1. Cumulative Environmental Effects

CEQA requires that an EIR examine the cumulative impacts associated with a project. The range of projects to be included in the cumulative analysis encompasses "past, present, and reasonably anticipated future projects producing related or cumulative impacts, including those outside of the control of the agency." A cumulative effect is deemed significant if the project's incremental contribution to a cumulative impact is "considerable." A cumulative impact is not considered significant if the impact can be mitigated to below the level of significance through mitigation, including providing improvements and/or contributing funds through fee-payment programs. The EIR must examine "reasonable options for mitigating or avoiding any significant cumulative effects of a proposed project" (CEQA Guidelines Section 15130).

CEQA Guidelines Section 15130 requires identification of related projects, both public and private, that together with the proposed project could have cumulative impacts on the environment. CEQA Guidelines Section 15130 (b) (1) requires that a discussion of cumulative impacts be based on either a list of past, present and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency (the list method); or a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact (the plan method). For each issue area, the identification of which method is used will vary. Unless otherwise noted in a particular section, the following plans were used for the plan method followed by the list of projects used in the list method. Thus, the related projects and/or general plan projections for each issue area are discussed within the following sections. The discussion of cumulative impacts is limited because the Project is consistent with the plans used in the evaluation of each environmental issue area discussed.

Plan Method

Riverside County Integrated Project (RCIP) General Plan and the Final Program EIR, Vol. 1 City of Ontario GPA for the NMC and the Final EIR

City of Chino The Preserve Specific Plan and Chino Sphere of Influence Final EIR

List Method

Project	Land Use	Quantity	Units ¹	Daily Trips
Countryside	Single-Family Residential	650	DU	6,220
West Hesser Creeks Dless	Single-Family Residential	1,037	DU	9,924
West Haven Specific Plan	Shopping Center	115	TSF	7,740
	Single-Family Residential	184	DU	1,760
Cub Ama 7 Caraifia Dlan	Multi-Family Residential	400	DU	2,688
Sub-Area 7 Specific Plan	Shopping Center	271.51	TSF	17,460
	Business Park	550	TSF	7,018
	Single-Family Residential	2,220	DU	21,245
Subarea 29 Specific Plan	Elementary School	900	Student	6,867
	Shopping Center	87	TSF	5,855

Project	Land Use	Quantity	Units ¹	Daily Trips
Parkside Specific Plan	Single-Family Residential	430	DU	4,116
	Shopping Center	115	TSF	7,740
	Low-Rise Condos/ Townhomes	1,517	DU	8,890
Total				107,523

¹DU=Dwelling Units; TSF= Thousand Square Feet

Agricultural Resources

Cumulatively, the proposed project will contribute to the loss of prime Farmland in the NMC and within the Chino basin as a whole. The plan method of analysis was used to evaluate cumulative impacts associated with agricultural resources. As discussed above, the Ontario GPA for the NMC (1998) projects virtually a 100 percent conversion of existing agricultural land to nonagricultural uses. The GPA for the NMC estimates that cumulatively in the 8,200-area of the NMC about 36 percent (2,952 acres) is considered prime agricultural soils. Thus, the prime Farmland on the project site represents approximately 133 acres which is approximately 4.5 percent of the projected prime farmland cumulative loss while the 223-acre site itself represents only 2.7 percent of the total land area of the NMC. The NMC is part of the larger Chino Basin which historically served as agricultural land. The Eastvale and Jurupa Area Plans are the portions of the Riverside County Integrated Project General Plan which govern planned land use in the Jurupa and Eastvale areas of Riverside County to the east and south of the NMC. Planned land uses for these areas do not include agriculture. The Riverside County Integrated Project (RCIP) General Plan Final Program EIR, Vol. 1, identifies all impacts associated with agriculture to be significant. Areas located within the City of Chino south of the NMC, are governed by The Preserve Specific Plan which covers over 5,400 acres. The Preserve Specific Plan designates approximately 2,450 acres nearest to the Subarea 29 project site for urban uses, over 2,120 acres of natural and recreational open spaces associated with the Prado Basin, over 500 acres of agriculture/natural open space and over 340 acres of agriculturally designated land. This development is in the process of converting from agriculture to non-agricultural uses including residential, commercial and industrial which will result in additional loss of farmland.

Proposed Mitigation Measures

Although mitigation strategies have been considered, none were determined feasible to avoid or reduce the cancellation of Williamson Act Contracts and the loss of Farmland to non-agricultural uses for the proposed project. Similarly, City-wide mitigation strategies have been considered such as agricultural preservation fees and easements but none were determined feasible for economic and environmental reasons. The purpose and intent of the NMC General Plan Amendment would be defeated by efforts to preserve agricultural lands within the NMC.

Summary of Environmental Effects After Mitigation Measures are Implemented

This cumulative loss of Farmland soils is considered significant. The GPA for the NMC FEIR was certified with Overriding Consideration findings related to the cumulative loss of agriculture. Cumulative losses of Farmland resulting from this project were a part of that original EIR and Statement of Overriding Consideration. No new issues have been raised by this project which were not considered in the GPA for the NMC FEIR. The Statement of Overriding Consideration for this project will be consistent with the GPA for the NMC FEIR's findings.

Air Quality

Cumulative air quality impact analysis relies on both the list and plan methods. The project site is located within a portion of the South Coast Air Basin (SCAB) which is subject to South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP). So all projects are evaluated for their consistency with this plan for cumulative air quality in the SCAB. Even though the GPA for the NMC land uses are taken into consideration in the AQMP, and the project is generally consistent with the GPA, cumulative impacts cannot be considered less than significant because the project site is located within a portion of the SCAB that is a non-attainment area for ozone and PM-10 under state standards, and as a non-attainment area for ozone, carbon monoxide, PM-2.5, and PM-10 under federal standards. Essentially, this means that any new contribution of emissions of these pollutants into the SCAB would be considered significant and adverse. It has also been well documented by the SCAQMD that the air quality impacts seen in City of Ontario are most attributable to the large population centers located in Los Angeles and Orange Counties. The meteorological patterns of Southern California lend to the "blowing-in" effect of air pollution from the more populated and industrial counties to the west of the project site area.

Implementation of the proposed project, the Esperanza Specific Plan, and the future development planned for the New Model Colony, would increase air pollution emissions in the SCAB as identified in the General Plan Amendment EIR for the New Model Colony and the EIR for the Esperanza Specific Plan. The Air Quality study for Subarea 29 (Appendix C) was based on the traffic study for the project (Appendix H) which included a list of five planned projects within the project vicinity, as shown in Table III-11-F on page III-11-13, herein. Analysis of the estimated short- and long-term emissions from this project shows that emissions of ROG, NO_X, and CO during construction and operation will exceed SCAQMD daily thresholds. When considering the cumulative effects on air quality in the region and the five additional projects in the vicinity, it is the long-term operational emissions that are of the most concern. Vehicular emissions from project-generated traffic are the main contributor to criteria pollutant emissions. Since the portion of the South Coast Air Basin within which the project is located is designated as a non-attainment area for ozone and PM-10 under state standards, and as a non-attainment area for ozone, carbon monoxide, and PM-10 under federal standards, and the operational emissions from this project will exceed the SCAQMD daily thresholds, the project's cumulative effects on air quality are considered significant.

In addition to automobiles as the primary source of growth-related air emissions, a number of small secondary sources may contribute pollutants to the regional burden. Such sources include temporary construction activity emissions, off-site or non-basin emission from power plants supplying electricity, natural gas combustion, or the use of gas-powered landscape utility equipment. The imprecise or poorly defined nature of many of these miscellaneous sources makes it difficult to accurately inventory them, but their incremental addition to the basin pollution burden make it much more difficult for Southern California to achieve completely clean air in the near future. Air quality impacts of project implementation, when considered in concert with other existing, approved and planned and not yet built projects, would, therefore, result in an incremental contribution to the degradation of air quality in the SCAB.

Proposed Mitigation Measures

Mitigation measures addressing project construction and operation have been incorporated into the project to reduce project-level impacts. However, with the mitigation measures incorporated into the project, ROG, NO_X and CO emissions will remain above the SCAQMD recommended thresholds. Therefore, the project is not in conformance with the SCAQMD standards, and in light of the surrounding residential development, the project could be considered to have a cumulative impact on overall air quality in the SCAB.

Summary of Environmental Effects After Mitigation Measures are Implemented

The project will contribute incrementally to an existing air quality problem. The cumulative air impacts cannot be avoided. The GPA for the NMC Final EIR was certified with Overriding Consideration findings related to cumulative air quality impacts. No new issues have been raised by this project which were not considered in the GPA for the NMC EIR.

Biological Resources

The plan method of analysis was used to evaluate cumulative impacts associated with agricultural resources. The project, as proposed, will eliminate some or all of the windrows of eucalyptus trees located along the property boundaries. Ornamental species were also recorded on the project site around residential units. According to the most recent biological assessment suitable nesting habitat exists for some raptors and migratory birds. The open fields and windrows that support the types of habitat needed for raptors and migratory birds are found on agricultural land throughout the area. As described under Agricultural Resources, page IV-1-1, above, the cumulative loss of this agricultural land will be significant. In the long term, development of the project site in conjunction with other development in the area will result in cumulative losses of potential foraging and nesting habitat.

Proposed Mitigation Measures

According to the City of Ontario GPA for the NMC, it is likely that most of the NMC area will be converted to urban land uses and that there will be a net loss of raptor habitat. It cannot be predicted how much of the area will remain as agricultural land, as the policies in the General Plan are mainly intended to prevent new urban developments from adversely impacting current agricultural activities. However, these policies are not intended for raptor conservation. The mitigative value of the policies (Policy 18.1-18.3) is considered minimal and does not reduce the potential impacts to raptors or other species to less than significant levels (GPA for the NMC EIR). This issue was overridden in the City of Ontario GPA for the NMC Final EIR. The statement of override was contested in a lawsuit filed by the Endangered Habitats League, et al., following certification of the GPA for the NMC Final EIR. Terms within the Settlement Agreement addressed and mitigated for cumulative losses of raptor nesting and foraging habitat through the establishment of mitigation fees. The proposed project will be subject to pay these fees (MM Bio 2) and avoid disturbance of nesting raptors (MM Bio 3 and 4).

Summary of Environmental Effects After Mitigation Measures are Implemented

After mitigation measures are implemented, potential adverse impacts associated with burrowing owls and cumulative loss of foraging habitat will be reduced to less than significant levels.

Cultural Resources

With respect to historic structures, adverse cumulative environmental impacts result from loss of multiple buildings within a potential or designated historic district to the extent that the integrity of the district and its historic significance is lost. Because the only structure on site older than 45 years of age is a residence which is not dairy-related, the proposed project has no historic structures that are considered contributors to a future NMC historic district.

The lack of known unique archaeological sites/resources or paleontological resources in the area make it unlikely that this project will impact any such resources individually. This would be the case for other projects in the NMC and surrounding areas. Therefore, no cumulative effect is expected related to archaeological or paleontological resources.

Proposed Mitigation Measures

No mitigation measures are necessary since no cumulative impacts to cultural resources will result from the proposed project.

Summary of Environmental Effects After Mitigation Measures are Implemented

No mitigation measures are necessary since no cumulative impacts to cultural resources will result from the proposed project.

Geology/Soils

As defined in Section 15355 of the CEQA Guidelines, a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. The Geology/Soils section of the EIR deals with two types of issues: first, those items related to placing structures (and therefore people) in unsafe places, and second, constructing in such a way that soils are eroded. Related to geologic hazards, the plan method of evaluating cumulative impacts was used. The impacts from/to all of the proposed land uses designated in the GPA for the NMC, RCIP land uses, and The Preserve Specific Plan in Chino are similar. Cumulatively, these planned land uses will allow more structures to be built and more people to reside in the Chino Basin. The EIRs for all three plans list similar impacts, risks, and local regulations related to geologic hazards. The same potential impacts are discussed in this EIR and the GPA for the NMC Final EIR. All make the findings that impacts will be less than significant with regulations and mitigation measures in place for areas with the same geologic conditions as the proposed project. The second soils issues related to water and wind erosion are more dependent on when construction on this project site and other sites in the area is occurring. It is not known which other construction sites in proximity to the project site will be active at the time of construction of this project.

Proposed Mitigation Measures

All cumulative potential significant adverse environmental effects related to geology and soils are reduced to below the level of significance identified for the project, following adherence with required regulations and General Plan policies, and implementation of the proposed mitigation measures outlined above, in the Hazards/Hazardous Materials Section, III-6, and in the other General/Specific Plans and EIRs used in the plan method of analysis. Mitigation measures are proposed to address blow sand and fill/excavated materials.

Summary of Project-Specific Environmental Effects After Mitigation Measures are Implemented

Due to the fact that all construction in the Cities of Ontario and Chino and Riverside County adjacent to the project site will be subject to the UBC, City/County inspections, and other standards that will reduce possible impacts from each development to less than significant levels; cumulative impacts resulting from seismic activity, constructing on unstable soils, erosion and blown sand are expected to be less than significant.

Hazards/Hazardous Materials

As defined in Section 15355 of the CEQA Guidelines, a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. The entire NMC will be built out in the vicinity of the project in the long-term.

Adverse cumulative effects could result from the removal of asbestos, lead-based paints, contaminated soil, and underground tanks if all such activities within the project area and on adjacent agricultural sites were conducted simultaneously without proper mitigation. However, it is speculative to assume which structures will be removed simultaneously. Potential risks such as ground cracking or methane seepage are site specific and not cumulative in nature. Using the plan method of evaluation, it was determined that all the plans' hazardous materials analyses concluded that, with regulations and mitigation in place related to the transport, storage or removal of hazardous materials, all impacts would be reduced to less than significant levels.

Proposed Mitigation Measures

Mitigation measures have been incorporated in this EIR, and other current regulations will apply, such that the potential project and cumulative impacts associated with removal of hazardous construction materials and risk of ground cracking or methane seepage are reduced to less than significant levels.

Summary of Environmental Effects After Mitigation Measures are Implemented

All potential significant cumulatively adverse environmental effects will be reduced to below the level of significance, as discussed above.

Hydrology and Water Quality

The proposed project in conjunction with future land development projects within the NMC, the Eastvale and Jurupa areas of Riverside County, and the Preserve in Chino would cumulatively impact water quality in the Santa Ana River due to increased urban runoff as described in the

three plans used for this cumulative analysis. The nature of the pollutants found in runoff is expected to change from pollutants associated with agricultural land uses, such as bacteria, ammonia, nitrates, phosphorous and salts, to urban uses which produce contaminants such as oil and grease, trash and debris, and pesticides. Currently, dairies within the NMC operate under the authority of NPDES Permit No. CAGO18001 (Waste Discharge Requirement Order No. 99-11). However, because this permit is concerned with dairy operations, existing non-dairy properties would not be covered along with portions of dairy properties not developed with dairies. Future development within all three plan areas would be required to obtain prepare and implement SWPPPs and WQMPs for all proposed development affording a more extensive amount of stormwater and nuisance water quality protection. Therefore, development of the project area with the implementation of water quality BMPs as required by the SWPPPs and WQMPs and mitigation measures has the potential to produce a net beneficial cumulative impact on the quality of downstream surface waters and groundwater within the Chino Basin.

Proposed Mitigation Measures

The proposed project and all other development within the cumulative impact area are required to incorporate the Best Management Practices outlined in the related project SWPPP, which regulates construction activities; and the proposed project and all other development within the cumulative impact area are required to incorporate the Best Management Practices within each WQMP for the operational phase of each development project.

Summary of Environmental Effects After Mitigation Measures are Implemented

Cumulative adverse environmental effects to water quality and downstream hydrology are still considered significant following implementation of the proposed mitigation measures outlined above because the receiving waters are currently impaired and the project will contribute incrementally to the degradation of water quality. A Statement of Overriding Consideration will be required prior to project approval.

Noise

Construction of the proposed project, when considered in concert with related projects in the area, would result in short-term noise impacts that would accompany the construction phases of each project. Construction noise impacts would be short term, incremental and can be mitigated to below a level of significance with controls on construction time periods and equipment use. Thus such impacts would not be regarded as cumulatively significant.

The ADT used for the cumulative analysis includes existing noise levels resulting from traffic generated both within and outside the NMC, plus the project-generated traffic noise, plus the 5 additional specific plan projects currently proposed in the NMC which will develop in the reasonably foreseeable future. The NMC is currently characterized as a relatively quiet rural area. The traffic study establishes that due to existing traffic levels and routes, many trucks and other traffic traverse the NMC today. This existing traffic causes higher existing noise conditions near major roads. The noise analysis shows that many roadway segments already exceed 65 dB CNEL at 50 feet from the centerline and that cumulatively the ambient noise levels throughout the project vicinity will increase by more that 3 dB CNEL. In some areas within the vicinity no

sensitive receptors exist, but in some locations residents, school children and outdoor agricultural workers are currently, and will continue to be, exposed to noise levels that exceed thresholds.

Within the NMC and adjacent jurisdictions, virtually all rural uses will be replaced by new development over time. On a project-by-project basis, increases in noise will be addressed through on-site mitigation; thereby cumulative ambient noise levels within the NMC will be mitigated over time for sensitive receptors that are developed in the future. In the interim, some existing sensitive receptors such as homes associated with dairies will remain while development occurs nearby. It would not be necessary or appropriate to upgrade windows or build walls in front of these existing homes to mitigate for noise increases because in the future they are expected to be demolished or incorporated into development project, which in turn will mitigate for traffic-related noise impacts.

As discussed above, some of the cumulative increases in noise within the NMC are currently occurring along roadways due to traffic generated in other jurisdictions located to the south, west, and east, and the developed portion of Ontario located to the north. Currently there are no joint fee programs or mitigation strategies for addressing these cross-jurisdictional cumulative noise increases. Legally, the City of Ontario has no ability to require the County of Riverside or City of Chino to mitigate noise impacts resulting from traffic that originates in one of those jurisdictions when such impacts affect sensitive receptors in the NMC. The reverse is also true in that Ontario cannot mandate developers to mitigate outside the City's jurisdiction. Additionally, since noise is created from many sources in addition to traffic (air conditioners, playgrounds, commercial establishments, etc.) it is very difficult to assign relative responsibility for cumulative noise increases. Improved technologies in the production of automobiles, trucks, and airplanes in the future may reduce noise in some areas. Therefore, it is speculative at best to determine relative responsibility and is legally infeasible to mitigate in jurisdictions outside Ontario.

Based on the above discussions, no feasible mitigation is available that will reduce cumulative noise impacts to less than significant levels. A statement of overriding consideration will be required if the proposed project is approved related to cumulative noise impacts.

Proposed Mitigation Measures

Mitigation measures have been incorporated which will reduce project-specific noise impacts to less than significant levels, but cumulative impacts will still remain.

Summary of Environmental Effects After Mitigation Measures are Implemented

No feasible mitigation is available that will reduce the cumulative noise impacts to less than significant levels. A statement of overriding consideration will be required if the proposed project is approved related to cumulative noise impacts.

Population and Housing

Cumulatively, the Esperanza Specific Plan will bring population growth into the area along with other specific plans being processed by the City currently and those specific plans in Riverside County that have been recently approved (The Resort located on the east side of Hamner/

Milliken Avenue adjacent to the project site). In total, the New Model Colony is projected to introduce approximately 31,000 housing units for a population increase of 109,430. The GPA for the NMC Final EIR identified this as "growth inducing" pursuant to CEQA, therefore cumulatively, the proposed project will have a significant impact on population growth in the region.

However, as discussed above, the project represents 2.7% of the forecasted population for the City of Ontario in 2010 and 1.74% in 2025. As a percent of SCAG's Subregional forecast, the proposed project represents 0.23% in 2010 and 0.19% by 2025. Therefore, because the proposed project comprises less than one-percent (not substantial) of SANBAG's projections, and no more than five-percent of the City's projections through 2025, and because the proposed project assists the City in meeting its Regional Housing Needs Allocation and improving the City's jobs/housing balance, the residential population growth from the project is not considered cumulatively considerable and is planned for at the regional level.

Proposed Mitigation Measures

No mitigation measures needed as this development, in conjunction with the entire NMC, is consistent with the GPA for the NMC which assists the City of Ontario in meeting its Regional Housing Needs Allocation.

Summary of Environmental Effects After Mitigation Measures are Implemented

No mitigation measures needed.

Public Services

Cumulative impacts to Public Services could occur if other major residential and/or commercial projects were proposed in immediate proximity to the proposed project. The list method is used in this analysis because only projects located within the NMC will be served by City of Ontario. Based on proportional numbers of dwelling units, the approximately 1,410-unit Esperanza Specific Plan represents the third-largest project (18 percent of total units) of those included in the list method of analysis. The project contributes a cumulatively considerable need for all public services. However, all potential impacts can be mitigated to less than significant levels for services such as police, fire, schools, parks, libraries, and medical services through the payment of mitigation fees and other mitigation measures included herein. For example, as with the five other specific plans being reviewed by the City at this time, other proposed specific plans within the New Model Colony will provide residential developments that will contribute to school age children requiring services from Mountain View Unified School District and Chaffey Joint Union High School District which are both currently over capacity. With the implementation of the mitigation measures, cumulative adverse effects on public services are not anticipated.

Proposed Mitigation Measures

As discussed in the Public Services section, mitigation measures have been incorporated which will reduce project related impacts to public services to less than significant levels.

Summary of Environmental Effects After Mitigation Measures are Implemented

Thus cumulative adverse effects on public services such as police, fire, schools, parks, libraries, or medical services are less than significant.

Transportation/Traffic

The traffic modeling for this project includes existing, proposed growth both within the NMC and Eastvale/Jurupa, expected developments other than the project listed herein, and the project itself. Vehicle trips from the project and the five other proposed specific plans within the NMC would create or add to traffic congestion on adjacent streets, and selected roadway segments and intersections. Some vehicle trips would be confined to the area (short trips), while others would travel outside the project area to surrounding counties and urban centers and affect the regional transportation system. Adverse impacts to the circulation network would occur if roadway improvements and trip reduction measures and programs are not implemented, as shown in the Transportation/Traffic section of this EIR. In accordance with City and SANBAG regulations, each development will be required to build or pay its fair share for needed roadway improvements. Payment of the traffic impact fees will fund signalization, roadway widening, and other transportation programs and improvements necessary to maintain acceptable levels of service at local intersections within the City of Ontario.

The GPA for the NMC Final EIR evaluated cumulative traffic impacts for the year 2015 with and without the development of the entire GPA for the NMC. The cumulative impacts analysis uses year 2015 because it was the year used in the GPA for the NMC EIR. Additionally, the GPA for the NMC EIR used 2015 because that is the build-out year for the City's Land Use Element and San Bernardino County's Comprehensive Transportation Plan. That analysis is included in section 5.7.3 of the GPA for the NMC Final EIR and is incorporated by reference. In summary, the study area was within a 5-mile radius of the NMC and included all the City of Ontario, portions of the cities of Upland, Rancho Cucamonga, Fontana, Montclair, Chino, Chino Hills, and Norco, and portions of the counties of Riverside and San Bernardino. The vehicle to capacity ratio analysis concluded that significant impacts to roadways both within the NMC and in outside the NMC would occur as a result of the proposed project, but that with implementation of the GPA Circulation Element and mitigation measures, impacts would be less than significant. GPA for the NMC Final EIR mitigation measures T-1 through T-3 require the City of Ontario to make improvements such as additional lanes, restriping, and signal system coordination in other jurisdictions to restore impacted areas to LOS D or to the No Project conditions levels of service if worse than LOS D. At build-out in 2015, the GPA for the NMC Final EIR identified the I-15 /Limonite Avenue and Hamner Avenue/Limonite Avenue locations as operating at LOS F with or without the development of the NMC pursuant to the GPA. In the existing condition, as shown in Table III-11-B on page III-11-7, the intersection of Limonite Avenue and Hamner Avenue currently operates at LOS E. Since the LOS of these areas is worse than LOS D in the current situation and in the future with or without the project, the General Plan Mitigation measures do not apply. Because the project contributes traffic to the Limonite/Hamner intersection and the I-15/Limonite ramps, cumulative impacts to traffic will be significant, even with all required GPA for the NMC Circulation Element improvements built out.

Proposed Mitigation Measures

Mitigation measures have been incorporated which will reduce project related traffic impacts to less than significant levels. In addition, off-site increases in traffic brought about by the proposed project can be mitigated to less than significant levels with payment of fair share fees and Citywide and project-level roadway improvements with the exception of the Hamner/Limonite intersection and the I-15/Limonite ramps, both of which are located in Riverside County.

Summary of Environmental Effects After Mitigation Measures are Implemented

After incorporation of mitigation measures, the project will contribute to cumulatively significant impacts associated with temporary interim conditions until all GPA for the NMC roadway improvements are built and, cumulative impacts to the Hamner/Limonite intersection and the I-15/Limonite ramps.

Utilities

As with Public Services, utilities such as water and sewer services are provided by the City of Ontario to the NMC, but not to other areas such as Eastvale or Chino, so analysis of cumulative impacts is based on the GPA for the NMC and the NMC Infrastructure Master Plans. Onsite and offsite pipelines for both water and sewer are not complete at this time, as described in the Utilities section. The proposed project was anticipated and evaluated in the environmental documents for the GPA for the NMC and the NMC Infrastructure Master Plans. The cumulative impacts related to water and sewer systems are discussed in these documents (incorporated by reference). The project cannot be occupied until such systems are built and operational. Once built, the water and sewer distribution and collection systems will meet City master planned requirements and City standards, as well as those of Inland Empire Utility Agency (IEUA) which treats wastewater generated in the City. Treatment facilities operated by IEUA are adequate to serve the five projects on the list plus the proposed project without the construction of additional facilities. Cumulatively, the Specific Plan will be one of many projects developed within the NMC which is only a portion of IEUA's Southern Service Area. The cumulative effects of the IEUA Wastewater Master Plan were evaluated under CEQA in the IEUA Wastewater, Recycled Water, and Organics Management Master Plan Program EIR, dated July 3, 2002 (SCH No. 202011116) and found to be less than significant. Likewise, the Water Supply Assessment for the NMC found that adequate water supply and treatment capacity exist for the project and all development planned within the NMC. The cumulative effects of the project and the NMC as a whole on electrical and natural gas demand and facilities were considered in the GPA for the NMC Final EIR and no new impacts not previously considered will result from the proposed project. Cumulative impacts to electrical and natural gas service are considered less than significant.

The project will individually contribute a minimal portion of the El Sobrante Landfill's daily intake however, the GPA for the NMC FEIR found that even with incorporation of the mitigation measures listed, residual solid waste impacts remain, and the FEIR was certified with overriding consideration findings related to the cumulative negative impact on solid waste.

Proposed Mitigation Measures

Mitigation measures have been incorporated which limit project development until utility services are provided. Water and sewer treatment facilities are adequate.

Summary of Environmental Effects After Mitigation Measures are Implemented

Since the water and sewer distribution systems are master planned to accommodate all projected development within the NMC and projects cannot be implemented until the water and sewer system is developed, potential significant individual and cumulative impacts to water, sewer lines are considered less than significant.

Water supply and treatment systems were evaluated in the WAS for the NMC and found to be adequate. Sewer treatment capacity was analyzed in IEUA's EIR for the Wastewater, Recycled Water, and Organics Management Master Plan, and cumulative impacts were found to be less than significant.

The GPA for the NMC Final EIR evaluated electrical and natural gas demand and facilities and found the cumulative effect to be less than significant.

The GPA for the NMC Final EIR found that even with incorporation of GPA policies and the mitigation measures listed, residual solid waste impacts remain and the FEIR was certified with overriding consideration findings related to the cumulative negative impact on solid waste. Although the solid waste generated by the project does not exceed the threshold of significance for solid waste, there have been no new mitigation measures added which will reduce the significant cumulative impact to a less than significant level. Therefore, impacts to solid waste are still considered cumulatively significant and a statement of overriding considerations will be required. However, no new issues have been raised by this project which were not considered in the GPA for the NMC FEIR and the statement of overriding considerations for this project will be consistent with the GPA for the NMC FEIR's findings.

Albert A. Webb Associates IV-1-12

2. Alternatives to the Proposed Project

The CEQA Guidelines Section 15126.6, identify the parameters within which consideration and discussion of alternatives to the proposed project should occur. As stated in this section of the guidelines, alternatives must focus on those that are reasonably feasible and which attain most of the basic objectives of the project. As stated in the Esperanza Specific Plan (the Specific Plan), the project objectives include:

- 1. Create a Livable Environment: allow for alternative modes of travel such as biking and walking, provide opportunities for informal neighborhood interaction, create diverse architectural design of high quality, connect neighborhoods, variety in housing types, develop human-scale neighborhoods, simple street system design with sidewalks separated from the street, design neighborhoods around parks.
- 2. Plan for a Circulation System Serving Motorists, Bicyclists, and Pedestrians: street design includes landscaped buffer areas and pedestrian walkways, internal project streets designed to slow traffic, bikeways integrated into the design of the community.
- 3. Provide for Adequate Public Community Facilities: reserve school site, provide utilities, connect project to General and Master Plan trails and facilities.
- 4. Provide New Parks and Open Space: provide 9 acres of public parks, provide linear open spaces along public roads and utility easements, and provide bike paths to connect community.
- 5. Promote Exceptional Architecture and Site Planning: create pedestrian-friendly and auto-accessible street network, provide variety of housing types accessible to schools, parks and open space, and residences that relate to the street for neighborhood interaction.
- 6. Develop a Project Consistent with the Vision of the New Model Colony: develop a specific plan that incorporates General Plan land use principles; standards and distribution of land uses relative to residential, open space, recreation and public uses.
- 7. Develop a Project that Responds well to market demand: meet a range of housing types and affordability.
- 8. Develop a Project with good regional access.

Each alternative must be capable of avoiding or substantially lessening any significant effects of the proposed project. The rationale for selecting the alternatives to be evaluated and a discussion of the "no project" alternative are also required, per Section 15126.6.

This section of the DEIR will look at 1) a No Project Alternative that retains/reinstates the agricultural use of the site, 2) a single-family residential alternative with fewer lots and lower density than the proposed project, 3) a residential alternative that would include some commercial uses, and 4) an alternative that replaces the school with single-family homes.

Rationale for Alternative Selection

Pursuant to CEQA (15126.6(a)), each alternative must in some way avoid or substantially lessen one or more of the significant effects created by the proposed project and meet most of the basic project objectives, as shown above. Since this Specific Plan and DEIR are being prepared as a direct response to the implementation requirements of the GPA for the NMC, land use designations and policies of the GPA for the NMC have also been considered in the selection and analysis of the alternatives.

The direct significant environmental effects that result from the proposed project are the overall loss of designated farmland and air quality impacts. Cumulatively, the project contributes to loss of agricultural lands, temporary traffic due to phasing of area-wide road improvements, traffic due to two intersections remaining at unacceptable LOS, landfill capacity, water quality, and impacts to air quality and noise. Thus, alternatives that reduce traffic and thereby reduce air quality and noise impacts may be appropriate for consideration. Likewise, alternatives that reduce traffic typically would include less development intensity which also translates into reductions in solid waste generation. Alternatives that require less developed land (e.g., higher densities) so that agricultural land can be retained on the site were determined to be infeasible due to: a) the lack of long-term viability for commercial agriculture within the Chino Basin (see Agricultural Resources, III-1, herein) and, b) the lack of such an alternative's ability to meet General Plan policies, land plan and goals for development of the NMC. Land retained in agricultural uses would also perpetuate the existing water quality violations of Reach 1 of Cucamonga Creek Channel, Mill Creek (Prado Area) and Reach 3 of the Santa Ana River which are currently in violation of water quality standards.

It is required under CEQA that alternative site(s) be evaluated if any feasible sites exist where significant impacts can be lessened. The project as proposed is anticipated to result in unavoidable adverse impacts related to the overall loss of designated farmland and air quality impacts. Cumulatively, the project contributes to loss of agricultural lands, temporary traffic due to phasing of area-wide road improvements, traffic due to two intersections remaining at unacceptable LOS, landfill capacity, water quality, and impacts to air quality and noise. Increases in traffic within an area and mobile emissions commonly result from residential development. Given the nature of the proposed development, an alternative location within the NMC or Chino Basin as a whole will not alleviate air, water quality, temporary traffic, landfill capacity or noise impacts. Considering the 223-acre size of the proposed project, alternativelylocated land in the project area would involve agricultural soils and property used or designated for agricultural purposes, thereby still resulting in an overall loss of farmlands. Likewise, noise and water quality impacts would be similar as a result of this proposed project in any location within the NMC or immediately adjacent jurisdictions. Therefore, analysis of an alternativelylocated site is not considered necessary because it will not provide avoidance or mitigation of significant impacts resulting from the project.

Per CEQA Guidelines Section 15126.6 (3), the "no project" alternative could take two forms, no change from the existing uses or development into already approved land uses. The site is currently zoned Specific Plan, but portions are, and could remain, in agricultural use. For this reason, and because the proposed project and the other alternatives address potential impacts associated with development, the No Project alternative will address continued agricultural use of the site.

Description of Alternatives

Alternative 1 - No Project, Continued Agricultural Use of the Site

The project site supports one currently-operating dairy (Pietersma), which will remain in operation upon project approval. Dairy operations on other portions of the site have ceased, but will be considered as "reactivated" for the purposes of this alternative as they were in the past when the Westra Dairy was operating. The No Project alternative would continue the agricultural use of the site for an indefinite period of time. Table IV-2-A, No Project Alternative, summarizes the acreage of dairy, cultivation, and rural residential that would exist under this alternative.

Table IV-2-A No Project Alternative

USE	ACRES
Dairy (feed lot)	83.7
Cultivated Land	125.3
Rural Residential	14.0
TOTAL	223.0

Alternative 2 - Reduced Density Residential

The Reduced Density alternative would remove all the proposed townhome units (14.2 du/ac) and replace them with single-family residential units (5.4 du/ac). This alternative would result in the development of a maximum of 1,103 residential units within the project site which represents a 22 percent reduction in the number of homes. Table IV-2-B, Reduced Density Alternative, summarizes the land uses assumed under this alternative.

Table IV-2-B Reduced Density Alternative						
PLANNING AREA	USE	ACRES	MAX. DENSITY	MAX. TOTAL UNITS		
1 and 3	Townhomes	0	NA	NA		
1 and 3	50"x85" SFD	34.9	5.4 du/ac	189		
2	Alley-loaded SFD	20.8	7.9 du/ac	165		
4	6-pack Courtyard	18.9	7.9 du/ac	150		
5	4-pack Courtyard	17.6	9.1 du/ac	161		
6	Alley-loaded SFD	6.4	8.6 du/ac	55		
7	50"x85" SFD	16.7	5.6 du/ac	94		
8	50'x100' SFD	16.1	5.7 du/ac	92		
9	2-pack SFD	15.2	6.1 du/ac	93		
10	50'x85' SFD	16.4	6.3 du/ac	104		
RESIDENTIAL TOTAL		163.0		1,103		
All	Backbone Streets	30.0				
All	Neighborhood Edge	6.9				

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Table IV-2-B Reduced Density Alternative						
PLANNING AREA USE ACRES DENSITY UNITS						
	SCE Easement + well sites	4.1		55.125.0		
	Parks	9.0				
	School	10.0				
TOTAL		223		1,103		

Alternative 3 – Residential and Commercial Mixed Use

The Mixed Use Alternative includes approximately 10 acres of commercial land uses near the Merrill Avenue/Milliken Avenue intersection (PA 4b) to provide commercial services within walking distance of the residences. Table IV-2-C, Mixed Use Alternative, summarizes the land uses assumed under this alternative.

Table IV-2-C Mixed Use Alternative

PLANNING AREA	USE	ACRES	MAX. DENSITY	MAX. TOTAL UNITS or SF
1	Townhomes	18.1	14.3 du/ac	258
2	Alley-loaded SFD	20.8	7.9 du/ac	165
3	Motorcourt Townhomes	16.8	14.2 du/ac	238
4a	6-pack Courtyard	8.9	10 du/ac	89
5	4-pack Courtyard	17.6	9.1 du/ac	161
6	Alley-loaded SFD	6.4	8.6 du/ac	55
7	50"x85" SFD	16.7	5.6 du/ac	94
8	50'x100' SFD	16.1	5.7 du/ac	92
9	2-pack SFD	15.2	6.1 du/ac	93
10	50'x85' SFD	16.4	6.3 du/ac	104
RESIDENTIAL TOTAL		153.0		1,349
All	Backbone Streets	30.0		
All	Neighborhood Edge	6.9		
	SCE Easement + well sites	4.1		
	Parks	9.0		
	School	10.0		
4b	Commercial	10.0		100,000 sf
TOTAL		223.0		100,000 sf commercial 1,349 residential units

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Alternative 4 – Residential –No School

The Residential – No School Alternative represents the proposed project in the configuration allowed if the school district chose not to utilize the school site proposed in the plan. Therefore, the 10 acre school site on Merrill Avenue in the central portion of the project site would be developed with 46 additional single-family units. Table IV-2-D, Residential-No School Alternative, summarizes the land uses assumed under this alternative.

MAX. MAX. TOTAL PLANNING AREA ACRES **USE** DENSITY **UNITS or SF** Townhomes 18.1 14.3 du/ac 258 2 Alley-loaded SFD 20.8 7.9 du/ac 165 3 **Motorcourt Townhomes** 16.8 | 14.2 du/ac 238 4 6-pack Courtyard 18.9 7.9 du/ac 150 4-pack Courtyard 17.6 9.1 du/ac 5 161 Alley-loaded SFD 6.4 8.6 du/ac 6 55 50"x85" SFD 7 16.7 | 5.6 du/ac 94 8 50'x100' SFD 16.1 | 5.7 du/ac 92 9 2-pack SFD 93 15.2 | 6.1 du/ac 50'x85' SFD 10 16.4 | 6.3 du/ac 104 Former School Single-Family Detatched 10.0 | 4.6 du/ac 46 Site RESIDENTIAL 173.0 1,456 TOTAL **Backbone Streets** All 30.0 Neighborhood Edge All 6.9 SCE Easement + well sites 4.1 **Parks** 9.0 1,456 residential units **TOTAL** 223.0

Table IV-2-D Residential-No School Alternative

Evaluation of Alternatives

Alternative 1 - No Project

The No Project Alternative would not result in any traffic impacts associated with the project, but would not provide road improvements and connections ultimately needed in the area as proposed in the GPA for the NMC. Although increased air quality impacts associated with automobiles would not result from this alternative, continued dairy use does pose air quality impacts of its own. According to the Final Mira Loma Air Quality Study (CE-CERT 2002), the Chino Basin dairy lands have an acid-base air chemistry dominated by the large ammonia sources in the area (dairies). "A reduction in the levels of ammonia in the region would have a dramatic, positive influence on Mira Loma particulate matter air quality." No loss of agricultural land or soils would result from this alternative and foraging habitat for raptors would remain intact. Extension of utilities to serve this area would not be necessary. Unauthorized dumping of trash and dead animals would likely continue with this alternative resulting in continued

aesthetic and potentially hazardous impacts. This alternative would meet none of the objectives of the proposed project, or the GPA for the NMC.

Alternative 2 – Reduced Density Residential

The reduced density alternative would provide approximately a 22 percent reduction in traffic which relates to a similar reduction in long-term air pollutants resulting from the project. The proposed project exceeds air quality standards for ROG, NO_X, and CO. If a direct 22 percent reduction in pollutants were achieved under Alternative 2, the air quality operational threshold would not be exceeded for CO, but would still be exceeded for NOx and ROG. Little or no reduction in short-term (construction) impacts would be afforded by this alternative because the same acreage is being developed as the proposed project. Other impacts that are the same as the proposed project resulting from the development of this land include loss of agricultural land or soils, loss of foraging habitat for raptors, noise impacts, traffic impacts at the Limonite/Hamner Avenue intersection and Limonite/I-15 ramps, and construction of major utilities to serve this area. This alternative would generally meet project objectives, but the elimination of the 14.2 du/acre medium density residential from Neighborhoods 1 and 3 does not meet/implement the GPA for the NMC land use density envisioned for this area.

Alternative 3 – Residential and Commercial Mixed Use

The mixed use alternative would provide approximately a 4 percent reduction in residential traffic due to the reduced number of proposed housing units. Some additional savings in auto trips might be achieved because residents could walk to the commercial uses. About 50 percent of the homes would be located within one-quarter mile of the commercial area. However, an increase in non-project traffic associated with the proposed commercial would be expected. Based on the trip generation rates assumed in the traffic study for the project, the 100,000 square feet of commercial would generate 6,764 daily trips (67.64 daily trips/thousand s.f. x 100,000 s.f.). The loss of 61 townhouses represents a reduction of 358 daily trips (5.86 daily trips/d.u. x 61 d.u.) The addition of commercial uses clearly offsets any reduction in trips due to pedestrian accessibility or fewer housing units. In addition, commercial uses in this location do not match the proposed land uses envisioned in the GPA for the NMC. Thus, the 4 percent reduction in housing units would not relate to a similar reduction in long-term air pollutants resulting from the project. Little or no reduction in short-term (construction) impacts would be afforded by this alternative because the same acreage is being developed as the proposed project.

Other impacts under Alternative 3 that are the same as the proposed project resulting from the development of this land include loss of agricultural land or soils, loss of foraging habitat for raptors, temporary traffic and long-term traffic at the Limonite/Hamner Avenue intersection and Limonite/I-15 ramps, and construction of major utilities to serve this area.

Land use compatibility issues could result from this alternative, as neighborhood commercial centers that often include stores that sell alcohol are not allowed within 1,000 feet of a school per City of Ontario Development Code. This alternative would generally meet project objectives, but the inclusion of commercial uses in Planning Area 4b does not meet GPA for the NMC land uses proposed for this area. Commercial uses in such close proximity to the GPA for the NMC Major

Center, (to be located at the intersection of Milliken Avenue and Edison Avenue) could jeopardize the commercial viability of some portion of that general-planned mixed use area.

Alternative 4 – Residential-No School

The Residential-No School Alternative would provide a reduction of approximately 949 daily trips due to the elimination of the school. At the same time, additional trips associated with the 46 additional units would equal 440, for a net decrease in trips of 509. This represents an approximate 4.2 percent reduction in total daily trips. The proposed project exceeds air quality standards for ROG, NO_X, and CO. If a direct 4.2 percent reduction in pollutants were achieved under Alternative 4, the air quality pollutants resulting from the alternative would not be reduced to less than the operational threshold for any of the criteria pollutants. Little or no reduction in short-term (construction) impacts would be afforded by this alternative because the same acreage is being developed as the proposed project. Other impacts that are the same as the proposed project resulting from the development of this land include loss of agricultural land or soils, loss of foraging habitat for raptors, noise impacts, temporary traffic and long-term traffic at the Limonite/Hamner Avenue intersection and Limonite/I-15 ramps, and construction of major utilities to serve this area. This alternative would generally meet project objectives and implement the GPA for the NMC land use density envisioned for this area, however, a much needed public service, the school, would have to be built elsewhere.

The matrix approach to comparing the above described alternatives is used for ease of directly comparing the proposed project's significant effects with those of the alternatives, per CEQA Guidelines Section 15126.6 (d). Table IV-2-E identifies the areas of potential environmental effects per CEQA and ranks each alternative as **better**, **different**, the **same**, or **worse** than the proposed project with respect to each area of potential impacts.

Table IV-2-E Comparison of Alternatives Matrix

Environmental Issue	Esperanza Specific Plan	Alternative 1 No Project Alternative	Alternative 2 Reduced Density Alternative	Alternative 3 Mixed Use Alternative	Alternative 4 Residential-No School Alternative
Aesthetics	Less than Significant Effect	Worse – No change since the project site would remain in agricultural use. Unauthorized dumping of trash would continue.	Same – Less than Significant Effect	Same – Less than Significant Effect.	Same – Less than Significant Effect
Ag. Resources	Significant - Loss of 223 acres of Farmland.	Better - Project site would remain in agricultural use.	Same - Loss of 223 acres of Farmland	Same – Loss of 223 acres of Farmland.	Same - Loss of 223 acres of Farmland
Air Quality	Significant with mitigation measures – exceeds standards for ROG, NO _X , and CO Cumulatively Significant - contributes to existing exceedance of air quality standards in Basin.	Different – Minimal impacts to air quality from autos. Existing odor problems remain. Continuation of high particulates due to ammonia production from dairies.	Better – Reduction of emissions by approximately 22%. Thresholds would not be exceeded for CO, but still exceeded for NOx and ROG. Still cumulatively significant impacts to Air Basin.	Worse – Still exceeds standards for NOx, CO, and ROG. Still cumulatively significant impacts to Air Basin.	Same – Reduction of emissions by approximately 4.2%. Alt. 4 exceeds standards for ROG, NO _X , and CO Still cumulatively significant impacts to Air Basin.
Biology	Less than Significant effect with mitigation incorporated.	Better – No loss of burrowing owl or foraging habitat.	Same – Less than Significant effect with mitigation incorporated.	Same – Less than Significant effect with mitigation incorporated.	Same – Less than Significant effect with mitigation incorporated.
Cultural Resources	Less than Significant effect with mitigation incorporated.	Same or worse – Project site would remain in agricultural use which has no requirement to preserve resources, but excavation is typically surficial.	Same – Less than Significant effect with mitigation incorporated.	Same – Less than Significant effect with mitigation incorporated.	Same – Less than Significant effect with mitigation incorporated.
Hydrology/ Water Quality	Less than significant project-specific effects with mitigation incorporated. Cumulatively Significant - contributes to existing exceedance of water quality standards in the receiving waters.	Worse – Runoff from agricultural land is a problem for receiving waters causing continuation of elevated levels of pollutants.	Same - Less than significant project-specific effects with mitigation incorporated. Cumulatively Significant - contributes to existing exceedance of water quality standards in the receiving waters.	Same - Less than significant project-specific effects with mitigation incorporated. Cumulatively Significant - contributes to existing exceedance of water quality standards in the receiving waters.	Same - Less than significant project-specific effects with mitigation incorporated. Cumulatively Significant - contributes to existing exceedance of water quality standards in the receiving waters.
Noise	Less than Significant effect with mitigation incorporated. Cumulatively Significant - contributes to existing exceedance of noise standards.	Better – Maintenance of existing noise levels. No construction noise and no new people exposed to over- standard ambient levels.	Same – Less than Significant effect with mitigation incorporated. Cumulatively Significant - contributes to existing exceedance of noise standards.	Same – Less than Significant effect with mitigation incorporated. Cumulatively Significant - contributes to existing exceedance of noise standards.	Same – Less than Significant effect with mitigation incorporated. Cumulatively Significant - contributes to existing exceedance of noise standards.
Traffic	Less than Significant project-specific effect with mitigation incorporated.	Better – Existing traffic levels from the project site are maintained.	Same – Less than Significant project-specific effect with mitigation incorporated.	Worse – Commercial uses would generate more traffic on a daily basis, causing	Same – Less than Significant project-specific effect with mitigation incorporated.

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Table IV-2-E Comparison of Alternatives Matrix

Environmental Issue	Esperanza Specific Plan	Alternative 1 No Project Alternative	Alternative 2 Reduced Density Alternative	Alternative 3 Mixed Use Alternative	Alternative 4 Residential-No School Alternative
	Significant temporary cumulative traffic impacts due to unknown timing of area-wide improvements. Cumulative impacts due to traffic contribution to already failing intersections that cannot be remedied.		Significant temporary cumulative traffic impacts due to unknown timing of areawide improvements. Cumulative impacts due to traffic contribution to already failing intersections that cannot be remedied.	overall increase for project. Significant temporary cumulative traffic impacts due to unknown timing of area- wide improvements. Cumulative impacts due to traffic contribution to already failing intersections that cannot be remedied.	Significant temporary cumulative traffic impacts due to unknown timing of areawide improvements. Cumulative impacts due to traffic contribution to already failing intersections that cannot be remedied.
Hazards/ Hazardous Materials	Less than Significant effect with mitigation incorporated.	Worse – Dumping of organic and inorganic materials will continue. Use of on-site fuels and agricultural chemicals will continue.	Same - Less than Significant effect with mitigation incorporated.	Same – Less than Significant effect with mitigation incorporated.	Same - Less than Significant effect with mitigation incorporated.
Utilities	Less than Significant effect at the project-specific level with mitigation incorporated. Significant cumulative impacts related to solid waste due to landfill capacity.	Worse – Some NMC backbone utilities might not be constructed.	Same – Less than Significant effect at the project-specific level with mitigation incorporated. Significant cumulative impacts related to solid waste due to landfill capacity.	Same – Less than Significant effect at the project-specific level with mitigation incorporated. Significant cumulative impacts related to solid waste due to landfill capacity.	Same – Less than Significant effect at the project-specific level with mitigation incorporated. Significant cumulative impacts related to solid waste due to landfill capacity.
Public Services	Less than Significant effect with mitigation incorporated.	Better – No impacts to public services.	Same – Less than Significant effect with mitigation incorporated.	Same – Less than Significant effect with mitigation incorporated.	Worse – Although payment of school fees is considered adequate mitigation, the provision of a school site is better.
Land Use Compatibility	Less than Significant effect with mitigation incorporated.	Same – Still has residential/ agricultural interface in the existing condition.	Same – Less than Significant effect with mitigation incorporated.	Worse – School/commercial interface potentially significant.	Same – Less than Significant effect with mitigation incorporated.
Environmentally Superior to Proposed Project?	N/A	Yes – But not with environmental impacts of its own.	Same – Although one criteria pollutant is reduced to below significance threshold, overall air quality impacts still remain significant.	Worse.	Same – Although criteria pollutants are reduced, overall air quality impacts still remain significant.
Meets Project Objectives?	Yes	No	Yes	No, commercial added to the master planned community.	Yes
Meets all NMC GPA Objectives and planned uses?	Yes	No	No	No	Yes

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Environmentally Superior Alternative

The CEQA Guidelines, Section 15126.6(e)(2), requires the identification of the environmentally superior alternative. Of the alternatives evaluated above, the No Project alternative is an environmentally superior alternative with respect to reducing impacts created by the proposed project, however, potentially significant water quality, air quality, hydrology, aesthetic and hazardous materials impacts caused by agricultural uses will be perpetuated and none of the GPA or Specific Plan objectives are met. The CEQA Guidelines also require the identification of another environmentally superior alternative if the No Project alternative is the environmentally superior alternative.

Of the four alternatives, Alternative 2, Reduced Density, is marginally environmentally superior to the proposed project in that this alternative would reduce air quality emissions to a level that would drop CO emissions to below threshold for operations. However, the Reduced Density alternative will not reduce overall air quality impacts to less than significant levels or eliminate the need to rely upon a Statement of Overriding Consideration for air quality impacts. Under Alternative 2, other development-related impacts are not lessened from those resulting from the proposed project. This alternative does not meet the GPA for the NMC objectives for proposed land uses.

3. Unavoidable Adverse Impacts

This topic is intended to address any impacts that cannot be mitigated to below a level of significance (CEQA Guidelines Section 15126.2). Significant impacts which cannot be avoided or eliminated if the project is implemented have been discussed in detail throughout Section III of this document. A summary of the areas in which impacts could not be reduced to a level below significance is briefly presented below.

Agriculture – Project and Cumulative

Approximately 53 percent of the project site was under an active or non-renewed Williamson Act contract in 2002. Since the implementation of the project will begin prior to 2010 when some contracts expire, the development will result in the cancellation of all or some contracts. Thus the project's impacts to land under Williamson Act contracts are considered significant.

The proposed 223-acre Specific Plan will convert approximately 133 acres of Prime Farmland into non-agricultural uses. The final LESA model score for the proposed project site was 80 out of 100. This score of 80 resulted in a scoring decision of "Considered Significant."

Other than direct conversion of agricultural land to non-agricultural uses, discussed above, the project includes the construction of on- and off-site roads, water supply and sewer infrastructure that will provide access and utilities to the adjacent agricultural properties and support increased future development in the area. Therefore, the proposed project involves other improvements that could promote the conversion of additional Farmland offsite, and these impacts are considered significant.

Mitigation measures were considered (see Section III-1) but found infeasible to reduce the above significant environmental effects to less than significant. Thus, potential project-specific impacts to agriculture are considered unavoidable and adverse which is consistent with the findings of the GPA for the NMC Final EIR.

Cumulatively, the proposed project will contribute to the loss of prime Farmland in the NMC and within the Chino basin as a whole. The Ontario GPA for the NMC (1998) projects virtually a 100 percent conversion of existing agricultural land to non-agricultural uses. The GPA estimates that cumulatively in the 8,200-area of the NMC about 36 percent (2,952 acres) is considered prime agricultural soils. Thus, the prime Farmland on the project site represents about 5.6 percent of the projected cumulative loss while the site itself represents only 2.7 percent of the total land area of the NMC. The NMC is part of the larger Chino Basin which historically served as agricultural land. Within the past 10 years, the Jurupa and Eastvale areas of Riverside County to the east and south of the NMC, and areas located within the City of Chino south of the NMC are in the process of converting from agriculture to non-agricultural uses including residential, commercial and industrial. This cumulative loss of Farmland soils is considered significant. The GPA for the NMC EIR was certified with Overriding Consideration findings related to the cumulative loss of agriculture. Cumulative losses of Farmland resulting from this project were a part of that original EIR and Statement of Overriding Consideration. No new issues have been raised by this project which were not considered in the GPA for the EIR.

<u>Air Quality – Project and Cumulative</u>

Analysis of the short- and long-term emissions from this project estimate that emissions of ROG, NO_X, and CO during project construction, and ROG, NO_X, and CO during project operation will exceed SCAQMD daily thresholds. The portion of the South Coast Air Basin within which the Specific Plan is located is designated as a non-attainment area for ozone and PM-10 under state standards, and as a non-attainment area for ozone, carbon monoxide, PM-10, and PM-2.5 under federal standards. Since the Project area is non-attainment for ozone and ROG is a pre-cursor of ozone, any exceedance of the SCAQMD threshold for ROG will result in cumulatively significant impacts to air quality. In addition, the Specific Plan exceeds the threshold for significance for CO for which the area is also a non-attainment zone; thus the Specific Plan will result in a cumulatively significant impact to air quality. Although the Specific Plan does not exceed the long term thresholds of significance for the emission of PM-10, because the area is a non-attainment area for PM-10 and PM-2.5 and the Specific Plan will result in short-term localized PM-10 impacts, the Specific Plan is considered to result in cumulative impacts to air quality and the impact is considered significant. The GPA for the NMC Final EIR concluded that although mitigation might reduce pollution, potential impacts would likely result in both long-and short-term significant and cumulative unavoidable impacts. Therefore, findings herein are consistent with the GPA for the NMC Final EIR.

Hydrology/Water Quality - Cumulative

Individually, the amount of pollutants that will reach any surface water bodies will be less than significant after mitigation. However, this project in conjunction with all other development projects (New Model Colony) that drain into the same surface waters create significant cumulative impacts to the water quality of County Line Channel, Reach 1 of Cucamonga Creek Channel, Mill Creek (Prado Area) and Reach 3 of the Santa Ana River because they are currently in violation of their water quality standards. Cumulative impacts to these water bodies would occur even if during construction a SWPPP was developed and a WQMP enforced after construction since the permits that govern these documents allow some discharge of non-storm water pollutants into receiving waters, and these waters are currently in violation. Cumulative adverse environmental effects to water quality and downstream hydrology are still considered significant following implementation of the proposed mitigation measures.

Noise – Cumulative

The ADT used for the cumulative analysis includes existing noise levels resulting from traffic generated both within and outside the NMC, plus the Project generated traffic noise, plus the 6 additional specific plan projects proposed currently proposed in the NMC which will develop in the reasonably foreseeable future. The NMC is currently characterized as a relatively quiet rural area. The traffic study establishes that due to existing traffic levels and routes, many trucks and other traffic traverse the NMC today. This existing traffic causes higher existing noise conditions near major roads. The noise analysis shows that many roadway segments already exceed 65 dB CNEL at 50 feet from the centerline and that cumulatively the ambient noise levels throughout the project vicinity will increase by more that 3 dB CNEL. In some areas within the vicinity of the Project site no sensitive receptors exist, but in some locations residents, school children and outdoor agricultural workers are currently, and will continue to be, exposed to noise levels that

exceed thresholds. No feasible mitigation is available that will reduce these cumulative impacts to less than significant levels.

Traffic – Cumulative and Temporary Cumulative

Project-specific potential traffic impacts are less than significant with mitigation, however, at the time the project is operational, it is not known which of the off-site regional improvements will be constructed. Therefore, there is a possibility that project-generated traffic will result in temporary cumulatively significant impacts to traffic in the project vicinity.

In addition, two intersections located in Riverside County remain at unacceptable levels of service even with all NMC traffic improvements in place, as reported in the GPA for the NMC Final EIR and the Specific Plan traffic study. The intersection of Limonite Avenue and Hamner Avenue currently operates at LOS E. Since the LOS of these areas is worse than LOS D in the current situation and in the future with or without the project, and because the project contributes traffic to the Limonite/Hamner intersection and the I-15/Limonite ramps, cumulative impacts to traffic will be significant, even with all required GPA for the NMC Circulation Element improvements built out.

Utilities – Cumulative Solid Waste

The GPA for the NMC FEIR found that even with incorporation of the mitigation measures listed, residual solid waste impacts remain and the FEIR was certified with overriding consideration findings related to the cumulative negative impact on solid waste. Although the solid waste generated by the project does not exceed the threshold of significance for solid waste, there have been no changes in circumstances and no new mitigation measures added which will reduce the significant cumulative impact to a less than significant level.

4. Growth Inducing Impacts

According to CEQA Guidelines (Section 15126.2 [d]), a project may foster economic or population growth, or additional housing, either indirectly or directly, in a geographical area if it meets any one of the following criteria below:

- A project would remove obstacles to population growth.
- Increases in the population may tax existing community service facilities, causing significant environmental effects.
- A project would encourage and facilitate other activities that could significantly affect the environment.

Urbanization of the project site could potentially influence the timing of development and remove obstacles to growth within adjacent properties by providing or extending roadways, water and sewer service, and utility services to the immediate area. This could eliminate potential constraints for future development in this area.

If access to the area were limited, improvement of roadways into the area might encourage development of agricultural or vacant land. However, the proposed project site currently has access from existing paved Milliken Ave/Hamner Road, serving the east areas of the project site, Mill Creek/Cleveland Avenue serving the west northern boundary of the project site, and Edison Avenue serving as the northern boundary of the project site. These streets would support some development within vicinity of the project site, with or without the proposed project, but major development could not occur due to limitations in the capacity of these roads. As part of the development of the Esperanza Specific Plan, those portions of these roads adjacent to the project site will be improved to City of Ontario General Plan standards.

Currently, the City of Ontario does not have water distribution mains in any of the roadways in and around the project. Ultimately, potable water will be provided to the proposed project development by the City of Ontario as presented in the Water Master Plan prepared for the New Model Colony. The backbone water system planned to serve this eastern portion of the NMC would be required by any development within the area. Water supply will be affected by this development. See Section III-12, Utilities, for discussions of water supply impacts.

The City of Ontario does not have sewer facilities in the vicinity of the project. The New Model Colony Sewer Master Plan shows service to this project by the proposed Eastern Trunk Sewer (Archibald Avenue). The wastewater generated by the project will be collected by 8 inch to 10 inch mains and routed to Archibald Avenue where it will be discharged into the Archibald Trunk Sewer, and ultimately treated by RP-5. The proposed project will be required to construct sewer facilities that are tailored to accommodate those sewer flows that are generated by the proposed development, and connections to the backbone sewer system which could serve other areas, thus allowing for growth.

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The proposed project is located within a rapidly urbanizing area of the City of Ontario. As previously indicated, the Southern California Association of Governments (SCAG) anticipates significant growth within the area over the next 25 years. The project site is located within the New Model Colony as designated by the City of Ontario General Plan. As described in Section III-9, Housing/Population, the project population of 4,743 persons comprises 0.23% of the forecasted population for the SANBAG Subregion and 2.6% of the forecasted population for the City of Ontario in 2010. In 2030, the project population of 4,743 persons will comprise 0.17% of the forecasted population for the SANBAG Subregion and 1.5 % of the forecasted population for the City of Ontario.

The proposed project is a residential subdivision which will bring an additional approximately 1,410 to 1,456 housing units to the area. SCAG's *The New Economy and Jobs/Housing Balance in Southern California* defines jobs/housing balance for the City of Ontario as job center, along with the City of San Bernardino and Riverside-Corona. The proposed project falls within an area projected to be very jobs-rich. The project will provide housing opportunities for employment centers within the same local region, thereby contributing to an overall jobs/housing balance. Therefore, the proposed project is consistent with regional growth forecasts and regional jobs/housing balance projections (see Section III-9).

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5. Irreversible Environmental Changes

The intent of this section of the EIR is to discuss primary and secondary impacts of the proposed project that result in significant irreversible changes in the environment. The CEQA Guidelines section related to this topic (15126.2 (c)) identifies as examples such things as use of nonrenewable natural resources, irreversible changes in land use, and irreversible damage to the environment resulting from environmental accidents associated with the project.

Consumption of non-renewable resources will result from construction and operation of the proposed project. Non-renewable resources such as sand, gravel, and steel, and renewable resources such as lumber will be consumed during project construction. Energy, fossil fuels, oils and natural gas will be irreversibly committed during construction. These same resources are used for vehicles and heating/cooling equipment during operations. The continued use of these resources associated with project operations represents a long-term obligation.

Other irreversible changes that result from development of previously undeveloped or underutilized land include changes in noise, glare from lights, increased traffic, and air pollution. Implementation of mitigation measures included in this EIR and adherence to City of Ontario policies and standards will reduce such impacts to less than significant levels in most cases, but the degradation of air quality and increased traffic and ambient noise levels will result in the long term from development.

Although the site was previously utilized, water consumption increases will result from project development. Such additional consumption in this area will require a long-term commitment to providing such service. Conservation programs and mitigation measures will limit harmful effects to water sources but cannot completely prevent irreversible changes to the environment.

The "open space" quality of agriculture, even dairies, currently visible in the community will be irreversibly changed to a developed state and is unlikely to revert to open space again even after the 50- to 75-year life span of structures on site is reached.

The proposed project should not result in future accidents or upset that will damage the environment. No new hazardous chemicals other than household cleaning products are or will be stored on site.