

SECTION 6: ALTERNATIVES TO THE PROJECT

6.1 - Introduction

In accordance with CEQA Guidelines Section 15126.6, this Environmental Impact Report (EIR) contains a comparative impact assessment of alternatives to the Project. The primary purpose of this section is to provide decision makers and the public with a reasonable range of feasible Project alternatives that could attain most of the basic Project objectives, while avoiding or reducing any of the Project's significant adverse environmental effects. Important considerations for these alternatives analyses are noted below (as stated in CEQA Guidelines Section 15126.6):

- An EIR need not consider every conceivable alternative to a Project;
- An EIR should identify alternatives that were considered by the lead agency, but rejected as infeasible during the scoping process;
- Reasons for rejecting an alternative include:
 - Failure to meet most of the basic Project objectives;
 - Infeasibility; or
 - Inability to avoid significant environmental effects

6.1.1 - Significant Unavoidable Impacts

The Project would result in the following significant unavoidable impacts:

Operational Exceedance of the SCAQMD's Regional Emission Thresholds

Operation of the Project would violate SCAQMD's regional emission thresholds for VOC, NO_x, CO, and PM₁₀ and result in a significant impact on a regional level even after mitigation. The Project may result in cumulative health effects from cumulative exposures from ozone, nitrogen dioxide, and PM₁₀.

Cumulative Exceedance of the SCAQMD's Regional Emission Thresholds

Operation of the Project would result in a cumulatively significant impact even after mitigation because of the exceedances of the SCAQMD's regional emission thresholds for VOC, NO_x, CO, and PM₁₀. The Project may result in cumulative health effects from cumulative exposures from ozone and PM₁₀. The Project may result in cumulative health effects from cumulative exposures from ozone, nitrogen dioxide, and PM₁₀.

Horizon Year 2030 Traffic Conditions

Freeway Ramp and Mainline Improvements - Adverse and Unavoidable

There are no additional ramp merge and diverge junctions anticipated to operate at unacceptable levels of service with the addition of Project traffic, with the exception of the SR-210 Westbound on-

ramp at San Bernardino Avenue and the I-10 Eastbound off-ramp to the SR-210 Westbound (upstream only). The I-10 Eastbound off-ramp to the SR-210 Westbound is a freeway-to-freeway diverge junction and is anticipated to operate at LOS “F” due to the addition of background growth and cumulative traffic in conjunction with Project traffic.

With respect to the significant impacts to the State facilities (mainline and ramp junctions) at the 2030 time horizon, no further mitigation measures or improvements are feasible. The I-10 Freeway and SR-210 Freeway would operate at LOS “F” even without the Project under Horizon Year 2030 traffic conditions. The Project’s contribution to cumulative impacts under 2030 conditions is relatively minor, involving only a small percentage of the forecast traffic occurring on the identified segments at Horizon Year 2030 traffic conditions. Because the City has no control over State facilities, and because the State facilities funded and planned to be developed under 2030 conditions are already anticipated to operate at LOS “E” and “F” even without the Project, there are no further mitigation measures that can be imposed upon the Project to mitigate its small cumulative contribution to significant impacts to the identified segments of SR-210 Freeway and I-10 Freeway under 2030 conditions. Caltrans has exclusive control over State highway improvements and State highway improvements are by and large a matter of State-wide control. Thus, for the aforementioned reasons there are no available and feasible mitigation measures available to mitigate the Project’s minor cumulative contribution to traffic on the SR-210 and I-10 Freeways under Horizon Year 2030 traffic conditions. Therefore, impacts in this regard will be significant and unavoidable and a Statement of Overriding Considerations will be developed for the deficient Caltrans facilities.

Cumulative Impacts - Adverse and Unavoidable

Mitigation for the cumulative transportation impacts the Project will have on intersections is provided under Mitigation Measure TRANS 2. As such, the Project is required to pay its fair share/DIF amount of the improvement costs of the impacted intersections to mitigate the Project’s traffic impacts (See Table 3.15-22 for a summary of transportation impact fee program improvements for Horizon Year 2030 conditions). Although these intersections may be improved, there are many uncertainties related to the timing of the full funding and completion of such improvements identified to maintain acceptable LOS in support of the Project. These uncertainties include payment of DIF fees/fair share payments by other development in the future, availability of non-DIF funding that may be available to the City in the future, and, for improvements located in County unincorporated areas, County decisions and funding availability for completing the necessary improvements. Due to these uncertainties, timely construction of improvements needed to address cumulative impacts cannot be guaranteed. Therefore, impacts in this regard will be significant and unavoidable and a Statement of Overriding Considerations will be developed.

6.1.2 - Alternatives to the Project

The Redlands Crossing Center (Project) proposes to develop a regional shopping center, anchored by the proposed Walmart store, that consists of approximately 275,500 square feet of commercial retail

uses on approximately 23.9 acres. The proposed Project also includes off-site improvements within the area east of the Project site and west of Karon Street, (storm drain facility improvements, a block wall West of Karon Street and mass grading to “match” grade elevations between Karon Street and future New York Street) For purposes of evaluation these improvements have been assumed to be included with all of the alternatives considered except the “No Project” Alternative.

The four alternatives to the Project analyzed in this section are as follows:

- **No Project Alternative:** The Project site would remain in its existing condition as vacant land.
- **10-Percent Reduction Alternative:** The 10-Percent Reduction Alternative would reduce the proposed Redlands Crossing Center total square footage from 275,500 square feet to 247,950). This alternative would represent a total net reduction of 27,550 square feet, or approximately 10 percent relative to the Project.
- **Walmart Standalone Alternative:** The Walmart Standalone Alternative would eliminate the proposed commercial and retail buildings in the Redlands Crossing Center, except for the Walmart. The total square footage would be reduced from 275,500 square feet to 215,000 square feet. The Walmart Standalone Alternative would represent a total net reduction of 60,500 square feet, or approximately 22 percent relative to the Project.
- **No Walmart/Medium-Sized Tenant Alternative:** Under this alternative total building area would be the same as the Project and the uses for the non-Walmart Parcels would be the same. This alternative would differ from the Project, in that it would not include a “big box” anchor but would include medium-sized, individual tenants with retail space generally in the 15,000 square feet to 50,000 square feet range, as well as buildings associated with the grocery, nursery, and specialty automotive/tire functions currently planned for the Walmart. All of these uses would occupy separate, freestanding tenant spaces under this alternative.

Alternative Sites Considered but Rejected: CEQA Guidelines Section 15126.6(f)(2) sets forth considerations to be used in evaluating an alternative location. The section states that the “key question” is whether any of the significant effects of the Project would be avoided or substantially lessened by relocating the Project. Accordingly, alternative locations were analyzed pursuant to CEQA Guidelines Section 15126.6(f)(2). However, alternative locations were concluded to not meet the CEQA Guidelines objective of avoiding or substantially lessening the Project significant effects.

The four alternatives to the Project are analyzed below. These analyses compare the Project and each individual Project alternative. In several cases, the description of the impact may be the same under each alternative when compared with the CEQA Thresholds of Significance (i.e., both the Project and the alternative would result in a less than significant impact). The actual degree of impact may be slightly different between the Project and each alternative, and this relative difference is the basis for

a conclusion of greater or lesser impacts. In addition, the evaluation of the alternatives assumes that the mitigation measures that would be imposed on the Project are also imposed on each alternative, with the exception of the No Project Alternative.

6.1.3 - Project Objectives

As stated in Section 2, Project Description, the objectives of the Project are to:

1. Maximize retail commercial property and sales tax revenues that would be accrued to the various agencies within the City of Redlands from the development of the Project site.
2. Facilitate customer convenience by providing a full range of goods and services (including grocery, gardening, dry goods, automotive, and other uses) within a single store.
3. Develop the Project site with a high-quality mix of retail, grocery, restaurant, and commercial uses that will complement each other and encourage one stop shopping thereby reducing vehicle miles traveled and vehicle trips in the community.
4. Provide convenient and affordable shopping opportunities to the residents of the City of Redlands and surrounding areas for a wide range of retail goods and services, including the provision of such goods and services on a 24-hour basis.
5. Provide the Redlands Crossing Center with a nationally recognized, general-merchandise anchor to attract consumers and other businesses to the Project.
6. Provide an additional grocery outlet in the North Redlands Community to minimize travel, as well as provide convenient shopping opportunities for City residents.
7. Develop a new major retail and commercial center along Major Arterial streets and in close proximity to the 210 Freeway/San Bernardino Avenue Interchange in order to facilitate regional public access and promote the Project as a regional shopping destination.
8. Develop the vacant unused parcels comprising the Project site for retail-commercial uses in a manner that fully utilizes their development potential.

6.2 - Alternative 1 - No Project Alternative

Under the No Project Alternative, the Project site would remain in its existing condition and no development would occur.

6.2.1 - Impact Analysis

The Project site would remain in its existing condition and no changes would occur. Currently, the Project site is undeveloped. If developed, the likely alternative is that the site would be built out as another type of commercial center that is consistent with current General Plan and zoning designations; the scenarios that are evaluated under Alternatives 2, 3 and 4 are representative of this buildout.

Under the No Project Alternative, all of the Project’s significant unavoidable impacts would be avoided, and its potentially significant impacts that can be mitigated to a level of less than significant would not occur.

6.2.2 - Conclusion

The No Project Alternative would avoid all of the Project’s significant unavoidable impacts and have less impact on all environmental topical areas. However, this alternative would not advance any of the project objectives. Furthermore, this alternative would not realize the project benefits of increased retail opportunities, additional employment opportunities, and new tax revenues.

6.3 - Alternative 2 - 10-Percent Reduction Alternative

The 10-Percent Reduction Alternative would reduce the proposed Redlands Crossing Center total square footage from 275,500 square feet to 247,950 square feet for the Project. This alternative would represent a net reduction of 27,550 square feet, or approximately 10 percent relative to the Project. Table 6-1 provides a summary of the 10-Percent Reduction Alternative.

Table 6-1: Ten Percent Reduction Alternative Summary

Component	Square Footage
Project	275,500
10-Percent Reduction Alternative	247,950
Net Change Relative to Project	(27,550)
Source: Michael Brandman Associates, 2011	

Under this alternative each building footprint would be reduced by approximately 10%, including each of the outparcels and the major tenant (Walmart).

6.3.1 - Impact Analysis

Aesthetics

The Project was found to have the potential to degrade the existing visual character or quality of the site and its surroundings, and to introduce new sources of substantial light and glare, though these effects were determined to be less than significant with mitigation.

The Reduced Density Alternative would develop a total of 247,950 square foot retail center anchored by a Walmart discount store with smaller retail and restaurant uses. The appearance of the resulting project would be similar to that of the Project; therefore, the underlying change in visual character would be similar. Additional landscaping would be provided in areas where building square footage and parking would be reduced. Exterior lighting fixtures would be installed and would require mitigation similar to that of the Project to reduce potential light spillage impacts to a level of less than

significant. Therefore, this alternative would have aesthetics, light, and glare impacts similar to the Project.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact with respect to aesthetics, light or glare, this alternative would fail to do so as well.

Agricultural Resources

As with the Project, this alternative would result in the conversion of approximately 9.70 acres of prime farmland, 0.15 acre of farmland of statewide importance to non-agricultural use. However, the Farmland Mapping and Monitoring Program (FMMP) requires that the land be used for agricultural production within the past four (4) years to be considered prime farmland and farmland of statewide importance. The Project site has not been in agricultural production for over nine (9) years. Consequently, an impact to prime farmland and farmland of statewide importance from implementation of the Project was determined to be less than significant. Similar to the Project, the alternative's residual significance would be less than significant. Therefore, this alternative would have a less than significant impact to agricultural resource impacts, similar to the Project.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project does not make a cumulatively considerable contribution to a significant cumulative impact, this alternative would do so as well.

Air Quality

This alternative would develop a total of 247,950 square foot retail center anchored by a Walmart discount store with smaller retail and restaurant uses. Construction activities would be similar to the Project and would result in a comparable amount of pollutant emissions. From an operational emissions perspective, this alternative would generate fewer daily trips relative to the Project. This would result in fewer emissions of criteria pollutants on a daily basis.

The following table is a comparison of the Project and the alternative Winter Daily Regional Operational Emissions for the year 2013, without Mitigation. See Appendix B for additional information regarding the Project's Winter Daily Regional Operational Emissions.

Table 6-2: Regional Operational Emissions Comparison

Source	Worst Case Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Project	233	191	1,997	2	222	10
Regional Threshold	55	55	550	150	150	55
Significant Impact?	Yes	Yes	Yes	No	Yes	No
Reduced Density Alternative	210	172	1,797	2	200	9
Regional Threshold	55	55	550	150	150	55
Significant Impact?	Yes	Yes	Yes	No	Yes	No

Source: Air Quality Analysis Report, Michael Brandman Associates, 2011.

The Project site is located in the Basin, which is within a nonattainment area for PM₁₀, PM_{2.5}, and ozone. Therefore, if the alternative exceeds the regional thresholds for NO_x or VOC, and CO then it follows that the alternative would contribute to a cumulatively considerable impact for ozone and particulate matter since both VOC, NO_x and CO participate in the formation of particulates, similar to the Project.

Although the alternative’s daily operational emissions were found to be significant, this alternative would still result in fewer overall emissions and would be considered more beneficial. Additionally, this alternative would result in fewer diesel particulate matter (DPM) and greenhouse gas emissions relative to the Project. While the Project’s DPM and greenhouse gas emissions were found to add no cumulatively considerable amounts to global greenhouse gas emission concentrations, this alternative would still result in fewer overall emissions and would be considered more beneficial. Therefore, this alternative would have fewer air quality impacts than the Project.

In terms of cumulative impacts, the fact that this alternative has fewer individual impacts means its contributions to any cumulative impact would be fewer compared to the contributions of the Project. Given that the Project makes a cumulatively considerable contribution to a significant cumulative impact, this alternative would do so as well.

Biological Resources

Development activities associated with the Project were found to have the potential to adversely affect special-status species, though these effects were determined to be less-than-significant with mitigation. Other impacts were found to be less-than-significant.

This alternative would result in an amount of ground disturbance that is similar to that of the Project. As such, this alternative would implement mitigation for special-status species similar to that of the Project. Therefore, this alternative would have biological resources impacts similar to the Project.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Cultural Resources

Subsurface construction activities associated with the Project were found to have the potential to damage or destroy previously undiscovered historic resources; the potential to damage or destroy previously undiscovered paleontological resources and the potential to damage or destroy previously undiscovered human burial sites, though these effects were determined to be less than significant with mitigation. Other impacts were found to be less than significant.

This alternative would result in an amount of ground disturbance similar to the Project. As such, this alternative would implement mitigation for cultural resources similar to that of the Project. Therefore, this alternative would have cultural resource impacts similar to the Project.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Geology and Soils

Development of the Project was found to potentially expose persons or structures to seismic hazards, and construction activities associated with the Project were found to potentially create erosion and sedimentation, though these effects were determined to be less than significant with mitigation. Other impacts were found to be less-than-significant.

This alternative would develop a total of 247,950-square-foot retail center anchored by a Walmart discount store with smaller retail and restaurant uses. The structures developed under this alternative would implement mitigation similar to the Project to reduce potential seismic hazards to a level of less than significant. Construction activities associated with this alternative would result in ground disturbance that could create erosion. Mitigation similar to that of the Project would be required to ensure that standard stormwater quality control measures are implemented to reduce potential erosion impacts to a level of less than significant. Therefore, this alternative would have geology, soils, and seismicity impacts similar to the Project.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Hazards and Hazardous Materials

Development of the Project was found to have the potential impacts due to hazardous materials associated with past or present usage of the Project site or surrounding land uses, though these effects were determined to be less-than-significant with mitigation. Other impacts were found to be less-than-significant.

This alternative would result in construction and operational activities similar to the Project. The Project site and surrounding areas do not contain any recognized environmental constraints; therefore, this alternative would not be susceptible to hazards associated with the past and present use. As with the Project, this alternative would not handle substantial quantities of hazardous materials, create aviation hazards, impair emergency response or evacuation, or create exposure to wildland fires. Impacts related to hazards and hazardous materials resulting from this alternative would be similar to the Project.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Hydrology and Water Quality

Construction activities and operational activities associated with the Project were found to have the potential to degrade water quality in downstream water bodies. In addition, the Project was found to have potential impacts with regard to its contribution to groundwater overdraft, though these effects were determined to be less than significant with mitigation. Remaining impacts were found to be less than significant.

This alternative would develop a total of 247,950 square foot retail center anchored by a Walmart discount store with smaller retail and restaurant uses. The amount of impervious area would be reduced by this alternative by 10 percent because building square footage would be replaced with landscaping, which in turn would lessen the severity of impacts from a water quality perspective and drainage perspective. While this alternative would result in a net increase in potable water consumption relative to existing conditions and, therefore, would contribute to groundwater overdraft, the actual change in groundwater consumption between the Project and this alternative would be negligible, since this alternative would exchange building square footage for landscaping. Accordingly, this alternative would have negligible impacts on hydrology and water quality than the Project.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Land Use and Planning

The Project was not found to conflict with the applicable provisions of the City of Redlands Municipal Code.

This alternative would develop a total of 247,950-square-foot retail center anchored by a Walmart discount store with smaller retail and restaurant uses. This alternative assumes that all of the buildings, including the Walmart Store, would be reduced uniformly by 10% as compared to the Project. The Project would be consistent with the General Plan designation of General Commercial District and Administrative Professional District. Similar entitlements would be necessary, including a use permit, site plan review, and tentative parcel map. As such, this alternative would have land use impacts similar to the Project.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Mineral Resources

The Project was not found to conflict with mineral resources.

This alternative would result in construction and operational activities similar to the Project. Therefore, as with the Project, this alternative would not impact mineral resources at the Project site.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Noise

The Project was found to have significant impacts with regard to the exposure to nearby land uses from excessive construction noise, though these effects were determined to be less than significant with mitigation. Remaining impacts were found to be less than significant.

This alternative would develop a total of 247,950 square foot retail center anchored by a Walmart discount store with smaller retail and restaurant uses. Construction activities would be similar in nature to those of the Project. Because the Project's construction noise impacts were found to be less than significant with mitigation incorporated, this alternative's impacts would also remain less than significant with mitigation incorporated.

In terms of cumulative impacts, the fact that this alternative has fewer individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given

that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Population, Housing, and SCAG Consistency

The Project was not found to conflict with Population, Housing, and SCAG Consistency.

This alternative would result in construction and operational activities similar to the Project. Although this alternative would develop less square footage as compared to the Project, as with the Project, this alternative would not impact Population, Housing, and SCAG Consistency.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Public Services

The Project was found to have the potential to adversely impact police protection, though these effects were determined to be less than significant with mitigation. Other impacts were found to be less than significant.

This alternative would develop a total of 247,950-square-foot retail center anchored by a Walmart discount store with smaller retail and restaurant uses. This alternative would result in a reduction of 27,550 square feet relative to the Project, which equates to an approximate 10 percent reduction in area compared with the Project. Areas within the Project site not utilized for retail or parking space would be landscaped. The reduction in square footage and differences in operations would be expected to result in correspondingly fewer demands for police protection, fire protection, and emergency medical services. As such, this alternative would demand fewer resources, which would reduce the severity of the impact. Therefore, this alternative would have fewer impacts on public services than the Project.

In terms of cumulative impacts, the fact that this alternative has fewer individual impacts means its contributions to any cumulative impact would be fewer than the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact to public services, this alternative would fail to do so as well.

Recreation

The Project was not found to conflict with recreation within the Project area.

This alternative would result in construction and operational activities similar to the Project. Although this alternative would develop less square footage as compared to the Project, as with the Project, this alternative would not impact recreational resources within the Project area.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Transportation

The Project was found to contribute trips to intersections and queues that would operate at unacceptable levels under Existing Plus Project, Year 2013, and Year 2030 conditions and to potentially not provide adequate access to public transit. However, each of these effects was determined to be less than significant with mitigation with exception of impacts to freeway ramps and mainline freeway segments. The Project was found to have significant and unavoidable impacts with respect to State facilities (mainline and ramp junctions) at the Horizon Year 2030. The I-10 Freeway westbound segment west of California Street would operate at LOS "F" even without the Project under Horizon Year 2030 traffic conditions.

Although this alternative would generate fewer daily trips, it would still contribute additional vehicle trips to the intersections, roadway segments, and queues that are projected to operate at unacceptable levels. Mitigation similar to that included in the Project would be implemented, reducing any significant impacts to a level of less than significant (consistent with the Project's impacts). In addition, this alternative would contribute vehicle trips to State facilities (mainline and ramp junctions) as with the Project; however, Caltrans has exclusive control over State highway improvements and State highway improvements are by and large a matter of State-wide control. Thus, for the aforementioned reasons there are no feasible mitigation measures available to mitigate the alternative's contribution to traffic on the SR-210 and I-10 Freeways under Horizon Year 2030 traffic conditions. Therefore, impacts in this regard would remain significant, adverse and unavoidable with respect to Caltrans facilities.

Similar to the Project, this alternative would provide bicycle storage and enhanced pedestrian facilities. Finally, this alternative would implement mitigation similar to that of the Project to ensure all vehicular access points would operate safely and efficiently. Therefore, this alternative would have similar impacts on transportation compared to the Project.

Utilities and Service Systems

The Project was found to have the potential to adversely impact long-term sources of potable water, though these effects were determined to be less than significant with mitigation. Other impacts were found to be less than significant.

This alternative would develop a total of 247,950-square-foot retail center anchored by a Walmart discount store with smaller retail and restaurant uses. This alternative would result in a reduction of 27,550 square feet relative to the Project, which equates to an approximate 10 percent reduction in area compared with the Project. Areas within the project site not utilized for retail or parking space

would be landscaped. The reduction of 10 percent would be expected to result in less consumption of water and energy; and less generation of wastewater and solid waste. As such, this alternative would demand fewer resources and generate less effluent, which would lessen the severity of impacts. Therefore, this alternative would have fewer impacts on utilities than the Project.

In terms of cumulative impacts, the fact that this alternative has fewer individual impacts means its contributions to any cumulative impact would be fewer to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Greenhouse Gases

The Project was not found to conflict with greenhouse gases.

This alternative would result in construction and operational activities similar to the Project. Although this alternative would develop less square footage as compared to the Project, as with the Project, this alternative would not be impacted by greenhouse gases from development and operation of this alternative.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Urban Decay

This alternative would develop a total of 247,950-square-foot retail center anchored by a Walmart discount store with smaller retail and restaurant uses. This alternative would result in a reduction of 27,550 square feet relative to the Project, which equates to an approximate 10 percent reduction in area compared with the Project. However, this alternative is not anticipated to change the size/scope of the proposed Walmart's grocery facility. As a result, this alternative would be expected to generate similar sales as the Project's capture of sales from competing retailers. In addition, the Primary Market Area and Secondary Market Area are anticipated to experience substantial increase in grocery expenditures over the next decade, and demand for food-related items is anticipated to outpace existing and planned supply. Accordingly, competing grocery stores would not close as a direct or indirect result of the development of this alternative, and urban decay would not be a foreseeable consequence. Therefore, this alternative would have urban decay impacts similar to the Project.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

6.3.2 - Conclusion

The 10-Percent Reduced Density Alternative would result in the same significant unavoidable impacts as those of the Project (i.e., cumulative Air Quality and cumulative Freeway ramp and mainline traffic impacts). However, the severity of the significant unavoidable traffic impacts would be less because fewer daily and peak-hour trips would be generated. In addition, the severity of impacts associated with air quality, noise, hydrology, public services and utilities, transportation, and urban decay would be less. Otherwise, this alternative would have impacts similar to the Project.

This alternative would not achieve most of the basic Project objectives, or would not achieve them to the same degree, as the Project. It would not generate as much sales, thereby resulting in less positive contribution to the local economy, generating less tax revenue. The reduction in sales and tax revenues would prevent achievement of Objective 1, as such revenues would not be maximized. It would not fully achieve Objective 2 as the reduction in square footage of sales area represented by this alternative would likely result in a narrowing of the range of goods and services that would be provided to the currently underserved community as compared to the Project. Likewise, this alternative would not fully meet Objective 4 since the range of goods and services would be narrowed as compared to the Project. Also, since the building area is reduced by 10% under this alternative Objective 8 is not met because the full development potential of the site is limited as compared to the Project.

In addition, a 10% reduction in the size of the outparcels would impact the overall marketability of the Project. The outparcel retail pads have been designed and sized so as to attract compatible uses to the shopping center, including smaller retailers, banks, fast food and sit down restaurants, and other such uses. A further reduction in the already small pad sizes for these uses decreases their marketability to potential businesses and reduces the ability to attract stable tenants.

Also, although it will lessen the magnitude of cumulative air quality and freeway traffic impacts, these impacts would remain significant, adverse and unavoidable under this alternative.

6.4 - Alternative 3 - Walmart Standalone Alternative

The Walmart Standalone Alternative would eliminate the proposed commercial and retail buildings in the Redlands Crossing Center, except for the Walmart. The Standalone Walmart would operate 24 hours per day. The total square footage would be reduced from 275,500 square feet to 215,000 square feet. The Walmart Standalone Alternative would represent a net reduction of 60,500 square feet, or approximately 22 percent relative to the Project. Table 6-3 provides a summary of the Walmart Standalone Alternative.

Table 6-3: Walmart Standalone Alternative

Component	Square Footage
Project	275,500
Walmart Standalone Alternative	215,000
Net Change Relative to Project	60,500
Source: Michael Brandman Associates, 2009	

6.4.1 - Impact Analysis

Aesthetics

The Project was found to have the potential to degrade the existing visual character or quality of the site and its surroundings, and to introduce new sources of substantial light and glare, though these effects were determined to be less than significant with mitigation.

This alternative would result in the development of a 215,000-square-foot Walmart Standalone that would operate 24-hours a day. The appearance of the resulting Walmart would be the same as that of the Project and would require similar mitigation for elevations, landscaping, and signage.

This alternative does not include development of the outlots, and therefore the Walmart store would be more visible from Tennessee Street and San Bernardino Avenue.

In terms of light and glare, exterior lighting fixtures would be installed and would require mitigation similar to that of the Project to reduce potential light spillage impacts to a level of less than significant. However, lighting for the outlots would not be constructed, resulting in less potential light spillage. Although these impacts can be mitigated to a level of less than significant, this alternative would lessen the severity of these impacts because it would result in less visual change and would introduce fewer new sources of light and glare. Therefore, this alternative would have fewer aesthetics, light, and glare impacts than the Project.

In terms of cumulative impacts, the fact that this alternative has fewer individual impacts means its contributions to any cumulative impact would be fewer to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Agricultural Resources

As with the Project, this alternative would result in the conversion of approximately 9.70 acres of prime farmland, 0.15 acre of farmland of statewide importance to non-agricultural use. However, the Farmland Mapping and Monitoring Program (FMMP) requires that the land be used for agricultural production within the past four (4) years to be considered prime farmland and farmland of statewide importance. The Project site has not been in agricultural production for over nine (9) years. Consequently, an impact to prime farmland and farmland of statewide importance from

implementation of the Project was determined to be less than significant. Similar to the Project, the alternative’s residual significance would be less than significant. Therefore, this alternative would have a less than significant impact to agricultural resource impacts, similar to the Project.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project does not make a cumulatively considerable contribution to a significant cumulative impact, this alternative would do so as well.

Air Quality

This alternative would result in a net decrease of 60,500 square feet relative to the Project. Construction activities would be similar to the Project and would result in a comparable amount of pollutant emissions. However, the Project’s construction emissions were found to be less than significant without mitigation; therefore, this alternative’s emissions would also be less than significant without mitigation. From an operational emissions perspective, this alternative would generate fewer daily trips relative to the Project. This would result in fewer emissions of criteria pollutants on a daily basis. The following table is a comparison of the Project and the alternative Winter Daily Regional Operational Emissions for the year 2013, without mitigation. See Appendix B for additional information regarding the Project’s Winter Daily Regional Operational Emissions.

Table 6-4: Regional Operational Emissions Comparison

Source	Worst Case Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Project	233	191	1,997	2	222	10
Regional Threshold	55	55	550	150	150	55
Significant Impact?	Yes	Yes	Yes	No	Yes	No
Walmart Standalone Alternative	182	149	1,558	2	173	8
Regional Threshold	55	55	550	150	150	55
Significant Impact?	Yes	Yes	Yes	No	Yes	No

Source: Air Quality Analysis Report, Michael Brandman Associates, 2009.

The Project site is located in the Basin, which is within a nonattainment area for PM₁₀, PM_{2.5}, and ozone. Therefore, if the alternative exceeds the regional thresholds for VOC, NO_x, CO then it follows that the alternative would contribute to a cumulatively considerable impact for ozone and particulate matter since VOC’s NO_x and CO participate in the formation of particulates, which is a similar significant impact to the Project.

Consequently, this alternative would result in fewer overall emissions and would be considered more beneficial. Additionally, this alternative would result in fewer DPM and greenhouse gas emissions

relative to the Project. While the Project's DPM and greenhouse gas emissions were found to add no cumulatively considerable amounts to global greenhouse gas emission concentrations, this alternative would still result in fewer overall emissions and would be considered more beneficial. Therefore, this alternative would have fewer air quality impacts than the Project.

In terms of cumulative impacts, the fact that this alternative has fewer individual impacts means its contributions to any cumulative impact would be fewer to the contributions of the Project. Given that the Project makes a cumulatively considerable contribution to a significant cumulative impact, this alternative would do so as well.

Biological Resources

This alternative would still result in a potential impact to the San Bernardino Kangaroo Rat (*Dipodomys merriami parvus*) (SBKR), Western Burrowing Owl (*Athene cunicularia*) (BUOW) and Nesting Birds. Mitigation similar to that of the Project would be implemented to ensure that impacts would not be adversely affected by this alternative's construction activities. Therefore, this alternative would have biological resources impacts similar to the Project.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Cultural Resources

Subsurface construction activities associated with the Project were found to have the potential to damage or destroy previously undiscovered historic resources and the potential to damage or destroy previously undiscovered paleontological resources, though these effects were determined to be less than significant with mitigation. Other impacts were found to be less than significant.

This alternative would result in an amount of ground disturbance similar to the Project. As such, this alternative would implement mitigation for cultural resources similar to that of the Project.

Therefore, this alternative would have cultural resources impacts similar to the Project.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Geology and Soils

Development of the Project was found to potentially expose persons or structures to seismic hazards, and construction activities associated with the Project were found to potentially create erosion and

sedimentation, though these effects were determined to be less than significant with mitigation. Other impacts were found to be less than significant.

This alternative would result in the development of a 125,000-square-foot Walmart Standalone that would operate 24-hours a day. The structure developed under this alternative would implement mitigation similar to that of the Project to reduce potential seismic hazards to a level of less than significant.

Construction activities associated with this alternative would result in ground disturbance that is similar to the Project and, as with the latter, would have potential to create erosion. However, mitigation similar to that of the Project would be required to ensure that standard stormwater quality control measures are implemented to reduce potential erosion impacts to a level of less than significant. Therefore, this alternative would have geology, soils, and seismicity impacts similar to the Project.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Hazards and Hazardous Materials

Development of the Project was found to have potential impacts from hazardous materials associated with past or present usage of the Project site or surrounding land uses, though these effects were determined to be less than significant with mitigation. Other impacts were found to be less than significant.

This alternative would result in construction and operational activities similar to the Project. The Project site and surrounding areas do not contain any recognized environmental constraints; therefore, this alternative would not be susceptible to hazards associated with the past and present use.

Elimination of the outlots would not reduce the risk associated with hazards and hazardous materials by any substantial level, as the outlot uses would not be expected to use significant amounts of such materials. As with the Project, this alternative would not handle substantial quantities of hazardous materials. Impacts related to hazards and hazardous materials resulting from this alternative would be similar to the Project.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Hydrology and Water Quality

Construction activities and operational activities associated with the Project were found to have the potential to degrade water quality in downstream water bodies. In addition, the Project was found to have potential impacts with regard to its contribution to groundwater overdraft, though these effects were determined to be less than significant with mitigation. Remaining impacts were found to be less than significant.

This alternative would result in the development of a 215,000-square-foot Walmart Standalone and associated improvements on the Project site. The amount of impervious area would be reduced under this alternative by 60,500 square feet because the outlots would be replaced with landscaping, which in turn would lessen the severity of impacts from a water quality perspective and a drainage perspective. While this alternative would result in a net increase in potable water consumption relative to existing conditions and, therefore, would contribute to groundwater overdraft, the actual change in groundwater consumption between the Project and this alternative would be negligible, since this alternative would exchange building square footage for landscaping. Accordingly, this alternative would have fewer impacts on hydrology and water quality than the Project.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Land Use and Planning

The Project was not found to conflict with the applicable provisions of the City of Redlands Municipal Code.

This alternative would result in the development of a 215,000-square-foot Walmart Standalone that would operate 24-hours a day. The Project would be consistent with the General Plan designation of General Commercial District and Administrative Professional District. Similar entitlements would be necessary, including a use permit, site plan review, and tentative parcel map. As such, this alternative would have land use impacts similar to the Project. However, development of this stand-alone alternative would prevent development as envisioned by the EVCS and Citrus Pavilion Plans.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Mineral Resources

The Project was not found to conflict with mineral resources.

This alternative would result in construction and operational activities similar to the Project. Therefore, as with the Project, this alternative would not impact mineral resources at the Project site.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Noise

The Project was found to have significant impacts with regard to exposure to nearby land uses from excessive construction noise, though these effects were determined to be less than significant with mitigation. Remaining impacts were found to be less than significant.

This alternative would result in the development of a 215,000 square foot Walmart Standalone that would operate 24-hours a day. Construction activities would be similar in nature to the Project. Because the Project's construction noise impacts were found to be less than significant with mitigation incorporated, this alternative's impacts would also remain less than significant with mitigation incorporated.

In terms of cumulative impacts, since this alternative has fewer individual impacts, its contributions to any cumulative impact would be less than the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Population, Housing, and SCAG Consistency

The Project was not found to conflict with Population, Housing, and SCAG Consistency.

This alternative would result in construction and operational activities similar to the Project. Although this alternative would develop less square footage as compared to the Project, as with the Project, this alternative would not impact Population, Housing, and SCAG Consistency.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Public Services and Recreation

The Project was found to have the potential to adversely impact police protection, though these effects were determined to be less than significant with mitigation. Other impacts were found to be less than significant.

This alternative would result in the development of a 215,000-square-foot Walmart Standalone that would operate 24-hours a day, which equates to approximately 22 percent less area. The elimination of the outlots would be expected to result in correspondingly fewer demands for fire protection, emergency medical services and police protection. As such, this alternative would demand fewer resources, which would lessen the severity of impacts. Therefore, this alternative would have fewer impacts on public services and recreation than the Project.

In terms of cumulative impacts, the fact that this alternative has fewer individual impacts means its contributions to any cumulative impact would be fewer to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Recreation

The Project was not found to conflict with recreation within the Project area.

This alternative would result in construction and operational activities similar to the Project. Although this alternative would develop less square footage as compared to the Project, as with the Project, this alternative would not impact recreational resources within the Project area.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Transportation

The Project was found to contribute trips to intersections and queues that would operate at unacceptable levels under Existing Plus Project, Year 2013, and Year 2030 conditions and to potentially not provide adequate access to public transit. However, each of these effects was determined to be less than significant with mitigation. The Project was found to have significant and unavoidable impacts with respect to State facilities (mainline and ramp junctions) at the 2030 time horizon. The I-10 Freeway westbound segment west of California Street would operate at LOS "F" even without the Project under Horizon Year 2030 traffic conditions.

This alternative would generate fewer daily trips than the Project and, similar to the Project, impacts to intersections, roadway segments, and queues would be less than significant with mitigation. Mitigation similar to that included in the Project would be implemented, reducing impacts to a level of less than significant (consistent with the Project's impacts). This alternative would contribute vehicle trips to State facilities (mainline and ramp junctions) as with the Project; however, Caltrans has exclusive control over State highway improvements and State highway improvements are by and large a matter of State-wide control. Thus, for the aforementioned reasons there are no available and feasible mitigation measures available to mitigate the alternative's contribution to traffic on the SR-

210 and I-10 Freeways under Horizon Year 2030 traffic conditions. Therefore, impacts in this regard would remain similar to the Project, resulting in a significant and unavoidable impact to Caltrans facilities.

Similar to the Project, this alternative would provide bicycle storage and enhanced pedestrian facilities. Finally, this alternative would implement mitigation similar to that of the Project to ensure all vehicular access points would operate safely and efficiently. Therefore, this alternative would have similar impacts on transportation compared to the Project.

In terms of cumulative impacts, the fact that this alternative has fewer individual impacts means its contributions to any cumulative impact would be fewer to the contributions of the Project. Given that the Project makes a cumulatively considerable contribution to a significant cumulative impact, this alternative would do so as well, albeit to a lesser degree.

Utilities and Service Systems

The Project was found to have the potential to adversely impact long-term sources of potable water, though these effects were determined to be less than significant with mitigation. Other impacts were found to be less than significant.

This alternative would result in the development of a 215,000-square-foot Walmart Standalone that would operate 24-hours a day, which equates to approximately 22 percent less area. The elimination of the outlots would be expected to result in less consumption of water and energy; and less generation of wastewater and solid waste. As such, this alternative would demand fewer resources and generate less effluent, which would lessen the severity of impacts. Therefore, this alternative would have fewer impacts on utilities than the Project.

In terms of cumulative impacts, the fact that this alternative has fewer individual impacts means its contributions to any cumulative impact would be fewer to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Greenhouse Gases

The Project was not found to conflict with greenhouse gases.

This alternative would result in construction and operational activities similar to the Project. Although this alternative would develop less square footage as compared to the Project, as with the Project, this alternative would not be impacted by greenhouse gases from development and operation of this alternative.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given

that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Urban Decay

This alternative would result in the development of a 215,000-square-foot Walmart Standalone that would operate 24-hours a day, which equates to approximately 22 percent less area. However, this alternative is not anticipated to change the size/scope of the proposed Walmart's grocery facility. As a result, this alternative would be expected to generate similar sales as the Project's capture of sales from competing retailers. In addition, the Primary Market Area and Secondary Market Area are anticipated to experience substantial increase in grocery expenditures over the next decade, and demand for food-related items is anticipated to outpace existing and planned supply. Accordingly, competing grocery stores would not close as a direct or indirect result of the development of this alternative, and urban decay would not be a foreseeable consequence. Therefore, this alternative would have urban decay impacts similar to the Project.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

6.4.2 - Conclusion

The Walmart Standalone Alternative would result in the same significant unavoidable impacts as the Project. However, the severity of traffic impacts would be less because fewer daily and peak hour trips would be generated. In addition, the severity of impacts associated with aesthetics, air quality, hydrology and water quality, noise, public services and utilities, and transportation would be lessened relative to the Project.

The Walmart Standalone Alternative would not meet most of the basic Project objectives, or would not further them to the same degree as the Project. In general, the elimination of the outlots would result in fewer sales, thereby resulting in less positive contribution to the local economy, and generating less tax revenue for local agencies.

The reduction in sales and tax revenues would prevent achievement of Objective 1, as such revenues would not be maximized. This alternative also fails to meet Objective 3 since the mix of complementary uses is limited because the Project site would only be occupied by the Walmart Store. Likewise, this alternative would not fully meet Objective 4 since the range of goods and services would be narrowed as compared to the Project. Objective 5 is not met because the nationally recognized anchor (Walmart) would not attract other businesses to the Project. Objective 7 is compromised as a major new center would not be developed—only the Walmart store. Since the building area is reduced by approximately 22% under this alternative, Objective 8 is not met because the full development potential of the site is limited as compared to the Project.

In addition, although it will lessen the magnitude of cumulative air quality and freeway traffic impacts, these impacts would remain significant, adverse and unavoidable under this alternative.

6.5 - Alternative 4 - No Walmart/Medium Size Tenant Alternative

Under this alternative total building area would be the same as the Project and the uses for the parcels other than the Walmart Parcel would also be the same. This alternative would differ from the Project, in that it would not include a “big box,” general merchandise anchor, but would include medium-sized, individual tenants with retail space generally in the 15,000 square feet to 50,000 square feet range. This alternative also includes the other types of retail uses that the proposed Walmart would have (grocery store, tire/auto and nursery), except under this alternative they would be independent, freestanding tenants. Unlike big box discount/general merchandise stores such as Walmart, Target, Costco or K-Mart, medium sized stores tend to concentrate on certain type of product types such as clothing, books and music, electronics, office supplies/equipment, etc. Consequently, shopper visits to these types of establishments tend to be more limited-purpose in nature than a visit to a general merchandise business (such as Walmart) where a shopper may purchase many types of goods. Table 6-5 shows uses that were assumed to replace the 215,000 square foot floor area occupied by the Walmart store for the Project and are typical types of commercial uses for shopping centers. Table 6-5 also shows the aggregate figures for the freestanding uses, comprising 60,500 square feet, which would remain the same for both the Project and this alternative.

Table 6-5: No Walmart/Medium Size Tenant Alternative Tenant Space Summary

Commercial Use/ ITE Code	Building Area (SF)	Net Average Daily Weekday Trips
Electronics Store/ 863	35,000	851
Office Supply Store/867	35,000	1,071
Clothing/Apparel Stores (2stores) /876	70,000	4,184
Grocery Store//850	55,000	3,239
Retail Nursery/818	13,500	474
Specialty Auto (Tires, Lube & Oil Change, etc.)/942	6,500	87
Aggregate Freestanding Uses (Various Codes)	60,500	9,200
Total	275,500	19,106

The total weekday average daily trips (ADT) for the Project at 19,481 ADT would be slightly higher than the estimated 19,106 ADT resulting from this alternative. However, that ADT would vary substantially depending on what specific commercial use is assumed to be in the mix. For example, if this alternative is reduced in area to 240,500 (by 35,000 square feet) and, instead of 70,000 square

feet devoted to two clothing apparel stores a single 35,000 book/media store (ITE Code 868) is included (such as a Barnes and Noble) the weekday ADT for the alternative would be 2,1074 ADT, despite the 35,000 square feet reduction in floor area.

6.5.1 - Impact Analysis

Aesthetics

The Project was found to have the potential to degrade the existing visual character or quality of the site and its surroundings, and to introduce new sources of substantial light and glare, though these effects were determined to be less than significant with mitigation.

This alternative would develop the same amount of floor area as the Project and would be similar in appearance and in terms of lighting. Therefore, the underlying change in visual character and potential impacts would be similar.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact with respect to aesthetics, light and glare, this alternative would fail to do so as well.

Agricultural Resources

As with the Project, this alternative would result in the conversion of approximately 9.70 acres of prime farmland and 0.15 acre of farmland of statewide importance to non-agricultural use. Historically, the Project site has to be irrigated as well as used for agricultural production. However, the Farmland Mapping and Monitoring Program (FMMP) requires that the land be used for agricultural production within the past four (4) years to be considered prime farmland and farmland of statewide importance. The Project site has not been in agricultural production for over nine (9) years. Consequently, an impact to prime farmland and farmland of statewide importance from implementation of the Project was determined to be less than significant. Similar to the Project, the alternative's residual significance would be less than significant. Therefore, this alternative would have a less than significant impact to agricultural resource impacts, similar to the Project.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project does not make a cumulatively considerable contribution to a significant cumulative impact, this alternative would do so as well.

Air Quality

This alternative would develop the same amount of floor area as the Project. Since weekday ADT are estimated to be slightly smaller than the Project (375 weekday ADT). From an operational emissions perspective, this slight lowering of ADT would result in a similar slight reduction in pollutant emission.

The Project site is located in the Basin, which is within a nonattainment area for PM₁₀, PM_{2.5}, and ozone. Therefore, if the alternative exceeds the regional thresholds for NO_x or VOC, and CO then it follows that the alternative would contribute to a cumulatively considerable impact for ozone and particulate matter since both VOC, NO_x and CO participate in the formation of particulates, similar to the Project.

Although the alternative's daily operational emissions would be significant, this alternative would still result in fewer overall emissions and would be considered more beneficial, albeit by a small margin. Additionally, this alternative would likely result in marginally less diesel particulate matter (DPM) and greenhouse gas emissions relative to the Project. While the Project's DPM and greenhouse gas emissions were found to add no cumulatively considerable amounts to global greenhouse gas emission concentrations, this alternative would still result in fewer overall emissions and would be considered more beneficial. Therefore, this alternative would have fewer air quality impacts than the Project.

In terms of cumulative impacts, the fact that this alternative has slightly fewer individual impacts means its contributions to any cumulative impact would be slightly less compared to the Project. However, the cumulative impacts would still be significant, adverse and unavoidable.

Biological Resources

Development activities associated with the Project were found to have the potential to adversely affect special-status species, though these effects were determined to be less-than-significant with mitigation. Other impacts were found to be less-than-significant.

This alternative would result in an amount of ground disturbance that is similar to that of the Project. As such, this alternative would implement mitigation for special-status species similar to that of the Project. Therefore, this alternative would have biological resources impacts similar to the Project.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Cultural Resources

Subsurface construction activities associated with the Project were found to have the potential to damage or destroy previously undiscovered historic resources; the potential to damage or destroy previously undiscovered paleontological resources and the potential to damage or destroy previously undiscovered human burial sites, though these effects were determined to be less than significant with mitigation. Other impacts were found to be less than significant.

This alternative would result in the same amount of ground disturbance as the Project. As such, this alternative would implement mitigation for cultural resources similar to that of the Project. Therefore, this alternative would have cultural resource impacts similar to the Project.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Geology and Soils

Development of the Project was found to potentially expose persons or structures to seismic hazards, and construction activities associated with the Project were found to potentially create erosion and sedimentation, though these effects were determined to be less than significant with mitigation. Other impacts were found to be less-than-significant.

This alternative would develop the same amount of building floor area as the Project. The structures developed under this alternative would implement mitigation similar to the Project to reduce potential seismic hazards to a level of less than significant. Construction activities associated with this alternative would result in ground disturbance that could create erosion. Mitigation similar to that of the Project would be required to ensure that standard stormwater quality control measures are implemented to reduce potential erosion impacts to a level of less than significant. Therefore, this alternative would have geology, soils, and seismicity impacts similar to the Project.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Hazards and Hazardous Materials

Development of the Project was found to have the potential impacts due to hazardous materials associated with past or present usage of the Project site or surrounding land uses, though these effects were determined to be less-than-significant with mitigation. Other impacts were found to be less-than-significant.

This alternative would result in construction and operational activities similar to the Project. The Project site and surrounding areas do not contain any recognized environmental constraints; therefore, this alternative would not be susceptible to hazards associated with the past and present use. As with the Project, this alternative would not handle substantial quantities of hazardous materials, create aviation hazards, impair emergency response or evacuation, or create exposure to wildland fires. Impacts related to hazards and hazardous materials resulting from this alternative would be similar to the Project.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Hydrology and Water Quality

Construction activities and operational activities associated with the Project were found to have the potential to degrade water quality in downstream water bodies. In addition, the Project was found to have potential impacts with regard to its contribution to groundwater overdraft, though these effects were determined to be less than significant with mitigation. Remaining impacts were found to be less than significant.

This alternative would develop the same amount of floor area and impermeable surfaces as the Project. Therefore, impacts with respect to Hydrology and Water would be similar to the Project.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Land Use and Planning

The Project was not found to conflict with the applicable provisions of the City of Redlands Municipal Code.

This alternative would develop the same amount of floor area and would be consistent with the General Plan designation of General Commercial District and Administrative Professional District. Similar entitlements would be necessary, including a use permit, site plan review, and tentative parcel map. As such, this alternative would have land use impacts similar to the Project.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Mineral Resources

The Project was not found to conflict with mineral resources.

This alternative would result in construction and operational activities similar to the Project. Therefore, as with the Project, this alternative would not impact mineral resources at the Project site.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given

that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Noise

The Project was found to have significant impacts with regard to the exposure to nearby land uses from excessive construction noise, though these effects were determined to be less than significant with mitigation. Remaining impacts were found to be less than significant.

This alternative would develop the same amount of floor area as the Project. Construction activities would be similar in nature to those of the Project. Because the Project's construction noise impacts were found to be less than significant with mitigation incorporated, this alternative's impacts would also remain less than significant with mitigation incorporated.

In terms of cumulative impacts, the fact that this alternative has marginally fewer individual impacts resulting from the slight (375 ADT) reduction in vehicle trips means its contributions to any cumulative impact would be slightly less than the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Population, Housing, and SCAG Consistency

The Project was not found to conflict with Population, Housing, and SCAG Consistency.

This alternative would result in construction and operational activities similar to the Project. Although this alternative would develop less square footage as compared to the Project, as with the Project, this alternative would not impact Population, Housing, and SCAG Consistency.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Public Services

The Project was found to have the potential to adversely impact police protection, though these effects were determined to be less than significant with mitigation. Other impacts were found to be less than significant.

This alternative would develop the same amount of floor area as the Project. Therefore, this alternative would be expected to have impacts on public services similar to the Project.

In terms of cumulative impacts, given that the Project makes no cumulatively considerable contribution to a significant cumulative impact to public services, this alternative would fail to do so as well.

Recreation

The Project was not found to conflict with recreation within the Project area.

This alternative would result in construction and operational activities similar to the Project. Although this alternative would develop less square footage as compared to the Project, as with the Project, this alternative would not impact recreational resources within the Project area. In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Transportation

The Project was found to contribute trips to intersections and queues that would operate at unacceptable levels under Existing Plus Project, Year 2013, and Year 2030 conditions and to potentially not provide adequate access to public transit. However, each of these effects was determined to be less than significant with mitigation with exception of impacts to freeway ramps and mainlines. The Project was found to have significant and unavoidable impacts with respect to State facilities (mainline and ramp junctions) at the Horizon Year 2030. The I-10 Freeway westbound segment west of California Street would operate at LOS "F" even without the Project under Horizon Year 2030 traffic conditions.

Although this alternative would generate slightly fewer (375) daily trips, it would still contribute additional vehicle trips to the intersections, roadway segments, and queues that are projected to operate at unacceptable levels. Mitigation similar to that included in the Project would be implemented, reducing any significant impacts to a level of less than significant (consistent with the Project's impacts). In addition, this alternative would contribute vehicle trips to State facilities (mainline and ramp junctions) as with the Project; however, Caltrans has exclusive control over State highway improvements and State highway improvements are by and large a matter of State-wide control. Thus, for the aforementioned reasons there are no feasible mitigation measures available to mitigate the alternative's contribution to traffic on the SR-210 and I-10 Freeways under Horizon Year 2030 traffic conditions. Therefore, impacts in this regard would remain adverse, significant and unavoidable with respect to Caltrans facilities.

Similar to the Project, this alternative would provide bicycle storage and enhanced pedestrian facilities. Finally, this alternative would implement mitigation similar to that of the Project to ensure all vehicular access points would operate safely and efficiently. Therefore, this alternative would have similar impacts on transportation compared to the Project.

Utilities and Service Systems

The Project was found to have the potential to adversely impact long-term sources of potable water, though these effects were determined to be less than significant with mitigation. Other impacts were found to be less than significant.

This alternative would develop the same amount of floor area as the Project. Therefore, impacts of this alternative with respect to utilities would be similar to the Project.

In terms of cumulative impacts, given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Greenhouse Gases

The Project was not found to conflict with greenhouse gases.

This alternative would result in construction and operational activities similar to the Project. Although this alternative would develop less square footage as compared to the Project, as with the Project, this alternative would not be impacted by greenhouse gases from development and operation of this alternative.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

Urban Decay

This alternative would develop the same amount of floor area as the Project. As a result, this alternative would be expected to generate similar sales as the Project's capture of sales from competing retailers. In addition, the Primary Market Area and Secondary Market Area are anticipated to experience substantial increase in grocery expenditures over the next decade, and demand for food-related items is anticipated to outpace existing and planned supply. Accordingly, competing grocery stores would not close as a direct or indirect result of the development of this alternative, and urban decay would not be a foreseeable consequence. Therefore, this alternative would have urban decay impacts similar to the Project.

In terms of cumulative impacts, the fact that this alternative has similar individual impacts means its contributions to any cumulative impact would be similar to the contributions of the Project. Given that the Project makes no cumulatively considerable contribution to a significant cumulative impact, this alternative would fail to do so as well.

6.5.2 - Conclusion

The alternative would result in the same significant unavoidable impacts as those of the Project (i.e. cumulative Air Quality and Freeway ramp and mainline traffic impacts). However, the severity of these significant unavoidable traffic and air quality impacts would be slightly less since this alternative would create somewhat less (375) average daily trips than the Project which will, in turn, result in slightly less traffic and emissions. Likewise, under this alternative cumulative impacts to Air

Quality and Freeway facilities would be slightly less but still remain significant adverse and unavoidable. Otherwise, this alternative would have impacts similar to the Project.

This alternative does not meet most of the Project Objectives, including Objective 2 in that it does not provide for the wide range of uses that is typical of “big box” general merchandise discount stores, nor does it provide for the convenience of providing these goods and services within a single store. Since the types of uses that would occupy the Project site is more limited, Objective 3 would not be fully achieved due to the narrow, focused nature of the uses, which are also not likely to be as complementary to one another as compared to the Project. The potential for “one-stop shopping” is limited which also hinders achievement of Objective 3. Objective 4 is not met by this alternative because the range of goods and services provided would be limited, and few if any of the stores identified under this alternative would be open 24 hours, thus hindering convenience. Since a nationally recognized, general merchandise anchor is not included for this alternative Objective 5 would not be met.

6.6 - Alternatives Considered But Rejected

Section 15126.6(f)(2)(A) of the CEQA Guidelines indicates that, in determining the consideration of an alternative location, “The key question and first step in 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.” Section 15126.6(f)(3) of the CEQA Guidelines further states “an EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.”

To meet the objectives of the proposed Redlands Crossing Center, an alternative site would need to be of sufficient size to accommodate the Project and its land uses designation as Commercial (C). As can be seen from Exhibit 6-1, there are approximately six (6) areas located within the City of Redlands containing sufficient size to accommodate the Project and have a land use designation of Commercial (C). As previously noted, only locations that would avoid or substantially lessen any of the significant effects of the Project need be considered for inclusion in the EIR. In general, and as discussed further below, any development of the size and type proposed by the Project in the Redlands area would have substantially the same impacts, including significant and unavoidable cumulative air quality and traffic impacts as the proposed Project.

Because any alternative site meeting the Project objectives would be within the same air basin (South Coast Air Basin) and near the proposed Project site, an alternative site would result in the same regional and local air quality emissions as the proposed Project, including significant and unavoidable local operational emissions for VOC, NO_x, CO, and PM₁₀ and result in a significant impact on a regional level even after mitigation. In addition, an alternative site would result in cumulative health effects from cumulative exposures from ozone and PM₁₀, similar to the Project. Also, due to the

developed nature of the Project area, and the close proximity of alternative sites to the Project site, it is anticipated that implementation of the proposed Project on an alternative site would involve construction and operation activities in proximity to the SR-210 Westbound on-ramp at San Bernardino Avenue and the I-10 Eastbound off-ramp to the SR-210 Westbound (upstream only), that would be anticipated to operate at unacceptable levels of service with the addition of Project traffic. Further, because the City has no control over State facilities, and because the State facilities funded and planned to be developed under 2030 conditions are already anticipated to operate at LOS “E” and “F” even without the Project, there are no further mitigation measures that can be imposed upon the Project alternative to mitigate its small cumulative contribution to significant impacts to impacted segments of SR-210 Freeway and I-10 Freeway under 2030 conditions. Caltrans has exclusive control over State highway improvements and State highway improvements are by and large a matter of State-wide control. Therefore, the establishment of the Project at any of the 6 potential alternative sites would still result in cumulative impacts to freeway mainline facilities that are significant, adverse and unavoidable, similar to the proposed Project.

Further, a reduced intensity alternative was not included as part of this Alternative analysis as it is similar in nature to the Stand-Alone Alternative analyzed within this Section. The Stand-Alone Alternative would reduce square footage/intensity by 22 percent, which would be similar in nature to square footage and impacts of a reduced intensity alternative. See the Walmart Standalone Alternative, above, for additional information in this regard.

In summary, an alternative site of adequate size and within a location that would substantively meet the Project objectives would not substantially reduce or avoid impacts resulting from the proposed Project. Therefore, further analysis of alternatives site(s) in this Draft EIR is not warranted.

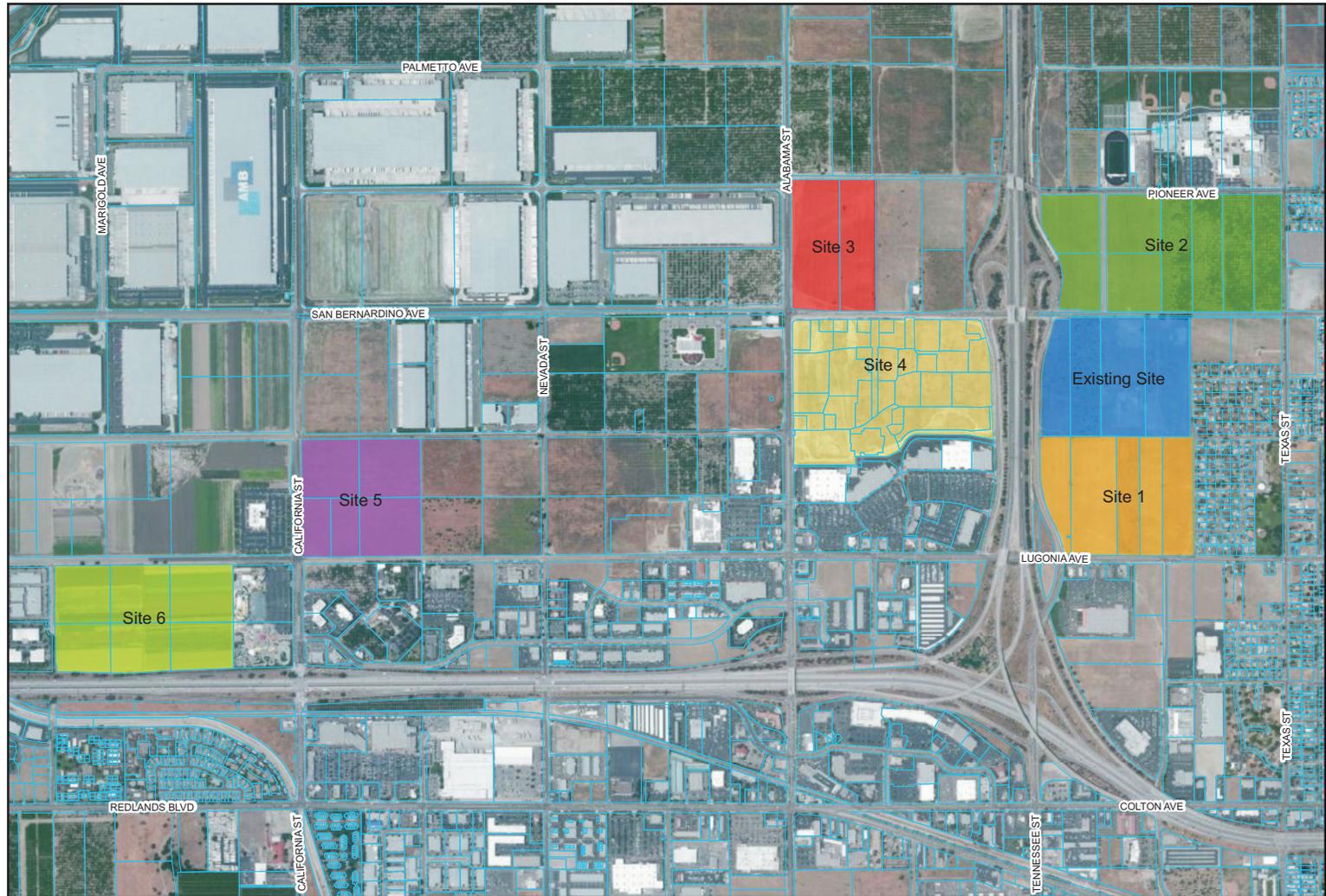
6.7 - Environmentally Superior Alternative

CEQA Guidelines Section 15126(e)(2) requires an EIR to identify an “environmentally superior alternative.” If the no project alternative is the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives. The no project alternative is environmentally superior because it avoids significant and adverse impacts to regional air quality and traffic impacts.

The Walmart Standalone Alternative would be the most environmentally superior among the other three alternatives. Among the three alternatives, it would result in the greatest reductions in terms of traffic, noise, air quality and climate change, utilities and public services. However, it does not meet most of the basic Project objectives. Table 6-6 summarizes the impacts of the Project compared to the four alternatives discussed in this section.

Table 6-6: Impact Summary Comparison of Project Alternatives with Project

Environmental Issue	Project	No Project Alternative	10-Percent Reduction Alternative	Walmart Standalone Alternative	No Walmart /Medium Size Tenant Alternative
Aesthetics	LTS/M	L	E	L	E
Agricultural Resources	LTS/M	L	E	E	E
Air Quality	SIG/U	L	L(SIG/U)	L(SIG/U)	L(SIG/U)
Biological Resources	LTS/M	L	E	E	E
Cultural Resources	LTS/M	L	E	E	E
Geology and Soils	LTS/M	L	E	E	E
Hazards and Hazardous Materials	LTS/M	L	E	E	E
Hydrology and Water Quality	LTS/M	L	L	L	E
Land Use and Planning	LTS	G	E	E	E
Mineral Resources	LTS	E	E	E	E
Noise	LTS/M	L	L	L	E
Population and Housing and SCAG Consistency	LTS	L	L	L	L
Public Services	LTS/M	L	L	L	L
Recreation	LTS	L	L	L	L
Transportation and Traffic	SIG/U	L	L(SIG/U)	L(SIG/U)	L(SIG/U)
Utilities and Service Systems	LTS/M	L	L	L	E
Urban Decay	LTS	L	L	L	E
<p>L = Lesser impact than the Project. G = Greater impact than the Project. E = Equivalent impact to the Project. LTS/M = Less Than Significant With Mitigation Source: MBA, 2011.</p> <p>LTS = Less than Significant. NI = No Impact SIG/U = Significant and Unavoidable</p>					



Alternate Sites

- | | | | |
|--------------------------|-------------------|-------------------|-------------------|
| Parcel Boundaries | Site 1 - 46 acres | Site 3 - 30 acres | Site 5 - 37 acres |
| Existing Site - 46 acres | Site 2 - 69 acres | Site 4 - 67 acres | Site 6 - 50 acres |

Source: City of Redlands, October 2011.



Michael Brandman Associates

06290016 • 11/2011 | 6-1_alternative_sites.cdr

Exhibit 6-1 Alternative Sites

REDLANDS CROSSING CENTER
ENVIRONMENTAL IMPACT REPORT

Table 6-7: Project Objectives, Summary Comparison of Alternatives

Objectives	Proposed Project	No Project Alternative	10-Percent Reduction Alternative	Walmart Standalone Alternative	No Walmart /Medium Size Tenant Alternative
OBJ-1 Maximize retail commercial property and sales tax revenues that would be accrued to the various agencies within the City of Redlands from the development of the Project site	Yes	No	No	No	Yes
OBJ-2 Facilitate customer convenience by providing a full range of goods and services (including grocery, gardening, dry goods, automotive, and other uses) within a single store	Yes	No	No	Yes	No
OBJ-3 Develop the Project site with a high-quality mix of retail, grocery, restaurant and commercial uses that will complement each other and encourage one stop shopping thereby reducing vehicle miles traveled and vehicle trips in the community	Yes	No	Yes	No	No
OBJ-4 Provide convenient and affordable shopping opportunities to the residents of the City of Redlands and surrounding areas for a wide range of retail goods and services, including the provision of such goods and services on a 24-hour basis.	Yes	No	No	No	No
OBJ-5 Provide the Redlands Crossing Center with a nationally recognized general-merchandise anchor to attract consumers and other businesses to the Project.	Yes	No	Yes	No	No
OBJ-6 Provide an additional grocery outlet in the North Redlands Community to minimize travel, thereby reducing miles traveled and air pollution, as well as providing convenient shopping opportunities for City residents.	Yes	No	Yes	Yes	Yes

Table 6-7 (cont.): Project Objectives, Summary Comparison of Alternatives

Objectives	Proposed Project	No Project Alternative	10-Percent Reduction Alternative	Walmart Standalone Alternative	No Walmart /Medium Size Tenant Alternative
OBJ-7 Develop a new major retail and commercial center along Major Arterial streets and in close proximity to the 210 Freeway/San Bernardino Avenue Interchange in order to facilitate regional public access and promote the Project as a regional shopping destination.	Yes	No	Yes	No	Yes
OBJ-8 Develop the vacant unused parcels comprising the Project site for retail-commercial uses in a manner that fully utilizes their development potential.	Yes	No	No	No	Yes
Source: MBA, 2011.					