CHAPTER 6
ALTERNATIVES TO THE PROPOSED PROJECT

6.1 INTRODUCTION

The following discussion is intended to inform the public and decision makers of feasible alternatives to the proposed project that would avoid or substantially lessen any significant effects of the project. Section 15126.6(a) of the CEQA Guidelines states that:

> An EIR shall describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternative. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.

Consistent with the CEQA Guidelines, the EIR does not consider every conceivable alternative to the project or multiple variations on the alternative that it does consider. Rather, the EIR considers a reasonable range of potentially feasible alternatives that would mitigate or avoid potentially significant impacts of the proposed project in order to foster informed decision making and public participation.

As described in the City of Vacaville's 2015 General Plan EIR, the residential densities and uses to be developed on the project site were evaluated extensively by the City during its General Plan Update process, between 2010 and 2015. The City specifically evaluated a range of land use alternatives for the East of Leisure Town Road growth area and determined that the project site should be developed at certain residential densities designed to accomplish the City's policies and objectives with respect to housing and planned growth of the City. The low density and low-medium density residential General Plan land use designations of the proposed project are the result of the City's review process and policy determinations. These land use designations are reflected in the proposed zoning and development plan for the Roberts' Ranch Specific Plan area, which was designed following the City's decision on preferred land uses for this site. The City's policy to accommodate anticipated housing growth is reflected in the analysis of project alternatives below. Due to this extensive analysis, incorporated by reference into this EIR, this EIR does not evaluate alternatives involving densities that conflict with the policy decisions made during the recent General Plan Update process.

The alternatives to the project analyzed below include a "No Project" Alternative. A "No Project" Alternative is required under Section 15126.6(e)(1) to allow decision makers to compare the impacts of the proposed project with the impacts of not approving the project. Each

alternative is analyzed against the significance thresholds considered in Chapter 4, Environmental Evaluation. This chapter assesses whether the impacts of the alternatives would be greater than, less than, equal to or similar to those of the proposed project.

This chapter identifies the proposed project objectives, describes the project alternatives, and evaluates the comparative effects of the alternatives relative to the proposed project. All of the project alternatives evaluated do not change the total number of residential units included as part of the proposed project, with the exception of the No Project/No Development Alternative that forgoes development entirely. As required under Section 15126.6(e)(2) of the CEQA Guidelines, the environmentally superior alternative is identified and included at the end of this chapter.

Alternatives to the proposed project are:

- **No Project/No Development Alternative** – Which assumes the project site would remain in its current undeveloped condition.
- **Active Park Alternative** – This alternative assumes that 7.7 acres of the passive open space included along the eastern boundary of the plan area would be developed with active recreation uses, such as basketball courts, play grounds, and other uses for the community which would increase the acreage made available for community park recreational uses. With the project's 7.7 aces of active park uses this alternative would provide active park uses in an area designated as Open Space on the proposed land use plan. Development of the remainder of the site, including the number of residential units, the remaining open space area, infrastructure, utilities and roadways would be the same as the proposed project.
- **No School Alternative** – This alternative assumes the 16.5 acre school site would be zoned for residential uses. For this alternative, no additional residential units would be developed. Instead, the 785 units would be spread across the additional 16.5 acres allowing for some larger lot, lower density residential development. Development of the remainder of the site, including infrastructure, utilities and roadways would be the same as the proposed project.
- **Open Space Alternative** – Under the Open Space Alternative, the 16.5 acre school site would be set aside as open space increasing the amount of open space on the project site to approximately 30 acres. Development of the remainder of the site would be the same as the proposed project.

Significant and Unavoidable Impacts

The project would result in the following significant and unavoidable air quality impacts on both a project level and cumulatively and the following project level and cumulative

traffic impacts. There is no feasible mitigation available to reduce these impacts to less than significant.

- Operation of the proposed project would result in emissions of ROG, NOx, or PM_{10} at levels that could substantially contribute to a potential violation of applicable air quality standards or to nonattainment conditions under both project level and cumulative conditions.
- Implementation of the proposed project would increase traffic volumes above the LOS C threshold on Leisure Town Road between Ulatis Road and Elmira Road.
- Under Existing plus Approved plus Project conditions, traffic volumes would exceed intersection LOS operations at Leisure Town Road (Jepson Parkway) / Sequoia-White Pine Street (#4) intersection and at the Elmira Road / Nut Tree Road (#17) intersection.
- Under Cumulative plus Project conditions, intersection operations would exceed LOS at the Elmira Road / Nut Tree Road (#17) intersection.
- Traffic volumes under Existing plus Approved plus Project conditions would cause traffic volumes to exceed the LOS C threshold at Leisure Town Road between Ulatis Road and Orange Drive.

Project Objectives

Pursuant to CEQA Guidelines, Section 15124(b), a clear statement of project objectives is required. The project includes the following project objectives.

- Provide for the orderly, well planned, and balanced development of future projects in the East of Leisure Town Road Growth Area, consistent with the City's growth projections and policies, and consistent with the City's envisioned urban form for the East of Leisure Town New Growth Area, as included in the City's General Plan adopted in August 2015.
- Support the City's long-range growth plans for new growth areas by directing growth to areas identified as priority for urban growth in the General Plan and to support the orderly provision of City services to this new growth area.
- Support the City's General Plan policies, including the encouragement of moderate-density housing and a variety of housing designs.
- Support improvements to Leisure Town Road (Jepson Parkway), including planning and funding for development of frontage roadway features and landscaping.
- Provide public benefits such as stroller parks, schools, multi-use trails, dedicated open space and recreational areas, and pedestrian and bike connectivity to enhance the City's existing recreational opportunities.

- Provide unique open spaces designed to provide compatible recreational opportunities adjacent to agricultural buffers and flood control facilities, to create innovative features within a well-planned residential community.
- Provide infrastructure and services that meet City standards and are integrated with existing and planned facilities and connections.
- Create livable residential neighborhoods through the use of high quality building materials and design standards and through high quality pedestrian and bike facilities within the project.
- Support the implementation of sustainability features to encourage efficient use of the project site through building and landscape designs.

6.2 ALTERNATIVES CONSIDERED BUT DISMISSED FROM FURTHER CONSIDERATION

As noted previously, the purpose of an alternatives analysis is to develop alternatives to the proposed project that substantially lessen at least one of the significant environmental effects identified as a result of the project, while still meeting most, if not all, of the basic project objectives. Project alternatives that would change the mix of uses that would lessen the severity of some of the impacts identified under the project are addressed later in this chapter.

The EIR prepared for the City's General Plan Update evaluated a few different land use alternatives that included the project site. The General Plan Update process began in March 2010 and included extensive community input including seven City Council study sessions, 17 Steering Committee meetings, and four community workshops, all of which were open to the public and included extensive public comment. Within this process, one community workshop, eleven Steering Committee meetings, and six City Council meetings were specifically devoted to creating, evaluating, and selecting among the various land use alternatives. The Planning Commission also held three hearings on the Draft General Plan (August 5, August 18, and September, 22, 2014) and recommended that several revisions be incorporated into the final plan documents. At its January 13, 2015 meeting, the City Council directed staff to prepare a Final Revised Focused Growth land use plan for the East of Leisure Town Road Growth Area. The City Council then held another hearing on March 24, 2015, to consider the Revised Focused Growth Alternative land use alternative for the East of Leisure Town Road Growth Area. During this process, the land use alternatives were evaluated and compared in relation to market and financing feasibility, utilities and transportation, infrastructure needs, public service needs, and impacts on environmental resources.

At the end of this process, on August 11, 2015, the City Council approved the Revised Focused Growth Alternative for the East of Leisure Town Road Growth Area, including

the project site, which resulted in a reduction in residential scale and density. The approved General Plan includes Policy LU-P17.1, which limits residential development on the project site to 785 residential units. After considering several reduced density alternatives (which includes the project site), according to the General Plan, "the proposed General Plan land use map represents a land use plan that the City believes is most appropriate to accommodate growth projected for 2035 and beyond" (City of Vacaville 2015).

To allow for the approved density, as provided in Section 4.5 of the General Plan Update EIR, the City's General Plan Land Use map (City of Vacaville 2015, Figure LU-6) designates various portions of the project site Residential Low Density (3.1-5 units/acre), Residential Low-Medium Density (5.1-8.0 units/acre), schools, agricultural buffer, and public open space. The proposed project would zone the project site to be consistent with the General Plan land use designations. Consistent with the General Plan designations and the policy of designating land to accommodate growth beyond 2035, the project includes approximately 785 single-family residences with an average density of 3.2 dwelling units/acre (du/ac). As indicated in Table 3.1 in Chapter 3, Project Description, land to be zoned RL would have an average density of between 3.5 and 3.9 du/ac, and land zoned RLM would have an average density of 5.2 du/ac. These proposed densities are already at the lower range indicated by the General Plan for the project site.

As indicated, the City has previously evaluated reduced residential densities and intensity for the project site at length and determined that the project site should be developed at the proposed project's densities to accomplish the City's policies and objectives with respect to housing. A Reduced Density Alternative would fail to conform to the densities set forth by the General Plan's land use designations for the project site, would fail to meet the General Plan policies of encouraging moderate density housing, and would fail to advance the City's stated policy of accommodating a higher amount of projected growth beyond 2035. The City's policy of accommodating growth is also consistent with the Housing Accountability Act and its requirement that jurisdictions "give adequate attention to the economic, environmental, and social costs of decisions that result in disapproval of housing projects, reduction in density of housing projects, and excessive standards for housing projects." Furthermore, because a Reduced Density Alternative would develop the same acreage as the proposed project, just at a lower density, this alternative would fail to avoid the impacts of the project with respect to biological resources, cultural resources, and hydrology, drainage and water quality, and would have only a slight reduction in impacts regarding air quality, traffic, and utilities. Alternately, leaving a portion of the site as agricultural land use would similarly conflict with the General Plan land use determination that this site is appropriate for urban land uses. The project site is also relatively uniform in physical conditions making it less useful to eliminate development on any particular portion of the site as a way to further resource protection considerations.

Thus, the City has considered and rejected the Reduced Density Alternative because it fails to advance policies of the City and of the State to accommodate housing needs, and because this alternative would fail to avoid or lessen many of the environmental impacts of the project.

An Off-Site Alternative was also dismissed because as discussed in *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553 (*Goleta II*), where a project is consistent with an approved general plan, no off-site alternative need be analyzed in the EIR. The EIR "is not ordinarily an occasion for the reconsideration or overhaul of fundamental land-use policy." (*Goleta II, supra*, 52 Cal.3d at p. 573.) In approving a general plan, the local agency has already identified and analyzed suitable alternative sites for particular types of development and has selected a feasible land use plan. "Informed and enlightened regional planning does not demand a project EIR dedicated to defining alternative sites without regard to feasibility. Such ad hoc reconsideration of basic planning policy is not only unnecessary, but would be in contravention of the legislative goal of long-term, comprehensive planning." (*Goleta II, supra*, 52 Cal.3d at pp. 572-573.) The project site is designated consistent with the City's Land Use Map (City of Vacaville 2015, Figure LU-6) and is requesting the site be pre-zoned Residential Low Density (RL-5 & RL-6), Residential Low Medium Density (RLM-3.6) and Community Facilities (CF) with an agricultural buffer overlay zone over portions of the publicly owned lands, consistent with the existing land use designations. Therefore, the EIR need not analyze an offsite alternative.

6.3 ALTERNATIVES TO THE PROPOSED PROJECT CONSIDERED IN THIS EIR

This section provides a description of the alternatives to the proposed project analyzed in this Draft EIR and evaluates how specific impacts differ in severity from those associated with the project. For purposes of this analysis, the potentially significant impacts identified under the alternatives analysis are assumed to be fully mitigated through compliance with mitigation measures identified in Sections 4.1 through 4.7 included in Chapter 4, which contains the environmental analysis of the proposed project.

The project alternatives identified herein address the significant impacts (before mitigation) identified for the project including biological resources, traffic, and air emissions associated with project construction. Thus, the alternatives developed for the project contemplate a change in land uses that include a reduction in development to address these impacts. All of the alternatives evaluated do not change the total number of residential units or stroller parks. The primary change is in the amount of open space and how the 16.5 acre future school site is developed. In many instances, the impacts are virtually identical to the proposed project and are described as such.

This Draft EIR has incorporated a reasonable range of project alternatives that, collectively, attain a majority of the project objectives in a reasonable manner while reducing the severity of the significant impacts (before mitigation) identified under the proposed project.

The alternatives to the proposed project analyzed in this Draft EIR are:

- **Alternative 1:** No Project/No Development
- **Alternative 2:** Active Park
- **Alternative 3:** No School
- **Alternative 4:** Open Space

As noted previously, because the number of residential units would not change under any of the project alternatives the increase in air emissions associated with project construction and operation would only change by a small amount under alternatives 2, 3, and 4. Therefore, air emissions are not quantified. In addition, the demand for wastewater conveyance and treatment, increase in solid waste and energy, and trip generation would essentially not change from the project because the number of residential units and anticipated number of new residents would not change. Therefore, the trip generation, and increase in demand for public utilities is not quantified for each alternative.

Alternative 1: No Project/No Development Alternative

Description

The No Project/No Development Alternative considers the effects of forgoing the project entirely, and leaving the project site in its current, vacant condition. Under the No Project/No Development Alternative, the proposed project would not be adopted. The approved build-out for the Specific Plan area as set forth in the General Plan would not be developed and the project site would not be annexed into the City. In addition to not providing up to 785 residential units, over 25 acres of parks, open space and trails, and improvements to the transportation network, the No Project/No Development Alternative would not provide trail, road, or utility connections to the Brighton Landing project. In addition, a site for a future new school would also not be provided. Under this alternative, the project site would not be zoned and developed in a manner consistent with the General Plan land use designations. This alternative would also not meet the City's policies, General Plan or project objectives, or State policies of promoting the development of new housing. For policy reasons, and because the No Project/No Development Alternative would fail to meet any of the basic objectives of the project or of the City's General Plan, this alternative could be rejected in favor of the proposed project. The No Project/No Development Alternative thus allows decision-makers to compare the impacts of the proposed project to retaining the existing condition of the site. The No Project/No Development Alternative describes the environmental conditions that exist at the time that the environmental analysis commenced (CEQA Guidelines, Section 15126.6 (e)(2)).

Comparative Analysis of Environmental Effects

The No Project/No Development Alternative would produce no changes on the project site, because the site would remain in its current condition, effectively eliminating those project impacts discussed in this Draft EIR. There would be no air emissions associated with project construction and operation and would not increase emissions of ROG, NOx, or PM_{10} at levels that could substantially contribute to a potential violation of applicable air quality standards or to nonattainment conditions. There would be no land disturbance so there would be no impacts to biological or cultural resources so no mitigation would be required. There would be no increase in the number of vehicles accessing the site and on area roadways and intersections, or increase in demand for public utilities. Mitigation would not be required to address capacity of the wastewater treatment plant or traffic.

Relationship to the Project Objectives

The No Project/No Development Alternative would not achieve any of the project objectives.

Alternative 2: Active Park Alternative

Description

The proposed project would include approximately 21.2 acres of passive open space along the eastern boundary of the plan area as well as approximately 2.5 acres of stroller parks. Under the Active Park Alternative, approximately 7.7 acres of this passive open space would be developed with additional active recreation uses, such as basketball courts, play grounds, athletic fields, and other uses for the community. This alternative would increase the acreage made available for community park recreational uses in the City by an additional 7.7 acres. These park facilities would be placed outside of agricultural buffer areas designated on the site. Therefore, the additional land designated for active park uses would have a beneficial impact on the City's planned park service ratios. These facilities would be designed to serve as Community Park facilities as defined in the City's Park Master Plan and would replace planned facilities that would be deleted from the planned Community Park near the intersection of Leisure Town Road and Elmira Road. Approximately 7 acres within that Community Park has been newly designated as the likely location for recreational facilities that are not part of the City's planned program of uses in Community Parks, thus leading to a loss of potential Community Park use at that location (i.e., the proposed "Play for All" park would use a portion of this planned Community Park, thus eliminating certain community park facilities from the City's planned park master plan).

Comparative Analysis of Environmental Effects

The Active Park Alternative would have the following impacts compared to the proposed project.

Air Quality. The conversion of over 7 acres to active park uses would increase construction activities resulting in a small increase in air emissions in the local air basin caused by soil disturbance, fugitive dust emissions, and combustion pollutants from on-site construction equipment. In addition, emissions would be created from off-site trucks hauling materials and from construction workers travelling to and from the site. The Active Park Alternative may also generate some additional vehicle trips within Roberts' Ranch upon completion as people travel to and use the recreational facilities from adjacent neighborhoods. However, having a community park in this part of the City would likely reduce the length of trips to other community park facilities in the City, and, this alternative may also divert some vehicle trips from that intersection toward other local intersections. However, the number of trips would be small and as with the proposed project, implementation of mitigation measure AQ-1 would reduce these impacts to a less-than-significant level, although this impact may be slightly greater than the proposed project. It is anticipated the increase in ROG, NOx, or PM10 associated with project operation would be similar to the proposed project and would remain a significant and unavoidable impact even with mitigation (AQ-2). It is anticipated the cumulatively considerable net increase of criteria pollutants for which the project area is in non-attainment under federal or state ambient air quality standard would also remain a significant and unavoidable impact. The addition of active park uses would not change this significance finding because it is primarily associated with development of the remainder of the project site.

Biological Resources. As passive open space under the proposed project, the 7.7 acres would provide potential foraging or nesting opportunities for wildlife present on the site, resulting in a small reduction of potential impacts to biological resources. By converting the passive open space to active park uses outside the agricultural buffer, the Active Park Alternative would foreclose the use of this portion of the open space area as foraging and/or nesting habitat, this would result in similar impacts as the proposed project, but slightly more intense because the project would not set aside any lands as passive open space. Mitigation Measures BIO-1 through BIO-6 and BIO-8 would still be required to mitigate for the loss of foraging and nesting habitat for Burrowing owl and Swainson's hawk under both project and cumulative conditions during project construction and operation. The amount of land required to mitigate for the loss of foraging habitat for Swainson's hawk and burrowing owl would increase under this alternative and be slightly greater than the project.

Cultural Resources. As identified for the proposed project, ground-disturbing activities associated with construction of the proposed project have the potential to encounter or disturb previously unidentified subsurface archaeological resources or unrecorded human

remains. The Active Park Alternative would further increase this possibility due to the additional grading required for the active recreational facilities. As with the proposed project, impacts of the Active Park Alternative would be mitigated to a less-than-significant level with mitigation measures CUL-1 and CUL-2.

Hydrology, Drainage, and Water Quality. Conversion of 7.7 acres of open space to active park uses would not be the same as developing more residential uses (or any other development) that would result in the contribution of more impervious surface area. The active park uses would include ball fields with some hard surface courts, such as basketball courts. However, the amount of impervious surface area would be minor and should not significantly change the findings of the Storm Drainage Report prepared for the project. It is anticipated no additional drainage facilities would be required and the same mitigation measures (HYDRO-1, HYDRO-2, and HYDRO-3) including preparing a Storm Drain Master Plan, would be required.

Land Use and Planning. The proposed project is consistent with the City of Vacaville General Plan and Zoning Ordinance as well as the Travis Air Force Base Airport Land Use Compatibility Plan land use restrictions and would not result in wildlife attractants. The addition of more recreation space would not result in any inconsistency with the City's General Plan or the Travis Air Force Base Airport Land Use Compatibility Plan. Therefore, land use impacts under this alternative would be the same as the proposed project.

Public Utilities. The addition of 7.7 acres of active park uses would not result in any increase in severity of impacts to public utilities, because the number of residential units is not changing. Mitigation measures WW-1 and WW-2 would still be required for this alternative.

Transportation and Circulation. Traffic is primarily generated by the 785 residential units and the addition of active park uses would only generate a small increase in vehicle trips. Typically these trips would not occur during the AM and PM peak hours, but during the weekends. It is anticipated there could be a small increase in vehicle trips from people driving to access the active park facilities. However, these trips would primarily come from internal roadways and from roadways that connect the project site to Brighton Landing to the north. The small increase in vehicle trips are not anticipated to contribute to a decline in LOS at any of the intersections analyzed, degrade operations at any intersection, significantly increase traffic volumes on the freeway, impede emergency access or adversely affect transit, bicycle or pedestrian movements. The impacts and mitigation measures identified under the proposed project would still be required because the number of residential units would not change. Therefore, mitigation measures TRAFF-1 through TRAFF-8 would still be required under this alternative to address impacts primarily associated with development of the remainder of the project site.

Relationship to the Project Objectives

If the proposed project was not approved and development was to occur consistent with the Active Park Alternative generally all of the project objectives would be met because the type, density and amount of development would not change from what was included in the proposed project. In addition, the Active Park Alternative supports the project objectives of providing for growth consistent with the 2015 General Plan by providing land to fulfill the City's long-range plan for community park facilities that would otherwise not be achieved because of recent changes in the size and design of the existing Community Park site designated north of Elmira Road.

Alternative 3: No School Alternative

Description

The proposed project would provide a site for a future middle school. The project includes 16.5 acres set aside for a future middle school to complement the proposed K-6 school included as part of the Brighton Landing project. Under the No School Alternative, the school site would not be set aside, but would instead be zoned for residential uses. For this alternative, no additional residential units would be developed. Instead, the 785 units would be spread across the additional 16.5 acres made available by the school site, which would allow for some larger lot, lower density residential development. This alternative would not change any of the other project components and would result in the same amount of land disturbance as the proposed project, as discussed below, and would fail to avoid or lessen several of the project's impacts.

Comparative Analysis of Environmental Effects

Air Quality. Under this alternative the same number of residential units would be developed as well as project roadways, utilities, and parks, the same as the proposed project. Construction-related air emissions would be essentially the same or very similar to the proposed project because generally the amount of development has not changed. Mitigation measure AQ-1 would still be required to reduce emissions of ROG, NO_x, or PM_{10} associated with construction activities and equipment. Therefore, construction-related air emissions would not change from what was analyzed as part of the project. Operational air emissions may slightly increase due to more students traveling to the closest middle school via car versus walking or riding their bikes from residences in the neighborhood. However, this increase in emissions would be relatively small and would not likely result in a change in the operational emissions analyzed as part of the project. The project identified a potentially significant impact associated with an increase in ROG and NO_x due to vehicle trips and PM_{10} associated with wood burning fireplaces. Mitigation measure AQ-2 requires additional features be added to the project to encourage use of alternative modes of transportation and to eliminate the use of wood burning devices. This mitigation would still be required for this alternative.

Biological Resources. The amount of land disturbance under this alternative would essentially be the same as the proposed project. Development of the 16.5 acre school site was assumed in the analysis of biological impacts; therefore, under this alternative impacts to biological resources would be the same as the proposed project and mitigation measures BIO-1 through BIO-8 would still be required.

Cultural Resources. Similar to biological resources, future development of this site was assumed in the analysis of Cultural Resources including development of the 16.5 acre school site. Impacts to unknown subsurface archeological and historic resources as well as the potential to unearth human remains would not change under this alternative. Therefore, mitigation measures CUL-1 and CUL-2 would still be required.

Hydrology, Drainage, and Water Quality. Development of the 16.5 acre future school site with residential uses would add more impervious surfaces than what would be anticipated if a school were developed because a school typically includes large athletic fields. Regardless, any change in impervious surface area would be small and would not change the severity of the impact identified for the project or the need for additional detention capacity. Mitigation measures HYDRO-1, HYDRO-2, and HYDRO-3 would still be required for this alternative to ensure impacts associated with an increase in erosion and downstream runoff and detention would be reduced to less than significant.

Land Use and Planning. Similar to the proposed project converting the 16.5 acre school site to residential development would still be consistent with the Travis Air Force Base CLUP. In addition, because the same number of residential units would be developed as the proposed project and a Specific Plan would also be prepared; therefore, this alternative would also be consistent with the City's general plan goals and policies, specifically plans for development in the East of Leisure Town Road Growth Area. The overall density of the project would decrease given the addition of up to 16.5 acres of land allowing for some larger lot, lower density residential development. Because the total number of units would not change, impacts associated with consistency with applicable plans and policies would remain less than significant, the same as the proposed project. However, because this alternative would eliminate a previously identified school site, it would conflict with adopted policies for the provision of adequate school sites in the new growth areas (General Plan Figure PUB-3), and the City as a whole, and would potentially conflict with goals and policies in the General Plan that encourage the location of adequate school facilities near planned residential neighborhoods. Furthermore, residential uses would not be consistent with the current General Plan land use designation and would not support the project's objectives of being consistent with the City's envisioned urban form for the new growth area.

Public Utilities. Similar to biological and cultural resources, future development of this site was assumed in the analysis of public utilities. Because the total number of residential units is not changing the increase in demand for wastewater conveyance and treatment, solid waste collection and disposal, and energy resources would be the same as the project. Therefore, mitigation measures WW-1 and WW-2 would still be required to address wastewater treatment capacity and conveyance capacity.

Transportation and Circulation. Under this alternative the future middle school site would be converted to residential development. Therefore, middle school children in both the project site and the adjacent Brighton Landing project would not be able to walk or ride their bicycles to school resulting in more vehicle trips to drive children to the nearest middle school. The increase in vehicle trips would contribute to degrading the LOS at the Leisure Town Road (Jepson Parkway) / Elmira Road intersection and contributing vehicles to Leisure Town Road (Jepson Parkway) between Marshall Road and Elmira Road and between Elmira Road and Ulatis Road, contributing to a decline in LOS along this portion of Leisure Town Road. The increase in vehicle trips would be small, but would be slightly greater than under the proposed project. Mitigation measures TRAFF-1 through TRAFF-4 would still be required for project level impacts to ensure the impacts are reduced to a less-than-significant level. In addition, under this alternative there would be a small contribution to the significant cumulative effects identified for the project. Mitigation measures TRAFF-5 through TRAFF-8 would still be required to ensure cumulative impacts are reduced to less than significant.

Relationship to the Project Objectives

This alternative would fulfill a number of the project objectives, but by reducing the overall density across the project site and removing the land set aside for a future school, the No School Alternative would not meet the project's objectives of providing a school site as a public benefit andproviding for orderly and well-planned development. In addition, this alternative would conflict with the City's General Plan that calls for the provision of adequate school sites in new growth areas, and the City as a whole, and would potentially conflict with goals and policies in the General Plan that encourage the location of adequate school facilities near planned residential neighborhoods. Furthermore, residential uses would not be consistent with the current General Plan land use designation and would not support the project's objectives of being consistent with the City's envisioned urban form for the new growth area.

Alternative 4: Open Space Alternative

Under this alternative the 16.5 acre future middle school site would not be developed with a school but would be designated as Open Space. Combined with the approximately 21.2 acres of passive open space included as part of the project, this alternative would provide a total of approximately

37.7 acres of open space. The remainder of the site would be developed consistent with the proposed project, including 785 residential units, parks, circulation and site access, and utilities.

Comparative Analysis of Environmental Effects

Air Quality. Under this alternative the same number of residential units would be developed as well as project roadways, utilities, and parks, the same as the proposed project. However, the future middle school would not be constructed leaving the 16.5 acres in passive open space. Overall, construction-related air emissions would be essentially the same or very similar to the proposed project because a majority of the development has not changed. Eliminating construction of the middle school would reduce construction emissions of ROG, NO_x, and PM_{10} in proportion to the size of this site. Mitigation measure AQ-1 would still be required to reduce construction emissions associated with construction activities and equipment. Therefore, construction-related air emissions would be only slightly reduced from what was analyzed as part of the project. Operational air emissions may slightly increase due to more students traveling to the closest middle school via car versus walking or riding their bikes from residences in the neighborhood. However, this increase in emissions would be very small and would not likely result in a change in the operational emissions analyzed as part of the project. The project identified a potentially significant operational impact associated with an increase in ROG and NO_x due to vehicle trips and PM_{10} associated with wood burning fireplaces. Mitigation measure AQ-2 requires additional features be added to the project to encourage use of alternative modes of transportation and to eliminate the use of wood burning devices. This mitigation would still be required for this alternative.

Biological Resources. The amount of land disturbance under this alternative would be less than the proposed project because the middle school would not be developed. The amount of open space would increase to approximately 37.7 acres under this alternative, more than under the proposed project. The decrease in construction activities on this portion of the project site would help reduce construction-related impacts to the Short-eared owl, Burrowing owl and Swainson's hawk, however mitigation measures BIO-1, BIO-2, BIO-4, and BIO-6 would still be required to address development of the remainder of the project site. The increase in open space would also reduce the number of acres required to mitigate the loss of Burrowing owl nesting and foraging habitat and Swainson's hawk foraging habitat. Mitigation measures BIO-3 and BIO-5 would still be required but the amount of acreage needed to mitigate the impact would be less. The loss of 1.7 acres of waters that could be considered jurisdictional would not change under this alternative and mitigation measure BIO-7 would still be required.

Cultural Resources. Under this alternative leaving 16.5 acres in undeveloped open space would reduce the potential for unearthing unknown archeological and historic resources as well as human remains. However, impacts to unknown subsurface archeological and historic

resources as well as the potential to unearth human remains would still occur associated with development of the remainder of the site. Therefore, mitigation measures CUL-1 and CUL-2 would still be required.

Hydrology, Drainage, and Water Quality. Leaving the 16.5 acre future school site as open space would decrease the amount of impervious surface area and would help to reduce the amount of stormwater runoff and any construction-related erosion. However, even though it would reduce the overall severity of the impacts identified for the project mitigation measures HYDRO-1, HYDRO-2, and HYDRO-3 would still be required for this alternative to ensure impacts associated with project construction and an increase in erosion and downstream runoff and detention would be reduced to less than significant for the remainder of the project site.

Land Use and Planning. Similar to the proposed project converting the 16.5 acre school site to open space would still be consistent with the Travis Air Force Base CLUP. In addition, because the same number of residential units would be developed as the proposed project and a Specific Plan would also be prepared; therefore, this alternative would also be consistent with the City's general plan goals and policies, specifically plans for development in the East of Leisure Town Road Growth Area. However, this alternative would conflict with the Public Facilities and Services Element of the General Plan by failing to provide for a middle school site within the growth area. Impacts associated with consistency with applicable plans and policies would remain less than significant, the same as the proposed project.

Public Utilities. The removal of the middle school and conversion of this land to open space would only slightly change the demand for wastewater conveyance and treatment, solid waste collection and disposal, and energy resources. These impacts would be very similar to what was analyzed as part of the project. Therefore, mitigation measures WW-1 and WW-2 would still be required to address treatment capacity and conveyance capacity.

Transportation and Circulation. Under this alternative the future middle school site would be converted to open space. Therefore, similar to alternative 3, middle school children in the project site would not be able to walk or ride their bicycles to school resulting in more vehicle trips to drive children to the nearest middle school. The increase in vehicle trips would contribute to degrading the LOS at the Leisure Town Road (Jepson Parkway) / Elmira Road intersection and contributing vehicles to Leisure Town Road (Jepson Parkway) between Marshall Road and Elmira Road and between Elmira Road and Ulatis Road, contributing to a decline in LOS along this portion of Leisure Town Road. The increase in vehicle trips would be small, but would be slightly greater than under the proposed project. Mitigation measures TRAFF-1 through TRAFF-4 would still be required for project level impacts to ensure the impacts are reduced to a less-than-significant level. In addition, under this

alternative there would be a small contribution to the significant cumulative effects identified for the project. Mitigation measures TRAFF-5 through TRAFF-8 would still be required to ensure cumulative impacts are reduced to less than significant.

Relationship to the Project Objectives

This alternative would fulfill most of the project objectives. It would provide for the orderly, well planned, and balanced development of future projects in the East of Leisure Town Road Growth Area, direct growth to areas identified as priority for urban growth in the General Plan, support the City's General Plan policies consistent with the City's growth projections and housing policies, and provide public amenities, infrastructure, and open spaces to provide for a well-planned community.

By eliminating the middle school site, this alternative does not fully meet the objective to provide public benefits that include a school, as compared to the proposed project. Therefore, the project would conflict with adopted policies for the provision of adequate school sites in the new growth areas (General Plan Figure PUB-3), and the City as a whole, and would potentially conflict with goals and policies in the General Plan that encourage the location of adequate school facilities near planned residential neighborhoods.

6.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines require that an EIR identify the environmental superior alternative (Section 15126.6 (e)(2)). If the environmentally superior alternative is the "No Project" Alternative, the EIR must identify an environmentally superior alternative from among the other alternatives. As shown in Table 5-7, the No Project/No Development Project is the environmentally superior alternative. Therefore, an environmentally superior alternative must be identified from among the other three development alternatives.

After the No Project/No Development Project Alternative, the next most environmentally superior alternative is, Alternative 4, Open Space Alternative, which would reduce several of the project's significant impacts associated with biological resources and utilities.

Table 6-1
Evaluation of Alternatives by Impact Area

Impact	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: Active Park	Alternative 3: No School	Alternative 4: Open Space
Air Quality					
4.1-1: Construction of the proposed project could result in emissions of ROG, NOx, or PM10 at levels that could substantially contribute to a potential violation of applicable air quality standards or to nonattainment conditions.	LS/M	NI	LS/M+	LS/M=	LS/M-
4.1-2: Operation of the proposed project would result in emissions of ROG, NOx, or PM_{10} at levels that could substantially contribute to a potential violation of applicable air quality standards or to nonattainment conditions.	SU/M	NI	SU/M+	SU/M=	SU/M=
4.1-3: The proposed project would not result in CO concentrations that exceed the 1-hour state ambient air quality standard (i.e., 20.0 ppm) or the 8-hour state ambient standard (i.e., 9.0 ppm).	LS	NI	LS=	LS=	LS=
4.1-4: The proposed project would not result in the exposure of sensitive receptors to substantial pollutant concentrations.	LS	NI	LS=	LS=	LS=
4.1-5: The proposed project would result in a cumulatively considerable net increase of any criteria pollutant for which the project area is in non-attainment under an applicable federal or state ambient air quality standard (including the release of emissions that exceed quantitative thresholds for ozone precursors).	SU/M	NI	SU/M=	SU/M=	SU/M=

Table 6-1
Evaluation of Alternatives by Impact Area

Impact	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: Active Park	Alternative 3: No School	Alternative 4: Open Space
Biological Resources					
4.2-1: Implementation of the proposed project may result in substantial adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS.	LS/M	NI	LS/M+	LS/M=	LS/M-
4.2-2: Implementation of the proposed project could result in a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the CDFW or USFWS.	LS	NI	LS+	LS=	LS=
4.2-3: Implementation of the proposed project may result in placement of fill into potential jurisdictional waters of the U.S and State.	LS/M	NI	LS/M=	LS/M=	LS/M=
4.2-4: Implementation of the proposed project may interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites..	LS	NI	LS=	LS=	LS=

Table 6-1
Evaluation of Alternatives by Impact Area

Impact	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: Active Park	Alternative 3: No School	Alternative 4: Open Space
4.2-5: Implementation of the proposed project could conflict with applicable land use plans, policies, regulations, or ordinances, of an agency with jurisdiction over the project, including the Solano County Water Agency's draft HCP adopted for the purpose of protecting biological resources or avoiding and mitigating impacts to biological resources.	LS/M	NI	LS/M+	LS/M=	LS/M-
4.2-6: The proposed project could contribute to cumulative impacts to special-status species in the region due to removal of foraging and breeding habitat.	LS/M	NI	LS/M+	LS/M=	LS/M-
Cultural Resources					
4.3-1: Implementation of the proposed project may cause a substantial adverse change in the significance of an archaeological resource.	LS/M	NI	LS/M+	LS/M=	LS/M-
4.3-2: Implementation of the proposed project may disturb human remains, including those interred outside of formal cemeteries.	LS/M	NI	LS/M+	LS/M=	LS/M-
4.3-3: The proposed project could contribute to cumulative impacts to historical, archaeological and paleontological resources in the area..	LS	NI	LS=	LS=	LS=
Hydrology and Water Quality					
4.4-1: Implementation of the proposed project may violate water quality standards or waste discharge requirements, or otherwise substantially degrade water quality.	LS	NI	LS=	LS+	LS-

Table 6-1
Evaluation of Alternatives by Impact Area

Impact	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: Active Park	Alternative 3: No School	Alternative 4: Open Space
4.4-2: Implementation of the proposed project may alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion or siltation on- or off-site.	LS/M	NI	LS/M+	LS/M+	LS/M-
4.4-3: Implementation of the proposed project may substantially alter the existing drainage pattern of the site or area or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.	LS/M	NI	LS/M+	LS/M+	LS/M-
4.4-4: Implementation of the proposed project may create or contribute to runoff water which would exceed the capacity of the existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff**.**	LS/M	NI	LS/M+	LS/M+	LS/M-
4.4-5: The proposed project, in addition to other projects in the watershed, could result in the generation of polluted runoff that could violate water quality standards or waste discharge requirements for receiving waters.	LS	NI	LS+	LS+	LS-
Land Use and Planning					
4.5-1: Implementation of the proposed project may conflict with an applicable land use plan, policy or regulation.	LS	NI+	LS-	LS+	LS+
Public Utilities					
4.6-1: The proposed project could exceed the treatment requirements of the applicable Regional Water Quality Control Board.	LS	NI	LS=	LS=	LS-

Table 6-1
Evaluation of Alternatives by Impact Area

Impact	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: Active Park	Alternative 3: No School	Alternative 4: Open Space
4.6-2: The proposed project could require or result in the construction of new wastewater facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects.	LS	NI	LS=	LS=	LS-
4.6-3: The proposed project could result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.	LS/M	NI	LS/M=	LS/M=	LS/M-
4.6-4: The proposed project could be served by a landfill without sufficient permitted capacity to accommodate the project's solid waste disposal needs.	LS	NI	LS=	LS=	LS-
4.6-5: The proposed project could require or result in the construction of new energy production and/or transmission facilities or expansion of existing facilities.	LS	NI	LS=	LS=	LS-
4.6-6: The proposed project could contribute to a cumulative increase in the demand for wastewater treatment, which could result in inadequate capacity and require the construction of new or expansion of existing wastewater treatment facilities.	LS	NI	LS=	LS=	LS-
4.6-7: The proposed project could contribute to a cumulative increase in solid waste, which could result in either the construction of new solid waste facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects.	LS	NI	LS=	LS=	LS-

Table 6-1
Evaluation of Alternatives by Impact Area

Impact	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: Active Park	Alternative 3: No School	Alternative 4: Open Space
4.6-8: The proposed project could contribute to a cumulative increase in energy demand, which could result in the need for construction of new energy production and/or transmission facilities or expansion of existing facilities.	LS	NI	LS=	LS=	LS-
4.8-10: The proposed project could contribute to a cumulative increase in solid waste, which could result in either the construction of new solid waste facilities or the expansion of existing facilities, the construction of which could cause significant environmental effects.	LS	NI	LS=	LS=	LS-
Transportation and Circulation					
4.7-1: Implementation of the proposed project would degrade operations at one study intersection.	LS/M	NI	LS/M+	LS/M+	LS/M+
4.7-2: Implementation of the proposed project would increase traffic volumes above the LOS C threshold on two study road segments.	SU/M	NI	SU/M+	SU/M+	SU/M+
4.7-3: Implementation of the proposed project would increase traffic volumes along study freeway segments in the CMP system but would not exceed LOS thresholds of significance.	LS	NI	LS=	LS=	LS=
4.7-4: Implementation of the proposed project, including installation of traffic circles and other traffic calming devices, may delay emergency response or impede movement of emergency vehicles.	LS/M	NI	LS/M=	LS/M=	LS/M=

Table 6-1
Evaluation of Alternatives by Impact Area

Impact	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: Active Park	Alternative 3: No School	Alternative 4: Open Space
4.7-5: Implementation of the proposed project could conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.	LS/M	NI	LS/M=	LS/M=	LS/M=
4.7-6: Under Existing plus Approved plus Project conditions, traffic volumes would exceed intersection LOS operations at six intersections.	SU/M	NI	SU/M+	SU/M+	SU/M+
4.7-7: Under Cumulative plus Project conditions, intersection operations would exceed LOS thresholds of significance at one intersection.	SU/M	NI	SU/M+	SU/M=	SU/M=
4.7-8: Traffic volumes under Existing plus Approved plus Project conditions would be above the LOS C threshold on five study road segments. The project would cause traffic volumes to exceed the LOS C threshold on one of the five segments.	SU/M	NI	SU/M+	SU/M+	SU/M+
4.7-9: Traffic volumes under Cumulative plus Project conditions would be above the LOS C threshold on one study road segment.	LS/M	NI	LS/M=	LS/M=	LS/M=
4.7-10: Implementation of the proposed project under Existing plus Approved plus Project conditions would increase traffic volumes along study freeway segments in the CMP system but would not exceed LOS thresholds of significance.	LS	NI	LS=	LS=	LS=

Table 6-1
Evaluation of Alternatives by Impact Area

Impact	Proposed Project	Alternative 1: No Project/No Development	Alternative 2: Active Park	Alternative 3: No School	Alternative 4: Open Space
4.7-11: Implementation of the proposed project under Cumulative plus Project conditions would increase traffic volumes along study freeway segments in the CMP system but would not exceed LOS thresholds of significance.	LS	NI	LS=	LS=	LS=

Notes:
NI = No impact
LS = impacts less than significant
LS/M = Impacts less than significant after mitigation
PS = Potentially significant (mitigation not determined)
SU/M = Significant and unavoidable after mitigation
"+" indicates the impact is more severe than the project impact
"-" indicates that the impact is less severe than the project impact
"=" indicates that the impact is the same as the proposed project