon Society, March JPA, and LNR Riverside LLC, as the complete settlement of the claims and actions raised in <i>Center for Biological Diversity v. Jim Bartel, et al.</i> to preserve open space through establishing a Conservation Easement.	Yes. Alternative 3 would place the Conservation Easement under a conservation easement. As such, Alternative 3 would fully achieve this Project objective.

6.4.5 Alternative 4 – Reduced Cultural Resource Impact Alternative

Under Alternative 4, Barton Street would be realigned to the east to avoid a known cultural resource site¹ that otherwise would be directly impacted under the proposed Project during construction activities. To avoid this known cultural resource, Alternative 4 would realign the portion of Barton Street that extends north from the emergency access only roadway from Cactus Avenue to the east. Realigning Barton Street to the east would result in Barton Street bisecting the proposed Mixed-Use parcels west of Airman Drive and the Business Park parcel located on the northwest corner of Arlight Drive. Therefore, Alternative 4 would result in a 1.9-acre reduction of Mixed-Use area and a 4.35-acre reduction of Business Park area compared to the proposed Project. Additionally, by realigning this portion of Barton Street, there would an increase of 2.16 acres of Open Space to the west of Barton Street compared

¹ As analyzed in Section 4.4, Cultural Resources, and Appendix E-1, this site has been evaluated as not eligible for the CRHR or NRHP. However, as this site is part of a potential Traditional Cultural Property/Traditional Cultural Landscape, Alternative 4 would still reduce impacts.

to the proposed Project. Alternative 4 would result in a slight reduction in workforce and total trips compared to the proposed Project.

Similar to the proposed Project, Alternative 4 would construct Barton Street at its ultimate full-section width as a Collector (66-foot right-of-way, 40-foot curb-to-curb) from the existing northerly and southerly termini consistent with the City of Riverside’s Circulation Element. Once completed, the roadway will provide a connection between the existing Mission Grove community to the north and Orangecrest community to the south. The right-of-way will accommodate 6-foot sidewalks on one side with 10-foot multipurpose trail and 5 feet of landscape on the other side along with a 5-foot bike lane and a single traveled lane in each direction (of 14.5-feet). The multipurpose trail will only be accommodated for portions of Barton Street adjacent to the Park (Table 6-11).

Table 6-11. Alternative 4 Buildout Land Uses

Use	Alternative 4 (acres)	Proposed Project (acres)	Alternative 4 vs. Proposed Project (acres)
Specific Plan Area			
Business Park	60.97	65.32	-4.35
Industrial	143.31	143.31	0
Mixed Use	40.32	42.22	-1.9
Public Facility	2.84	2.84	0
Open Space	80.16	78	2.16
Streets	42	37.91	4.09
<i>Subtotal</i>	369.60	369.60	0
Conservation Easement			
Open Space	445.43	445.43	0
Existing WMWD Water Tank			
Public Facility	2.87	2.87	0
Total Net Acres	817.90	817.90	0

6.4.5.1 Environmental Analysis

Aesthetics

As discussed in Section 4.1, Aesthetics, implementation of the proposed Project would not have a substantial adverse effect on a scenic vista or substantially degrade the existing visual character or quality of public views of the site and its surroundings with implementation of **MM-AES-1** (Construction Equipment Staging and Screening). Impacts would be less than significant, and no mitigation is required. With the implementation of **MM-AES-2** (Exterior Lighting Point-by-point Photometric Study Approval) and **MM-AES-3** (Solar Photovoltaic System Approval), the Project’s impacts as a new source of substantial light or glare would be reduced to less than significant with mitigation incorporated.

Alternative 4 would have a slightly smaller development footprint compared to the proposed Project. With the realignment of Barton Street, Alternative 4 would result a reduction of 4.35 acres available for Business Park development, a reduction of 1.9 acres available for Mixed-Use development, and an increase of 2.16 acres of Open Space, resulting in a corresponding slight reduction in workforce and total trips. Given Alternative 4’s slightly smaller

development footprint, public views from the residential land uses to the west of the Project site would have slightly more open space than the Project. Alternative 4 would have a less than significant impact on a scenic vista, the existing visual character, and the quality of public views of the site and its surroundings with implementation of **MM-AES-1**. Given Alternative 4's slightly smaller development footprint, Alternative 4's potential impacts to scenic vistas, existing visual character and quality of public views would be similar but reduced when compared to the proposed Project. Alternative 4 would introduce fewer new sources of substantial light or glare than the Project but would still require implementation of **MM-AES-2** and **MM-AES-3** to reduce Alternative 4's light and glare impacts to less than significant. In summary, Alternative 4 would result in **fewer aesthetic impacts** than the proposed Project.

Air Quality

With implementation of **MM-AQ-1 through MM-AQ-4**, the Specific Plan Area's construction air quality impacts would be reduced to less than significant levels. The Specific Plan Area's daily regional emissions from operations would exceed the SCAQMD thresholds of significance for emissions of VOCs, NO_x, CO, ~~and PM₁₀, and PM_{2.5}~~ and would, therefore, per SCAQMD criteria, be cumulatively potentially significant, and mitigation is required. **MM-AQ-52** through **MM-AQ-2715** are designed to reduce Specific Plan Area operational-source VOCs, NO_x, CO, ~~and PM₁₀, and PM_{2.5}~~ emissions. ~~There is no way to meaningfully quantify these reductions in CalEEMod, and therefore no numeric emissions credit has been taken in the analysis. As such~~ However, even with application of **MM-AQ-52** through **MM-AQ-2715**, the Specific Plan's operational-source emissions impacts would be significant and unavoidable. Since Specific Plan operations would exceed the SCAQMD thresholds of significance, the Project would also conflict with the AQMP, thereby resulting in an additional significant and unavoidable impact. The construction and operation of the Specific Plan would not exceed applicable LST, CO hotspot, or HRA thresholds and impacts would be less than significant. The Specific Plan Area's odor and other emissions impacts would be less than significant.

Alternative 4 would have a slightly smaller development footprint compared to the proposed Project. With the realignment of Barton Street, Alternative 4 would result a reduction of 4.35 acres available for Business Park development, a reduction of 1.9 acres available for Mixed-Use development, and an increase of 2.16 acres of Open Space, resulting in a corresponding slight reduction in workforce and total trips. Given Alternative 4's slightly smaller development footprint, construction and operations emissions under Alternative 4 would be similar but reduced compared to the proposed Project but would still be potentially significant. With implementation of **MM-AQ-1 through MM-AQ-4**, Alternative 4's construction air quality impacts would be reduced to less than significant levels. Under Alternative 4, operational activities would be less intense than those associated with the proposed Project, thereby resulting in fewer vehicle trips and associated air emissions. However, Alternative 4's reduced development and vehicle trips would not reduce operational air emissions to levels below the SCAQMD thresholds of significance for emissions of VOCs, NO_x, CO, ~~and PM₁₀, and PM_{2.5}~~. Even with application of **MM-AQ-52** through **MM-AQ-2715**, Alternative 4 operational-source emissions impacts would be significant and unavoidable. Since Alternative 4 operations would exceed the SCAQMD thresholds of significance, Alternative 4 would also conflict with the AQMP, an additional significant and unavoidable impact. The construction and operation of Alternative 4 would not exceed applicable LST, CO hotspot, or HRA thresholds and impacts would be less than significant. Similar to the Project, Alternative 4's odor and other emissions impacts would be less than significant. In summary, Alternative 4 would result in **lower air quality impacts** compared to the Project but would still result in **significant and unavoidable** air quality impacts.

Biological Resources

As discussed in Section 4.3, Biological Resources, implementation of the proposed Project would result in potentially significant biological impacts. The Specific Plan Area's effect on special status plant and wildlife species, direct impacts on burrowing owl, San Diego black tailed jackrabbit, coast horned lizard, coastal whiptail, orange-throated whiptail, and western yellow bat, Cooper's hawk, Lawrence's goldfinch, northern harrier, sharp-shinned hawk, yellow warbler, and California horned lark and indirect impacts on Least Bell's Vireo and Stephens' Kangaroo Rat, would be reduced to less than significant with the implementation of **MM-BIO-1** (Best Management Practices), **MM-BIO-2** (Least Bell's Vireo), **MM-BIO-3** (Operation-Related Indirect Impacts to Special-Status Wildlife), **MM-BIO-4** (Stephens' Kangaroo Rat Avoidance), **MM-BIO-5A** (Burrowing Owl Avoidance and Mitigation Measures)/**MM-BIO-5B** (Burrowing Owl Relocation and Mitigation Plan), **MM-BIO-6** (San Diego Black-Tailed Jackrabbit), and **MM-BIO-7** (Nesting Bird Avoidance and Minimization Measures). The Specific Plan Area's effect on riparian habitat or other sensitive natural communities would be reduced to less than significant with implementation of **MM-BIO-8** (Upland Vegetation Communities) and **MM-BIO-9** (Aquatic Resources Mitigation). The Specific Plan Area's effect on state or federally protected wetlands would be reduced to less than significant with implementation of **MM-BIO-9**. The Specific Plan would have less than significant impacts to the movement of fish/wildlife, wildlife corridors, or native wildlife nursery sites. The Specific Plan's conflicts with local policies/ordinances protecting biological resources would be reduced to less than significant with the implementation of **MM-BIO-1** through **MM-BIO-9**. The Specific Plan's conflicts with an adopted HCP or other conservation plan would be reduced to less than significant with implementation of **MM-BIO-4**, **MM-BIO-5A/MM-BIO-5B**, **MM-BIO-6**, and **MM-BIO-9**. As such, with implementation of **MM-BIO-1** through **MM-BIO-9**, the Project's impacts to biological resources would be reduced to less than significant levels.

Alternative 4 would have a slightly smaller development footprint compared to the proposed Project. With the realignment of Barton Street, Alternative 4 would result a reduction of 4.35 acres available for Business Park development, a reduction of 1.9 acres available for Mixed-Use development, and an increase of 2.16 acres of Open Space, resulting in a corresponding slight reduction in workforce and total trips. Given Alternative 4's slightly smaller development footprint, impacts to biological resources under Alternative 4 would be similar but reduced compared to the proposed Project, but would still be potentially significant. Alternative 4's effect on special status plant and wildlife species, direct impacts on burrowing owl, San Diego black tailed jackrabbit, coast horned lizard, coastal whiptail, orange-throated whiptail, and western yellow bat, Cooper's hawk, Lawrence's goldfinch, northern harrier, sharp-shinned hawk, yellow warbler, and California horned lark and indirect impacts on Least Bell's Vireo and Stephens' Kangaroo Rat, would be reduced to less than significant with the implementation of **MM-BIO-1** through **MM-BIO-7**. Alternative 4's effect on riparian habitat or other sensitive natural communities would be reduced to less than significant with implementation of **MM-BIO-8** and **MM-BIO-9**. Alternative 4's effect on state or federally protected wetlands would be reduced to less than significant with implementation of **MM-BIO-9**. Alternative 4 would have less than significant impacts to the movement of fish/wildlife, wildlife corridors, or native wildlife nursery sites. Alternative 4's conflicts with local policies/ordinances protecting biological resources would be reduced to less than significant with the implementation of **MM-BIO-1** through **MM-BIO-9**. Alternative 4's conflicts with an adopted HCP or other conservation plan would be reduced to less than significant with implementation of **MM-BIO-4**, **MM-BIO-5A/MM-BIO-5B**, **MM-BIO-6**, and **MM-BIO-9**. In summary, given Alternative 4's slightly smaller development footprint, Alternative 4 would have *fewer biological resources impacts* compared to the proposed Project.

Cultural Resources

As discussed in Section 4.4, Cultural Resources, implementation of the proposed Project would result in potentially significant impacts to cultural resources. However, even with the incorporation of **MM-CUL-1** through **MM-CUL-118** and **MM-CUL-13**, the Project's impacts to historical and archaeological resources would be *significant and unavoidable*. With implementation of **MM-CUL-129**, impacts to human remains would be *less than significant*.

Alternative 4 would have a slightly smaller development footprint compared to the proposed Project. With the realignment of Barton Street to avoid a cultural resource, Alternative 4 would result a reduction of 4.35 acres available for Business Park development, a reduction of 1.9 acres available for Mixed-Use development, and an increase of 2.16 acres of Open Space, resulting in a corresponding slight reduction in workforce and total trips. Under the proposed Project, a cultural resource located along the proposed Barton Street extension would be directly impacted during construction activities. Alternative 4 would avoid this known resource by shifting this portion of Barton Street to the east. As no new buildings and/or grading would be introduced on the additional 2.16 acres of Open Space. Without grading on this portion of the Project site, there is less likelihood of encountering previously unidentified cultural, historic and/or archaeological resources. Given Alternative 4's slightly smaller development footprint, impacts to cultural resources under Alternative 4 would be similar but reduced compared to the proposed Project, but would still be potentially significant. Even with the incorporation of **MM-CUL-1** through **MM-CUL-118** and **MM-CUL-13**, Alternative 4's impacts to historical and archaeological resources would be *significant and unavoidable*. With implementation of **MM-CUL-129**, Alternative 4's impacts to human remains would be *less than significant*. In summary, given Alternative 4's slightly smaller development footprint, Alternative 4 would have **fewer cultural resources impacts** compared to the proposed Project, but would still result in **significant and unavoidable** impacts to historical and archaeological resources.

Energy

As discussed in Section 4.5, Energy, construction and operation of the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy or conflict with or obstruct a state or local plan for renewable energy or energy efficiency and the Project's energy impacts would be less than significant. ~~with the incorporation of **MM-GHG-1** through **MM-GHG-1211** and **MM-AQ-1** through **MM-AQ-27**. These mitigation measures would further reduce the Project's energy use impacts to less than significant.~~

Alternative 4 would have a slightly smaller development footprint compared to the proposed Project. With the realignment of Barton Street, Alternative 4 would result a reduction of 4.35 acres available for Business Park development, a reduction of 1.9 acres available for Mixed-Use development, and an increase of 2.16 acres of Open Space, resulting in a corresponding slight reduction in workforce and total trips. Given Alternative 4's slightly smaller development footprint, Alternative 4 would consume less energy compared to the proposed Project and Alternative 4's energy impacts would be less than significant. ~~With the incorporation of **MM-GHG-1** through **MM-GHG-1211**, and **MM-AQ-1** through **MM-AQ-27** would further reduce Alternative 4's energy use impacts would be less than significant.~~ In summary, given Alternative 4's slightly smaller development footprint, Alternative 4 would have **fewer energy impacts** compared to the proposed Project.

Geology and Soils

As discussed in Section 4.6, Geology and Soils, implementation of the proposed Project would result in potentially significant impacts to geology and soils. The Specific Plan Area would have less than significant impacts with regard to strong seismic ground shaking, seismic-related ground failure, and expansive soils. With the implementation of

MM-GEO-1 (Slope Stability), the Project's impacts related to landslides and unstable soil would be reduced to less than significant. The Specific Plan Area's impacts to paleontological resources and site or unique geologic features would be reduced to less than significant with incorporation of **MM-GEO-2** (Paleontological Resources).

Alternative 4 would have a slightly smaller development footprint compared to the proposed Project. With the realignment of Barton Street, Alternative 4 would result a reduction of 4.35 acres available for Business Park development, a reduction of 1.9 acres available for Mixed-Use development, and an increase of 2.16 acres of Open Space, resulting in a corresponding slight reduction in workforce and total trips. Given Alternative 4's slightly smaller development footprint, Alternative 4's impacts to geology and soils would be similar but reduced compared to the proposed Project but would still be potentially significant. Alternative 4 would have less than significant impacts with regard to strong seismic ground shaking, seismic-related ground failure, and expansive soils. With the implementation of **MM-GEO-1**, Alternative 4's impacts related to landslides and unstable soil would be reduced to less than significant. Alternative 4's impacts to paleontological resources and site or unique geologic features would be reduced to less than significant with incorporation of **MM-GEO-2**. In summary, because Alternative 4 would have a slightly smaller development footprint, Alternative 4 would have *fewer impacts to geology and soils* compared to the proposed Project.

Greenhouse Gas Emissions

As discussed in Section 4.7, Greenhouse Gas Emissions, implementation of the proposed Project would result in potentially significant GHG impacts because it could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. However, with implementation of **MM-GHG-1** through **MM-GHG-~~1211~~**, the Project would be consistent with the applicable plans, including the County CAP, and GHG impacts would be reduced to *less than significant* levels. Additionally, the Project would not conflict with any of the Senate Bill 32/2017 Scoping Plan elements since any regulations adopted would apply directly or indirectly to the Project. Furthermore, the proposed Project represents ~~0.90~~1.24% of the anticipated increase in jobs for the WRCOG region, and therefore, would not result in long-term operational employment growth that exceeds planned growth projections in the RTP/SCS or an Air Quality Management Plan, or result in employment growth that would substantially add to traffic congestion.

Alternative 4 would have a slightly smaller development footprint compared to the proposed Project. With the realignment of Barton Street, Alternative 4 would result a reduction of 4.35 acres available for Business Park development, a reduction of 1.9 acres available for Mixed-Use development, and an increase of 2.16 acres of Open Space, resulting in a corresponding slight reduction in workforce and total trips. Given Alternative 4's slightly smaller development footprint, Alternative 4's GHG emissions impacts would be similar but reduced compared to the proposed Project but would still be potentially significant because Alternative 4 could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. With implementation of **MM-GHG-1** through **MM-GHG-~~1211~~**, Alternative 4 would be consistent with the applicable plans, including the County CAP, and GHG impacts would be reduced to less than significant levels. In summary, given Alternative 4's slightly smaller development footprint, Alternative 4 would have *fewer GHG impacts* compared to the proposed Project.

Hazards and Hazardous Materials

As discussed in Recirculated Section 4.8, Hazards and Hazardous Materials, implementation of the proposed Project would result in potentially significant hazard and hazardous materials impacts. During construction of the Specific Plan Area, implementation of **MM-HAZ-1** would reduce the Project's impacts involving the routine transport, use, or disposal of hazardous materials. During operations, the Project would have a less than significant impact

with regards to reasonably foreseeable upset and accident conditions involving the release of hazardous materials. Given the proximity of the neighboring preschool at Community Grove Church, **MM-HAZ-2** is required to reduce potentially significant impacts associated with Project uses emitting and/or handling hazardous materials within one-quarter mile of an existing or planned school. With implementation of **MM-HAZ-3**, the Project's proximity to March ARB/Inland Port Airport would not result in a safety hazard or excessive noise for people residing or working in the Project area. **MM-FIRE-1** would reduce the Project's impacts involving wildland fires. With implementation of **MM-HAZ-1**, **MM-HAZ-2**, **MM-HAZ-3**, and **MM-FIRE-1**, the Project's hazards and hazardous materials impacts would be reduced to less than significant levels.

Alternative 4 would have a slightly smaller development footprint compared to the proposed Project. With the realignment of Barton Street, Alternative 4 would result a reduction of 4.35 acres available for Business Park development, a reduction of 1.9 acres available for Mixed-Use development, and an increase of 2.16 acres of Open Space, resulting in a corresponding slight reduction in workforce and total trips. Given Alternative 4's slightly smaller development footprint, Alternative 4's impacts related to hazards and hazardous materials would be similar but reduced compared to the proposed Project but would still be potentially significant. During Alternative 4 construction, implementation of **MM-HAZ-1** would reduce Alternative 4's impacts involving the routine transport, use, or disposal of hazardous materials. During operations, Alternative 4 would have a less than significant impact with regards to reasonably foreseeable upset and accident conditions involving the release of hazardous materials. The development footprint under Alternative 4 would still introduce new uses within proximity of the preschool, and as such, **MM-HAZ-2** would still be required under Alternative 4. With implementation of **MM-HAZ-3**, Alternative 4's proximity to March ARB/Inland Port Airport would not result in a safety hazard or excessive noise for people residing or working in the Project area. **MM-FIRE-1** would reduce Alternative 4's impacts involving wildland fires to less than significant levels. In summary, given Alternative 4's slightly smaller development footprint, Alternative 4 would have *fewer impacts related to hazards and hazardous materials* compared to the proposed Project.

Hydrology and Water Quality

As discussed in Section 4.9, Hydrology and Water Quality, implementation of the proposed Project would result in potentially significant impacts to hydrology and water quality. With implementation of **MM-HYD-1** (Interim Soil Stabilization Plan) and **MM-HYD-2** (Water Quality Management Plan), the Project's impacts to surface or groundwater quality would be reduced to less than significant levels. In addition, implementation of the Storm Water Pollution Prevention Plan (SWPPP) in conformance with the Construction General Permit would reduce potential discharge of polluted runoff from construction sites. Further, Project design features would ensure that post-construction runoff velocities would be less than existing conditions and would not substantially alter the existing drainage pattern of the site or area. The Project's impacts to groundwater supplies and recharge would be less than significant. With implementation of **MM-HYD-3** (Hydrology/Drainage Study), the Project's impacts related to on- or off-site erosion or siltation and runoff water would be reduced to less than significant. Further the Project would have a less than significant impact related to risk releasing of pollutants due to inundation, impeding or redirecting flood flows, or conflicting with or obstructing implementation of a water quality control plan or sustainable groundwater management plan.

Alternative 4 would have a slightly smaller development footprint compared to the proposed Project. With the realignment of Barton Street, Alternative 4 would result a reduction of 4.35 acres available for Business Park development, a reduction of 1.9 acres available for Mixed-Use development, and an increase of 2.16 acres of Open Space, resulting in a corresponding slight reduction in workforce and total trips. Given Alternative 4's slightly smaller development footprint, Alternative 4's impacts to hydrology and water quality would be similar but reduced compared to the proposed Project but would still be potentially significant. With implementation of **MM-HYD-1** and

MM-HYD-2, Alternative 4's impacts to surface or groundwater quality would be reduced to less than significant levels. In addition, implementation of the SWPPP in conformance with the Construction General Permit would reduce potential discharge of polluted runoff from construction sites. Further, Project design features would ensure that post-construction runoff velocities would be less than existing conditions and would not substantially alter the existing drainage pattern of the site or area. Alternative 4's impacts to groundwater supplies and recharge would be less than significant. With implementation of **MM-HYD-3**, Alternative 4's impacts related to on- or off-site erosion or siltation and runoff water would be reduced to less than significant. Further, Alternative 4 would have a less than significant impact related to risk releasing of pollutants due to inundation, impeding or redirecting flood flows, or conflicting with or obstructing implementation of a water quality control plan or sustainable groundwater management plan. In summary, given Alternative 4's slightly smaller development footprint, Alternative 4 would have **fewer impacts to hydrology and water quality** compared to the proposed Project.

Land Use and Planning

As discussed in Recirculated Section 4.10, Land Use and Planning, with implementation of **MM-AQ-1** through **MM-AQ-2715**, **MM-BIO-1** through **MM-BIO-9**, **MM-CUL-1** through **MM-CUL-139**, **MM-GEO-1**, **MM-GEO-2**, **MM-GHG-1** through **MM-GHG-1211**, **MM-HAZ-1** through **MM-HAZ-3**, **MM-HYD-1** through **MM-HYD-3**, **MM-TRA-1** and **MM-TRA-2**, and **MM-FIRE-1** through **MM-FIRE-3**, the Project would be generally consistent ~~or partially consistent~~ with the March JPA General Plan Goals and policies, as well as the Draft Environmental Justice Element. March JPA designates the Project site as Business Park (BP), Industrial (IND) and Park/Recreation/Open Space (P/R/OS) land uses in the March JPA General Plan. The Project site has not previously been given a zoning designation by March JPA; therefore, the Project proposes zoning consistent with the proposed General Plan Amendment and Specific Plan designations of Mixed Use, Business Park (BP), Industrial (IND), Parks/Recreation/Open Space (P/R/OS), and Public Facility for the site. The Project proposes adoption of Specific Plan SP-9 consistent with applicable requirements in California Government Code Sections 65450–65457 and March JPA Development Code Chapter 9.13. The Project would be consistent with the March Development Code and the Riverside County ALUCP. Furthermore, the proposed Project would be consistent with the guiding principles, goals, and policies of SCAG's Connect SoCal and the County Good Neighbor Policy for Logistics and Warehouse/Distribution Uses. As such, with incorporation of mitigation, the Project would result in less than significant land use impacts through conflicts with plans adopted for the purpose of avoiding or mitigating an environmental effect.

Alternative 4 would have a slightly smaller development footprint compared to the proposed Project. With the realignment of Barton Street to avoid a cultural resource, Alternative 4 would result a reduction of 4.35 acres available for Business Park development, a reduction of 1.9 acres available for Mixed-Use development, and an increase of 2.16 acres of Open Space, resulting in a corresponding slight reduction in workforce and total trips. Given Alternative 4's slightly smaller development footprint, Alternative 4's land use and planning impacts would be similar but reduced compared to the proposed Project. With implementation of **MM-AQ-1** through **MM-AQ-2715**, **MM-BIO-1** through **MM-BIO-9**, **MM-CUL-1** through **MM-CUL-139**, **MM-GEO-1**, **MM-GEO-2**, **MM-GHG-1** through **MM-GHG-1211**, **MM-HAZ-1** through **MM-HAZ-3**, **MM-HYD-1** through **MM-HYD-3**, **MM-TRA-1** and **MM-TRA-2**, and **MM-FIRE-1** through **MM-FIRE-3**, Alternative 4 would be generally consistent ~~or partially consistent~~ with the March JPA General Plan Goals and policies, as well as the Draft Environmental Justice Element. Similar to the proposed Project, Alternative 4 would propose zoning consistent with the proposed General Plan Amendment and Specific Plan designations of Mixed Use, Business Park (BP), Industrial (IND), Parks/Recreation/Open Space (P/R/OS), and Public Facility for the site. Alternative 4 would also propose adoption of Specific Plan SP-9 consistent with applicable requirements in California Government Code Sections 65450–65457 and March JPA Development Code Chapter 9.13. Alternative 4 would be consistent with the March Development Code and the Riverside County ALUCP. Alternative 4 would be consistent with the guiding principles, goals, and policies of SCAG's Connect SoCal and the

County Good Neighbor Policy for Logistics and Warehouse/Distribution Uses. In summary, given Alternative 4's slightly smaller development footprint, Alternative 4 would result in *less than significant land use and planning impacts* and have *fewer land use and planning impacts* compared to the proposed Project.

Noise

As discussed in Section 4.11, Noise, the Project would not generate substantial temporary or permanent increase in ambient noise levels, with the exception of traffic noise level increases along a non-sensitive roadway segment: Cactus Avenue east of Meridian Parkway (Segment #13). Therefore, the Project would have a significant and unavoidable noise impact and no feasible mitigation measures are available to reduce Project-related significant traffic noise increases along Segment #13. All other noise and vibration impacts associated with construction and operation of the Project would be less than significant.

Alternative 4 would have a slightly smaller development footprint compared to the proposed Project. With the realignment of Barton Street, Alternative 4 would result a reduction of 4.35 acres available for Business Park development, a reduction of 1.9 acres available for Mixed-Use development, and an increase of 2.16 acres of Open Space, resulting in a corresponding slight reduction in workforce and total trips. Given Alternative 4's slightly smaller development footprint, Alternative 4's noise impacts would be similar but reduced compared to the proposed Project but would still be potentially significant. Alternative 4's reduction in vehicle trips would not be sufficient to reduce the traffic noise level increases along a non-sensitive roadway segment: Cactus Avenue east of Meridian Parkway (Segment #13). Therefore, Alternative 4 would have a significant and unavoidable noise impact and no feasible mitigation measures are available to reduce Alternative 4's significant traffic noise increases along Segment #13. All other noise and vibration impacts associated with construction and operation of Alternative 4 would be less than significant. In summary, given Alternative 4's slightly smaller development footprint, Alternative 4 would have *fewer noise impacts* compared to the proposed Project, but would still result in *significant and unavoidable noise impacts*.

Population and Housing

As discussed in Section 4.12, Population and Housing, Under the buildout scenario, it is anticipated that the Project would employ approximately 2,600 full-time employees. Based on the County's unemployment rate, this EIR assumes that the Project's employees will be primarily existing residents of Riverside County. The anticipated number of jobs generated by the Project would be a nominal addition to the County's existing and projected labor force. Thus, the employment growth that would be attributed to the Project is consistent with SCAG's overall growth projections and would not result in a substantial increase of unplanned population growth. Therefore, the Project would have a less than significant impact related to population and housing and no mitigation is required.

Alternative 4 would have a slightly smaller development footprint compared to the proposed Project. With the realignment of Barton Street, Alternative 4 would result a reduction of 4.35 acres available for Business Park development, a reduction of 1.9 acres available for Mixed-Use development, and an increase of 2.16 acres of Open Space, resulting in a corresponding slight reduction in workforce and total trips. As a result of the reduction in acreages for Business Park and Mixed-Used development, Since Alternative 4 would have a reduced workforce, Alternative 4 would have *fewer population and housing impacts* compared to the proposed Project.

Public Services

As discussed in Section 4.13, Public Services, with the implementation of **MM-FIRE-1**, the Project's impacts to fire services would be reduced to less than significant. The Project's impacts to police services, schools, parks and other public facilities would be less than significant and no mitigation is required.

Alternative 4 would have a slightly smaller development footprint compared to the proposed Project. With the realignment of Barton Street, Alternative 4 would result a reduction of 4.35 acres available for Business Park development, a reduction of 1.9 acres available for Mixed-Use development, and an increase of 2.16 acres of Open Space, resulting in a corresponding slight reduction in workforce and total trips. Given Alternative 4's slightly smaller development footprint, Alternative 4's impacts on public services would be similar but reduced compared to the proposed Project but would still be potentially significant. With the implementation of **MM-FIRE-1**, Alternative 4's impacts to fire services would be reduced to less than significant. Alternative 4's impacts to police services, schools, parks and other public facilities would be less than significant and no mitigation is required. In summary, Alternative 4 would have **fewer impacts to public services** compared to the proposed Project.

Recreation

As discussed in Section 4.14, Recreation, it is likely that the majority of the Campus Development's future employees are already residents of the nearby communities and are already using the local parks and recreational facilities. There could be an increase in demand for recreational facilities but because the Project's employees and surrounding neighborhoods would have access to the proposed 60.28-acre Park, any increased demand would not result in the need to construct additional recreational facilities under the Specific Plan buildout scenario. The recreational amenities analyzed include a playground, multiuse sports fields that could be used for soccer, football, and field hockey, and trails with cardio stops for recreational users. The impacts related to the Park's construction have been included in all of the analyses in this Draft Final EIR. Additionally, the currently existing service roads within the Conservation Easement, as depicted by the red lines on Figure 3-4, would continue to be utilized by the public for passive recreation as authorized by the March JPA, consistent with the terms of the CBD Settlement Agreement (Appendix S). Therefore, the Project would result in less than significant impacts to recreational facilities and no mitigation is required.

Alternative 4 would have a slightly smaller development footprint compared to the proposed Project. With the realignment of Barton Street, Alternative 4 would result a reduction of 4.35 acres available for Business Park development, a reduction of 1.9 acres available for Mixed-Use development, and an increase of 2.16 acres of Open Space, resulting in a corresponding slight reduction in workforce and total trips. Given Alternative 4's slightly smaller development footprint, Alternative 4's impacts on recreation would be similar but reduced compared to the proposed Project. Alternative 4 would result in a reduced demand on recreational resources compared to the proposed Project. Therefore, Alternative 4 would have **fewer recreational impacts** compared to the proposed Project.

Transportation

As discussed in Section 4.15, Transportation, with the incorporation of **MM-TRA-1** (Construction Traffic Management Plan), Project construction impacts on the circulation system would be reduced to less than significant. With implementation of **MM-TRA-2** (Traffic Safety Plan for Barton Street), the Project's operational impacts on the circulation system would be less than significant. The Specific Plan Area's impact on VMT would be less than significant. Although the Specific Plan Area is not anticipated to have a significant VMT impact, **MM-AQ-219** further reduces VMT by requiring all tenants to implement or otherwise participate in a Transportation Demand Management program,

including on-site transit pass sales and discounted passes, shuttle service to/from public transit and commercial/food establishments, if warranted, guarantee a ride home, and “commuter club” to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk or take transit to work. Additionally, **MM-GHG-11** requires the Project to provide funding for the installation of a bus shelter on Alessandro Boulevard. The Project’s potential to increase hazards due to design features or incompatible uses would be reduced to less than significant with implementation of **MM-TRA-1** and **MM-TRA-2**.

Alternative 4 would have a slightly smaller development footprint compared to the proposed Project. With the realignment of Barton Street, Alternative 4 would result a reduction of 4.35 acres available for Business Park development, a reduction of 1.9 acres available for Mixed-Use development, and an increase of 2.16 acres of Open Space, resulting in a corresponding slight reduction in workforce and total trips. Given Alternative 4’s slightly smaller development footprint, Alternative 4’s transportation impacts would be similar but reduced compared to the proposed Project but would still be potentially significant. With the incorporation of **MM-TRA-1**, Alternative 4 construction impacts on the circulation system would be reduced to less than significant. With implementation of **MM-TRA-2**, Alternative 4’s operational impacts on the circulation system would be less than significant. Alternative 4’s impact on VMT would be less than significant. Although Alternative 4 is not anticipated to have a significant VMT impact, **MM-AQ-219** further reduces VMT by requiring all tenants to implement or otherwise participate in a Transportation Demand Management program, including on-site transit pass sales and discounted passes, shuttle service to/from public transit and commercial/food establishments, if warranted, guarantee a ride home, and “commuter club” to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk or take transit to work. Additionally, **MM-GHG-11** requires Alternative 4 to provide funding for the installation of a bus shelter on Alessandro Boulevard. Alternative 4’s potential to increase hazards due to design features or incompatible uses would be reduced to less than significant with implementation of **MM-TRA-1** and **MM-TRA-2**. During construction, fewer construction worker vehicle and equipment trips would be generated because less construction activities would occur. Because of the slightly smaller development footprint, there would also be a reduction in employee trips during operation of the Alternative 4. Therefore, Alternative 4 would have **fewer transportation impacts** compared to the proposed Project.

Tribal Cultural Resources

As discussed in Section 4.16, Tribal Cultural Resources, implementation of the proposed Project would result in potentially significant impacts to tribal cultural resources. However, even with implementation of **MM-CUL-1** through **MM-CUL-138**, the Project’s impacts to tribal cultural resources would remain *significant and unavoidable*.

Alternative 4 would have a slightly smaller development footprint compared to the proposed Project. With the realignment of Barton Street to avoid a cultural resource, Alternative 4 would result a reduction of 4.35 acres available for Business Park development, a reduction of 1.9 acres available for Mixed-Use development, and an increase of 2.16 acres of Open Space, resulting in a corresponding slight reduction in workforce and total trips. Given Alternative 4 is proposed to avoid a known cultural resource, impacts to tribal cultural resources under Alternative 4 would be similar but reduced compared to the proposed Project, but would still be potentially significant. Even with the incorporation of **MM-CUL-1** through **MM-CUL-138**, Alternative 4’s impacts to tribal cultural resources would be *significant and unavoidable*. In summary, implementation of Alternative 4 may result in **fewer tribal cultural resources impacts** when compared to the proposed Project but would still be **significant and unavoidable**.

Utilities and Service Systems

As discussed in Section 4.17, Utilities and Service Systems, the Project would have less than significant impacts to facilities providing water, wastewater, storm water, electric power, natural gas, and telecommunications. There are sufficient water supplies available and wastewater treatment capacity to serve the Project, resulting in less than significant impacts. The Project would have a less than significant impact on solid waste infrastructure and capacity and would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, the Project impacts to utilities and service systems would be less than significant, and no mitigation is required.

Alternative 4 would have a slightly smaller development footprint compared to the proposed Project. With the realignment of Barton Street, Alternative 4 would result a reduction of 4.35 acres available for Business Park development, a reduction of 1.9 acres available for Mixed-Use development, and an increase of 2.16 acres of Open Space, resulting in a corresponding slight reduction in workforce and total trips. Given Alternative 4's slightly smaller development footprint, Alternative 4's operational activities would be less intense and therefore introduce fewer employees and a reduced demand for water, wastewater, electric power, telecommunications infrastructure, and solid waste services when compared to the proposed Project. Alternative 4 would have **fewer impacts to utilities and service systems** compared to the proposed Project.

Wildfire

As discussed in Section 4.18, Wildfire, the Project site is near lands classified as Very High Fire Hazard Severity Zone (FHSZ) and implementation of the proposed Project would result in potentially significant wildfire impacts. However, with implementation of **MM-FIRE-1** through **MM-FIRE-3**, as well as **MM-HYD-3**, the Project's potential to facilitate wildfire spread, exacerbate wildfire risk, or expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes would be reduced to less than significant levels.

Alternative 4 would have a slightly smaller development footprint compared to the proposed Project. With the realignment of Barton Street, Alternative 4 would result a reduction of 4.35 acres available for Business Park development, a reduction of 1.9 acres available for Mixed-Use development, and an increase of 2.16 acres of Open Space, resulting in a corresponding slight reduction in workforce and total trips. Given Alternative 4's slightly smaller development footprint, Alternative 4's wildfire impacts would be similar but reduced compared to the proposed Project but would still be potentially significant. With implementation of **MM-FIRE-1** through **MM-FIRE-3**, as well as **MM-HYD-3**, Alternative 4's potential to facilitate wildfire spread, exacerbate wildfire risk, or expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes would be reduced to less than significant levels. Therefore, Alternative 4 would have **reduced wildfire impacts** compared to the proposed Project.

6.4.5.2 Project Objectives

Under Alternative 4, Barton Street would be realigned to the east to avoid a known cultural resource site that otherwise would be directly impacted under the proposed Project during construction activities. To avoid this known cultural resource, Alternative 4 would realign this portion of Barton Street. Realigning Barton Street to the east would result in a reduction of 4.25 acres available for Business Park development, and a reduction of 1.9 acres of Mixed-Use, resulting in a corresponding slight reduction in workforce and total trips, compared to the proposed Project. Additionally, by realigning this portion of Barton Street, there would an increase of 2.16 acres of Open Space to the west of Barton Street compared to the proposed Project. As shown in Table 6-12, Alternative 4 meets each Project objective.

Table 6-12. Summary of Alternative 4 Success at Meeting Project Objectives

Project Objective	Does Alternative 4 Meet Objective?
1. Provide increased job opportunities for residents through the provision of employment-generating businesses.	Yes. Alternative 4 would provide increased job opportunities through the provision of employment-generating businesses. However, Alternative 4 would have less Business Park and Mixed-Use development. As such, Alternative 4 would achieve this objective to a lesser extent than the Project.
2. Provide open space amenities to serve the region.	Yes. Alternative 4 would provide slightly more open space amenities to serve the region compared to the proposed Project. Alternative 4 would achieve this objective to a greater extent than the Project.
3. Provide an active park consistent with the 2009 Safety Study prepared by March JPA.	Yes. Alternative 4 would provide the same 60.28-acre Park as the proposed Project. Alternative 4 would fully achieve this Project objective.
4. Complete the buildout of the roadway infrastructure by extending Cactus Avenue to the Specific Plan Area from its existing terminus, extending Barton Street from Alessandro Boulevard to Grove Community Drive, and extending Brown Street from Alessandro Boulevard to Cactus Avenue.	Yes. Although Alternative 4 would realign a portion of Barton Street to the east, Alternative 4 would provide all the same roadway infrastructure as the proposed Project. As such, Alternative 4 would fully achieve this Project objective.
5. Remove and redevelop a majority of the former munitions storage area of the March AFB.	Yes. Alternative 4 would remove and redevelop a majority of the former munitions storage area. As such, Alternative 4 would fully achieve this Project objective.
6. Encourage the use of alternative modes of transportation through the provision of a pedestrian and bicycle circulation system, which is both safe and comfortable.	Yes. Under Alternative 4, the buildout would include the provision of new roadways that could accommodate all modes of travel, including pedestrian and bicycle movement. Alternative 4 would fully achieve this Project objective.
7. Implement the terms and conditions agreed upon in the September 12, 2012, Settlement Agreement entered into between and among the CBD, the San Bernardino Valley Audubon Society, March JPA, and LNR Riverside LLC, as the complete settlement of the claims and actions raised in <i>Center for Biological Diversity v. Jim Bartel, et al.</i> to preserve open space through establishing a Conservation Easement.	Yes. Alternative 4 would place the Conservation Easement under a conservation easement. As such, Alternative 4 would fully achieve this Project objective.

6.4.6 Alternative 5 – Non-Industrial Alternative

Under Alternative 5, the Non-Industrial Alternative, the parcels adjacent to Barton Street would be designated Commercial Retail. Unlike the Project, these parcels would have access to Barton Street to provide neighborhood commercial services. With the exception of the Public Facility and Park/Recreation/Open Space parcels, the remaining acreage within the Specific Plan Area would be designated Office Park. The Project's three Industrial parcels would be divided into 15 Office Park parcels under Alternative 5. Development under Alternative 5 would involve smaller, but more numerous buildings compared to the Project. The maximum height of Alternative 5's

buildings would be 45 feet compared with the Project's 50 feet. Under Alternative 5, warehousing and other industrial activities would not be permitted under either the Commercial Retail or Office Park designations. Table 6-13 details the development square footages by land use for the Project and Alternative 5. Compared to the Project, Alternative 5 represents an approximately 7.4% decrease in the total amount of building square footage but the same amount of development square footage. Alternative 5 would generate approximately 7,821 jobs.² Alternative 5 would also include the 17 acres of open space surrounding the Specific Plan Area, the 18.08-acre public park, 42.2-acre active park, and the 445-acre Conservation Easement. See Figure 6.2 for the Alternative 5 Site Plan.

Table 6-13 Comparison of Analyzed Development – Project vs. Alternative 5

<u>Use</u>	<u>Proposed Project (square feet)</u>	<u>Alternative 5 (square feet)^a</u>	<u>Difference</u>
<u>Warehouse</u>	<u>4,296,779</u>	<u>0</u>	<u>-4,296,779</u>
<u>Office</u>	<u>528,951</u>	<u>4,243,244</u>	<u>+3,714,293</u>
<u>Retail</u>	<u>160,921</u>	<u>374,398</u>	<u>+213,477</u>
<u>Total</u>	<u>4,986,651</u>	<u>4,617,642</u>	<u>-369,009</u>

^a Alternative 5's square footages are based on a 0.25 FAR for Commercial Retail and a 0.45 FAR for Office Park

The following comparative analysis for Alternative 5 is provided for each environmental topic analyzed in the EIR.

6.4.6.1 Environmental Analysis

Aesthetics

As discussed in Section 4.1, Aesthetics, implementation of the proposed Project would not have a substantial adverse effect on a scenic vista or substantially degrade the existing visual character or quality of public views of the site and its surroundings with implementation of **MM-AES-1** (Construction Equipment Staging and Screening). Impacts would be less than significant, and no mitigation is required. With the implementation of **MM-AES-2** (Exterior Lighting Point-by-point Photometric Study Approval) and **MM-AES-3** (Solar Photovoltaic System Approval), the Project's impacts as a new source of substantial light or glare would be reduced to less than significant with mitigation incorporated.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of building square footage but the same amount of development square footage. Alternative 5 would eliminate all Industrial development. Alternative 5's smaller and shorter buildings would reduce visual impacts vertically and potentially allow for views through the development. Therefore, Alternative 5's potential impacts to scenic vistas, existing visual character and quality of public views would be reduced compared to the proposed Project. Alternative 5 would have a less than significant impact on a scenic vista, the existing visual character, and the quality of public views of the site and its surroundings with implementation of **MM-AES-1**. With a greater number of buildings requiring lighting for doorways, parking lots, etc., Alternative 5 would likely introduce more new sources of substantial light or glare than the Project and would still require implementation of **MM-AES-2** and **MM-AES-3** to reduce Alternative 5's light and glare impacts to less than

² Employee estimates for Alternative 5 are based on the Riverside County General Plan Table E-3 - Commercial Employment Factors. The March JPA Employment Data discussed in Topical Response 5 - Jobs, did not contain sufficient data to determine March JPA employment ratio for the land uses proposed under Alternative 5.

significant. In summary, notwithstanding Alternative 5's introduction of more new sources of light and glare, Alternative 5 would result in **reduced aesthetic impacts** compared to the proposed Project.

Air Quality

As discussed in Recirculated Section 4.2, Air Quality, implementation of the proposed Project would result in potentially significant air quality impacts. With implementation of **MM-AQ-1** through **MM-AQ-4**, the Specific Plan Area's construction air quality impacts would be reduced to less than significant levels. The Specific Plan Area's daily regional emissions from operations would exceed the SCAQMD thresholds of significance for emissions of VOCs, NO_x, CO, PM₁₀, and PM_{2.5} and would, therefore, per SCAQMD criteria, be cumulatively potentially significant and mitigation is required. **MM-AQ-5** through **MM-AQ-27** are designed to reduce Specific Plan Area operational-source VOCs, NO_x, CO, PM₁₀, and PM_{2.5} emissions. However, even with application of **MM-AQ-5** through **MM-AQ-27**, Specific Plan Area operational-source emissions impacts would be significant and unavoidable. Since Specific Plan Area operations would exceed the SCAQMD thresholds of significance, the Project would also conflict with the AQMP, which also results in a significant and unavoidable impact under Threshold AQ-1. The construction and operation of the Specific Plan Area would not exceed applicable LST, CO hotspot, or HRA thresholds and impacts would be less than significant. The Specific Plan Area's odor and other emissions impacts would be less than significant.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of building square footage but the same amount of development square footage. Alternative 5 would eliminate all Industrial development.

Construction Emissions: Given that Alternative 5 represents an approximately 7.4% decrease in total building square footage but the same amount of developed square footage compared to the proposed Project, construction impacts under Alternative 5 would likely be reduced. As with the proposed Project, with implementation of **MM-AQ-1** through **MM-AQ-4**, Alternative 5's construction air quality impacts would be reduced to less than significant levels.

Operational Emissions: Based on the mobile source, area source, and energy source emissions associated with Alternative 5 uses, as shown in Table 6-14 below, Alternative 5 would exceed SCAQMD's regional thresholds for VOCs, NO_x, CO, PM₁₀, and PM_{2.5}. As with the proposed Project, Alternative 5 would be subject to **MM-AQ-5**, **MM-AQ-6**, **MM-AQ-7**, **MM-AQ-10**, **MM-AQ-13**, **MM-AQ-14**, **MM-AQ-21**, **MM-AQ-26** and **MM-AQ-27**, which are designed to reduce operational-source emissions. However, there is no way to meaningfully quantify these reductions in CalEEMod, and therefore no numeric emissions credit has been taken in the analysis. As such, even with application of mitigation, Alternative 5 operational-source emissions impacts would be significant and unavoidable.

Table 6-14. Alternative 5 Regional Operational Emissions – with Mitigation

<u>Source</u>	<u>Emissions (lbs/day)</u>					
	<u>VOC</u>	<u>NO_x</u>	<u>CO</u>	<u>SO_x</u>	<u>PM₁₀</u>	<u>PM_{2.5}</u>
<u>Summer</u>						
<u>Mobile Source</u>	<u>304.02</u>	<u>361.95</u>	<u>3,596.77</u>	<u>10.07</u>	<u>927</u>	<u>240</u>
<u>Area Source</u>	<u>137.68</u>	<u>1.69</u>	<u>200.84</u>	<u>0.01</u>	<u>0.27</u>	<u>0.36</u>
<u>Energy Source</u>	<u>1.76</u>	<u>32.04</u>	<u>26.91</u>	<u>0.19</u>	<u>2.43</u>	<u>2.43</u>
<u>Total Maximum Daily Emissions</u>	<u>443.46</u>	<u>395.68</u>	<u>3,824.53</u>	<u>10.27</u>	<u>929.7</u>	<u>242.79</u>

Table 6-14. Alternative 5 Regional Operational Emissions – with Mitigation

Source	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
<u>SCAQMD Regional Threshold</u>	<u>55</u>	<u>55</u>	<u>550</u>	<u>150</u>	<u>150</u>	<u>55</u>
<u>Winter</u>						
Mobile Source	<u>287.37</u>	<u>388.32</u>	<u>2,946.19</u>	<u>9.45</u>	<u>927</u>	<u>240</u>
Area Source	<u>104.69</u>	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>
Energy Source	<u>1.76</u>	<u>32.04</u>	<u>26.91</u>	<u>0.19</u>	<u>2.43</u>	<u>2.43</u>
Total Maximum Daily Emissions	<u>393.82</u>	<u>420.36</u>	<u>2,973.10</u>	<u>9.64</u>	<u>929.43</u>	<u>242.43</u>
<u>SCAQMD Regional Threshold</u>	<u>55</u>	<u>55</u>	<u>550</u>	<u>150</u>	<u>150</u>	<u>55</u>
Threshold Exceeded?	<u>Yes</u>	<u>Yes</u>	<u>Yes</u>	<u>No</u>	<u>Yes</u>	<u>Yes</u>

Source: Final EIR Appendix R-3.

As shown in Table 6-15, Alternative 5 is anticipated to generate more emissions per day for all criteria air pollutants (VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5}) as compared to emissions generated by the proposed Project.

Table 6-15. Alternative 5 Operational Emissions Comparison

Source	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
<u>Summer</u>						
Alternative 5	<u>443.46</u>	<u>395.68</u>	<u>3,824.53</u>	<u>10.27</u>	<u>929.70</u>	<u>242.79</u>
Proposed Project	<u>349.51</u>	<u>351.05</u>	<u>2,218.17</u>	<u>7.01</u>	<u>578.51</u>	<u>152.42</u>
Emissions Comparison (Alternative 5 - Project)	<u>+93.95</u>	<u>+44.63</u>	<u>+1,606.35</u>	<u>+3.26</u>	<u>+351.19</u>	<u>+90.37</u>
<u>Winter</u>						
Alternative 5	<u>393.82</u>	<u>420.36</u>	<u>2,973.10</u>	<u>9.64</u>	<u>929.43</u>	<u>242.43</u>
Proposed Project	<u>341.51</u>	<u>371.05</u>	<u>1,832.17</u>	<u>6.63</u>	<u>578.51</u>	<u>152.42</u>
Emissions Comparison (Alternative 5 - Project)	<u>+52.31</u>	<u>+49.31</u>	<u>+1,140.93</u>	<u>+3.01</u>	<u>+350.92</u>	<u>+90.01</u>

Source: Appendix R-3.

As such, and as is the case with the proposed Project, even with application of **MM-AQ-5, MM-AQ-6, MM-AQ-7, MM-AQ-10, MM-AQ-13, MM-AQ-14, MM-AQ-21, MM-AQ-26 and MM-AQ-27**, Alternative 5 operational-source emissions impacts would be significant and unavoidable. Since Alternative 5 operations would exceed the SCAQMD thresholds of significance, Alternative 5 would also conflict with the AQMP, an additional **significant and unavoidable** impact.

Operational Health Risk Assessment: Alternative 5 assumes the development of 374,398 square feet of commercial retail use and 4,243,244 square feet of Office Park use. Warehouse uses would not be permitted under Alternative 5. Based on the West Campus Upper Plateau Alternative 5 Trip Generation Assessment (Appendix R-5), Alternative 5 would be expected to generate 65,482 two-way passenger vehicle trips and 34 two-way truck trips

per day (in actual vehicles). As noted in Recirculated Section 4.2, Air Quality, the Project would generate diesel particulate matter (DPM) emissions during operations by trucks traveling to and from the Project site. During the operations, Alternative 5 would result in significantly fewer truck trips, an approximately 98% reduction, compared to the proposed Project. As such, Alternative 5 would result in **lower DPM emissions** and therefore lower cancer and non-cancer health risks for nearby residents, workers, and school children. As such, like the Project, Alternative 5 would not cause a significant health or cancer risk to nearby residents, workers, or school children. Similar to the proposed Project, Alternative 5's odor and other emissions impacts would be **less than significant**.

In summary, Alternative 5 would result in **more criteria air quality pollutant emissions yet fewer DPM emissions** when compared to the Project. Air quality impacts would still be considered **significant and unavoidable** under Alternative 5.

Biological Resources

As discussed in Section 4.3, Biological Resources, implementation of the proposed Project would result in potentially significant biological impacts. The Specific Plan Area's effect on special status plant and wildlife species, direct impacts on burrowing owl, San Diego black tailed jackrabbit, coast horned lizard, coastal whiptail, orange-throated whiptail, and western yellow bat, Cooper's hawk, Lawrence's goldfinch, northern harrier, sharp-shinned hawk, yellow warbler, and California horned lark and indirect impacts on Least Bell's Vireo and Stephens' Kangaroo Rat, would be reduced to less than significant with the implementation of **MM-BIO-1** (Best Management Practices), **MM-BIO-2** (Least Bell's Vireo), **MM-BIO-3** (Operation-Related Indirect Impacts to Special-Status Wildlife), **MM-BIO-4** (Stephens' Kangaroo Rat Avoidance), **MM-BIO-5A** (Burrowing Owl Avoidance and Mitigation Measures)/**MM-BIO-5B** (Burrowing Owl Relocation and Mitigation Plan), **MM-BIO-6** (San Diego Black-Tailed Jackrabbit), and **MM-BIO-7** (Nesting Bird Avoidance and Minimization Measures). The Specific Plan Area's effect on riparian habitat or other sensitive natural communities would be reduced to less than significant with implementation of **MM-BIO-8** (Upland Vegetation Communities) and **MM-BIO-9** (Aquatic Resources Mitigation). The Specific Plan Area's effect on state or federally protected wetlands would be reduced to less than significant with implementation of **MM-BIO-9**. The Specific Plan would have less than significant impacts to the movement of fish/wildlife, wildlife corridors, or native wildlife nursery sites. The Specific Plan's conflicts with local policies/ordinances protecting biological resources would be reduced to less than significant with the implementation of **MM-BIO-1** through **MM-BIO-9**. The Specific Plan's conflicts with an adopted HCP or other conservation plan would be reduced to less than significant with implementation of **MM-BIO-4**, **MM-BIO-5A/MM-BIO-5B**, **MM-BIO-6**, and **MM-BIO-9**. As such, with implementation of **MM-BIO-1** through **MM-BIO-9**, the Project's impacts to biological resources would be reduced to less than significant levels.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of building square footage but the same amount of development square footage. Alternative 5 would eliminate all Industrial development. Since Alternative 5 would have the same development footprint as the proposed Project, impacts to biological resources under Alternative 5 would be similar compared to the proposed Project, and would be potentially significant. Similar to the Project, Alternative 5's effect on special status plant and wildlife species, direct impacts on burrowing owl, San Diego black tailed jackrabbit, coast horned lizard, coastal whiptail, orange-throated whiptail, and western yellow bat, Cooper's hawk, Lawrence's goldfinch, northern harrier, sharp-shinned hawk, yellow warbler, and California horned lark and indirect impacts on Least Bell's Vireo and Stephens' Kangaroo Rat, would be reduced to less than significant with the implementation of **MM-BIO-1** through **MM-BIO-7**. Alternative 5's effect on riparian habitat or other sensitive natural communities would be reduced to less than significant with implementation of **MM-BIO-8** and **MM-BIO-9**. Alternative 5's effect on state or federally protected wetlands would be reduced to less than significant with implementation of **MM-BIO-9**.

Alternative 5 would have less than significant impacts to the movement of fish/wildlife, wildlife corridors, or native wildlife nursery sites. Alternative 5's conflicts with local policies/ordinances protecting biological resources would be reduced to less than significant with the implementation of MM-BIO-1 through MM-BIO-9. Alternative 5's conflicts with an adopted HCP or other conservation plan would be reduced to less than significant with implementation of MM-BIO-4, MM-BIO-5A/MM-BIO-5B, MM-BIO-6, and MM-BIO-9. In summary, notwithstanding Alternative 5's reduced industrial development, Alternative 5 would have *similar biological resources impacts* compared to the proposed Project.

Cultural Resources

As discussed in Section 4.4, Cultural Resources, implementation of the proposed Project would result in potentially significant impacts to cultural resources. However, even with the incorporation of MM-CUL-1 through MM-CUL-11 and MM-CUL-13, the Project's impacts associated with historical and archaeological resources would be significant and unavoidable. With implementation of MM-CUL-12, impacts to human remains would be less than significant.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of building square footage but the same amount of development square footage. Alternative 5 would eliminate all Industrial development. Since Alternative 5 has the same development footprint as the proposed Project, impacts to cultural resources under Alternative 5 would be similar compared to the proposed Project, and would be potentially significant. Even with the incorporation of MM-CUL-1 through MM-CUL-11 and MM-CUL-13, Alternative 5's impacts to historical and archaeological resources would be *significant and unavoidable*. With implementation of MM-CUL-12, Alternative 5's impacts to human remains would be *less than significant*. In summary, notwithstanding Alternative 5's reduced industrial development, Alternative 5 would have *similar cultural resources impacts* compared to the proposed Project and would result in *significant and unavoidable* impacts to historical and archaeological resources.

Energy

As discussed in Section 4.5, Energy, construction and operation of the proposed Project would not result in wasteful, inefficient, or unnecessary consumption of energy or conflict with or obstruct a state or local plan for renewable energy or energy efficiency and the Project's energy impacts would be less than significant. Incorporation of MM-GHG-1 through MM-GHG-12 and MM-AQ-1 through MM-AQ-27 would further reduce the Project's energy use.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of building square footage but the same amount of development square footage. Alternative 5 would eliminate all Industrial development. Given Alternative 5 represents an approximately 7.4% decrease in total building square footage but the same amount of developed square footage, energy impacts during construction would likely be reduced compared to those of the proposed Project. Under operations, the electricity consumption associated with Alternative 5 would be approximately 77,672,577 kilowatt-hours per year compared to the proposed Project's consumption of approximately 45,862,987 kilowatt-hours per year. (Appendix R-3) This approximately 70% increase in electrical consumption, associated with increases related to building lighting, computer use, climate control, etc., is due to the higher electrical demand of Alternative 5's proposed land uses. Alternative 5's fuel consumption would be approximately 13,222,383 gallons per year compared to the proposed Project's consumption of approximately 8,606,089 gallons per year (Appendix R-3). This approximately 54% increase in fuel consumption is due to the higher vehicle trips of

Alternative 5's proposed land uses. While Alternative 5 would incorporate MM-GHG-1 through MM-GHG-12 and MM-AQ-1 through MM-AQ-27. Alternative 5 would have *increased energy impacts* compared to the proposed Project.

Geology and Soils

As discussed in Section 4.6, Geology and Soils, implementation of the proposed Project would result in potentially significant impacts to geology and soils. The Specific Plan Area would have less than significant impacts with regard to strong seismic ground shaking, seismic-related ground failure, and expansive soils. With the implementation of MM-GEO-1 (Slope Stability), the Project's impacts related to landslides and unstable soil would be reduced to less than significant. The Specific Plan Area's impacts to paleontological resources and site or unique geologic features would be reduced to less than significant with incorporation of MM-GEO-2 (Paleontological Resources).

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of building square footage but the same amount of development square footage. Alternative 5 would eliminate all Industrial development. Since Alternative 5 has the same development footprint as the proposed Project, Alternative 5's impacts to geology and soils would be similar compared to the proposed Project and would be potentially significant. Alternative 5 would have less than significant impacts with regard to strong seismic ground shaking, seismic-related ground failure, and expansive soils. Similar to the Project, with the implementation of MM-GEO-1, Alternative 5's impacts related to landslides and unstable soil would be reduced to less than significant. Alternative 5's impacts to paleontological resources and site or unique geologic features would be reduced to less than significant with incorporation of MM-GEO-2. In summary, notwithstanding Alternative 5's reduced industrial development, Alternative 5 would have *similar impacts to geology and soils* compared to the proposed Project.

Greenhouse Gas Emissions

As discussed in Section 4.7, Greenhouse Gas Emissions, implementation of the proposed Project would result in potentially significant GHG impacts because it could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. However, with implementation of MM-GHG-1 through MM-GHG-12, the Project would be consistent with the applicable plans, including the County CAP, and GHG impacts would be reduced to less than significant levels. Additionally, the Project would not conflict with any of the Senate Bill 32/2017 Scoping Plan elements since any regulations adopted would apply directly or indirectly to the Project. Furthermore, the proposed Project represents 1.24% of the anticipated increase in jobs for the WRCOG region, and therefore, would not result in long-term operational employment growth that exceeds planned growth projections in the RTP/SCS or an Air Quality Management Plan, or result in employment growth that would substantially add to traffic congestion.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of building square footage but the same amount of development square footage. Alternative 5 would eliminate all Industrial development. Alternative 5 would result in GHG emissions equating to 140,661.92 CO₂e, compared to the proposed Project's GHG emissions of 92,591.99 CO₂e. (Appendix R-3) This approximately 52% increase is due to the higher GHG emissions from vehicle trips, use of electricity, etc., associated with Alternative 5's proposed land uses. With implementation of MM-GHG-1 through MM-GHG-12, Alternative 5 would likely not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. While both Alternative 5 and the proposed Project would be consistent with applicable

plans, including the County CAP, with the implementation of **MM-GHG-1** through **MM-GHG-12**, Alternative 5 would still result in **increased GHG impacts** compared to the proposed Project.

Hazards and Hazardous Materials

As discussed in Recirculated Section 4.8, Hazards and Hazardous Materials, implementation of the proposed Project would result in potentially significant hazard and hazardous materials impacts. During construction of the Specific Plan Area, implementation of **MM-HAZ-1** would reduce the Project's impacts involving the routine transport, use, or disposal of hazardous materials. During operations, the Project would have a less than significant impact with regards to reasonably foreseeable upset and accident conditions involving the release of hazardous materials. Given the proximity of the neighboring preschool at Community Grove Church, **MM-HAZ-2** is required to reduce potentially significant impacts associated with Project uses emitting and/or handling hazardous materials within one-quarter mile of an existing or planned school. With implementation of **MM-HAZ-3**, the Project's proximity to March ARB/Inland Port Airport would not result in a safety hazard or excessive noise for people residing or working in the Project area. **MM-FIRE-1** would reduce the Project's impacts involving wildland fires. With implementation of **MM-HAZ-1**, **MM-HAZ-2**, **MM-HAZ-3**, and **MM-FIRE-1**, the Project's hazards and hazardous materials impacts would be reduced to less than significant levels.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of building square footage but the same amount of development square footage. Alternative 5 would eliminate all Industrial development. During Alternative 5 construction, implementation of **MM-HAZ-1** would reduce Alternative 5's impacts involving the routine transport, use, or disposal of hazardous materials. As with the proposed Project, these impacts would be less than significant. During operations, Alternative 5 would have a less than significant impact with regards to reasonably foreseeable upset and accident conditions involving the release of hazardous materials. The development footprint under Alternative 5 would still introduce new uses within proximity of the preschool, and as such, **MM-HAZ-2** would still be required under Alternative 5, although land uses proposed under Alternative 5 would be less likely to require toxic or highly toxic gases. With implementation of **MM-HAZ-3**, Alternative 5's proximity to March ARB/Inland Port Airport would not result in a safety hazard or excessive noise for people residing or working in the Project area. **MM-FIRE-1** would reduce Alternative 5's impacts involving wildland fires to less than significant levels. In summary, given Alternative 5 would result in development on the same footprint of the Project site, Alternative 5 would have **similar impacts related to hazards and hazardous materials** to the proposed Project.

Hydrology and Water Quality

As discussed in Section 4.9, Hydrology and Water Quality, implementation of the proposed Project would result in potentially significant impacts to hydrology and water quality. With implementation of **MM-HYD-1** (Interim Soil Stabilization Plan) and **MM-HYD-2** (Water Quality Management Plan), the Project's impacts to surface or groundwater quality would be reduced to less than significant levels. In addition, implementation of the Storm Water Pollution Prevention Plan (SWPPP) in conformance with the Construction General Permit would reduce potential discharge of polluted runoff from construction sites. Further, Project design features would ensure that post-construction runoff velocities would be less than existing conditions and would not substantially alter the existing drainage pattern of the site or area. The Project's impacts to groundwater supplies and recharge would be less than significant. With implementation of **MM-HYD-3** (Hydrology/Drainage Study), the Project's impacts related to on- or off-site erosion or siltation and runoff water would be reduced to less than significant. Further the Project would have a less than significant impact related to risk releasing of pollutants due to inundation, impeding or redirecting flood flows,

or conflicting with or obstructing implementation of a water quality control plan or sustainable groundwater management plan.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of building square footage but the same amount of development square footage. Alternative 5 would eliminate all Industrial development. Since Alternative 5 has the same development footprint as the proposed Project, Alternative 5's impacts to hydrology and water quality would be similar compared to the proposed Project and would be potentially significant. Similar to the Project, with implementation of MM-HYD-1 and MM-HYD-2, Alternative 5's impacts to surface or groundwater quality would be reduced to less than significant levels. In addition, implementation of the SWPPP in conformance with the Construction General Permit would reduce potential discharge of polluted runoff from construction sites. Further, Project design features would ensure that post-construction runoff velocities would be less than existing conditions and would not substantially alter the existing drainage pattern of the site or area. Alternative 5's impacts to groundwater supplies and recharge would be less than significant. With implementation of MM-HYD-3, Alternative 5's impacts related to on- or off-site erosion or siltation and runoff water would be reduced to less than significant. Further, Alternative 5 would have a less than significant impact related to risk releasing of pollutants due to inundation, impeding or redirecting flood flows, or conflicting with or obstructing implementation of a water quality control plan or sustainable groundwater management plan. In summary, notwithstanding Alternative 5's reduced industrial development, Alternative 5 would have *similar impacts to hydrology and water quality* compared to the proposed Project.

Land Use and Planning

As discussed in Recirculated Section 4.10, Land Use and Planning, with implementation of MM-AQ-1 through MM-AQ-27, MM-BIO-1 through MM-BIO-9, MM-CUL-1 through MM-CUL-13, MM-GEO-1, MM-GEO-2, MM-GHG-1 through MM-GHG-12, MM-HAZ-1 through MM-HAZ-3, MM-HYD-1 through MM-HYD-3, MM-TRA-1 and MM-TRA-2, and MM-FIRE-1 through MM-FIRE-3, the Project would be generally consistent with the March JPA General Plan goals and policies, as well as the Draft Environmental Justice Element. March JPA designates the Project site as Business Park (BP), Industrial (IND), and Park/Recreation/Open Space (P/R/OS) land uses in the March JPA General Plan. The Project site has not previously been given a zoning designation by March JPA; therefore, the Project proposes zoning consistent with the proposed General Plan Amendment and Specific Plan designations of Mixed Use, Business Park (BP), Industrial (IND), Parks/Recreation/Open Space (P/R/OS), and Public Facility for the site. The Project proposes adoption of Specific Plan SP-9 consistent with applicable requirements in California Government Code Sections 65450–65457 and March JPA Development Code Chapter 9.13. The Project would be consistent with the March Development Code and the Riverside County ALUCP. Furthermore, the proposed Project would implement the guiding principles, goals, and policies of SCAG's Connect SoCal and the County Good Neighbor Policy for Logistics and Warehouse/Distribution Uses. As such, with incorporation of mitigation, the Project would result in less than significant land use impacts through conflicts with plans adopted for the purpose of avoiding or mitigating an environmental effect.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of building square footage but the same amount of development square footage. Alternative 5 would eliminate all Industrial development. As such, Alternative 5's land use and planning impacts would be similar to the proposed Project. With implementation of MM-AQ-1 through MM-AQ-4, MM-AQ-5 through MM-AQ-7, MM-AQ-10, MM-AQ-13, MM-AQ-14, MM-AQ-21, MM-AQ-24, MM-AQ-26, MM-AQ-27, MM-BIO-1 through MM-BIO-9, MM-CUL-1 through MM-CUL-13, MM-GEO-1, MM-GEO-2, MM-GHG-1 through

MM-GHG-12, MM-HAZ-1 through MM-HAZ-3, MM-HYD-1 through MM-HYD-3, MM-TRA-1 and MM-TRA-2, and MM-FIRE-1 through MM-FIRE-3, Alternative 5 would be generally consistent with the March JPA General Plan Goals and policies, as well as the Draft Environmental Justice Element. Similar to the proposed Project, Alternative 5 would propose zoning consistent with the proposed General Plan Amendment and Specific Plan designations of Commercial Retail, Office Park (OP), Parks/Recreation/Open Space (P/R/OS), and Public Facility for the site. Alternative 5 would also include adoption of Specific Plan SP-9 consistent with applicable requirements in California Government Code Sections 65450–65457 and March JPA Development Code Chapter 9.13. Alternative 5 would be consistent with the March Development Code and the Riverside County ALUCP. Alternative 5 would be consistent with the guiding principles, goals, and policies of SCAG’s Connect SoCal and the County Good Neighbor Policy for Logistics and Warehouse/Distribution Uses. In summary, Alternative 5 would result in less than significant land use and planning impacts and have *similar land use and planning impacts* to the proposed Project.

Noise

As discussed in Section 4.11, Noise, the Project would not generate substantial temporary or permanent increase in ambient noise levels, with the exception of traffic noise level increases along a non-sensitive roadway segment: Cactus Avenue east of Meridian Parkway (Segment #13). Therefore, the Project would have a significant and unavoidable noise impact and no feasible mitigation measures are available to reduce Project-related significant traffic noise increases along Segment #13. All other noise and vibration impacts associated with construction and operation of the Project would be less than significant.

Alternative 5 would have the same development footprint as the proposed Project, but the Project’s three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of building square footage but the same amount of development square footage. Alternative 5 would eliminate all Industrial development. As construction and grading activities would be reduced under Alternative 5, construction noise levels would be reduced compared to those of the proposed Project.

According to the West Campus Upper Plateau Alternative 5 Trip Generation Assessment prepared by Urban Crossroads, Inc. (Appendix R-5), Alternative 5 is anticipated to generate a total of 65,516 daily vehicles trips with 34 truck trips. The proposed Project evaluated in this Final EIR included 33,260 daily vehicle trips with 2,054 truck trips. Therefore, Alternative 5 represents a near doubling of the vehicle trips (+32,222) and a substantial reduction of truck trips (-2,020). The Federal Highway Administration (FHWA) noise prediction model is significantly influenced by the number of heavy trucks in the vehicle mix. Table 6-17, Off-Site Traffic Noise Level Increases, presents a summary of the Project related off-site traffic noise level increases. As shown on therein, the unmitigated off-site traffic noise levels increase evaluated for the proposed Project would range from 0.0 to 4.4 dBA CNEL, while the off-site traffic noise level increases for Alternative 5 would range from 0.0 to 1.8 dBA CNEL. As such, off-site traffic noise level increases would be reduced under Alternative 5 due to the reduction in the number of heavy trucks.

Table 6-17. Off-Site Traffic Noise Level Increases

Road	Segment	Receiving Land Use	Incremental Noise Level Increase Summary (dBA CNEL) ²							
			Project				Alternative 5			
			E	EA	OYC	HY	E	EA	OYC	HY
<u>Alessandro Blvd.</u>	<u>s/o Arlington Av.</u>	<u>Sensitive</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.0</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>
<u>Alessandro Blvd.</u>	<u>s/o Canyon Crest Dr.</u>	<u>Sensitive</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.2</u>	<u>0.2</u>	<u>0.2</u>	<u>0.1</u>
<u>Trautwein Rd.</u>	<u>n/o Van Buren Blvd.</u>	<u>Sensitive</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
<u>Barton St.</u>	<u>n/o Van Buren Blvd.</u>	<u>Sensitive</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.0</u>	<u>0.3</u>	<u>0.3</u>	<u>0.2</u>	<u>0.1</u>
<u>Sycamore Canyon Blvd.</u>	<u>n/o Cottonwood Av.</u>	<u>Non-Sensitive</u>	<u>0.6</u>	<u>0.5</u>	<u>0.5</u>	<u>0.4</u>	<u>0.2</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>
<u>Meridian Pkwy.</u>	<u>n/o Van Buren Blvd.</u>	<u>Non-Sensitive</u>	<u>1.6</u>	<u>1.4</u>	<u>1.3</u>	<u>1.1</u>	<u>1.3</u>	<u>1.2</u>	<u>1.0</u>	<u>0.9</u>
<u>Day St.</u>	<u>n/o Alessandro Blvd.</u>	<u>Sensitive</u>	<u>0.1</u>	<u>0.1</u>	<u>0.0</u>	<u>0.0</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.0</u>
<u>Frederick St.</u>	<u>n/o Cactus Av.</u>	<u>Non-Sensitive</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.2</u>	<u>0.2</u>	<u>0.2</u>	<u>0.1</u>
<u>Alessandro Blvd.</u>	<u>w/o Barton St.</u>	<u>Sensitive</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.3</u>	<u>0.2</u>	<u>0.2</u>	<u>0.2</u>
<u>Alessandro Blvd.</u>	<u>e/o Barton St.</u>	<u>Sensitive</u>	<u>0.1</u>	<u>0.1</u>	<u>0.2</u>	<u>0.1</u>	<u>0.3</u>	<u>0.2</u>	<u>0.3</u>	<u>0.2</u>
<u>Alessandro Blvd.</u>	<u>e/o Meridian Pkwy.</u>	<u>Non-Sensitive</u>	<u>0.2</u>	<u>0.2</u>	<u>0.2</u>	<u>0.2</u>	<u>0.4</u>	<u>0.3</u>	<u>0.3</u>	<u>0.3</u>
<u>Alessandro Blvd.</u>	<u>w/o Day St.</u>	<u>Sensitive</u>	<u>0.0</u>	<u>0.0</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>
<u>Cactus Av.</u>	<u>e/o Meridian Pkwy.</u>	<u>Non-Sensitive</u>	<u>4.4</u>	<u>4.0</u>	<u>4.0</u>	<u>3.4</u>	<u>1.8</u>	<u>1.6</u>	<u>1.6</u>	<u>1.3</u>
<u>Cactus Av.</u>	<u>w/o Elsworth St.</u>	<u>Non-Sensitive</u>	<u>0.2</u>	<u>0.2</u>	<u>0.2</u>	<u>0.2</u>	<u>0.2</u>	<u>0.1</u>	<u>0.2</u>	<u>0.1</u>
<u>Orange Terrace Pkwy.</u>	<u>e/o Trautwein Rd.</u>	<u>Sensitive</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>	<u>0.0</u>
<u>Van Buren Blvd.</u>	<u>w/o Wood Rd.</u>	<u>Sensitive</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.2</u>	<u>0.2</u>	<u>0.2</u>	<u>0.1</u>
<u>Van Buren Blvd.</u>	<u>e/o Wood Rd.</u>	<u>Sensitive</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.1</u>	<u>0.2</u>	<u>0.2</u>	<u>0.2</u>	<u>0.1</u>
<u>Van Buren Blvd.</u>	<u>e/o Orange Terrace Pkwy.</u>	<u>Sensitive</u>	<u>0.2</u>	<u>0.2</u>	<u>0.1</u>	<u>0.1</u>	<u>0.4</u>	<u>0.3</u>	<u>0.3</u>	<u>0.2</u>
<u>Van Buren Blvd.</u>	<u>e/o Meridian Pkwy.</u>	<u>Non-Sensitive</u>	<u>0.5</u>	<u>0.4</u>	<u>0.2</u>	<u>0.2</u>	<u>0.1</u>	<u>0.1</u>	<u>0.0</u>	<u>0.1</u>

Source: Appendix R-4.

Table 6-18, Off-Site Traffic Noise Threshold Exceedances, shows that Segment #13 (Cactus Avenue east of Meridian Parkway) would experience potentially significant off-site traffic noise level increases due to the proposed Project. Based on the significance criteria for off-site traffic noise presented in the Noise Study prepared for the proposed Project (Appendix M-1), land uses adjacent to all the study area roadway segments would experience **reduced as well as less than significant** noise level increases on receiving land uses due to Alternative 5-related traffic.

Table 6-18. Off-Site Traffic Noise Threshold Exceedances

ID	Road	Segment	Limit	Incremental Noise Level Increase Summary (dBA CNEL) ²							
				Project				Project			
				E	EA	OYC	HY	E	EA	OYC	HY
<u>1</u>	<u>Alessandro Blvd.</u>	<u>s/o Arlington Av.</u>	<u>1.5</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>
<u>2</u>	<u>Alessandro Blvd.</u>	<u>s/o Canyon Crest Dr.</u>	<u>1.5</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>
<u>3</u>	<u>Trautwein Rd.</u>	<u>n/o Van Buren Blvd.</u>	<u>1.5</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>
<u>4</u>	<u>Barton St.</u>	<u>n/o Van Buren Blvd.</u>	<u>1.5</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>
<u>5</u>	<u>Sycamore Canyon Blvd.</u>	<u>n/o Cottonwood Av.</u>	<u>3.0</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>
<u>6</u>	<u>Meridian Pkwy.</u>	<u>n/o Van Buren Blvd.</u>	<u>3.0</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>
<u>7</u>	<u>Day St.</u>	<u>n/o Alessandro Blvd.</u>	<u>1.5</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>
<u>8</u>	<u>Frederick St.</u>	<u>n/o Cactus Av.</u>	<u>3.0</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>
<u>9</u>	<u>Alessandro Blvd.</u>	<u>w/o Barton St.</u>	<u>1.5</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>
<u>10</u>	<u>Alessandro Blvd.</u>	<u>e/o Barton St.</u>	<u>1.5</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>
<u>11</u>	<u>Alessandro Blvd.</u>	<u>e/o Meridian Pkwy.</u>	<u>3.0</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>
<u>12</u>	<u>Alessandro Blvd.</u>	<u>w/o Day St.</u>	<u>1.5</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>
<u>13</u>	<u>Cactus Av.</u>	<u>e/o Meridian Pkwy.</u>	<u>3.0</u>	Yes	Yes	Yes	Yes	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>
<u>14</u>	<u>Cactus Av.</u>	<u>w/o Elsworth St.</u>	<u>3.0</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>
<u>15</u>	<u>Orange Terrace Pkwy.</u>	<u>e/o Trautwein Rd.</u>	<u>1.5</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>
<u>16</u>	<u>Van Buren Blvd.</u>	<u>w/o Wood Rd.</u>	<u>1.5</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>
<u>17</u>	<u>Van Buren Blvd.</u>	<u>e/o Wood Rd.</u>	<u>1.5</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>
<u>18</u>	<u>Van Buren Blvd.</u>	<u>e/o Orange Terrace Pkwy.</u>	<u>1.5</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>
<u>19</u>	<u>Van Buren Blvd.</u>	<u>e/o Meridian Pkwy.</u>	<u>3.0</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>	<u>No</u>

Source: Appendix R-4.

As discussed in Section 4.11, Noise, of the EIR, the on-site Project-related noise sources are expected to include: loading dock activity, roof-top air conditioning, trash enclosure activity, and parking lot vehicle movements, truck movements, and park activities. Under Table 4.11-24, Hourly Average Noise Level Measurements for Reference Sound Sources, loading dock activities (65.7 dBA L_{eq}) and truck movements (59.8 dBA L_{eq}) represent the noisiest Project-related operational activities. For Alternative 5, on-site related noise sources are expected to include similar types of noise source activities without the heavy truck movements associated with loading docks or truck movements needed to support the proposed Project industrial/warehouse land uses. In addition, due to the commercial retail/Office Park use associated with Alternative 5, other noise sources activities may be included as part of the Alternative 5 land use. This could include noise source activities such as fast-food restaurant drive-through speakerphones and/or gas stations fueling. Table 6-19, Alternative 5 Reference Noise Level Measurements, presents a summary of the reference noise level measurements needed to assess the on-site

Alternative 5 land uses. As shown on Table 6-19, none of the on-site Alternative 5 operational noise sources are as loud as loading dock activity and truck movements.

Alternative 5 would involve a slightly reduced amount of development as the Project but would not include noise from loading dock activity or truck movements. It is anticipated Alternative 5's on-site operational noise would be **reduced** as compared to the Project.

Table 6-19. Alternative 5 Reference Noise Level Measurements

Noise Source	Noise Source Height (feet)	Minutes within Hour		Reference Noise Level (dBA Leq at 50 feet)	Sound Power Level (dBA)
		Day	Night		
Roof-Top Air Conditioning Units	5'	39	28	57.2	88.9
Drive-Thru Activity	3'	60	60	51.5	83.2
Trash Enclosure Activity	5'	10	10	57.3	89.0
Gas Station Activity	5'	60	60	48.2	79.9

Source: Appendix R-4.

In summary, Alternative 5 would have **fewer noise impacts** compared to the proposed Project and would reduce an identified significant and unavoidable operational noise impact to a **less than significant level**.

Population and Housing

As discussed in Section 4.12, Population and Housing, under the buildout scenario, it is anticipated that the Project would create approximately 3,622 full-time jobs. Based on the County's unemployment rate, this EIR assumes that the Project's employees will be primarily existing residents of Riverside County (see Topical Response 5 – Jobs). The anticipated number of jobs generated by the Project would be a nominal addition to the County's existing and projected labor force. Thus, the employment growth that would be attributed to the Project is consistent with SCAG's overall growth projections and would not result in a substantial increase of unplanned population growth. Therefore, the Project would have a less than significant impact related to population and housing and no mitigation is required.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of building square footage but the same amount of development square footage. Alternative 5 would eliminate all Industrial development. Alternative 5 would generate approximately 7,821 jobs compared to the Project's 3,622 jobs. This 116% increase in jobs would account for a larger percentage of SCAG's 2030 projections (5.67% of 138,000 jobs) and 2045 projections (2.79% of 280,000 jobs) for Riverside County but a nominal percentage (0.95%) of the County's estimated 2019 labor force.³ The employment growth that would be attributed to Alternative 5 is consistent with SCAG's overall growth projections and would not result in a substantial increase of unplanned population growth. Therefore, Alternative 5 would have **comparable population and housing impacts** to the proposed Project.

³ $7,821 \div 823,000 = 0.0095 \times 100 = 0.95\%$

Public Services

As discussed in Section 4.13, Public Services, with the implementation of MM-FIRE-1, the Project's impacts to fire services would be reduced to less than significant. The Project's impacts to police services, schools, parks and other public facilities would be less than significant and no mitigation is required.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of building square footage but the same amount of development square footage. Alternative 5 would eliminate all Industrial development. Alternative 5 would generate approximately 7,821 jobs and as such, there is the potential for Alternative 5 to result in greater impacts to public services but not to the extent that additional facilities would need to be constructed. Alternative 5 would have **increased impacts to public services** compared to the proposed Project due to the increased number of employees at the Project site.

Recreation

As discussed in Section 4.14, Recreation, it is likely that the majority of the Campus Development's future employees are already residents of the nearby communities and are already using the local parks and recreational facilities. There could be an increase in demand for recreational facilities but because the Project's employees and surrounding neighborhoods would have access to the proposed 60.28-acre Park, any increased demand would not result in the need to construct additional recreational facilities under the Specific Plan buildout scenario. The recreational amenities analyzed include a playground, multiuse sports fields that could be used for soccer, football, and field hockey, and trails with cardio stops for recreational users. The impacts related to the Park's construction have been included in all of the analyses in this EIR. Additionally, the currently existing service roads within the Conservation Easement, as depicted by the red lines on Figure 3-4, would continue to be utilized by the public for passive recreation as authorized by March JPA, consistent with the terms of the CBD Settlement Agreement (Appendix S). Therefore, the Project would result in less than significant impacts to recreational facilities and no mitigation is required.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of building square footage but the same amount of development square footage. Alternative 5 would eliminate all Industrial development. The proposed Public Facility and Park/Recreation/Open Space components of Alternative 5 would be the same as the proposed Project. Alternative 5 would result in the creation of 5,221 more jobs at the Project site than the proposed Project, and as such, there is the potential for Alternative 5 to result in greater impacts to recreation. Alternative 5 has the potential to result in an increased demand on recreational resources compared to the proposed Project. Therefore, Alternative 5 would have **increased recreational impacts** compared to the proposed Project.

Transportation

As discussed in Section 4.15, Transportation, with the incorporation of MM-TRA-1 (Construction Traffic Management Plan), Project construction impacts on the circulation system would be reduced to less than significant. With implementation of MM-TRA-2 (Traffic Safety Plan for Barton Street), the Project's operational impacts on the circulation system would be less than significant. The Specific Plan Area's impact on VMT would be less than significant. Although the Specific Plan Area is not anticipated to have a significant VMT impact, MM-AQ-21 further reduces VMT by requiring

all tenants to implement or otherwise participate in a Transportation Demand Management program, including on-site transit pass sales and discounted passes, shuttle service to/from public transit and commercial/food establishments, if warranted, guarantee a ride home, and “commuter club” to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk or take transit to work. Additionally, MM-GHG-11 requires the Project to provide funding for the installation of a bus shelter on Alessandro Boulevard. The Project’s potential to increase hazards due to design features or incompatible uses would be reduced to less than significant with implementation of MM-TRA-1 and MM-TRA-2.

Alternative 5 would have the same development footprint as the proposed Project, but the Project’s three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of building square footage but the same amount of development square footage. Alternative 5 would eliminate all Industrial development. The trip generation rates used for this analysis are based upon information collected by the ITE as provided in their Trip Generation Manual (11th Edition, 2021) and is included as Appendix R-5.

Table 6-20. Alternative 5 Trip Generation Summary

<u>Land Use</u>	<u>Quantity Units</u>	<u>AM Peak Hour</u>			<u>PM Peak Hour</u>			<u>Weekday</u>	<u>Saturday Peak Hour</u>		
		<u>In</u>	<u>Out</u>	<u>Total</u>	<u>In</u>	<u>Out</u>	<u>Total</u>	<u>Daily</u>	<u>In</u>	<u>Out</u>	<u>Total</u>
<u>Office Park</u>	<u>4,243.244 TSF</u>	<u>4,869</u>	<u>859</u>	<u>5,728</u>	<u>1,346</u>	<u>3,831</u>	<u>5,177</u>	<u>52,786</u>	<u>1,407</u>	<u>1,198</u>	<u>2,605</u>
<u>Shopping Center</u>	<u>374.398 TSF</u>	<u>≡</u>	<u>≡</u>	<u>≡</u>	<u>≡</u>						
<u>Passenger Cars</u>	<u>≡</u>	<u>206</u>	<u>127</u>	<u>333</u>	<u>693</u>	<u>749</u>	<u>1,442</u>	<u>14,722</u>	<u>942</u>	<u>870</u>	<u>1,812</u>
<u>Trucks</u>	<u>≡</u>	<u>4</u>	<u>0</u>	<u>4</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>34</u>	<u>0</u>	<u>0</u>	<u>0</u>
<u>Internal Trip Reduction</u>	<u>≡</u>	<u>-104</u>	<u>-104</u>	<u>-208</u>	<u>-70</u>	<u>-70</u>	<u>-140</u>	<u>-1,428</u>	<u>-47</u>	<u>-47</u>	<u>-94</u>
<u>Pass-by Reduction</u>	<u>≡</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>-121</u>	<u>-139</u>	<u>-261</u>	<u>-2798</u>	<u>-172</u>	<u>-163</u>	<u>-335</u>
<u>Active Park</u>	<u>42.20 acres</u>	<u>137</u>	<u>137</u>	<u>274</u>	<u>95</u>	<u>95</u>	<u>190</u>	<u>2,110</u>	<u>187</u>	<u>203</u>	<u>390</u>
<u>Public Park</u>	<u>18.08 acres</u>	<u>6</u>	<u>6</u>	<u>12</u>	<u>4</u>	<u>4</u>	<u>8</u>	<u>90</u>	<u>19</u>	<u>20</u>	<u>39</u>
<u>Total Trips</u>	<u>≡</u>	<u>5,118</u>	<u>1,025</u>	<u>6,143</u>	<u>1,947</u>	<u>4,470</u>	<u>6,416</u>	<u>65,516</u>	<u>2,336</u>	<u>2,081</u>	<u>4,417</u>

Source: Appendix R-5.

When comparing the trip generation between Alternative 5 and the proposed Project, as shown in Table 6-21, Alternative 5 Trip Generation Comparison, Alternative 5 would result in a net increase in 30,202 trips per day over the proposed Project.

Table 6-21. Alternative 5 Trip Generation Comparison

<u>Project</u>	<u>AM Peak Hour</u>			<u>PM Peak Hour</u>			<u>Weekday</u>	<u>Saturday Peak Hour</u>		
	<u>In</u>	<u>Out</u>	<u>Total</u>	<u>In</u>	<u>Out</u>	<u>Total</u>	<u>Daily</u>	<u>In</u>	<u>Out</u>	<u>Total</u>
<u>Project Traffic Study</u>	<u>1,353</u>	<u>408</u>	<u>1,761</u>	<u>902</u>	<u>2,486</u>	<u>3,389</u>	<u>35,314</u>	<u>844</u>	<u>798</u>	<u>1,642</u>
<u>Alternative 5</u>	<u>5,118</u>	<u>1,025</u>	<u>6,143</u>	<u>1,947</u>	<u>4,470</u>	<u>6,416</u>	<u>65,516</u>	<u>2,336</u>	<u>2,081</u>	<u>4,417</u>
<u>Net Change in Trips</u>	<u>+3,765</u>	<u>+617</u>	<u>+4,382</u>	<u>+1,045</u>	<u>+1,984</u>	<u>+3,028</u>	<u>+30,202</u>	<u>+1,492</u>	<u>+1,283</u>	<u>+2,775</u>

Source: Appendix R-5.

As with the proposed Project, with the incorporation of **MM-TRA-1**, Alternative 5 construction impacts on the circulation system would be reduced to less than significant.

Vehicle Miles Traveled (VMT) for Alternative 5 has been evaluated using the methodology and procedures outlined in the Recommended Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment prepared by the Western Riverside Council of Governments. This analysis is included in Appendix R-6. Retail uses are evaluated utilizing the VMT metric of total VMT. A 15-mile service area is a conservatively estimated distance from the Project as the retail component is not anticipated as a regional shopping destination but instead is anticipated to serve the surrounding communities of Riverside, Moreno Valley, Perris, etc. Additionally, large boundaries such as Riverside County or WRCOG tend to be too large of an area to accurately measure an individual project's effect on VMT without model noise (i.e., convergence criteria) influencing the results.

A significant impact associated with VMT would occur if a project's retail component would result in a net increase in total VMT for the region. As shown in Table 6-22, Net Change in Regional Total VMT for Retail, the increase in retail square footage proposed by Alternative 5 would result in an increase in total VMT within the region (i.e. 15-mile boundary) and a potentially significant impact.

Table 6-22. Net Change in Regional Total VMT for Retail

	Project	Alternative 5
<u>Total VMT for No Project/Alt 5 Retail</u>	<u>43,167,218</u>	<u>43,167,218</u>
<u>Total VMT for With Project/Alt 5 Retail</u>	<u>43,039,938</u>	<u>43,862,638</u>
<u>+/- to VMT</u>	<u>-127,280</u>	<u>+695,420</u>
<u>Percent Change</u>	<u>-0.29%</u>	<u>+1.61%</u>
Potentially Significant?	No	Yes

Source: Appendix R-6.

Non-retail employment based VMT is calculated as homebased work (HBW) VMT divided by the Project's non-retail employment, which results in the efficiency metric HBW VMT per employee or VMT per employee. A significant impact to VMT would occur if the addition of a project's non-retail components would result in project-generated VMT per employee to exceed 15% below the WRCOG's baseline of 29.97 VMT per employee for a regional average significance threshold of 25.47 VMT per employee. Table 6-23, Non-Retail VMT Per Employee, presents HBW VMT as calculated for both the Project's and Alternative 5's non-retail land uses, the number of Project and Alternative 5 non-retail employees and the resulting VMT per employee metric compared to the impact threshold.

Table 6-23. Non-Retail Per Employee

	Project	Alternative 5
<u>Non-Retail Employment</u>	<u>2,340</u>	<u>7,072</u>
<u>HBW VMT</u>	<u>58,874</u>	<u>205,170</u>
<u>VMT Per Employee</u>	<u>24.12</u>	<u>26.24</u>
<u>WRCOG Threshold</u>	<u>25.47</u>	<u>25.47</u>
Potentially Significant?	No	Yes

Source: Appendix R-6.

Project Alternative 5 would shift all Industrial land use and non-Barton Street Mixed Use to Office Park and convert the Mixed Use areas along Barton Street to Commercial Retail. Warehousing would not be a permitted use under Alternative 5. These shifts in land use result in a corresponding increase in overall vehicle trip generation and an associated increase in VMT over the proposed Project. As such, Alternative 5 would result in **greater VMT impacts**, as well as introduce a **new significant impact** when compared to the proposed Project.

Tribal Cultural Resources

As discussed in Section 4.16, Tribal Cultural Resources, implementation of the proposed Project would result in potentially significant impacts to tribal cultural resources. However, even with implementation of **MM-CUL-1** through **MM-CUL-13**, the Project's impacts to tribal cultural resources would remain *significant and unavoidable*.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of building square footage but the same amount of development square footage. Alternative 5 would eliminate all Industrial development. Given Alternative 5's similar development footprint, impacts to tribal cultural resources under Alternative 5 would be similar compared to the proposed Project, and would also be potentially significant. Even with the incorporation of **MM-CUL-1** through **MM-CUL-13**, Alternative 5's impacts to tribal cultural resources would be significant and unavoidable. Therefore, implementation of Alternative 5 would result in **similar significant and unavoidable tribal cultural resources impacts** when compared to the proposed Project.

Utilities and Service Systems

As discussed in Section 4.17, Utilities and Service Systems, the Project would have less than significant impacts to facilities providing water, wastewater, storm water, electric power, natural gas, and telecommunications. There are sufficient water supplies available and wastewater treatment capacity to serve the Project, resulting in less than significant impacts. The Project would have a less than significant impact on solid waste infrastructure and capacity and would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. Therefore, the Project impacts to utilities and service systems would be less than significant, and no mitigation is required.

Alternative 5 would have the same development footprint as the proposed Project, but the Project's three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of building square footage but the same amount of development square footage. Alternative 5 would eliminate all Industrial development. Alternative 5 would result in the creation of approximately 5,221 more jobs at the Project site than the proposed Project, and as such, there is the potential for Alternative 5 to result in greater impacts to utilities and service systems when compared to the proposed Project. As such, Alternative 5 would have **increased impacts to utilities and service systems** compared to the proposed Project due to the different mix of land uses and increased number of employees at the Project site.

Wildfire

As discussed in Section 4.18, Wildfire, the Project site is near lands classified as Very High Fire Hazard Severity Zone (FHSZ) and implementation of the proposed Project would result in potentially significant wildfire impacts. However, with implementation of **MM-FIRE-1** through **MM-FIRE-3**, as well as **MM-HYD-3**, the Project's potential to facilitate wildfire

spread, exacerbate wildfire risk, or expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes would be reduced to less than significant levels.

Alternative 5 would have the same development footprint as the proposed Project, but the Project’s three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of building square footage but the same amount of development square footage. Alternative 5 would eliminate all Industrial development. Given that Alternative 5 would have the same development footprint, Alternative 5’s wildfire impacts would be similar but reduced compared to the proposed Project but would still be potentially significant. With implementation of MM-FIRE-1 through MM-FIRE-3, as well as MM-HYD-3, Alternative 5’s potential to facilitate wildfire spread, exacerbate wildfire risk, or expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes would be reduced to less than significant levels. Therefore, Alternative 5 would have **similar wildfire impacts** compared to the proposed Project.

6.4.6.2 Project Objectives

Alternative 5 would have the same development footprint as the proposed Project, but the Project’s three Industrial parcels would be divided into 15 Office Park parcels, resulting in smaller, but more numerous buildings and an approximately 7.4% decrease in the total amount of building square footage but the same amount of development square footage. Alternative 5 would eliminate all Industrial development. As shown in Table 6-24, Alternative 5 meets each Project objective.

Table 6-24. Summary of Alternative 5 Success at Meeting Project Objectives

<u>Project Objective</u>	<u>Does Alternative 5 Meet Objective?</u>
<u>1. Provide increased job opportunities for residents through the provision of employment-generating businesses.</u>	<u>Yes. Alternative 5 would provide increased job opportunities through the provision of employment-generating businesses. Alternative 5 would achieve this objective to a greater extent than the Project because Alternative 5 would employ approximately 5,221 more employees at the site than the proposed Project.</u>
<u>2. Provide open space amenities to serve the region.</u>	<u>Yes. Alternative 5 would provide open space amenities to serve the region. Alternative 5 would fully achieve this Project objective.</u>
<u>3. Provide an active park consistent with the 2009 Safety Study prepared by March JPA.</u>	<u>Yes. Alternative 5 would provide the same 60.28-acre Park as the proposed Project. Alternative 5 would fully achieve this Project objective.</u>
<u>4. Complete the buildout of the roadway infrastructure by extending Cactus Avenue to the Specific Plan Area from its existing terminus, extending Barton Street from Alessandro Boulevard to Grove Community Drive, and extending Brown Street from Alessandro Boulevard to Cactus Avenue.</u>	<u>Yes. Alternative 5 would provide all the same roadway infrastructure as the proposed Project. As such, Alternative 5 would fully achieve this Project objective.</u>

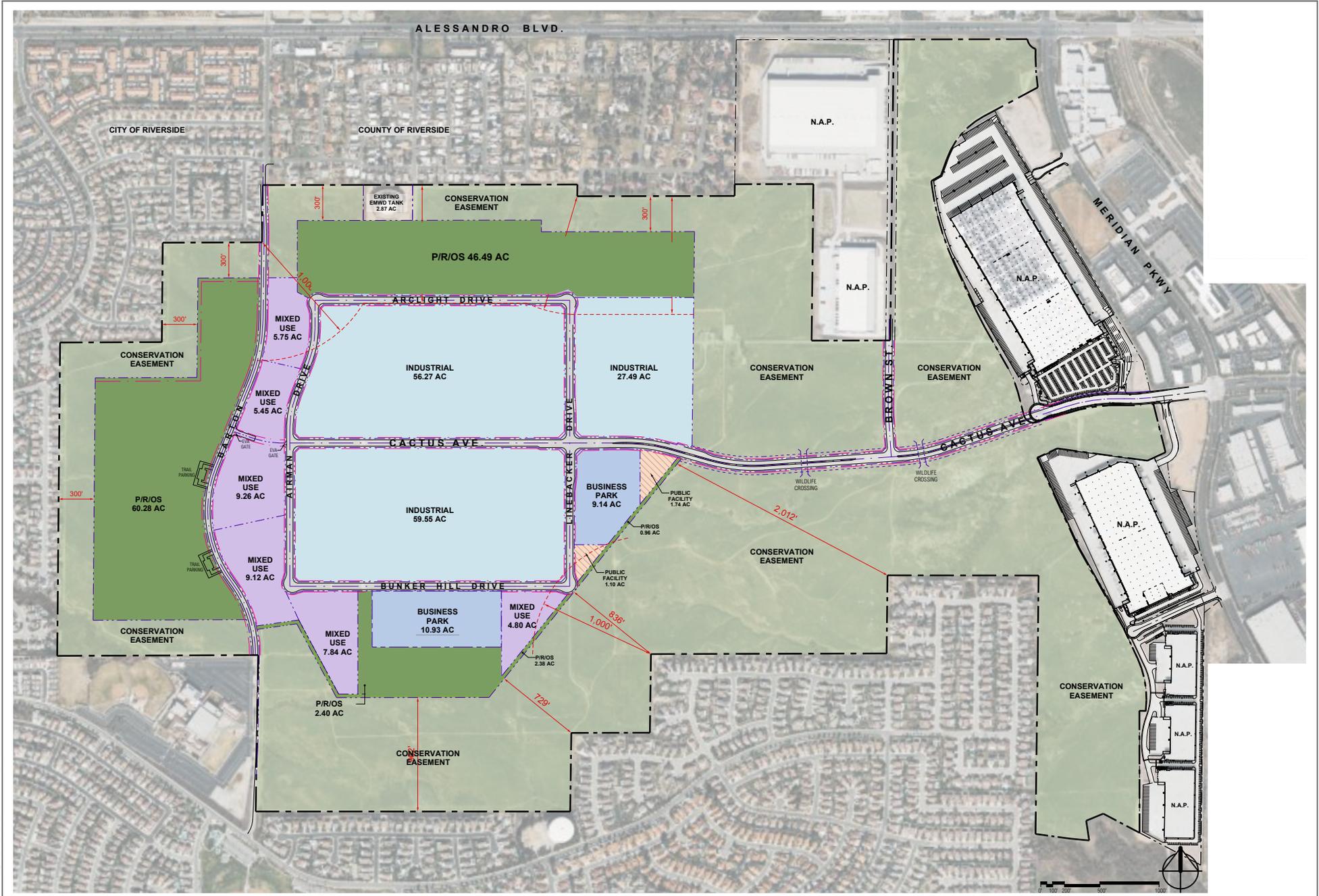
Table 6-24. Summary of Alternative 5 Success at Meeting Project Objectives

<u>Project Objective</u>	<u>Does Alternative 5 Meet Objective?</u>
5. <u>Remove and redevelop a majority of the former munitions storage area of the March AFB.</u>	<u>Yes. Alternative 5 would remove and redevelop a majority of the former munitions storage area. As such, Alternative 5 would fully achieve this Project objective.</u>
6. <u>Encourage the use of alternative modes of transportation through the provision of a pedestrian and bicycle circulation system, which is both safe and comfortable.</u>	<u>Yes. Under Alternative 5, the buildout would include the provision of new roadways that could accommodate all modes of travel, including pedestrian and bicycle movement. As such, Alternative 5 would fully achieve this Project objective.</u>
7. <u>Implement the terms and conditions agreed upon in the September 12, 2012, Settlement Agreement entered into between and among the CBD, the San Bernardino Valley Audubon Society, March JPA, and LNR Riverside LLC, as the complete settlement of the claims and actions raised in <i>Center for Biological Diversity v. Jim Bartel, et al.</i> to preserve open space through establishing a Conservation Easement.</u>	<u>Yes. Alternative 5 would place the Conservation Easement under a conservation easement. As such, Alternative 5 would fully achieve this Project objective.</u>

6.5 Environmentally Superior Alternative

As indicated in Table 6-1, Alternative 1, the No Project Alternative, would result in the fewest environmental impacts, and therefore would be considered the Environmentally Superior Alternative. Pursuant to CEQA Guidelines Section 15126.6(e)(2), if the No Project Alternative is the environmentally superior alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

Alternative 2, the Reduced Development Alternative, would be the Environmentally Superior Alternative. Alternative 2 reduces the development footprint more than Alternative 3, Restricted Industrial Building Size Alternative, as well as also slightly reduces the development footprint when compared to Alternative 4, Reduced Cultural Resource Impact Alternative, thereby providing a greater reduction in workforce and total vehicle trips. While Alternative 4 would result in fewer impacts to cultural resources by shifting the Barton Street roadway alignment, Alternative 4 would result in more development than Alternative 2 and would therefore result in more impacts overall when compared with Alternative 2. Alternative 5 would result in fewer noise impacts, avoiding a significant and unavoidable operational noise impact; however, Alternative 5 would increase the severity of significant and unavoidable air quality impacts as well as result in new significant and unavoidable VMT impacts. Alternative 2 was found to result in fewer aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire impacts. Alternative 2 would achieve all the Project objectives, but not to the same extent as the Project.



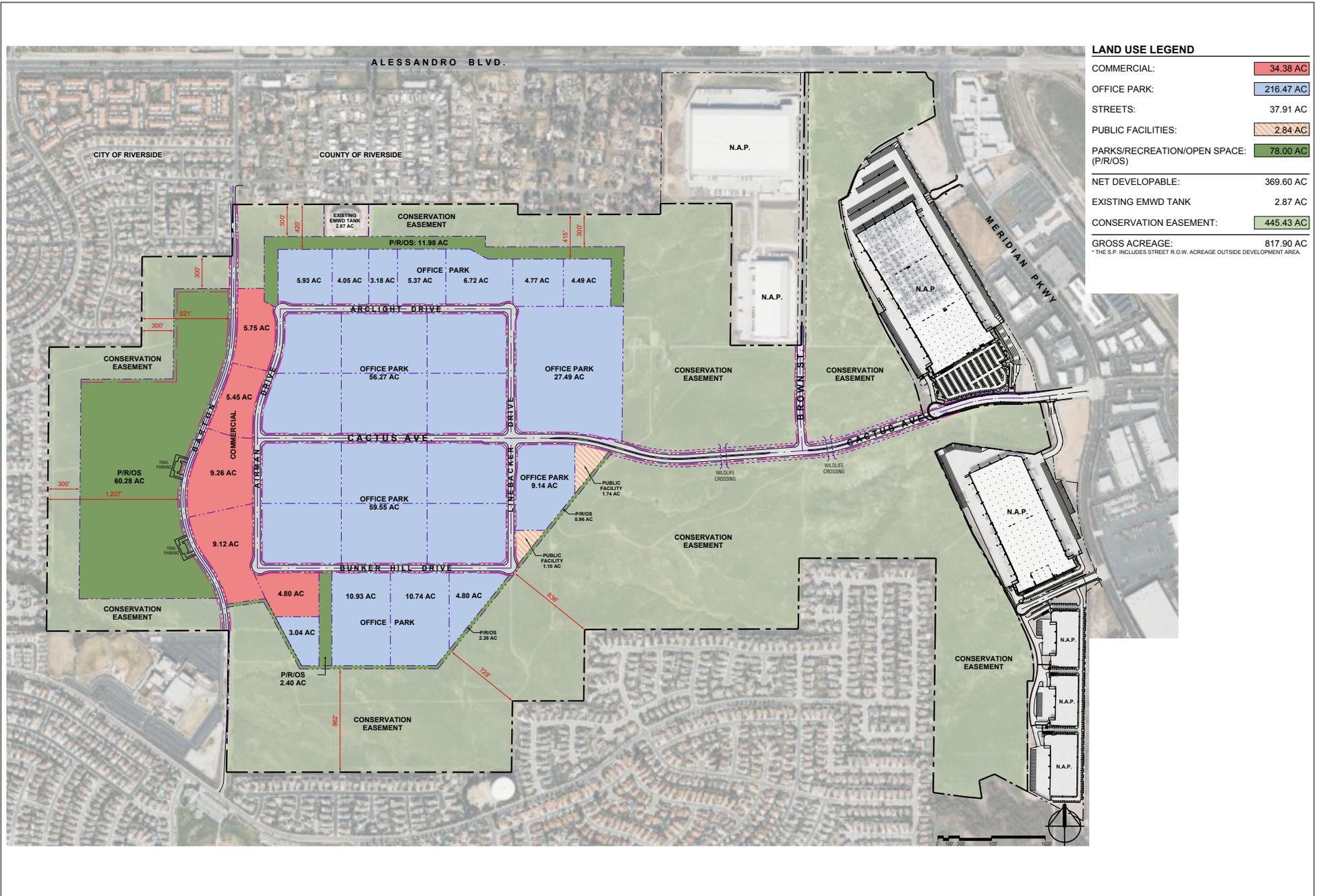
SOURCE: RGA, 2022



FIGURE 6-1
Alternative 2 – Reduced Development Area Alternative

West Campus Upper Plateau Draft EIR

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SOURCE: RGA, 2024

FIGURE 6-2
Alternative 5 – Non-Industrial Alternative Concept Plan
West Campus Upper Plateau Project

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