

7. Alternatives to the Proposed Project

7.1 INTRODUCTION

7.1.1 Purpose and Scope

The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Guidelines § 15126.6[a]). As required by CEQA, this chapter identifies and evaluates potential alternatives to the La Puerta School Site Specific Plan (Specific Plan).

Section 15126.6 of the CEQA Guidelines explains the foundation and legal requirements for the alternatives analysis in an EIR. Key provisions are:

- “[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” (15126.6[b])
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact.” (15126.6[e][1])
- “The no project analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” (15126.6[e][2])
- “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.” (15126.6[f])
- “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries..., and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)” (15126.6[f][1]).
- “Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.” (15126.6[f][2][A])

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- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.” (15126.6[f][3])

For each development alternative, this analysis:

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

According to Section 15126.6(d) of the CEQA Guidelines, “[i]f an alternative would cause...significant effects in addition those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.”

7.1.2 Project Objectives

As described in Section 3.1.1.6, *Specific Plan and Proposed Land Use*, of Chapter 3, *Project Description*, the following objectives have been established for the Specific Plan and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts.

- Promote quality development consistent with the goals and policies of the Claremont General Plan.
- Establish development criteria and standards that guide and regulate future development in the Specific Project Area.
- Provide for the development of a single-family residential neighborhood.
- Coordinate the land use, intensity, and scale of development with the goals and policies of the Claremont General Plan.
- Provide new housing opportunities in Claremont.
- Reduce energy use by the homes in the project by among other things, using solar energy and encouraging clean mobility by including electric vehicle capable infrastructure in every home.

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

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

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7.2.1 Alternative Development Areas

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines § 15126[5][B][1]). In addition, an alternative site need not be considered when implementation is “remote and speculative,” such as when the alternative site is beyond the control of a project applicant.

Based on the Opportunity Sites Mapbook prepared for the City’s current Housing Element Update, there are no other similar sites in the northern area of Claremont that would accommodate implementation of the Specific Plan (City of Claremont 2023). Additionally, there are no suitable alternative sites in the City that are within the control of the project applicant. In the event land could be purchased of suitable size and developmental characteristics, based on the known general conditions of such land in other areas of the City, an alternative site would likely have similar impacts after mitigation as the Specific Plan. Given the size and nature of the Specific Plan and the project objectives, it would be impractical and infeasible to propose implementation of the Specific Plan on an alternate site in the area with fewer environmental impacts.

Additionally, given the density and type of residential development that would be accommodated by the Specific Plan, other vacant land in the City of similar size as the Project Area may require City approval of a General Plan Amendment, a zone change, and most likely preparation of a specific plan. Similarly, development on other vacant land in the City may require similar mitigation measures to reduce impacts to biological resources and cultural resources, and impacts resulting from temporary construction noise. Therefore, analysis of an alternative site for the Specific Plan is neither meaningful nor necessary because the significant impacts resulting from the project would not be avoided or substantially lessened by its implementation.

7.2.2 Reduced Density Alternative

The site design and layout of the Reduced Density Alternative would for the most part be similar to development that would be accommodated and proposed by the Specific Plan, including single-family lots with private backyards and driveways, an internal private street system, and all the necessary utility and infrastructure improvements. However, this alternative would include development of the Project Area with up to 20 single-family residential units (low end of the density at 2.1 dwelling units per acre[du/ac]), 38 less than proposed under the Specific Plan (up to 56 homes at a density of approximately 5.8 dwelling units per acre[du/ac]) and analyzed in this DEIR. Under the Specific Plan, the maximum density permitted is 6 dwelling units per acre (du/ac), which is consistent with the current Residential 6 land use designation of the neighborhoods surrounding the Project Area. The Residential 6 land use designation permits the development of single-family residences within a density range of 2.1 to 6 du/ac.

As with the Specific Plan, development of the Reduced Density Alternative would require disturbance (e.g., grading, shrub, and tree removal) of the entire Project Area and construction of the on- (e.g., private streets, sidewalks, and sewer, water, and drainage improvements) and offsite (i.e., sewer line and drainage improvement

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along the southern end of the adjacent La Puerta Sports Park) infrastructure improvements needed to support this alternative. Similar to the Specific Plan, this alternative may also require adoption of a Specific Plan if alternative development standards than those provided in an existing zoning district would be needed to implement this alternative. A Specific Plan would not be required if the Project Area were subdivided and developed consistent with the development standards of an existing zoning district. However, like the Specific Plan, the approval of a general plan amendment, zone change, tentative tract map, and proposed residential home designs would still be required. Therefore, analysis of a reduced density alternative for the Specific Plan is neither meaningful nor necessary because the significant impacts resulting from the project would not be avoided or substantially lessened by its implementation.

7.2.3 Increased Density Alternative

Under the Increased Density Alternative, the Project Area would accommodate a higher density development than would be accommodated under the proposed Specific Plan. Under the latest draft of the Claremont Housing Element update (which as of the writing of this DEIR was adopted by the City but not yet certified by the California Department of Housing and Community Development), the Project Area is designated as Opportunity Site #39. This opportunity site is suggested in the draft Housing Element to be rezoned from Public (current zoning designation) to Multifamily Residential (MFR) 30/acre, which would allow multifamily development at a density of up to 30 dwelling units per acre (du/ac). At 30 du/ac, the Project Area could accommodate up to 285 dwelling units (9.58-acres Project Area at 30 du/ac).

However, per the City-adopted draft of the Claremont Housing Element update and Opportunity Sites Mapbook, a more realistic development potential for the Project Area under the MFR zoning designation would be 137 dwelling units. The Housing Element sets forth an alternative vision for development of the Project Area that would provide for a more diverse mix of residential densities, unit types and affordability levels. In order to accomplish these outcomes, the City has included the following density blend in the Housing Element for the Project Area: 25 percent of the Project Area at 30 du/ac; 25% of the Project Area at 15 du/ac; and 50% of the Project Area at 6 du/ac. Therefore, resulting in a total of 137 residential units in the Project Area (City of Claremont 2023). Compared to the Specific Plan (which would accommodate up to 58 dwelling units), this alternative would result in an increase of 79 dwellings.

The site design of the Increased Density Alternative would be different from that of the development plan accommodated by the Specific Plan. To accommodate the higher density and greater number of units under this alternative, some of the units would be designed as attached for sale townhomes or condominiums, or as for rent apartments. Unlike the Specific Plan, which allows for two-story homes with single-story elements, this alternative would require the development of two- and three-story buildings in clusters or a courtyard design, or as alley-loaded products with small private drives to meet the target density and unit yield. The design of the residential buildings under this alternative would eliminate most of the private backyards that would be accommodated by the Specific Plan (except for the units built on 50% of the Project Area at 6 DU/acre) and replace these with smaller private balconies and porches. A small recreational area could be introduced onsite to serve residents of this alternative, which is a common amenity for multifamily residential developments. The infrastructure needed to serve the uses under this alternative would be similar to that of the Specific Plan, requiring a comprehensive infrastructure (drainage, water, sewer system) and utility (electricity, natural gas,

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telecommunications) to serve the residential uses. Vehicular access may be similar, with one vehicular access drive being provided. However, because of the density, layout and building massing, an additional vehicular entry may be required for emergency access.

As with implementation of the Specific Plan, development of the Increased Density Alternative would require disturbance (e.g., grading, shrub and tree removal) of the entire Project Area and construction of the on- (e.g., private streets, sidewalks, and sewer, water and drainage improvements) and offsite (i.e., sewer line and drainage improvement along the southern end of the adjacent La Puerta Sports Park) infrastructure improvements needed to support this alternative. Therefore, impacts to biological and cultural resources would be similar to those of development accommodated by the Specific Plan as the entire Project Area would be disturbed. Similar to the implementation of the Specific Plan, this alternative would also require the approval of a subdivision map and proposed residential home designs.

This alternative would result in the development of taller buildings (two to three stories) and greater massing (housing units attached rather than detached from another) in order to accommodate the higher density development. This in turn would result in building heights and massing that would be taller than the single-family residential development surrounding the Project Area.

The increase in housing units under this alternative would result in an increase in vehicle trips when compared to implementation of the Specific Plan because an increase in housing would result in an increase in residents; therefore, vehicle miles traveled (VMT) would also increase. However, VMT per capita would more than likely remain the same as with implementation of the Specific Plan, as it can be assumed that all residential uses within a zone would have a similar VMT per capita.

This alternative would also result in an increase in potable water needs, wastewater generation, and solid waste generation compared to development accommodated by the Specific Plan. The increase in population would result in a demand for police and fire protection services.

Because the increase in density would not avoid or substantially lessen impacts identified in this Draft EIR, analysis of an increased density alternative for the Specific Plan is neither meaningful nor necessary.

7.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

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

- No Project/No Development Alternative
- No Project/Existing General Plan Alternative

An EIR must identify an “environmentally superior” alternative and where the No Project Alternative is identified as environmentally superior, the EIR is then required to identify as environmentally superior an alternative from among the others evaluated. Each alternative's environmental impacts are compared to the

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proposed project and determined to be environmentally superior, neutral, or inferior. Section 7.7 identifies the Environmentally Superior Alternative. The preferred land use alternative (Specific Plan) is analyzed in detail in Chapter 5 of this DEIR.

7.4 NO PROJECT / NO DEVELOPMENT ALTERNATIVE

Section 15126.6(e) of the CEQA Guidelines requires analysis of the No Project Alternative. In accordance with the CEQA Guidelines, the No Project/No Development Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed as provided by Section 15126.6(e)(3)(B) of the CEQA Guidelines. Section 15126.6(e)(3)(B) provides that, “In certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is maintained.”

Under the No Project/No Development Alternative, the Specific Plan would not be implemented, and no new development would occur in the Project Area; the existing conditions would remain under this alternative. The Project Area would remain vacant land and no improvements would occur on- or offsite. None of the impacts of development accommodated by the Specific Plan, adverse or beneficial, would result under this alternative. Accordingly, the No Project/No Development Alternative provides a comparison between the environmental impacts of the Specific Plan as compared to the environmental conditions, resulting from not approving or denying the Specific Plan.

7.4.1 Aesthetics

Under the No Project/No Development Alternative, no new development would occur and the Project Area would remain in its existing condition, vacant and undeveloped. Therefore, the existing visual character and resources would remain as is. The various visual changes that would be introduced through development of the Project Area (e.g., landscaping, building form, architectural design, materials and finishes, and lighting) would not occur under this alternative.

The aesthetic and visual resource impacts that would result from implementation of the Specific Plan were determined to be less than significant. This alternative would not avoid or reduce any significant aesthetic impact as none were identified.

Therefore, aesthetic impacts of this alternative would have a nominal difference when compared to implementation of the Specific Plan.

7.4.2 Air Quality

Under this alternative, no new development would occur and no new construction or demolition activities would occur. Therefore, the potentially significant construction-related emissions impacts requiring mitigation as a result of implementation of the Specific Plan would be eliminated under this alternative. Since the No Project/No Development Alternative would not create any vehicle traffic, no mobile emissions would be generated.

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Although implementation of the Specific Plan would not result in any significant and unavoidable air quality impacts, as substantiated in this DIER, no impacts whatsoever to air quality would occur under this alternative and construction-related impacts would be reduced compared to implementation of the Specific Plan.

7.4.3 Biological Impacts

The No Project/No Development Alternative would not result in any new development and the Project Area would remain in its existing condition, vacant and undeveloped. Therefore, the No Project/No Development Alternative would avoid all on- and off-site disturbances and impacts to biological resources would not occur.

Impacts to biological resources resulting from implementation of the Specific Plan were determined to be less than significant with implementation of mitigation measures. Overall, biological resources impacts under this alternative would be reduced compared to implementation of the Specific Plan.

7.4.4 Cultural Resources

Under the No Project/No Development Alternative, no new development would occur and the Project Area would remain in its existing condition, vacant and undeveloped. This alternative would not result in the potential to encounter subsurface archaeological resources during grading activities. This alternative would also not require mitigation measures to reduce impacts to cultural resources, as is the case with implementation of the Specific Plan.

Since no development would occur, there would be no potential to damage unknown cultural resources, and impacts would be reduced under this alternative compared to implementation of the Specific Plan.

7.4.5 Energy

Under this alternative, no new development would occur, and no new construction or demolition activities would occur. Since the No Project/No Development Alternative would not result in any construction or operation activities, no energy consumption would occur. Therefore, energy demand for electricity, natural gas, and fuel would remain as is, with no energy needed.

The energy impact that would result from implementation of the Specific Plan was determined to be less than significant; therefore, this alternative would not avoid or reduce any significant energy impact since none were identified. Overall, impacts on energy under this alternative would be reduced compared to implementation of the Specific Plan.

7.4.6 Geology and Soils

No new construction activities, including demolition and grading, would occur under the No Project/No Development Alternative. Therefore, there would be no potential for residents or structures to experience seismic ground shaking, or other geologic hazard. No soil disturbance of any kind would occur and the potential to encounter subsurface paleontological resources would not occur.

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Impacts to geology and soils as a result of development accommodated by the Specific Plan were determined to be less than significant provided that existing regulations and standard conditions are implemented prior to and during building construction. Overall, impacts to geology and soils under this alternative would be reduced compared to implementation of the Specific Plan.

7.4.7 Greenhouse Gas Emissions

Under the No Project/No Development Alternative no new development would occur and the Project Area would remain in its existing undeveloped condition. This alternative would eliminate greenhouse gas (GHG) emissions that would be generated from construction and operation of development that would be accommodated by the Specific Plan, which totaled 1,753 MTCO₂e per year.

Therefore, impacts under this alternative would be reduced compared to development accommodated by the Specific Plan.

7.4.8 Hazards and Hazardous Materials

Under this alternative, no new development would occur and the Project Area would remain vacant and undeveloped. Unlike development accommodated by the Specific Plan, no hazardous materials would be required as no construction or operation activities would occur.

Impacts related to hazards and hazardous materials as a result of implementation of the Specific Plan were determined to be less than significant provided that existing regulations and standard conditions are implemented during construction and operation. Overall, impacts of this alternative would be reduced compared to implementation of the Specific Plan.

7.4.9 Hydrology and Water Quality

Existing water quality conditions, groundwater supplies, drainage patterns, and runoff amounts would remain as is under this alternative since no new development would occur. This alternative would not introduce new sources of water pollutants to the project area, from either construction or operations phases of development projects. However, this alternative would not include the development of new low-impact development, source control, site design, and treatment control best management practices (BMPs) to improve the water quality of runoff when compared to existing conditions since runoff currently flows untreated into the concrete V-ditch that runs across the southern border of the La Puerta Sports Park. These BMPs are required measures that would occur under implementation of the Specific Plan and have a beneficial impact on stormwater quality.

Additionally, impacts related to hydrology and water quality as a result of implementation of the Specific Plan were determined to be less than significant. Overall, hydrology and water quality impacts would be slightly greater under this alternative since the water quality of runoff would be improved under the Specific Plan when compared to existing conditions, as noted above.

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7.4.10 Land Use and Planning

The No Project/No Development Alternative would not require approval of a general plan amendment, zone amendment, or specific plan. The existing general plan and zoning designations of the Project Area would remain.

As substantiated in this DIER, impacts to land use and planning as a result of implementation of the Specific Plan were determined to be less than significant. Overall, land use impacts of the No Project/No Development Alternative would be reduced compared to implementation of the Specific Plan.

7.4.11 Noise

Under this alternative, no new development would occur, and the Project Area would remain vacant and undeveloped. Therefore, this alternative would eliminate the potentially significant temporary construction-related noise impact requiring mitigation as a result of development that would be accommodated by the Specific Plan. No new vehicle trips would be generated by this alternative and no new operation-related noise impacts would occur.

However, no significant operational noise impacts were identified as a result of implementation of the Specific Plan. Overall, impacts would be reduced under this alternative compared to implementation of the Specific Plan.

7.4.12 Population and Housing

Under the No Project/No Development Alternative, no new development would occur and the Project Area would remain vacant and undeveloped. This alternative does not generate population growth, housing, or temporary construction jobs. This alternative would not contribute to the City's jobs-housing ratio since it does not generate jobs nor housing opportunities.

As discussed in Chapter 5.11, *Population and Housing*, the City does not have an adequate supply of owner-occupied units. This alternative would not include development of any owner-occupied units. Therefore, this alternative would not help meet the City's current demand for owner-occupied units.

Since this alternative would not achieve some of the beneficial impacts of the Specific Plan related to housing, the impacts of this alternative are considered greater than implementation of the Specific Plan but would remain less than significant. Population and housing are not a significant and unavoidable impact of the Proposed Project.

7.4.13 Public Services

Under the No Project/No Development Alternative, no new development would occur and the Project area would remain vacant and undeveloped. This alternative would not generate any increased demand for public services (fire protection, police protection, schools, and libraries) compared to implementation of the Specific Plan.

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No significant impacts to public services were identified as a result of implementation of the Specific Plan. Overall, impacts would be reduced under this alternative compared to implementation of the Specific Plan.

7.4.14 Transportation

Under this alternative, no development would occur in the Project Area and it would remain vacant and undeveloped. Therefore, no new vehicle trips or vehicle miles traveled would be generated by this alternative. Additionally, no increase in the use of surrounding sidewalks and multi-use trails would occur under this alternative, and no increase in the use of public transportation would occur. No significant transportation impacts were identified as a result of implementation of the Specific Plan. Overall, impacts would be reduced under this alternative compared to implementation of the Specific Plan.

7.4.15 Tribal Cultural Resources

Under this alternative, the Project Area would remain vacant and undeveloped; no ground disturbances would occur. This alternative would not result in the potential to encounter subsurface tribal cultural resources during grading activities. Therefore, there would be no potential for encountering tribal cultural resources during grading activities.

No significant impacts to tribal cultural resources were identified as a result of implementation of the Specific Plan. Overall, impacts would be reduced under this alternative compared to implementation of the Specific Plan.

7.4.16 Utilities and Service Systems

Under this alternative, the Project Area would remain vacant and undeveloped. Therefore, this alternative would not generate an increased demand for water and telecommunication nor increase wastewater, stormwater, and solid waste generation compared to existing conditions.

No significant impacts to utilities and service systems were identified as a result of implementation of the Specific Plan. Overall, impacts would be reduced under this alternative compared to implementation of the Specific Plan.

7.4.17 Wildfire

Under this alternative, the Project Area would remain vacant and undeveloped. This alternative would not place any residential units or residents in the Project Area. This alternative would provide continued opportunities for undeveloped land that could be prone to wildfire risks (especially from overgrown vegetation), compared to development accommodated by the Specific Plan, which would introduce residential structures.

However, no significant impact to wildfire was identified as a result of implementation of the Specific Plan. Overall, this alternative could have both greater and reduced impacts related to wildfire. The site would remain covered in vegetation that could catch fire, but no new structures would be built that could be affected by wildfires.

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7.4.18 Conclusion

7.4.18.1 ABILITY TO REDUCE IMPACTS

The No Project/No Development Alternative would lessen or eliminate environmental impacts in the areas of air quality, biological resources, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, land use and planning, noise, population and housing, public services, transportation, tribal cultural resources, and utilities and service systems. This alternative would have greater environmental impacts related to hydrology and water quality. This alternative could have both greater and reduced impacts related to wildfire. Aesthetic impacts of this alternative would have a nominal difference when compared to implementation of the Specific Plan. Overall, this alternative is considered environmentally superior when compared to implementation of the Specific Plan.

7.4.18.2 ABILITY TO ACHIEVE PROJECT OBJECTIVES

Implementation of the No Project/No Development Alternative would ultimately stop any new development from occurring within the Project Area. Therefore, none of the project objectives would be achieved under this alternative.

The No Project/No Development Alternative would not provide any of the project benefits that would occur with adoption of the Specific Plan, including promoting quality development, establishing development criteria and standards that guide and regulate future development, providing for the development of a new single-family residential neighborhood, providing new housing opportunities in Claremont, and reducing energy use by the homes in the Project Area through the provision of among other green building measures, the use of solar energy panels and encouraging clean mobility by including electric vehicle capable infrastructure in every home.

7.5 NO PROJECT / EXISTING GENERAL PLAN ALTERNATIVE

Pursuant to CEQA Guidelines Section 15126.6(e)(3)(A), when a project is the revision of an existing regulatory plan, the “no project” alternative assumes continuation of the existing plan, policy, or operation into the future. Therefore, under the No Project/Existing General Plan Alternative, the current general plan land use and zoning designations of the Project Area, which is “Public”, would remain in effect. Development in accordance with the existing general plan and zoning would occur in the Project Area. The Public land use designation provides for a wide range of public uses, including public schools, transportation-related facilities, government uses, public utilities, libraries, museums, cultural facilities, and public service facilities. The Public zoning designation allows the development of public uses, including government agencies, schools, libraries, post offices, fire stations, public safety facilities, community centers, museums, theaters, civic center, and similar local, state, or federal uses.

Under this alternative, the Project Area could be developed with any of the permitted uses under the Public land use and zoning designations, subject to City review and approval (with the exception of a new public school or other school-related facility, which could be built subject to review and approval by the Claremont Unified School District). The exact type and size of use(s) is not known as there are no plans (past, present, or

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future) to develop any of these uses in the Project Area; however, with the exception of new public school facilities, any use(s) would be required to be consistent with the development standards (e.g., setbacks intensity, building heights) permitted under the Public land use and zoning designations. The Claremont Unified School District would have to obtain building permits from the Office of the State Architect for the construction of new public school facilities and as the Lead Agency under CEQA, would perform their own CEQA analysis.

The environmental impacts of developing the Project Area with any of the permitted uses in the Public zoning district could vary substantially, with some uses being more intense than others and having greater impacts than others. Uses permitted in the Public zoning district include:

- A. Public uses, including government agencies, schools, libraries, post offices, fire stations, public safety facilities, community centers, museums, theaters, civic centers, and similar local, state, or federal uses.
- B. Governmental maintenance yards.
- C. Utilities structures, substations, and distribution facilities, provided all equipment and appurtenances are within an enclosed structure or screened from view.
- D. Parking facilities.
- E. Parks.
- F. Open space and highway landscaping.
- G. Water treatment, retention, and distribution facilities.
- H. Wireless communication facilities pursuant to Chapter 16.100.

Three uses are considered to be highly unlikely to occur:

- A public park or parking area for the existing La Puerta Sports Park. Although additional park space makes sense since it would be an extension of the adjacent sports park, the City does not have the financial means to expand or add new park space; therefore, this use was not included as it is not realistic use. Similarly, building and maintaining a parking area is considered unlikely; the City would instead build or improve parks elsewhere in the city before building a parking lot for this park.
- A new public school. Although a public school is allowed under the existing zoning, it should be noted that the potential to develop a school is unlikely for several reasons: one, the prior school that operated onsite ceased operating in 1979 (as noted above) and the Claremont Unified School District declared the site to be surplus property and has been trying to sell the site for more than a decade and two, attendance for schools within the Claremont Unified School District service area has been declining. As reported in the 2022 City of Claremont Housing Element Update EIR, CUSD is currently experiencing decreasing levels of registration of local students.
- A new City maintenance yard. The City recently completed a new, multi-million-dollar corporation yard, and is not likely to build another in the foreseeable future.

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For the analysis conducted for this alternative and as a hypothetical approach since the range of uses is wide, the uses that could be developed were narrowed down to uses most likely to be developed and those that would be the most compatible with the surrounding existing residential community and adjacent La Puerta Sports Park. These include:

- Public facilities under item A, above, with the exception of a public school or public park.
- Utilities structures, substations, and distribution facilities provided all equipment and appurtenances are within an enclosed structure or screened from view.
- Water treatment, retention, and distribution facilities.
- Wireless communication facilities.

7.5.1 Aesthetics

Aesthetic impacts associated with the No Project/Existing General Plan Alternative would be reduced compared to development that would be accommodated by the Specific Plan. The provisions of the maximum heights, setbacks, building forms, and other development standards and design guidelines of the Specific Plan would not apply to this alternative. However, a typical building for a fire station or public safety facility, post office, community center, or cultural facility would most likely be a single-story building and built in a very different style and layout.

Buildings for these uses would also likely be located farther from residences that abut the southern Project Area boundary; a single or smaller building under these uses would also allow for greater view windows into and beyond the Project Area. This alternative would also result in less building massing and height compared to the number of residential structures that would be developed under the Specific Plan.

However, the aesthetic and visual resource impacts that would result from implementation of the Specific Plan were determined to be less than significant; therefore, this alternative would not avoid or reduce any significant impact as none were identified. Overall, impacts would be reduced under this alternative.

7.5.2 Air Quality

Construction-related air quality impacts under the No Project/Existing General Plan Alternative would be similar to those of implementation of the Specific Plan as the entire Project Area would be disturbed and graded. Although the amount of building square footage under this alternative would be less, the greatest amount of emissions would be generated during the grading phase due to the large construction equipment needed. However, it was determined that with mitigation, construction related air quality impacts of development accommodated by the Specific Plan would be reduced to a level of less than significant.

Compared to implementation of the Specific Plan, the maximum daily operational phase regional mobile emissions would decrease under this alternative if a fire station or public safety facility, community center, post

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office, cultural facility, or utility structure, substation, or distribution facility were built as these uses are not high traffic generation uses, which is what results in mobile emissions.

Further, the operational related air quality impacts (which includes mobile emission) that would result from implementation of the Specific Plan were determined to be less than significant; therefore, this alternative would not avoid or reduce any significant impact as none were identified.

Overall, this alternative would result in a decrease in air quality impacts.

7.5.3 Biological Impacts

The No Project/Existing General Plan Alternative would result in similar impacts to biological resources as development under this alternative (no matter which of the potential uses would be developed) would include disturbance of the entire Project Area, including site clearing and grading. However, it was determined that with mitigation, impacts to biological resources as a result of development accommodated by the Specific Plan would be reduced to a level of less than significant. Therefore, potential impacts to biological resources including active bird nests, removal of trees, and removal of essential foraging and breeding habitat for protected species would be similar to implementation of the Specific Plan and be reduced to less than significant with implementation of mitigation measures.

7.5.4 Cultural Resources

As with development that would be accommodated by the Specific Plan, implementation of the No Project/Existing General Plan Alternative would include development of the entire Project Area (no matter which of the potential uses would be developed), which would result in a potential to uncover unknown subsurface cultural resources during grading activities. However, it was determined that with mitigation, impacts to cultural resources as a result of development accommodated by the Specific Plan would be reduced to a level of less than significant. Therefore, impacts would be similar to implementation of the Specific Plan and be reduced to less than significant with implementation of mitigation measures.

7.5.5 Energy

Under this alternative, the building square footage would be less than the building square footage that would result by development accommodated by the Specific Plan, no matter which of the potential uses would be developed. Under the Specific Plan, up to 58 two-story single-family residences would be developed, which combined would equate to a larger building square footage than that of a single-story building for one of the potential uses. Therefore, the associated energy demand under this alternative would be reduced. However, the energy impacts that would result from implementation of the Specific Plan were determined to be less than significant; therefore, this alternative would not avoid or reduce any significant impact as none were identified. Overall, impacts would be reduced under this alternative.

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7.5.6 Geology and Soils

Under this alternative, as with implementation of the Specific Plan, the entire Project Area would be disturbed and graded no matter which of the potential uses would be developed. Although fewer buildings would be erected to accommodate one of the potential uses, the buildings and individuals that would be accommodated in the Project Area would be exposed to the same geology and soils conditions as with implementation of the Specific Plan. For example, Project Area occupants and buildings of this alternative would be exposed to the same seismic activity as those of the Specific Plan.

Development under this alternative would also be required to comply with the most recent building and seismic codes and regulations. The geology and soils impact that would result from implementation of the Specific Plan were determined to be less than significant. Therefore, this alternative would not avoid or reduce any significant impact as none were identified. Overall, impacts under this alternative would be similar to that of implementation of the Specific Plan.

7.5.7 Greenhouse Gas Emissions

Construction-related GHG impacts under the No Project/Existing General Plan Alternative would be similar to those of implementation of the Specific Plan as the entire Project Area would be disturbed and graded no matter the potential uses that would be developed. Although the amount of building square footage under this alternative would be less, the greatest amount of emissions would be generated during the grading phase due to the large construction equipment needed.

Compared to implementation of the Specific Plan, the maximum daily operational phase regional mobile emissions would decrease under this alternative if a fire station or public safety facility, community center, post office, cultural facility, or utility structure, substation, or distribution facility were built as these uses are not high traffic generation uses, which is what results in mobile emissions.

Further, the construction and operational related air quality impacts that would result from implementation of the Specific Plan were determined to be less than significant; therefore, this alternative would not avoid or reduce any significant impact as none were identified.

Overall, GHG impacts under this alternative would slightly decrease compared to those of implementation of the Specific Plan no matter which potential use is developed.

7.5.8 Hazards and Hazardous Materials

Similar to implementation of the Specific Plan, development of any one of the potential uses listed earlier in this section would involve the use of hazardous materials during construction. However, construction materials such as fuels, paints, and solvents would be used in limited quantities and would not pose a significant safety hazard. Use and transport of hazardous materials would be required to comply with the appropriate state standards, guidelines, and responsible agencies.

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Long-term operation of a fire station or public safety facility, community center, post office, cultural facility, or utility structure, substation, or distribution facility under this alternative would be different than the residential uses that would be accommodated by the Specific Plan. However, as with development accommodated by the Specific Plan, any one of these potential uses would involve small amounts of hazardous materials, such as cleansers, paints, fertilizers, and pesticides for cleaning and maintenance purposes.

Additionally, development of any potential use under this alternative would not affect implementation of the City's Multihazard Functional Plan or result in an airport safety hazard or excessive noise for people residing or working in the project area. Furthermore, the hazards and hazardous materials impact that would result from implementation of the Specific Plan was determined to be less than significant. Therefore, this alternative would not avoid or reduce any significant impact as none were identified.

Overall, impacts under this alternative would be similar to those of implementation of the Specific Plan.

7.5.9 Hydrology and Water Quality

The Project Area is currently vacant and undeveloped, and runoff currently flows untreated into the concrete V-ditch that runs across the southern border of the La Puerta Sports Park. As with development accommodated by the Specific Plan, development of anyone of the potential uses of listed earlier in this section would be required to reduce peak flow rates by implementing low-impact development features and providing a treatment/infiltration system that reduces runoff volumes conveyed to the drainage system. Therefore, as with implementation of the Specific Plan, it is anticipated that this alternative would have a beneficial impact on area hydrology and water quality at completion.

Also, similar to implementation of the Specific Plan, development under this alternative would be required to comply with the National Pollutant Discharge Elimination System Construction General Permit requirements and implementation of various BMPs to reduce construction-related water quality impacts. Furthermore, the hydrology and water quality impact that would result from implementation of the Specific Plan was determined to be less than significant; therefore, this alternative would not avoid or reduce any significant impact as none were identified.

Overall, impacts of this alternative would be similar to those of implementation of the Specific Plan.

7.5.10 Land Use and Planning

The No Project/Existing General Plan Alternative could include development of a fire station or public safety facility, community center, post office, cultural facility, or utility structure, substation, or distribution facility, which are permitted uses under the existing General Plan and zoning designations of the Project Area. Similar to the development accommodated by the Specific Plan, development of any of the potential uses would be subject to City review and approval. Development of any of these potential uses would also be required to be consistent with the development standards (e.g., setbacks intensity, building heights) permitted under the Public land use and zoning designations.

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Unlike implementation of the Specific Plan, development of any of the potential uses under this alternative would not require amendments to the City's general plan or a zone change. However, land use impacts that would result from implementation of the Specific Plan were determined to be less than significant; therefore, this alternative would not avoid or reduce any significant impact as none were identified.

Overall, impacts would be reduced under this alternative under this alternative.

7.5.11 Noise

Since this alternative would include disturbance and development of the entire Project Area no matter what potential use would be developed, construction-related noise impacts would be similar to those of implementation of the Specific Plan. Additionally, peak construction noise volumes and distance to sensitive receptors would also be similar. As with implementation of the Specific Plan, this alternative would result in temporary construction noise impacts requiring mitigation measures.

Regarding operational noise, this alternative would result in different noise sources than those of residential development accommodated by the Specific Plan. For example, operational noise from a fire station or public safety facility would include the sounding of sirens from emergency vehicles. Operation noise from a community center, post office, or cultural facility, would result in parking area noises such as car doors slamming, car alarms sounding, and people talking outdoors. Operational noise from a community or cultural center may have some outdoor events, which would generate noise. The noise generated from these uses could result in a significant impact on surrounding residential uses. Unlike this alternative, operational noise impacts as a result of implementation of the Specific Plan were determined to be less than significant.

Overall, noise impacts under this alternative could be either greater, less than, or the same as the proposed project, depending on the use which is developed.

7.5.12 Population and Housing

Under this alternative, no new residential development would occur in the Project Area, which would be developed with either a fire station or public safety facility, community center, post office, cultural facility, or utility structure, substation, or distribution facility. This alternative would not introduce additional housing and population in the City. However, this alternative would not provide additional housing to help meet the housing needs of the City and region. Additionally, population and housing impacts that would result from implementation of the Specific Plan were determined to be less than significant; therefore, this alternative would not avoid or reduce any significant impact as none were identified. Overall, impacts would be reduced under this alternative.

7.5.13 Public Services

Similar to implementation of the Specific Plan, development of one of the potential uses under this alternative (minus a fire station or public safety facility) could result in an increase on fire and police protection services. Development of any of these uses under his alternative would be required to comply with the current California Fire Code. Implementation of existing regulations and standards would ensure that impacts related to fire and

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police service would not be significant under this alternative. Additionally, impacts to public services that would result from implementation of the Specific Plan were determined to be less than significant; therefore, this alternative would not avoid or reduce any significant impact as none were identified. Overall, impacts would be similar to those of implementation of the Specific Plan

7.5.14 Transportation

Under this alternative, no impacts to the alternative modes of transportation are anticipated, including impacts to pedestrian, bicycle, or public transit systems or facilities no matter which potential use is developed. As with development accommodated by the Specific Plan and pursuant to the City's VMT guidelines, development of anyone of the potential uses under this alternative would not result in a significant project generated VMT impact as any of the uses would be considered local serving and therefore be exempt from a full VMT analysis. None of the potential uses under alternative would also not increase hazards due to a geometric design feature. Furthermore, transportation impacts that would result from implementation of the Specific Plan were determined to be less than significant; therefore, this alternative would not avoid or reduce any significant impact as none were identified. Overall, impacts under this alternative would be similar to those of implementation of the Specific Plan.

7.5.15 Tribal Cultural Resources

Similar to implementation of the Specific Plan, this alternative would result in ground disturbance of the entire Project Area no matter which potential uses would be developed, which would result in a potential to uncover unknown subsurface tribal cultural resources during grading activities. All of the potential uses would most likely require preparation of CEQA documentation that requires public review (e.g., MND, EIR), which like implementation of the Specific Plan would trigger tribal consultation under AB 52. However, impacts to tribal cultural resources that would result from implementation of the Specific Plan were determined to be less than significant; therefore, this alternative would not avoid or reduce any significant impact as none were identified. Overall, impacts under this alternative would be similar to those of implementation of the Specific Plan.

7.5.16 Utilities and Service Systems

Under this alternative, the proposed building square footage would be less than that of the building square footage that would result by development accommodated by the Specific Plan, no matter which of the potential uses would be developed. Additionally, development of any of the potential uses under this alternative would result in a decrease in the amount of wastewater generation, water consumption, and solid waste generation.

Impacts to utilities and service systems as a result of implementation of the Specific Plan were determined to be less than significant; therefore, this alternative would not avoid or reduce any significant impact as none were identified. Overall, impacts to utilities and service systems under this alternative would be similar.

7.5.17 Wildfire

Under this alternative, the Project Area would be disturbed and developed with a public school, fire station or public safety facility, community center, post office, cultural facility, or utility structure, substation, or

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distribution facility. As with the Specific Plan, this alternative would place buildings and people in the Project Area. This alternative would also include the provision of impervious and nonflammable surfaces such as paved areas and hardscape improvements.

As with implementation of the Specific Plan, this alternative would not substantially impair an adopted emergency response plan or emergency evacuation plan; exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire; or expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Further, impacts on wildfire as a result of implementation of the Specific Plan were determined to be less than significant; therefore, this alternative would not avoid or reduce any significant impact as none were identified.

Overall, impacts under this alternative would be similar to those of implementation of the Specific Plan.

7.5.18 Conclusion

7.5.18.1 ABILITY TO REDUCE IMPACTS

The No Project/Existing General Plan Alternative would lessen environmental impacts in the areas of aesthetics, air quality, energy, greenhouse gas emissions, land use and planning, and population and housing. This alternative would result in an increase in impacts on air quality and noise. This alternative would have similar impacts in the area of biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, public services, transportation, tribal cultural resources, utilities and service systems, and wildfire. Regarding noise impacts, this alternative could be either greater, less than, or the same as the proposed project, depending on the use which is developed.

Overall, this alternative is not considered environmentally superior when compared to implementation of the Specific Plan because it would potentially result in decreased environmental impacts when compared to the Specific Plan. Furthermore, although it would reduce impacts for six environmental areas, those impacts were determined to be less than significant for implementation of the Specific Plan.

7.5.18.2 ABILITY TO ACHIEVE PROJECT OBJECTIVES

The No Project/Existing General Plan Alternative would not meet many of the project objectives. For example, the No Project/Existing General Specific Plan, would not establish development criteria and standards that guide and regulate future development in the Project Area (objective 2), provide for the development of a single-family residential neighborhood (objective 3), provide new housing opportunities in Claremont (objective 5), and reduce energy use by the homes in the project by among other things, using solar energy and encouraging clean mobility by including electric vehicle capable infrastructure in every home (objective 6).

This alternative would achieve some of the proposed project's objectives but to a lesser extent as compared to implementation of the Specific Plan. For example, the No Project/Existing General Plan Alternative would promote quality development consistent with the goals and policies of the Claremont General Plan (objective

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1), and coordinate the land use, intensity, and scale of development with the goals and policies of the Claremont General Plan (objective 4).

7.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the “environmentally superior alternative” and, in cases where the “No Project” Alternative is environmentally superior to the Proposed Project, the environmentally superior development alternative must be identified. One alternative has been identified as “environmentally superior” to the Specific Plan:

- No Project/No Development Alternative

The No Project/No Development Alternative would have the least impact to the environment because it would maintain the existing Public use designation of the Project Area, which would also remain vacant and undeveloped. The No Project/No Development alternative would reduce all impacts compared to implementation of the Specific Plan, except for hydrology and water quality.

However, the No Project/No Development Alternative would not achieve any of the objectives established for the Specific Plan. In addition, the potential for development of the Project Area at some future date would not be precluded since the applicant could submit alternative development plans if the Specific Plan were not approved.

“Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts” (CEQA Guidelines § 15126.6[c]). These factors will be considered by the City of Claremont decision-makers in determining whether to approve the Specific Plan or one of the alternatives identified above.

7.7 REFERENCES

California Air Pollution Control Officers Association. 2021, December. Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity: Designed for Local Governments, Communities, and Project Developers. https://www.airquality.org/ClimateChange/Documents/Final%20Handbook_AB434.pdf.

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