6 ALTERNATIVES ANALYSIS

6.1 INTRODUCTION

The Alternatives Analysis chapter of the EIR includes consideration and discussion of a range of reasonable alternatives to the proposed project, as required per CEQA Guidelines Section 15126.6. Generally, the chapter includes discussions of the following: the purpose of an alternatives analysis; alternatives considered but dismissed; reasonable range of project alternatives and their associated impacts in comparison to the proposed project's impacts; and the environmentally superior alternative.

6.2 PURPOSE OF ALTERNATIVES

The primary intent of the alternatives evaluation in an EIR, as stated in Section 15126.6(a) of the CEQA Guidelines, is to "[…] describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." In the context of CEQA Guidelines Section 21061.1, "feasible" is defined as:

> ...capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors.

Section 15126.6(f) of CEQA Guidelines states, "The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." Section 15126.6(f) of CEQA Guidelines further states:

> The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determined could feasibly attain most of the basic objectives of the project.

In addition, an EIR is not required to analyze alternatives when the effects of the alternative "cannot be reasonably ascertained and whose implementation is remote and speculative."

The CEQA Guidelines provide the following guidance for discussing alternatives to a proposed project:

- An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but

would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives (CEQA Guidelines Section 15126.6[a]).

- Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly (CEQA Guidelines Section 15126.6[b]).
- The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination […] Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts (CEQA Guidelines Section 15126.6[c]).
- The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison (CEQA Guidelines Section 15126.6[d]).
- If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed (CEQA Guidelines Section 15126.6[d]).
- The specific alternative of "no project" shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The no project alternative analysis is not the baseline for determining whether the proposed project's environmental impacts may be significant, unless it is identical to the existing environmental setting analysis which does establish that baseline (CEQA Guidelines Section 15126.6[e][1]).
- If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6[e][2]).

Project Objectives

Based on the above, reasonable alternatives to the project must be capable of feasibly attaining most of the basic objectives of the project. The proposed project is being pursued with the following objectives:

- Reduce overcrowded living conditions that currently exist for students residing in the City by developing a new off-campus apartment housing project with easy access to UC Davis.
- Revitalize an underutilized tract of land along East Olive Drive by developing a three to five story for-lease student housing apartment community that provides a mix of two-bedroom to five-bedroom furnished living units.

- Provide residents with a range of indoor amenities including a student community center with fitness facilities, study lounges, game rooms, café areas, bike storage areas and bike maintenance and repair facilities, and with a range of outdoor amenities including a pool, outdoor barbecue area, cabanas, game areas and lounge areas to create a safe and active onsite community environment.
- Utilize a project location and design principles that encourage and support the use of alternate forms of transportation (public transit/pedestrian/cycling) to both downtown Davis and the UC Davis campus.
- Incorporate sustainable design strategies consistent with LEED Gold certification standards.

Significant Impacts Identified in the EIR

In addition to attaining the majority of project objectives, reasonable alternatives to the project must be capable of reducing the magnitude of, or avoiding, identified significant environmental impacts of the proposed project. Significant environmental impacts of the proposed project that have been identified as requiring mitigation measures to ensure that the level of significance is ultimately less than significant include the following:

- ***Air Quality and Greenhouse Gas Emissions.*** The EIR determined that implementation of the proposed project could result in a significant impact related to exposure of sensitive receptors to substantial pollutant concentrations, specifically associated with construction diesel particulate matter (DPM). The EIR requires mitigation in order to ensure that the impact is reduced to a less-than-significant level.

- ***Biological Resources.*** The EIR determined that implementation of the proposed project could result in significant impacts related to the following: Swainson's hawk; burrowing owl; other raptors, nesting birds, or other birds protected under the Migratory Bird Treaty Act (MBTA); special-status bats; a conflict with a local policy or ordinance protecting biological resources; and a conflict with an adopted HCP, NCCP, or other approved local, regional, or state habitat conservation plan. The EIR requires mitigation in order to ensure that the aforementioned impacts are reduced to less-than-significant levels.

- ***Cultural Resources.*** The EIR determined that implementation of the proposed project could result in significant impacts related to the following: a substantial adverse change in the significance of a previously undiscovered historic resource; a substantial adverse change in the significance of an archaeological resource during construction; the disturbance or damage of a unique paleontological resource or unique geologic feature on the project site during construction; and a substantial adverse change in the significance of a unique archeological resource or tribal cultural resource or disturbance of human remains during construction. The EIR requires mitigation in order to ensure that the aforementioned impacts are reduced to less-than-significant levels.

- ***Hazards and Hazardous Materials.*** The EIR determined that implementation of the proposed project could result in a significant impact related to accidental release of hazardous materials during construction and demolition activities, specifically associated with asbestos and lead-based paint. The EIR requires mitigation in order to ensure that the impact is reduced to a less-than-significant level.

- ***Hydrology and Water Quality.*** The EIR determined that implementation of the proposed project could result in significant impacts related to the following: violation of water quality standards or the creation of a substantial additional source of polluted runoff during construction; the creation of additional sources of polluted runoff or a substantial degradation of water quality during project operations; and altering existing site drainage patterns in such a way as to exceed the capacity of existing infrastructure or lead to flooding on- or off-site. This EIR requires mitigation in order to ensure that the aforementioned impacts are reduced to less-than-significant levels.

- ***Noise.*** This EIR determined that implementation of the proposed project could result in significant impacts related to construction-related noise and interior noise associated with nearby railroad activity. This EIR requires mitigation in order to ensure that the aforementioned impacts are reduced to less-than-significant levels.

- ***Transportation and Circulation.*** This EIR determined that implementation of the proposed project could result in significant impacts related to the following: construction vehicle traffic; study intersections under the Cumulative Plus Project scenario; and study freeway off-ramps under Cumulative Plus Project conditions. This EIR requires mitigation in order to ensure that the aforementioned impacts are reduced to less-than-significant levels.

The proposed project would not result in any significant impacts that could not be eliminated or reduced to a less-than-significant level by mitigations imposed by the City. As such, significant and unavoidable impacts would not occur as a result of the proposed project.

As discussed in each respective section of Chapter 4 within this EIR, the proposed project would result in no impact or a less-than-significant impact related to the following topics associated with the resource area indicated:

- ***Aesthetics and Visual Resources***
    - Substantially degrade the existing visual character or quality of the project site and its surroundings.
    - Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.
    - Long-term changes in visual character of the region associated with cumulative development of the proposed project in combination with future buildout in the City of Davis.
    - Cumulative impacts related to the creation of new sources of light or glare associated with development of the proposed project in combination with future buildout in the City of Davis.

- ***Air Quality and Greenhous Gas Emissions***
    - Violate any air quality standard or contribute substantially to an existing or projected air quality violation during construction.
    - Violate any air quality standard or contribute substantially to an existing or projected air quality violation during operations, and a conflict with or obstruction of implementation of applicable air quality plans.
    - Create objectionable odors affecting a substantial number of people.
    - Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).
    - Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.
    - Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.

- ***Biological Resources***
    - Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the CWA (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
    - Interfere substantially 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.
    - Cumulative loss of habitat in the City of Davis area for special-status species.

- ***Cultural Resources***
    - Cumulative development in the City of Davis, in conjunction with the development of the proposed project, could contribute incrementally to the regional loss of cultural resources in the City of Davis.

- ***Hazards and Hazardous Materials***
    - Increase in the number of people who could be exposed to potential hazards or hazardous materials and an increase in the transport, storage, and use of hazardous materials due to development of the proposed project in combination with future buildout in the City of Davis.

- ***Hydrology and Water Quality***
    - Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of preexisting nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted).
    - Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a dam.
    - Cumulative impacts related to hydrology and water quality within the City of Davis.

- ***Land Use and Planning***
    - Conflict, or create an inconsistency, with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.
    - Cumulative land use and planning incompatibilities.

- ***Noise***
    - Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.
    - Transportation noise impacts to existing sensitive receptors in the project vicinity.
    - Transportation noise impacts to new sensitive receptors in the project vicinity.
    - Railroad noise may increase at residences north of the project site due to reflections of sound off of building facades.
    - Cumulative impacts on traffic noise-sensitive receptors.
    - CEQA Cumulative Alternatives Generated Traffic Noise at Existing Sensitive Receptors.
    - Cumulative traffic noise effects on proposed uses.

- ***Population and Housing***
    - Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).
    - Displace substantial numbers of existing housing or people requiring construction of replacement housing elsewhere.
    - The project may contribute to cumulative impacts on population growth and displace substantial numbers of people or existing housing.

- ***Public Services and Recreation***
    - Result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, and/or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection facilities.
    - Result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, and/or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives for police protection facilities.
    - Result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, and/or the need for new or physically altered school facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable performance objectives for school facilities.
    - Result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, and/or the need for new or physically altered park facilities, the construction of which could cause significant environmental impacts in order to maintain performance objectives for park facilities.

- Result in substantial adverse physical impacts associated with the provision of new or physically altered other public facilities, and/or the need for new or physically altered other public facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives for other public facilities.
- Development of the proposed project, in combination with future buildout in the City of Davis, would increase demand for additional public services, and recreational facilities.

- ***Transportation and Circulation***
  - Impacts to study intersections under the Existing Plus Project scenario.
  - Impacts to study freeway segments under the Existing Plus Project scenario.
  - The project's Vehicle Miles of Travel (VMT) would exceed local or regional per capita averages.
  - Impacts to Bicycle and Pedestrian Facilities.
  - Impact to Transit Service.
  - Impacts to Emergency Vehicle Access.
  - Impacts to study freeway segments under the Cumulative Plus Project scenario.
  - Impacts to study intersections under the CEQA Cumulative scenarios.
  - Impacts to study freeway segments under CEQA Cumulative scenarios.
  - The project's Regional Vehicle Miles of Travel (VMT) would exceed regional per capita averages.
  - Cumulative Impacts to Bicycle and Pedestrian Facilities.
  - Cumulative Impacts to Transit Service.

- ***Utilities and Service Systems***
  - Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.
  - Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments, and that project wastewater would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board.
  - Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs or fail to comply with federal, State, and local statutes and regulations related to solid waste.
  - Gas, electric, and telecommunication facilities.
  - Development of the proposed project, in combination with future buildout in the City of Davis, would increase demand for additional utilities.

As stated above, reasonable alternatives to the project must be capable of reducing the magnitude of, or avoiding, identified significant environmental impacts of the proposed project. Because the proposed project would not result in significant impacts related to the resource areas listed above, a comparison of potential impacts associated with the aforementioned resource areas as a result of project alternatives versus the proposed project is not provided in this chapter. Rather, this chapter focuses on those resource areas and specific impacts listed above that have been identified for the

proposed project as requiring mitigation measures to reduce significant impacts to less than significant.

6.3 Alternatives Considered But Dismissed

As discussed throughout this EIR, the proposed project would be consistent with the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) adopted by the Sacramento Area Council of Governments (SACOG). One benefit of the CEQA streamlining process is that projects that are consistent SACOG's MTP/SCS are granted CEQA streamlining benefits, including that the EIR need not consider alternative locations, densities, or building intensities to the proposed project. Nevertheless, for the purpose of public disclosure, the City has chosen to include an analysis of feasible project alternatives.

Consistent with CEQA, primary consideration was given to alternatives that could reduce significant impacts, while still meeting most of the basic project objectives.

As stated in Guidelines Section 15126.6(c), among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are:

- failure to meet most of the basic project objectives;
- infeasibility; or
- inability to avoid significant environmental impacts.

Regarding infeasibility, among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent). Not one of these factors establishes a fixed limit on the scope of reasonable alternatives.

The one alternative that was considered but dismissed from detailed analysis in this EIR is discussed below, along with the reason(s) for dismissal, within the context of the three above-outlined permissible reasons.

Downtown Davis and Amtrak Station Parking Alternative

Based on a comment letter received during the Notice of Preparation (NOP) review period for the proposed project, the City has taken into consideration a Downtown Davis and Amtrak Station Parking Alternative, where the project site would be developed with a parking lot or structure. The parking lot or structure would serve to provide parking and easy access for the downtown Davis area, as well as to provide overflow parking opportunities for the nearby Amtrak train station. The intention of the Downtown Davis and Amtrak Station Parking Alternative would be to alleviate traffic congestion in the downtown Davis area.

The project objectives are focused on providing student housing, while at the same time emphasizing sustainable building design and the use of alternate forms of transportation. The Downtown Davis and Amtrak Station Parking Alternative would not involve the development of housing (student-oriented or market rate). According to the City of Davis 2013-2021 Housing Element, the City currently has a high demand and limited supply of housing, which contributes to high housing costs. Renter households in particular experience a disproportionate share of housing affordability problems. As a result, many UC Davis students choose to live in surrounding areas such as Woodland, Dixon, or West Sacramento due to the limited supply and cost of rental housing in the City of Davis. Because the Downtown Davis and Amtrak Station Parking Alternative would not contribute towards a needed supply of student-oriented housing for UC Davis students, the supply and cost of rental housing in the City would remain unchanged and the Alternative would not meet any of the project objectives related to such. The Downtown Davis and Amtrak Station Parking Alternative would help to encourage alternate forms of transportation in the immediate area by providing pedestrian and bicycle access to the UC Davis campus and downtown Davis area from a location outside of the congested downtown area. However, by not providing housing at the project site, which would help to reduce single-occupancy vehicle trips associated with students living outside of the City commuting to the UC Davis campus, the Alternative would still involve single-occupancy vehicle trips to and from the site, including trips originating outside of the City. Thus, the Downtown Davis and Amtrak Station Parking Alternative would not be capable of providing the full intention of the project objectives related to alternative modes of transportation.

As noted in *City of Santa Cruz*, *supra*, 177 Cal.App.4th, the CEQA Guidelines make clear that the project objectives should drive the agency's selection of alternatives for analysis and approval. However, the alternatives selected are not legally required to satisfy every key objective of the project. Rather, the concept finds expression in CEQA case authority. One example is *Mira Mar*, *supra*, 119 Cal.App.4th 477. In that case, the court rejected the project opponents' contention that the alternatives in the EIR failed to "satisfy CEQA's requirements that an EIR meet basic project objectives and avoid or substantially reduce the project's environmental alternatives." (Id. at p. 488.) There, "the primary objective of the project [was] to provide high-density housing consistent with existing planning goals" but there were other objectives as well, including sensitive development of a vacant area. (Id. at p. 489.) As the court observed, two reduced density alternatives did "not meet the primary development objective of providing high-density housing," but they did satisfy all the secondary project objectives. This is sufficient because alternatives need not satisfy all project objecti[ve]s, they must merely meet 'most' of them. In this case, the Downtown Davis and Amtrak Station Parking Alternative would not meet the majority of the project objectives.

The project site is currently designated by the Gateway/Olive Drive Specific Plan's Land Use and Zoning Plan as East Olive Multiple Use (EOMU) and Residential Medium Density (RMD). Based on the EOMU designation, the portion of the site designated EOMU could include a mix of uses containing a combination of any two of the following:

- Multi-family residential not to exceed 15 dwelling units per acre (du/ac);
- Restaurants;

- Professional and administrative offices; and
- Retail uses.

The purpose of the RMD district is to provide single-family or multifamily residential development with densities from 4.2 to 10.0 units per net acre in the East Olive Drive area. Based on the RMD designation for the Callori Property, as discussed in the Gateway/Olive Drive Specific Plan, the portion of the site designated RMD could include up to 49 small-sized, single-family cottage units and 8,000 square feet of commercial uses.

Based on the above, a Downtown Davis and Amtrak Station Parking Alternative would not be consistent with either of the existing land use designations for the site. In addition, the majority of uses in the immediately accessible proximity of the site consist of residential development. Placing a parking lot or structure on the project site per a Downtown Davis and Amtrak Station Parking Alternative would not be consistent and may be considered incompatible with the surrounding land uses.

As mentioned above, although the Downtown Davis and Amtrak Station Parking Alternative would support alternate forms of transportation in the immediate project vicinity and congested downtown Davis area, the Alternative would not help to reduce single-occupancy vehicle trips currently occurring associated with students living outside of the City commuting to the UC Davis campus. The City of Davis has set forth long-term goals through General Plan goals and policies, as well as through the Climate Action and Adaptation Plan, that seek to reduce reliance on single-occupancy vehicles by encouraging, promoting, and supporting alternate modes of transportation. The Downtown Davis and Amtrak Station Parking Alternative would not be capable of providing the same level of opportunity to meet such goals in comparison to the proposed project. Furthermore, a grade-separated crossing from the site to the Amtrak station or downtown area does not currently exist. Thus, until such a crossing is constructed, which would require extensive coordination with Union Pacific who owns the rail lines, direct access to the Amtrak station or downtown area would not be provided.

Because the proposed project would not meet the majority of project objectives and due to the lack of consistency with the City's' General Plan land use designations and goals, long-term goals set forth within the CAAP, and surrounding land uses, as well as unsuitability of the site for a parking use, the Downtown Davis and Amtrak Station Parking Alternative would not be considered a feasible alternative to the proposed project.

Furthermore, because the Downtown Davis and Amtrak Station Parking Alternative would involve development on the same site as the proposed project, which would result in a comparable area of disturbance during construction, and would require demolition of the existing on-site uses, the majority of significant impacts identified for the proposed project in this EIR would remain under the Downtown Davis and Amtrak Station Parking Alternative. Thus, the Alternative would not be capable of avoiding significant environmental effects that would occur with implementation of the proposed project.

For the aforementioned reasons, the Downtown Davis and Amtrak Station Parking Alternative was dismissed from further consideration within this EIR.

6.4 Alternatives Considered in this EIR

Eight alternatives to the proposed project were developed based on City of Davis staff and City Council input, input from the public during the NOP review period, and the technical analysis performed to identify the significant environmental effects of the proposed project. The following eight alternatives are considered feasible alternatives to the project, and are evaluated in further detail in this section:

- No Project Alternative;
- Existing Gateway/Olive Drive Specific Plan Alternative;
- Conventional Apartments Alternative;
- Reduced Density Student Apartments Alternative;
- Aggressive Transportation and Parking Demand Management Alternative;
- Mixed-Use Alternative;
- Off-Site (3820 Chiles Road) Alternative;
- Off-Site Woodland Alternative; and
- Off-Site UC Davis On-Campus Alternative.

Each of the project alternatives is described in detail below, with a corresponding analysis of each alternative's impacts in comparison to the proposed project. While an effort has been made to include quantitative data for certain analytical topics, where possible, qualitative comparisons of the various alternatives to the project are primarily provided. Such an approach to the analysis is appropriate as evidenced by CEQA Guidelines Section 15126.6[d], which states that the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. The analysis evaluates impacts that would occur with the alternatives relative to the significant impacts identified for the proposed project. The following terminology is used:

- "Fewer" = Less than Proposed Project;
- "Similar" = Similar to Proposed Project; and
- "Greater" = Greater than Proposed Project.

When the term "fewer" is used, the reader should not necessarily equate this to elimination of significant impacts identified for the proposed project. For example, in many cases, an alternative would reduce the relative intensity of a significant impact identified for the proposed project, but the impact would still be expected to remain significant under the alternative, thereby requiring mitigation. In other cases, the use of the term "fewer" may mean the actual elimination of an impact identified for the proposed project altogether.

A comparison of the environmental impacts resulting from the considered alternatives and the proposed project is provided in Table 6-15.

No Project Alternative

CEQA requires the evaluation of the comparative impacts of the "No Project" alternative (CEQA Guidelines Section 15126.6[e]). Analysis of the no project alternative shall:

> "… discuss […] existing conditions […] as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." (*Id.*, subd. [e][2]) "If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the 'no project' alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in the property's existing state versus environmental effects that would occur if the project were approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this 'no project' consequence should be discussed. In certain instances, the no project alternative means 'no build,' wherein the existing environmental setting is maintained. However, where failure to proceed with the project would not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment." (*Id.*, subd. [e][3][B]).

The City has decided to evaluate a No Project Alternative, which assumes that the project site would remain in its existing state and additional development would not occur. As described in this EIR, the current condition of the site consists of a small field, approximately 180 trees, and 24 residential units. The existing residential units include 10 single-family homes and an old lodging facility that was previously converted into a 14-unit apartment complex. The apartment complex is currently fully occupied. At the time of issuance of the Notice of Preparation, six of the 10 single-family homes were occupied by renters; of the remaining four units, three were uninhabitable and one was vacant. Portions of the project site not containing structures are mostly dominated by weedy, ruderal vegetation with the aforementioned 180 existing trees scattered throughout the site.

The No Project Alternative would not meet any of the project objectives.

<u>Air Quality and Greenhouse Gas (GHG) Emissions</u>

The No Project Alternative would involve the continuation of the existing conditions on the project site. Because the No Project Alternative would not involve construction, emissions associated with construction of the proposed project, including demolition, would not occur. Thus, construction-related air quality impacts would be eliminated under the No Project Alternative as compared to the proposed project, and Mitigation Measure 4.2-3 of this EIR would not be required.

Overall, the No Project Alternative would result in fewer impacts related to air quality and GHG emissions than the proposed project.

Biological Resources

The No Project Alternative would not involve construction and, thus, would not require demolition of existing structures, removal of trees, or any ground-disturbing activities on the project site. As such, the No Project Alternative would not have the potential to result in the disturbance or loss of potential Swainson's hawk nesting trees and/or active nests on the project site, disturbance or loss of an active nest for special-status bird or raptor species, direct loss of burrowing owls or temporary disruption of feeding or breeding behavior during construction, or bat roosts. Therefore, significant impacts identified for the proposed project related to such would not occur under the No Project Alternative and Mitigation Measures 4.3-1(a) and (b), 4.3-2(a) and (b), 4.3-3, and 4.3-4 would not be required.

Because tree removal would not occur under the No Project Alternative, the significant impact identified for the proposed project related to compliance with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, would not occur under the No Project Alternative and Mitigation Measures 4.3-7(a) and (b) would not be required.

Because the No Project Alternative would not involve any new development on the project site, the significant impact identified for the proposed project related to a conflict with an adopted NCP, NCCP, or other approved local, regional, or state habitat conservation plan would not occur under the No Project Alternative and Mitigation Measure 4.3-8 would not be required.

Based on the discussions above, none of the significant impacts related to biological resources identified for the proposed project would occur under the No Project Alternative. Overall, the No Project Alternative would result in no impacts related to biological resources.

Cultural Resources

The No Project Alternative would not involve construction, demolition, or any ground-disturbing activities. As such, the No Project Alternative would not have the potential to unearth any previously unknown cultural resources, including any resource related to Gould's Raisin Works, archaeological resources, unique paleontological resources, unique geologic features, unique archeological resources, tribal cultural resources, or human remains. Therefore, none of the significant impacts identified for the proposed project related to cultural resources would occur under the No Project Alternative and Mitigation Measures 4.4-1 through 4.4-4(b) would not be required.

Overall, the No Project Alternative would result in no impacts related to cultural resources.

Hazards and Hazardous Materials

As discussed in the Hazards and Hazardous Materials chapter of this EIR, given the age of the existing on-site structures, asbestos-containing materials and lead-based paint may be present within the structures. The No Project Alternative would not involve any construction activities, including demolition of existing structures. Because demolition of the existing structures would not occur under the No Project Alternative, the No Project Alternative would not have the potential

to expose people to airborne lead or asbestos associated with disturbance of such materials on the site. Therefore, the significant impact identified for the proposed project related to hazards and hazardous materials would not occur under the No Project Alternative and Mitigation Measures 4.5-1(a) and (b) would not be required.

Overall, the No Project Alternative would result in no impacts related to hazards and hazardous materials.

Hydrology and Water Quality

The No Project Alternative would involve the continuation of the existing conditions on the project site and would not involve any construction activities. Accordingly, significant impacts identified for the proposed project related to a violation of water quality standards, discharge requirements, or the creation of a substantial additional source of polluted runoff during construction would not occur under the No Project Alternative, and Mitigation Measure 4.6-1 would not be required.

Because the existing on-site uses do not currently incorporate any stormwater control features on the project site, the amount of pollutants that could be associated with stormwater from the project site and enter the downtstream water system would be expected to be greater than that which would occur under the proposed project. However, the No Project Alternative would not modify the existing on-sites land uses. As such, the Alternative would not have the potential to increase the creation of additional sources of polluted runoff or a substantial degradation of water quality during operations from what already occurs at the site. Similarly, alteration of the existing site drainage patterns or an increase in stormwater runoff from existing levels would not occur with the No Project Alternative. Therefore, the significant impacts identified for the proposed project associated with such would not occur under the No Project Alternative, and Mitigation Measures 4.6-2 and 4.6-4 would not be required.

Overall, the No Project Alternative would result in fewer impacts related to hydrology and water quality than the proposed project.

Noise

As determine in the Noise chapter of this EIR, the proposed project could result in a temporary construction noise impact to nearby receptors as a result of on-site use of heavy construction equipment. Because the No Project Alternative would not involve any construction activities, the significant impact identified for the proposed project associated with temporary construction noise would not occur with the No Project Alternative and Mitigation Measure 4.8-1 would not be required.

The existing on-site residences already experience elevated noise levels associated with the existing nearby noise sources, including railroad activity associated with the rail lines to the north of the site and roadway traffic. The nearest existing residence on the project site to the railroad tracks is located within 80 feet of the centerline of the railroad, which is in closer proximity than the nearest residential building of the proposed project (approximately 150 feet). Accordingly, the interior noise levels at the existing residences on the site would be expected to currently exceed

the allowable interior noise levels for a residential land use. The No Project Alternative would not introduce any new sensitive receptors to the site or involve any operations that would further exacerbate the existing conditions. Therefore, the significant impact identified for the proposed project related to interior noise associated with nearby railroad activity would be less than that of the proposed project and Mitigation Measures 4.8-5(a) and (b) would not be required for the No Project Alternative.

Overall, due to the lack of new development on the site, the No Project Alternative would result in fewer impacts related to noise than the proposed project.

Transportation and Circulation

Construction activities would not occur under the No Project Alternative. Accordingly, the No Project Alternative would not require implementation of a Construction Traffic Control Plan in order to reduce potential impacts related to construction activities to a less-than-significant level. Thus, the significant impact identified for the proposed project related to construction vehicle traffic would be less than that of the proposed project and Mitigation Measure 4.11-7 would not be required for the No Project Alternative.

Due to the lack of new development on the site, the No Project Alternative would not result in additional vehicle trips on the surrounding roadway network above and beyond those that are currently being generated by the existing on-site uses. According to the trip generation estimate for the No Project Alternative prepared by Fehr & Peers, the total vehicle trips associated with the existing on-site uses in comparison to the proposed project are presented in Table 6-1. It should be noted that the trip generation associated with the No Project Alternative takes into consideration the fact that three of the 10 existing single-family homes on the project site are currently uninhabitable; thus, only seven of the single-family homes were assumed to generate vehicle trips.

Table 6-1
Proposed Project vs. No Project Alternative Trip Generation

Duration	Proposed Project Trips	No Project Alternative Trips
Daily	894	173
AM Peak Hour	45	13
PM Peak Hour	63	14

Source: Fehr & Peers, April 2017.

Because the No Project Alternative would not increase vehicle trips beyond what currently occurs associated with the site, the No Project Alternative would not result in any further delay increases to any intersections or freeway off-ramps in the area, and the significant impacts identified for the proposed project associated with such would not occur under the No Project Alternative. Mitigation Measures 4.11-10 and 4.11-11 would not be required.

Overall, the No Project Alternative would result in fewer impacts related to transportation and circulation than the proposed project.

Existing Gateway/Olive Drive Specific Plan Alternative

The No Project Alternative discussed above would be considered a "no build" alternative, wherein the existing environmental setting is maintained. However, failure to proceed with the proposed project would not necessarily result in the preservation of the existing environmental conditions, but would rather result in the future buildout of the site pursuant to existing City planning documents. As such, the Existing Gateway/Olive Drive Specific Plan Alternative would be considered another type of "no project" alternative.

Under the Existing Gateway/Olive Drive Specific Plan Alternative, the project site is assumed to be redeveloped pursuant to the current Specific Plan land use assumptions for the project site. The project site is an underdeveloped in-fill site located within the East Olive Drive sub-area of the Gateway/Olive Drive Specific Plan. According to the Specific Plan, the land use regulations included in the Plan serve as the general plan, specific plan, and zoning for the properties within the plan area. The Gateway/Olive Drive Specific Plan's Land Use and Zoning Plan designates the project site as East Olive Multiple Use (EOMU) and Residential Medium Density (RMD), being a significant portion of the project site.

As discussed in this EIR, based on input from the City of Davis, buildout of the project site pursuant to the Gateway/Olive Drive Specific Plan could be expected to result in the development of 49 new single-family, detached, cottage-style units and 8,000 square feet of commercial space on the project site (see Table 6-2). The aforementioned development potential is above and beyond the existing on-site residential uses (10 single-family homes and 14 apartments), which are assumed to remain under the Gateway/Olive Drive Specific Plan Alternative. Thus, a total of 73 dwelling units would be on-site under the Existing Gateway/Olive Drive Specific Plan Alternative.

Table 6-2
Proposed Project vs. Existing Gateway/Olive Drive Specific Plan Alternative

	Proposed Project	Existing Gateway/Olive Drive Specific Plan Alternative
Residential		
Dwelling Units	130	73 (49 proposed; 24 existing)
Maximum Stories / Height	5 / 60 feet	3 / 35 feet[1]
Parking Spaces	240	98[2] + existing parking
Commercial		
Total Square Footage	0	8,000
Parking Spaces	0	27[3]

[1] The maximum allowable height for the project site per existing standards.
[2] Per City of Davis Municipal Code Section 40.25.090, two total parking spaces per single-family dwelling unit would be required (assuming dwelling of four bedrooms or less).
[3] Per City of Davis Municipal Code Section 40.25.090, one parking space per 300 square feet would be required (assuming the commercial space would be a retail use).

The 49 new single-family units would not be oriented towards students. For this analysis, the assumption has been made that affordable housing requirements would not be included in the Existing Gateway/Olive Drive Specific Plan Alternative, but would be otherwise met through payment of in-lieu fees only if there is a subdivision or proposal for new residential development

occurring at one time. Four or fewer individual units would not trigger affordable housing requirements. Accordingly, this analysis assumes that all dwelling units under the Existing Gateway/Olive Drive Specific Plan Alternative would be market rate. The Existing Gateway/Olive Drive Specific Plan Alternative would not include demolition of the existing structures on the project site. Specific development standards such as building setbacks, height, open space, and lot coverage would be consistent with those set forth in the Gateway/Olive Drive Specific Plan.

Because the Existing Gateway/Olive Drive Specific Plan Alternative would not include student-oriented housing, the Alternative would only have the potential to meet one of the project objectives (related to encouraging the use of alternate forms of transportation).

Air Quality and GHG Emissions

The existing on-site uses would remain and demolition of the existing structures would not occur under the Existing Gateway/Olive Drive Specific Plan Alternative. Because the existing developed areas on the project site would not be disturbed, development of the remaining uses under the Existing Gateway/Olive Drive Specific Plan Alternative would occur over a smaller area of disturbance than the proposed project. Accordingly, the intensity of construction activities would be less than what would occur with the proposed project. As a result, emissions associated with construction would be less than that of the proposed project, and construction-related air quality impacts would be fewer under the Existing Gateway/Olive Drive Specific Plan Alternative.

Biological Resources

As discussed above, the area of disturbance during construction of the Existing Gateway/Olive Drive Specific Plan Alternative would be less than what would occur with the proposed project, as the existing on-site uses would remain. Accordingly, fewer trees would likely be required to be removed in order to implement the Existing Gateway/Olive Drive Specific Plan Alternative. In addition, the intensity of construction activities, such as the extent of ground-disturbing activities, would be less than what would occur with the proposed project. As such, the Existing Gateway/Olive Drive Specific Plan Alternative would have a reduced potential to result in the disturbance or loss of potential Swainson's hawk nesting trees and/or active nests on the project site, disturbance or loss of an active nest for special-status bird or raptor species, direct loss of burrowing owls or temporary disruption of feeding or breeding behavior during construction, or bat roosts. However, complete avoidance of potential impacts related to such would not be likely. Therefore, significant impacts identified for the proposed project related to such would remain under the Existing Gateway/Olive Drive Specific Plan Alternative and Mitigation Measures 4.3-1(a) and (b), 4.3-2(a) and (b), 4.3-3, and 4.3-4 would be required.

Tree removal would still occur under the Existing Gateway/Olive Drive Specific Plan Alternative. It should be noted that many of the trees to be removed as part of the proposed project have been recommended by an arborist for removal due to their poor condition. Similar would be expected for the trees that would be removed under the Alternative. Because trees would still be removed under the Alternative, the significant impact identified for the proposed project related to compliance with local policies or ordinances protecting biological resources, such as a tree

preservation policy or ordinance, would still occur under the Existing Gateway/Olive Drive Specific Plan Alternative and Mitigation Measures 4.3-7(a) and (b) would be required.

As the Existing Gateway/Olive Drive Specific Plan Alternative would involve new development on the project site, the Alternative would be subject to the same requirements pursuant to the draft Yolo Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP), should the HCP/NCCP be adopted prior to development. Therefore, the significant impact identified for the proposed project related to a conflict with an adopted NCP, NCCP, or other approved local, regional, or state habitat conservation plan would still occur under the Existing Gateway/Olive Drive Specific Plan Alternative and Mitigation Measure 4.3-8 would be required.

Based on the discussions above, the significant impacts related to biological resources identified for the proposed project would be reduced under the Existing Gateway/Olive Drive Specific Plan Alternative, in comparison to the proposed project. However, the same impacts would still occur and the same mitigation measures that were required for the proposed project related to such would be required for the Alternative as well.

Cultural Resources

As discussed in the Cultural Resources chapter of this EIR, based on archival maps of the project site, the structures associated with Gould's Raisin Works were situated along Olive Drive. Most of the existing residential development is also currently situated along Olive Drive. Therefore, if subsurface deposits related to Gould's Raisin Works structures or activities remain, the deposits are likely beneath the existing residences. Because the existing on-site uses would remain and demolition of the existing structures would not occur under the Existing Gateway/Olive Drive Specific Plan Alternative, the potential to unearth any previously unknown resources related to Gould's Raisin Works could be reduced. However, the significant impact identified for the proposed project related to a substantial adverse change in the significance of a historical resource could still occur under the Existing Gateway/Olive Drive Specific Plan Alternative, and Mitigation Measure 4.4-1 would still be required.

Although, as stated above, the area of disturbance during construction of the Existing Gateway/Olive Drive Specific Plan Alternative would be less than that of the proposed project, ground-disturbing activities would still occur. The potential to unearth any previously unknown cultural resources, including archaeological resources, unique paleontological resources, unique geologic features, unique archeological resources, tribal cultural resources, or human remains, during such activities would occur under the Existing Gateway/Olive Drive Specific Plan Alternative. Therefore, the significant impacts identified for the proposed project related to such would still occur under the Existing Gateway/Olive Drive Specific Plan Alternative and Mitigation Measures 4.4-2 through 4.4-4(b) would be required.

Overall, the Existing Gateway/Olive Drive Specific Plan Alternative would result in fewer impacts related to cultural resources compared to the proposed project.

Hazards and Hazardous Materials

As discussed in the Hazards and Hazardous Materials chapter of this EIR, given the age of the existing on-site structures, asbestos-containing materials and lead-based paint may be present within the structures. The existing on-site uses would remain and demolition of the existing structures would not occur under the Existing Gateway/Olive Drive Specific Plan Alternative. Because demolition of the existing structures would not occur under the Existing Gateway/Olive Drive Specific Plan Alternative, the Alternative would not have the potential to expose people to airborne lead or asbestos associated with disturbance of such materials on the site. Therefore, the significant impact identified for the proposed project related to hazards and hazardous materials would not occur under the Existing Gateway/Olive Drive Specific Plan Alternative and Mitigation Measures 4.5-1(a) and (b) would not be required.

Overall, the Existing Gateway/Olive Drive Specific Plan Alternative would result in fewer impacts than the proposed project related to hazards and hazardous materials.

Hydrology and Water Quality

Although, as stated above, the area of disturbance during construction of the Existing Gateway/Olive Drive Specific Plan Alternative would be less than that of the proposed project, ground-disturbing activities would still occur over an area larger than one acre. As such, the Existing Gateway/Olive Drive Specific Plan Alternative would have a similar potential for runoff containing sediment or contaminants to enter downstream receiving waters and degrade water quality during construction activities, and would be subject to the same regulations regarding construction water quality. Therefore, the significant impacts identified for the proposed project related to a violation of water quality standards, or the creation of a substantial additional source of polluted runoff during construction would still occur under the Existing Gateway/Olive Drive Specific Plan Alternative and Mitigation Measure 4.6-1 would still be required.

As stated in the Hydrology and Water Quality chapter of this EIR, a total of 1.24 acres of impervious areas currently exist on the project site associated with the existing on-site development. The Existing Gateway/Olive Drive Specific Plan Alternative would involve new development on the project site, which would increase the impervious surface area from existing conditions. Assuming that the total impervious areas on the site after development of the Existing Gateway/Olive Drive Specific Plan Alternative would be similar to that of the proposed project, which is anticipated to result in a total impervious surface cover of 3.37 acres, the Existing Gateway/Olive Drive Specific Plan Alternative would involve an increase of approximately 2.13 acres of impervious areas on the site. Although the Alternative would involve the creation of less new impervious areas on the site compared to the proposed project, the Alternative would still increase the potential for the creation of additional sources of polluted runoff or the degradation of water quality during operations from what currently occurs at the site. Similarly, the Existing Gateway/Olive Drive Specific Plan Alternative would alter the existing site drainage patterns and potentially increase the amount of stormwater runoff from existing levels. Because the Existing Gateway/Olive Drive Specific Plan Alternative would involve a reduced amount of new impervious surfaces on the project site in comparison to the proposed project, the Alternative would have less of a potential to result in a substantial increase in stormwater runoff. Nonetheless,

the significant impacts identified for the proposed project associated with polluted runoff or a degradation of water quality during project operations and alteration of the existing site drainage patterns would still occur under the Existing Gateway/Olive Drive Specific Plan Alternative, and Mitigation Measures 4.6-2 and 4.6-4 would be required.

Based on the discussions above, the significant impacts related to hydrology and water quality identified for the proposed project would be reduced under the Existing Gateway/Olive Drive Specific Plan Alternative, in comparison to the proposed project. However, impacts would still occur and the same mitigation measures that were required for the proposed project would be required for the Alternative.

Noise

Although the Existing Gateway/Olive Drive Specific Plan Alternative would involve less intensive construction activities compared to the proposed project, as discussed above, new development would still occur on the project site under the Alternative and construction would be necessary. Accordingly, the Existing Gateway/Olive Drive Specific Plan Alternative would have the potential to result in a temporary construction noise impact to nearby receptors as a result of on-site use of heavy construction equipment. Therefore, the significant impact identified for the proposed project associated with temporary construction noise would occur with the Existing Gateway/Olive Drive Specific Plan Alternative and Mitigation Measure 4.8-1 would be required.

As discussed above, the existing on-site residences already experience elevated noise levels associated with the existing nearby noise sources, including railroad activity associated with the rail lines to the north of the site and roadway traffic. The existing on-site uses would remain under the Existing Gateway/Olive Drive Specific Plan Alternative. The Alternative would not involve any operations that would further exacerbate the existing conditions. However, the Existing Gateway/Olive Drive Specific Plan Alternative would involve the creation of an additional 49 new single-family units on the project site, which would be considered sensitive noise receptors. Depending on the location of the new residences (i.e., if placed within 150 feet from the centerline of the nearby railroad tracks), the Alternative, similar to the proposed project, may result in interior noise levels in excess of the applicable noise level standard. Therefore, the significant impact identified for the proposed project related to interior noise associated with nearby railroad activity would likely occur under the Existing Gateway/Olive Drive Specific Plan Alternative as well, and Mitigation Measure 4.8-5(a) and (b) would be required.

Overall, the Existing Gateway/Olive Drive Specific Plan Alternative would result in similar impacts related to noise as the proposed project.

Transportation and Circulation

Although the Existing Gateway/Olive Drive Specific Plan Alternative would involve less intensive construction activities compared to the proposed project, as discussed above, new development would still occur on the project site under the Alternative and construction would be necessary. Accordingly, the Existing Gateway/Olive Drive Specific Plan Alternative would, similar to the proposed project, require implementation of a Construction Traffic Control Plan in order to reduce

potential impacts related to construction activities to a less-than-significant level. Thus, the significant impact identified for the proposed project related to construction vehicle traffic would still occur under the Existing Gateway/Olive Drive Specific Plan Alternative, and Mitigation Measure 4.11-7 would be required.

According to the trip generation estimate for the Existing Gateway/Olive Drive Specific Plan Alternative prepared by Fehr & Peers, the Alternative would result in an additional 1,964 daily, 78 AM peak hour, and 165 PM peak hour vehicle trips from what currently occurs associated with the existing on-site uses. The total vehicle trips associated with the Existing Gateway/Olive Drive Specific Plan Alternative in comparison to the proposed project are presented in Table 6-3.

As shown in Table 6-3, the Existing Gateway/Olive Drive Specific Plan Alternative would result in additional vehicle trips on the surrounding roadway network from existing levels and from levels anticipated from implementation of the proposed project. Consequently, the Alternative would likely result in increased delay at nearby intersections and/or freeway off-ramps than the proposed project. Therefore, the significant impacts identified for the proposed project associated with such could be greater than the proposed project under the Existing Gateway/Olive Drive Specific Plan Alternative, and Mitigation Measures 4.11-10 and 4.11-11 would still be required. Additional mitigation may also be required for the Existing Gateway/Olive Drive Specific Plan Alternative.

Table 6-3
Proposed Project vs. Existing Gateway/Olive Drive Specific Plan Alternative Trip Generation

Duration	Proposed Project Trips	Existing Gateway/Olive Drive Specific Plan Alternative Trips
Daily	894	2,175
AM Peak Hour	45	94
PM Peak Hour	63	183

Source: Fehr & Peers, April 2017.

Overall, the Existing Gateway/Olive Drive Specific Plan Alternative would result in greater impacts related to transportation and circulation than the proposed project.

Conventional Apartments Alternative

Under the Conventional Apartments Alternative, the project site would be redeveloped similar to the proposed project with 130 units, but with conventional apartments leased by unit, rather than student-oriented apartments with the option to lease by bedroom. The Conventional Apartment Alternative would include affordable housing consistent with the full affordable housing requirements set forth in Section 18.05.060 of the City's Municipal Code. Accordingly, the unit breakdown would be as shown in Table 6-4. The affordable housing component would also be a conventional plan with the full affordable requirement provided as affordable apartments integrated with the market-rate units. Demolition of the existing structures on the project site would occur, similar to the proposed project, under the Conventional Apartments Alternative. Parking would be provided consistent with City of Davis Municipal Code Section 40.25.090.

Table 6-4 Conventional Apartments Alternative – Unit Breakdown (without density bonus)	
	Unit #
Existing Units	24
Proposed Units	130
Adjusted Proposed Units for Affordable Housing	106
Low-income (25% of total)	26.5
Very-low income (10% of total)	10.6
Total Affordable Units	37
Total Market-rate Units	**93**

Should a conventional zoning district be invoked, the possibility exists that the conventional nature of the Alternative would likely result in fewer students and a wider diversity of age groups at the site, with more family and working household units.

The Conventional Apartments Alternative would include a similar range of amenities as the proposed project. In addition, similar to the proposed project, the Conventional Apartments Alternative would be designed consistent with LEED Gold certification standards. Accordingly, the Conventional Apartments Alternative would be capable of generally meeting all of the five project objectives; however, because the Conventional Apartments Alternative would not provide a student-oriented housing apartment community with a mix of units including up to five-bedroom units, the Alternative would only partially meet one of the five project objectives.

Air Quality and GHG Emissions

The existing on-site uses would be demolished, similar to the proposed project, under the Conventional Apartments Alternative. In addition, because the Conventional Apartments Alternative would redevelop the site similar to the proposed project with 130 residential units, the same area of disturbance as anticipated for the proposed project would be expected under the Alternative as well. Accordingly, similar construction activities would occur under the Conventional Apartments Alternative as the proposed project, and emissions associated with construction would be expected to be similar to that of the proposed project. Therefore, Mitigation Measure 4.2-3 regarding construction-related equipment would still be required.

Overall, the Conventional Apartments Alternative would result in similar impacts as the proposed project related to air quality and GHG emissions.

Biological Resources

As discussed above, the area of disturbance during construction of the Conventional Apartments Alternative would be similar to what would occur with the proposed project. Accordingly, the same number of trees would likely be required to be removed in order to implement the Conventional Apartments Alternative. It should be noted that many of the trees to be removed as

part of the proposed project have been recommended by an arborist for removal due to their poor condition. Similar would be expected for the trees that would be removed under the Alternative. In addition, the Conventional Apartments Alternative would have the same potential as the proposed project to result in the disturbance or loss of potential Swainson's hawk nesting trees and/or active nests on the project site, disturbance or loss of an active nest for special-status bird or raptor species, direct loss of burrowing owls or temporary disruption of feeding or breeding behavior during construction, or bat roosts. Therefore, the significant impacts identified for the proposed project related to such would occur under the Conventional Apartments Alternative and Mitigation Measures 4.3-1(a) and (b), 4.3-2(a) and (b), 4.3-3, and 4.3-4 would be required.

Because tree removal similar to the proposed project would occur under the Conventional Apartments Alternative, the significant impact identified for the proposed project related to compliance with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, would still occur under the Conventional Apartments Alternative and Mitigation Measures 4.3-7(a) and (b) would be required.

The Conventional Apartments Alternative would involve redevelopment on the project site similar to that of the proposed project, which would be subject to the same requirements pursuant to the draft Yolo HCP/NCCP, should the HCP/NCCP be adopted prior to development. Therefore, the significant impact identified for the proposed project related to a conflict with an adopted NCP, NCCP, or other approved local, regional, or state habitat conservation plan would still occur under the Conventional Apartments Alternative and Mitigation Measure 4.3-8 would be required.

Overall, the Conventional Apartments Alternative would result in similar impacts as the proposed project related to biological resources.

Cultural Resources

As discussed above, the existing on-site uses would be demolished under the Conventional Apartments Alternative and the area of disturbance during construction would be similar to what would occur with the proposed project. Accordingly, the Conventional Apartments Alternative would have the same potential to unearth any previously unknown cultural resources, including any resource related to Gould's Raisin Works, archaeological resources, unique paleontological resources, unique geologic features, unique archeological resources, tribal cultural resources, or human remains. Therefore, the significant impacts identified for the proposed project related to cultural resources would occur under the Conventional Apartments Alternative and Mitigation Measures 4.4-1 through 4.4-4(b) would be required.

Overall, the Conventional Apartments Alternative would result in similar impacts related to cultural resources as the proposed project.

Hazards and Hazardous Materials

As discussed in the Hazards and Hazardous Materials chapter of this EIR, given the age of the existing on-site structures, asbestos-containing materials and lead-based paint may be present within the structures. The existing on-site uses would be demolished, similar to the proposed

project, under the Conventional Apartments Alternative. Accordingly, during construction of the Conventional Apartments Alternative, construction workers could be exposed to airborne asbestos and/or lead during demolition work. Therefore, the significant impact identified for the proposed project related to accidental release of hazardous materials during construction, specifically associated with asbestos and lead-based paint, would occur under the Conventional Apartments Alternative as well, and Mitigation Measures 4.5-1(a) and (b) would be required.

Overall, the Conventional Apartments Alternative would result in similar impacts related to hazards and hazardous materials as the proposed project.

Hydrology and Water Quality

The Conventional Apartments Alternative would redevelop the project site similar to the proposed project with 130 units, but with conventional apartments, rather than student-oriented apartments. Demolition of the existing structures on the project site would occur, similar to the proposed project, under the Conventional Apartments Alternative. As such, the area of disturbance and activities during construction of the Conventional Apartments Alternative would be similar to what would occur with the proposed project. Therefore, the Conventional Apartments Alternative would involve the same potential for runoff containing sediment or contaminants to enter downstream receiving waters and degrade water quality, and would be subject to the same regulations regarding construction water quality. Significant impacts identified for the proposed project related to a violation of water quality standards, or the creation of a substantial additional source of polluted runoff during construction would still occur under the Conventional Apartments Alternative, and Mitigation Measure 4.6-1 would be required.

In addition, the Conventional Apartments Alternative would be expected to involve the same amount of impervious surface area as the proposed project, which would have the same potential for the creation of additional sources of polluted runoff and degradation of water quality during operations. Similarly, the Conventional Apartments Alternative would involve a similar alteration of the existing site drainage patterns and potential increase in the amount of stormwater runoff from existing levels. Therefore, the significant impacts identified for the proposed project associated with polluted runoff or a degradation of water quality during project operations and alteration of the existing site drainage patterns would be similar under the Conventional Apartments Alternative, and Mitigation Measures 4.6-2 and 4.6-4 would be required.

Overall, the Conventional Apartments Alternative would result in similar impacts related to hydrology and water quality as the proposed project.

Noise

As discussed above, similar construction activities as the proposed project, including demolition of the existing on-site uses, would occur under the Conventional Apartments Alternative. In addition, the Conventional Apartments Alternative would involve redevelopment of the site with 130 residential units, similar to the proposed project. Accordingly, the Conventional Apartments Alternative would have the same potential as the proposed project to result in a temporary construction noise impact to nearby receptors as a result of on-site use of heavy construction

equipment. Therefore, the significant impact identified for the proposed project associated with temporary construction noise would occur with the Conventional Apartments Alternative and Mitigation Measure 4.8-1 would be required.

The same number of units, as well as a similar layout and building design, would occur under the Conventional Apartments Alternative. As a result, the nearest residence of the Conventional Apartments Alternative would be located at or within 150 feet from the centerline of the nearby railroad tracks, similar to the proposed project. The interior noise level at such a distance due to passing trains would exceed the applicable noise level standard. Therefore, the significant impact identified for the proposed project related to interior noise associated with nearby railroad activity would occur under the Conventional Apartments Alternative as well, and Mitigation Measure 4.8-5(a) and (b) would be required.

Overall, the Conventional Apartments Alternative would result in similar impacts related to noise as the proposed project.

Transportation and Circulation

Similar construction activities as the proposed project, including demolition of the existing on-site uses and redevelopment of the site with 130 residential units, would occur under the Conventional Apartments Alternative. Accordingly, the Conventional Apartments Alternative would, similar to the proposed project, require implementation of a Construction Traffic Control Plan in order to reduce potential impacts related to construction activities to a less-than-significant level. Thus, the significant impact identified for the proposed project related to construction vehicle traffic would still occur under the Conventional Apartments Alternative, and Mitigation Measure 4.11-7 would be required.

The proposed project would involve 708 beds, which correlates to an anticipated population of 708 future residents. The Conventional Apartments Alternative would likely result in more family and working household units. Based on the population estimate of 2.56 persons per household for the City of Davis, the Conventional Apartments Alternative would involve approximately 333 new residents. Accordingly, population growth under the Conventional Apartments Alternative would be less than the proposed project, which would be expected to correlate to fewer vehicle trips. According to the trip generation estimate for the Conventional Apartments Alternative prepared by Fehr & Peers, the vehicle trips associated with the Conventional Apartments Alternative in comparison to the proposed project are presented in Table 6-5.

Table 6-5
Proposed Project vs. Conventional Apartments Alternative Trip Generation

Duration	Proposed Project Trips	Conventional Apartments Alternative Trips
Daily	894	775
AM Peak Hour	45	56
PM Peak Hour	63	61

Source: Fehr & Peers, April 2017.

As shown in the table, while the Conventional Apartments Alternative would result in slightly greater AM peak hour vehicle trips, the PM peak hour and overall total daily trips would be less than the proposed project. Because the Conventional Apartments Alternative would result in overall fewer vehicle trips on the surrounding roadway network than the proposed project, the Alternative could result in a decrease in delay to nearby intersections and/or freeway off-ramps. Nonetheless, the significant impacts identified for the proposed project associated with such would still be expected to occur under the Conventional Apartments Alternative, and Mitigation Measures 4.11-10 and 4.11-11 would be required to ensure impacts are reduced to a less-than-significant level.

Overall, the Conventional Apartments Alternative would result in slightly fewer impacts related to transportation and circulation than the proposed project. However, the same mitigation measures that are required for the proposed project would be required for the Alternative.

Reduced Density Student Apartments Alternative

The Reduced Density Student Apartments Alternative would maintain the project as student-oriented apartments, but with a reduced number of units. The Reduced Density Student Apartments Alternative would involve development of the site with 100 student apartment units (an approximately 23 percent reduction in the number of proposed units). The Reduced Density Student Apartments Alternative could include affordable housing consistent with the full affordable housing requirements set forth in Section 18.05.060 of the City's Municipal Code. Pursuant to Section 18.05.060(4), the developer can request a project individualized affordable housing plan "that is determined to generate an amount of affordability equal to or greater than the amount that would be generated under the standard affordability requirements."

Similar to the proposed project, the Reduced Density Student Apartments Alternative would include a mix of two-bedroom to five-bedroom furnished living units. The building would be three- to four-stories tall, for a maximum height of 50 feet. A summary of the Reduced Density Student Apartments Alternative in comparison to the proposed project is provided in Table 6-6. Demolition of the existing structures on the project site would occur, similar to the proposed project, under the Reduced Density Student Apartments Alternative.

The Reduced Density Student Apartments Alternative would include the same amenities as the proposed project. In addition, similar to the proposed project, the Reduced Density Student Apartments Alternative would be designed consistent with LEED Gold certification standards. Because the Reduced Density Student Apartments Alternative would not involve development of up to five stories, the Alternative would only partially meet one of the five project objectives; however, the Reduced Density Student Apartments Alternative would meet all of the other project objectives.

Table 6-6 Proposed Project vs. Reduced Density Student Apartments Alternative		
	Proposed Project	**Reduced Density Student Apartments Alternative**
Dwelling Units	130	100
2-Bedroom	17	13
3-Bedroom	21	16
4-Bedroom	84	65
5-Bedroom	8	6
Total Rooms	473	364
Total Beds	708	545
Maximum Stories / Height	5 / 60 feet	4 / 50 feet
Parking Spaces	240	197[1]
[1] Per City of Davis Municipal Code Section 40.25.090, one and three-fourths parking spaces for each two-bedroom apartment and two for each three-bedroom or more apartment would be required.		

Air Quality and GHG Emissions

The existing on-site uses would be demolished, similar to the proposed project, under the Reduced Density Student Apartments Alternative. However, the Reduced Density Student Apartments Alternative would redevelop the site with 30 fewer units than the proposed project and fewer associated parking areas. Redevelopment of the site under the Reduced Density Student Apartments Alternative could involve a comparable area of disturbance as the proposed project, or possibly slightly less disturbance due to a reduction in 30 units and 43 parking spaces. Accordingly, similar construction activities would occur under the Reduced Density Student Apartments Alternative as the proposed project, and emissions associated with construction would be expected to be similar or slightly reduced to that of the proposed project. Therefore, Mitigation Measure 4.2-3 would be required.

Overall, the Reduced Density Student Apartments Alternative would result in a similar or slightly reduced impact as the proposed project related to air quality and GHG emissions.

Biological Resources

As discussed above, the area of disturbance during construction of the Reduced Density Student Apartments Alternative would be similar to what would occur with the proposed project, or potentially somewhat less disturbance due to reduction in 30 units and 43 parking spaces. Accordingly, an equivalent or slightly reduced number of trees would likely be required to be removed in order to implement the Reduced Density Student Apartments Alternative. It should be noted that many of the trees to be removed as part of the proposed project have been recommended by an arborist for removal due to their poor condition. Similar would be expected for the trees that would be removed under this Alternative. In addition, the Reduced Density Student Apartments Alternative would have an equivalent or slightly reduced potential as the proposed project to result in the disturbance or loss of potential Swainson's hawk nesting trees and/or active nests on the

project site, disturbance or loss of an active nest for special-status bird or raptor species, direct loss of burrowing owls or temporary disruption of feeding or breeding behavior during construction, or bat roosts. Therefore, the significant impacts identified for the proposed project related to such would occur under the Reduced Density Student Apartments Alternative and Mitigation Measures 4.3-1(a) and (b), 4.3-2(a) and (b), 4.3-3, and 4.3-4 would be required.

Because tree removal would occur under the Reduced Density Student Apartments Alternative, the significant impact identified for the proposed project related to compliance with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, would still occur under the Reduced Density Student Apartments Alternative and Mitigation Measures 4.3-7(a) and (b) would be required.

Although the Reduced Density Student Apartments Alternative would involve fewer units and parking spaces than the proposed project, redevelopment of the project site would still occur, which would be subject to the same requirements pursuant to the draft Yolo HCP/NCCP, should the HCP/NCCP be adopted prior to development. Therefore, the significant impact identified for the proposed project related to a conflict with an adopted NCP, NCCP, or other approved local, regional, or state habitat conservation plan would still occur under the Reduced Density Student Apartments Alternative and Mitigation Measure 4.3-8 would be required.

Overall, the Reduced Density Student Apartments Alternative would result in similar or slightly reduced impacts as the proposed project related to biological resources.

Cultural Resources

As discussed above, the existing on-site uses would be demolished under the Reduced Density Student Apartments Alternative and the area of disturbance during construction would be comparable or slightly reduced to that which would occur with the proposed project. Accordingly, the Reduced Density Student Apartments Alternative would have an equivalent or slightly reduced potential to unearth any previously unknown cultural resources, including any resource related to Gould's Raisin Works, archaeological resources, unique paleontological resources, unique geologic features, unique archeological resources, tribal cultural resources, or human remains. Therefore, the significant impacts identified for the proposed project related to cultural resources would occur under the Reduced Density Student Apartments Alternative and Mitigation Measures 4.4-1 through 4.4-4(b) would be required.

Overall, the Reduced Density Student Apartments Alternative would result in similar or slightly reduced impacts related to cultural resources as the proposed project.

Hazards and Hazardous Materials

The existing on-site uses would be demolished, similar to the proposed project, under the Reduced Density Student Apartments Alternative. Accordingly, construction workers could be exposed to airborne asbestos and/or lead during demolition work associated with the Reduced Density Student Apartments Alternative. Therefore, the significant impact identified for the proposed project related to accidental release of hazardous materials during construction, specifically associated

with asbestos and lead-based paint, would occur under the Reduced Density Student Apartments Alternative as well, and Mitigation Measures 4.5-1(a) and (b) would be required.

Overall, the Reduced Density Student Apartments Alternative would result in a similar impact related to hazards and hazardous materials as the proposed project.

Hydrology and Water Quality

The Reduced Density Student Apartments Alternative would redevelop the project site with 30 fewer units and approximately 43 fewer parking spaces than the proposed project. The overall building footprint would be expected to be similar or slightly reduced as compared to the proposed project. Demolition of the existing structures on the project site would occur, similar to the proposed project, under the Reduced Density Student Apartments Alternative. As such, the area of disturbance and activities during construction of the Reduced Density Student Apartments Alternative would be similar or slightly reduced to that which would occur with the proposed project. Therefore, the Reduced Density Student Apartments Alternative would involve an equivalent or slightly reduced potential for runoff containing sediment or contaminants to enter downstream receiving waters and degrade water quality, and would be subject to the same regulations regarding construction water quality. Therefore, the significant impacts identified for the proposed project related to a violation of water quality standards, or the creation of a substantial additional source of polluted runoff during construction would still occur under the Reduced Density Student Apartments Alternative, and Mitigation Measure 4.6-1 would be required.

In addition, the Reduced Density Student Apartments Alternative would be expected to involve a comparable or slightly reduced amount of impervious surface area as the proposed project, which would have a similar or slightly reduced potential for the creation of additional sources of polluted runoff and degradation of water quality during operations. Similarly, the Reduced Density Student Apartments Alternative would involve a similar alteration of the existing site drainage patterns and potential increase in the amount of stormwater runoff from existing levels. Therefore, the significant impacts identified for the proposed project associated with polluted runoff or a degradation of water quality during project operations and alteration of the existing site drainage patterns would be similar under the Reduced Density Student Apartments Alternative, and Mitigation Measures 4.6-2 and 4.6-4 would be required.

Overall, the Reduced Density Student Apartments Alternative would result in similar or slightly reduced impacts related to hydrology and water quality as the proposed project.

Noise

Similar construction activities as the proposed project, including demolition of the existing on-site uses, would occur under the Reduced Density Student Apartments Alternative. Although the Reduced Density Student Apartments Alternative would involve redevelopment of the site with 30 fewer residential units and approximately 43 fewer parking spaces than the proposed project, the overall duration and intensity of construction activities would be expected to be similar to the proposed project. Accordingly, the Reduced Density Student Apartments Alternative would have a similar potential as the proposed project to result in a temporary construction noise impact to

nearby receptors as a result of on-site use of heavy construction equipment. Therefore, the significant impact identified for the proposed project associated with temporary construction noise would occur with the Reduced Density Student Apartments Alternative and Mitigation Measure 4.8-1 would be required.

The Reduced Density Student Apartments Alternative would involve fewer units than the proposed project; however, the location of the residential building under the Alternative would be expected to be similar to that of the proposed project. As a result, the nearest residence of the Reduced Density Student Apartments Alternative would be located at or within 150 feet from the centerline of the nearby railroad tracks, similar to the proposed project. The interior noise level at such a distance due to passing trains would exceed the applicable noise level standard. Therefore, the significant impact identified for the proposed project related to interior noise associated with nearby railroad activity would occur under the Reduced Density Student Apartments Alternative as well, and Mitigation Measure 4.8-5(a) and (b) would be required.

Overall, the Reduced Density Student Apartments Alternative would result in similar impacts related to noise as the proposed project.

Transportation and Circulation

Similar construction activities as the proposed project, including demolition of the existing on-site uses and redevelopment of the site with residential units, would occur under the Reduced Density Student Apartments Alternative. Accordingly, the Reduced Density Student Apartments Alternative would, similar to the proposed project, require implementation of a Construction Traffic Control Plan in order to reduce potential impacts related to construction activities to a less-than-significant level. Thus, the significant impact identified for the proposed project related to construction vehicle traffic would still occur under the Reduced Density Student Apartments Alternative, and Mitigation Measure 4.11-7 would be required.

Due to the reduced number of residential units under the Reduced Density Student Apartments Alternative compared to the proposed project, and the associated reduction in total future residents, the Alternative would generate fewer vehicle trips. According to the trip generation estimate for the Reduced Density Student Apartments Alternative prepared by Fehr & Peers, the vehicle trips associated with the Alternative in comparison to the proposed project are presented in Table 6-7.

Table 6-7
Proposed Project vs. Reduced Density Student Apartments Alternative
Trip Generation

Duration	Proposed Project Trips	Reduced Density Student Apartments Alternative Trips
Daily	894	688
AM Peak Hour	45	34
PM Peak Hour	63	48

Source: Fehr & Peers, April 2017.

As shown in the table, the Reduced Density Student Apartments Alternative would result in fewer AM and PM peak hour vehicle trips, as well as overall total daily trips than the proposed project. Because the Reduced Density Student Apartments Alternative would result in overall fewer vehicle trips on the surrounding roadway network than the proposed project, the Alternative would result in a decrease in delay to nearby intersections and/or freeway off-ramps. Consequently, impacts associated with such would be fewer under the Reduced Density Student Apartments Alternative compared to the proposed project.

Overall, the Reduced Density Student Apartments Alternative would result in fewer impacts related to transportation and circulation than the proposed project.

Aggressive Transportation and Parking Demand Management Alternative

The Aggressive Transportation and Parking Demand Management Alternative would involve development of the site similar to the proposed project, but with fewer parking spaces. The same number of units, mix of unit type, layout, and building design would occur under the Aggressive Transportation and Parking Demand Management Alternative as the proposed project (see Table 6-8). The Aggressive Transportation and Parking Demand Management Alternative could include affordable housing consistent with the full affordable housing requirements set forth in Section 18.05.060 of the City's Municipal Code. Pursuant to Section 18.05.060(4), the developer can request a project individualized affordable housing plan "that is determined to generate an amount of affordability equal to or greater than the amount that would be generated under the standard affordability requirements."

Demolition of the existing structures on the project site would occur, similar to the proposed project, under the Aggressive Transportation and Parking Demand Management Alternative. The only difference from the proposed project would be to impose restrictions on parking in order to aggressively discourage the use of single-occupancy vehicles and reduce vehicle miles traveled associated with future residents at the site.

In order to discourage the use of single-occupancy vehicles at the project site, a maximum of 50 resident permit parking spaces would be provided on-site under the Aggressive Transportation and Parking Demand Management Alternative, as well as owner-managed (or contracted) car-sharing services on-site, which would require use of only electric vehicles. Visitor parking would not be provided on-site and would consist of only off-site street parking. Additional developer incentives and facilities to promote bicycle and transit use would be provided.

The Aggressive Transportation and Parking Demand Management Alternative would include the same amenities as the proposed project. In addition, similar to the proposed project, the Aggressive Transportation and Parking Demand Management Alternative would be designed consistent with LEED Gold certification standards.

Table 6-8
Proposed Project vs. Aggressive Transportation and Parking Demand Management Alternative

	Proposed Project	Aggressive Transportation and Parking Demand Management Alternative
Dwelling Units	130	130
2-Bedroom	17	17
3-Bedroom	21	21
4-Bedroom	84	84
5-Bedroom	8	8
Total Rooms	473	473
Total Beds	708	708
Maximum Stories / Height	5 / 60 feet	5 / 60 feet
Parking Spaces	240	50

Because the Aggressive Transportation and Parking Demand Management Alternative would involve similar development of the project site as the proposed project, with only fewer parking spaces, the Aggressive Transportation and Parking Demand Management Alternative would meet all of the project objectives.

Air Quality and GHG Emissions

The existing on-site uses would be demolished, similar to the proposed project, under the Aggressive Transportation and Parking Demand Management Alternative. In addition, the Aggressive Transportation and Parking Demand Management Alternative would redevelop the site similar to the proposed project with 130 residential units. However, the number of parking spaces would be reduced by 190 spaces, which could allow for the incorporation of more green space areas within the project site than the proposed project. Accordingly, the area of disturbance under the Aggressive Transportation and Parking Demand Management Alternative would be expected to be less than what is anticipated for the proposed project. As a result, construction activities under the Aggressive Transportation and Parking Demand Management Alternative would be less intensive than what would occur with the proposed project, and the emissions associated with construction would be expected to be less than that of the proposed project. Therefore, the significant construction-related air quality impact would be reduced under the Aggressive Transportation and Parking Demand Management Alternative.

Overall, the Aggressive Transportation and Parking Demand Management Alternative would result in fewer impacts than the proposed project related to air quality and GHG emissions.

Biological Resources

As discussed above, the area of disturbance during construction of the Aggressive Transportation and Parking Demand Management Alternative would be less than what would occur with the proposed project. Accordingly, the potential for fewer trees to be removed would occur under the Aggressive Transportation and Parking Demand Management Alternative. It should be noted that many of the trees to be removed as part of the proposed project have been recommended by an arborist for removal due to their poor condition. Similar would be expected for the trees that would be removed under the Alternative. Based on a reduced number of trees necessary to be removed, the Aggressive Transportation and Parking Demand Management Alternative would have a reduced potential to result in the disturbance or loss of potential Swainson's hawk nesting trees and/or active nests on the project site, disturbance or loss of an active nest for special-status bird or raptor species, direct loss of burrowing owls or temporary disruption of feeding or breeding behavior during construction, or bat roosts. However, complete avoidance of potential impacts related to such would not be possible. Therefore, significant impacts identified for the proposed project related to such would remain under the Aggressive Transportation and Parking Demand Management Alternative and Mitigation Measures 4.3-1(a) and (b), 4.3-2(a) and (b), 4.3-3, and 4.3-4 would be required.

Because tree removal would be necessary under the Aggressive Transportation and Parking Demand Management Alternative, the significant impact identified for the proposed project related to compliance with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, would still occur under the Aggressive Transportation and Parking Demand Management Alternative and Mitigation Measures 4.3-7(a) and (b) would be required.

The Aggressive Transportation and Parking Demand Management Alternative would involve redevelopment on the project site similar to that of the proposed project, which would be subject to the same requirements pursuant to the draft Yolo HCP/NCCP, should the HCP/NCCP be adopted prior to development. Therefore, the significant impact identified for the proposed project related to a conflict with an adopted NCP, NCCP, or other approved local, regional, or state habitat conservation plan would still occur under the Aggressive Transportation and Parking Demand Management Alternative and Mitigation Measure 4.3-8 would be required.

Overall, the Aggressive Transportation and Parking Demand Management Alternative would result in fewer impacts than the proposed project related to biological resources. However, the same impacts would still occur and the same mitigation measures that were required for the proposed project related to such would be required for the Alternative as well.

Cultural Resources

As discussed above, the existing on-site uses would be demolished under the Aggressive Transportation and Parking Demand Management Alternative. However, the area of disturbance during construction would be less than what would occur with the proposed project. Accordingly, the Aggressive Transportation and Parking Demand Management Alternative would have a reduced potential to unearth any previously unknown cultural resources, including any resource

related to Gould's Raisin Works, archaeological resources, unique paleontological resources, unique geologic features, unique archeological resources, tribal cultural resources, or human remains. However, the potential would still exist. Therefore, the significant impacts identified for the proposed project related to cultural resources would still occur under the Aggressive Transportation and Parking Demand Management Alternative and Mitigation Measures 4.4-1 through 4.4-4(b) would be required.

Overall, the Aggressive Transportation and Parking Demand Management Alternative would result in fewer impacts related to cultural resources as the proposed project; however, the same mitigation measures that were required for the proposed project related to such would be required for the Alternative as well.

Hazards and Hazardous Materials

The existing on-site uses would be demolished, similar to the proposed project, under the Aggressive Transportation and Parking Demand Management Alternative. Accordingly, construction workers could be exposed to airborne asbestos and/or lead during demolition work associated with the Aggressive Transportation and Parking Demand Management Alternative. Therefore, the significant impact identified for the proposed project related to accidental release of hazardous materials during construction, specifically associated with asbestos and lead-based paint, would occur under the Aggressive Transportation and Parking Demand Management Alternative as well, and Mitigation Measures 4.5-1(a) and (b) would be required.

Overall, the Aggressive Transportation and Parking Demand Management Alternative would result in similar impacts related to hazards and hazardous materials as the proposed project.

Hydrology and Water Quality

The Aggressive Transportation and Parking Demand Management Alternative would redevelop the project site similar to the proposed project with 130 units. Demolition of the existing structures on the project site would occur, similar to the proposed project, under the Aggressive Transportation and Parking Demand Management Alternative. However, the area of disturbance during construction would be less than what would occur with the proposed project due to the reduction in parking spaces. As such, activities during construction of the Aggressive Transportation and Parking Demand Management Alternative would be less intensive than what would occur with the proposed project. Therefore, the Aggressive Transportation and Parking Demand Management Alternative would involve a reduced potential for runoff containing sediment or contaminants to enter downstream receiving waters and degrade water quality. Nonetheless, the Alternative would be subject to the same regulations regarding construction water quality. The significant impacts identified for the proposed project related to a violation of water quality standards, or the creation of a substantial additional source of polluted runoff during construction would still occur under the Aggressive Transportation and Parking Demand Management Alternative, and Mitigation Measure 4.6-1 would be required.

In addition, the Aggressive Transportation and Parking Demand Management Alternative would be expected to involve less impervious surface area than the proposed project, which would result

in a reduced potential for the creation of additional sources of polluted runoff and degradation of water quality during operations, as well as a reduced potential increase in the amount of stormwater runoff from existing levels. Therefore, the significant impacts identified for the proposed project associated with polluted runoff or a degradation of water quality during project operations and alteration of the existing site drainage patterns would be reduced under the Aggressive Transportation and Parking Demand Management Alternative; however, Mitigation Measures 4.6-2 and 4.6-4 would still be required.

Overall, the Aggressive Transportation and Parking Demand Management Alternative would result in fewer impacts related to hydrology and water quality as the proposed project.

Noise

As discussed above, similar construction activities as the proposed project, including demolition of the existing on-site uses, would occur under the Aggressive Transportation and Parking Demand Management Alternative. In addition, the Aggressive Transportation and Parking Demand Management Alternative would involve redevelopment of the site with 130 residential units, similar to the proposed project. Accordingly, the Aggressive Transportation and Parking Demand Management Alternative would have the same potential as the proposed project to result in a temporary construction noise impact to nearby receptors as a result of on-site use of heavy construction equipment. Therefore, the significant impact identified for the proposed project associated with temporary construction noise would occur with the Aggressive Transportation and Parking Demand Management Alternative and Mitigation Measure 4.8-1 would be required.

The same number of units, as well as a similar layout and building design, would occur under the Aggressive Transportation and Parking Demand Management Alternative. As a result, the nearest residence of the Aggressive Transportation and Parking Demand Management Alternative would be located at or within 150 feet from the centerline of the nearby railroad tracks, similar to the proposed project. The interior noise level at such a distance due to passing trains would exceed the applicable noise level standard. Therefore, the significant impact identified for the proposed project related to interior noise associated with nearby railroad activity would occur under the Aggressive Transportation and Parking Demand Management Alternative as well, and Mitigation Measure 4.8-5(a) and (b) would be required.

Overall, the Aggressive Transportation and Parking Demand Management Alternative would result in similar impacts related to noise as the proposed project.

Transportation and Circulation

Similar construction activities as the proposed project, including demolition of the existing on-site uses and redevelopment of the site with 130 residential units, would occur under the Aggressive Transportation and Parking Demand Management Alternative. Accordingly, the Aggressive Transportation and Parking Demand Management Alternative would, similar to the proposed project, require implementation of a Construction Traffic Control Plan in order to reduce potential impacts related to construction activities to a less-than-significant level. Thus, the significant impact identified for the proposed project related to construction vehicle traffic would still occur

under the Aggressive Transportation and Parking Demand Management Alternative, and Mitigation Measure 4.11-7 would be required.

While the Aggressive Transportation and Parking Demand Management Alternative would involve the same number of residential units as the proposed project, the Alternative would involve a reduction of 190 parking spaces by only providing a maximum of 50 resident permit parking spaces. The intention of the Aggressive Transportation and Parking Demand Management Alternative is to discourage the use of single-occupancy vehicles at the project site, which would reduce all effects associated with the use of single-occupancy vehicles, including a reduction in mobile source emissions, traffic noise, and the degradation of the existing transportation/circulation system in the area. By encouraging alternate modes of transportation, including promoting the use of bicycle, pedestrian, and transit travel modes, the Aggressive Transportation and Parking Demand Management Alternative would be expected to reduce vehicle traffic associated with buildout of the site. According to the trip generation estimate for the Aggressive Transportation and Parking Demand Management Alternative prepared by Fehr & Peers, the vehicle trips associated with the Aggressive Transportation and Parking Demand Management Alternative in comparison to the proposed project are presented in Table 6-9.

As shown in the table, the Aggressive Transportation and Parking Demand Management Alternative would result in fewer vehicle trips on the surrounding roadway network than the proposed project, which would correlate to a decrease in delay to nearby intersections and/or freeway off-ramps. Therefore, impacts associated with such would be fewer under the Aggressive Transportation and Parking Demand Management Alternative compared to the proposed project.

Table 6-9
Proposed Project vs. Aggressive Transportation and Parking Demand Management Alternative Trip Generation

Duration	Proposed Project Trips	Aggressive Transportation and Parking Demand Management Alternative Trips
Daily	894	771
AM Peak Hour	45	38
PM Peak Hour	63	53

Source: Fehr & Peers, April 2017.

Overall, the Aggressive Transportation and Parking Demand Management Alternative would result in fewer impacts related to transportation and circulation than the proposed project.

Mixed-Use Alternative

The Mixed-Use Alternative would include a ground floor for retail uses and four stories with 100 student-oriented apartments. Similar to the proposed project, the Mixed-Use Alternative would include a mix of two-bedroom to five-bedroom furnished living units. A summary of the Mixed-Use Alternative in comparison to the proposed project is provided in Table 6-10. The ground-floor retail would consist of approximately 40,000 square feet for retail, which, for analysis purposes, is assumed to consist of the following:

- 10,000 square feet for restaurant and/or coffee shop space; and
- 30,000 square feet for specialty retail (e.g., salon, fitness, real estate office, florist, apparel, etc.).

Table 6-10
Proposed Project vs. Mixed-Use Alternative

	Proposed Project	Mixed-Use Alternative
Residential		
Dwelling Units	130	100
2-Bedroom	17	13
3-Bedroom	21	16
4-Bedroom	84	65
5-Bedroom	8	6
Total Rooms	473	364
Total Beds	708	545
Maximum Stories / Height	5 / 60 feet	5 / 60 feet
Parking Spaces	240	197[1]
Commercial		
Total Square Footage	0	40,000
Parking Spaces	0	134[2]

[1] Per City of Davis Municipal Code Section 40.25.090, one and three-fourths parking spaces for each two-bedroom apartment and two for each three-bedroom or more apartment would be required.
[2] Per City of Davis Municipal Code Section 40.25.090, one parking space per 300 square feet would be required (assuming the commercial space would be a retail use).

Demolition of the existing structures on the project site would occur, similar to the proposed project, under the Mixed-Use Alternative.

The Mixed-Use Alternative could include affordable housing consistent with the full affordable housing requirements set forth in Section 18.05.060 of the City's Municipal Code. Pursuant to Section 18.05.060(4), the developer can request a project individualized affordable housing plan "that is determined to generate an amount of affordability equal to or greater than the amount that would be generated under the standard affordability requirements."

The Mixed-Use Alternative would include the same residential amenities as the proposed project. In addition, similar to the proposed project, the Mixed-Use Alternative would be designed consistent with LEED Gold certification standards. Accordingly, the Mixed-Use Alternative would be capable of meeting all of the five project objectives.

Air Quality and GHG Emissions

The existing on-site uses would be demolished, similar to the proposed project, under the Mixed-Use Alternative. In addition, the Mixed-Use Alternative would involve the same area of disturbance as anticipated for the proposed project, but with the first story being designated for commercial uses rather than housing. Accordingly, similar construction activities would occur under the Mixed-Use Alternative as the proposed project, and emissions associated with

construction would be expected to be similar to that of the proposed project. Therefore, Mitigation Measure 4.2-3 regarding construction-related equipment would still be required.

Overall, the Mixed-Use Alternative would result in a similar impact as the proposed project related to air quality and GHG emissions.

Biological Resources

As discussed above, the area of disturbance during construction of the Mixed-Use Alternative would be similar to what would occur with the proposed project. Accordingly, the same number of trees would likely be required to be removed in order to implement the Mixed-Use Alternative. It should be noted that many of the trees to be removed as part of the proposed project have been recommended by an arborist for removal due to their poor condition. Similar would be expected for the trees that would be removed under the Alternative. In addition, the Mixed-Use Alternative would have the same potential as the proposed project to result in the disturbance or loss of potential Swainson's hawk nesting trees and/or active nests on the project site, disturbance or loss of an active nest for special-status bird or raptor species, direct loss of burrowing owls or temporary disruption of feeding or breeding behavior during construction, or bat roosts. Therefore, the significant impacts identified for the proposed project related to such would occur under the Mixed-Use Alternative and Mitigation Measures 4.3-1(a) and (b), 4.3-2(a) and (b), 4.3-3, and 4.3-4 would be required.

Because tree removal similar to the proposed project would occur under the Mixed-Use Alternative, the significant impact identified for the proposed project related to compliance with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, would still occur under the Mixed-Use Alternative and Mitigation Measures 4.3-7(a) and (b) would be required.

Although the Mixed-Use Alternative would involve fewer units than the proposed project, redevelopment of the project site with urban uses would still occur, which would be subject to the same requirements pursuant to the draft Yolo HCP/NCCP, should the HCP/NCCP be adopted prior to development. Therefore, the significant impact identified for the proposed project related to a conflict with an adopted NCP, NCCP, or other approved local, regional, or state habitat conservation plan would still occur under the Mixed-Use Alternative and Mitigation Measure 4.3-8 would be required.

Overall, the Mixed-Use Alternative would result in similar impacts as the proposed project related to biological resources.

Cultural Resources

As discussed above, the existing on-site uses would be demolished under the Mixed-Use Alternative and the area of disturbance during construction would be comparable to what would occur with the proposed project. Accordingly, the Mixed-Use Alternative would have the same potential to unearth any previously unknown cultural resources, including any resource related to Gould's Raisin Works, archaeological resources, unique paleontological resources, unique

geologic features, unique archeological resources, tribal cultural resources, or human remains. Therefore, the significant impacts identified for the proposed project related to cultural resources would occur under the Mixed-Use Alternative and Mitigation Measures 4.4-1 through 4.4-4(b) would be required.

Overall, the Mixed-Use Alternative would result in similar impacts related to cultural resources as the proposed project.

Hazards and Hazardous Materials

The existing on-site uses would be demolished, similar to the proposed project, under the Mixed-Use Alternative. Accordingly, construction workers could be exposed to airborne asbestos and/or lead during demolition work associated with the Mixed-Use Alternative. Therefore, the significant impact identified for the proposed project related to accidental release of hazardous materials during construction, specifically associated with asbestos and lead-based paint, would occur under the Mixed-Use Alternative as well, and Mitigation Measures 4.5-1(a) and (b) would be required.

Overall, the Mixed-Use Alternative would result in a similar impact related to hazards and hazardous materials as the proposed project.

Hydrology and Water Quality

The Mixed-Use Alternative would redevelop the project site with 30 fewer units than the proposed project, but would involve 40,000 square feet of retail space. The overall building footprint would be similar to what would occur under the proposed project. Demolition of the existing structures on the project site would occur, similar to the proposed project, under the Mixed-Use Alternative. As such, the area of disturbance and activities during construction of the Mixed-Use Alternative would be similar to what would occur with the proposed project. Therefore, the Mixed-Use Alternative would involve the same potential for runoff containing sediment or contaminants to enter downstream receiving waters and degrade water quality, and would be subject to the same regulations regarding construction water quality. Therefore, the significant impacts identified for the proposed project related to a violation of water quality standards, or the creation of a substantial additional source of polluted runoff during construction would still occur under the Mixed-Use Alternative, and Mitigation Measure 4.6-1 would be required.

In addition, the Mixed-Use Alternative would be expected to involve a comparable amount of impervious surface area as the proposed project, which would have the same potential for the creation of additional sources of polluted runoff and degradation water quality during operations. Similarly, the Mixed-Use Alternative would involve a similar alteration of the existing site drainage patterns and potential increase in the amount of stormwater runoff from existing levels. Therefore, the significant impacts identified for the proposed project associated with polluted runoff or a degradation of water quality during project operations and alteration of the existing site drainage patterns would be similar under the Mixed-Use Alternative, and Mitigation Measures 4.6-2 and 4.6-4 would be required.

Overall, the Mixed-Use Alternative would result in similar impacts related to hydrology and water quality as the proposed project.

Noise

As discussed above, similar construction activities as the proposed project, including demolition of the existing on-site uses, would occur under the Mixed-Use Alternative. Although the Mixed-Use Alternative would involve redevelopment of the site with 30 fewer residential units than the proposed project, the Alternative would involve 40,000 square feet of retail space. Accordingly, the duration and intensity of construction activities would be expected to be similar to the proposed project, and a similar potential as the proposed project to result in a temporary construction noise impact to nearby receptors would occur as a result of on-site use of heavy construction equipment. Therefore, the significant impact identified for the proposed project associated with temporary construction noise would occur with the Mixed-Use Alternative and Mitigation Measure 4.8-1 would be required.

The Mixed-Use Alternative would involve commercial uses on the ground floor and residential uses on the second through fifth floors; however, the location of the proposed building under the Alternative would be expected to be similar to that of the proposed project. As a result, the nearest residence of the Mixed-Use Alternative would still be located at or within 150 feet from the centerline of the nearby railroad tracks, similar to the proposed project. The interior noise level at such a distance due to passing trains would exceed the applicable noise level standard. Therefore, the significant impact identified for the proposed project related to interior noise associated with nearby railroad activity would occur under the Mixed-Use Alternative as well, and Mitigation Measure 4.8-5(a) and (b) would be required.

While operational noise impacts were not identified for the proposed project, it is noted that the commercial uses included in the Mixed-Use Alternative could result in operational noise impacts, depending upon the tenants (e.g., truck deliveries, outdoor seating). In addition, the increase in daily vehicle trips under this alternative (2,133 versus 894 for the proposed project) would result in off-site traffic noise level increases that could be considered significant. As demonstrated in Chapter 4.8, the proposed project would not result in significant increases in off-site traffic noise.

Overall, the Mixed-Use Alternative would result in similar or slightly increased impacts related to noise as the proposed project.

Transportation and Circulation

Similar construction activities as the proposed project, including demolition of the existing on-site uses and redevelopment of the site with residential units, would occur under the Mixed-Use Alternative. Accordingly, the Mixed-Use Alternative would, similar to the proposed project, require implementation of a Construction Traffic Control Plan in order to reduce potential impacts related to construction activities to a less-than-significant level. Thus, the significant impact identified for the proposed project related to construction vehicle traffic would still occur under the Mixed-Use Alternative, and Mitigation Measure 4.11-7 would be required.

According to the trip generation estimate for the Mixed-Use Alternative prepared by Fehr & Peers, the vehicle trips associated with the Mixed-Use Alternative are presented in Table 6-11. A comparison of the trip generation associated with the Mixed-Use Alternative and the proposed project is presented in Table 6-12. Compared to the proposed project, the Mixed-Use Alternative would result in 1,239 additional vehicle trips on a daily basis, 222 additional vehicle trips during the AM peak hour, and 72 additional vehicle trips during the PM peak hour. Because the Mixed-Use Alternative would result in overall greater vehicle trips on the surrounding roadway network than the proposed project, the Alternative would be expected to result in a greater increase in delay to nearby intersections and/or freeway off-ramps than the proposed project. Consequently, impacts associated with such would be greater under the Mixed-Use Alternative compared to the proposed project.

Overall, the Mixed-Use Alternative would result in greater impacts related to transportation and circulation than the proposed project.

Off-Site (3820 Chiles Road) Alternative

The Off-Site (3820 Chiles Road) Alternative would involve development similar to the proposed project at an off-site location. Parcels of similar size that are designated and/or zoned for multi-family residential uses are not currently available for development within the City. For the purposes of evaluating an off-site alternative location within the City, City staff has identified a 7.4-acre property located at 3820 Chiles Road. The property currently contains an existing UC Davis office building and associated parking lot. Existing uses surrounding the property include commercial, as well as multi-family and single-family residential. The property faces Interstate 80 (I-80) directly to the north.

The 3820 Chiles Road property is currently zoned Commercial Mixed Use (CMU) and does not currently allow residential uses. Accordingly, development of the Off-Site (3820 Chiles Road) Alternative would require a rezone to allow for the multi-family residential use, as well as design review for site plan and architectural review. It should be noted that the project applicant does not currently own, control, or otherwise have access to the 3820 Chiles Road property and would have to be capable of acquiring the property in order to implement the Off-Site (3820 Chiles Road) Alternative.

Due to the greater lot acreage, the Off-Site (3820 Chiles Road) Alternative would involve development of a greater number of units than the proposed project. Assuming the same density as the proposed project (22 units per acre), the Off-Site (3820 Chiles Road) Alternative could involve a total of 163 units. The Off-Site (3820 Chiles Road) Alternative could include affordable housing consistent with the full affordable housing requirements set forth in Section 18.05.060 of the City's Municipal Code. Pursuant to Section 18.05.060(4), the developer can request a project individualized affordable housing plan "that is determined to generate an amount of affordability equal to or greater than the amount that would be generated under the standard affordability requirements."

Table 6-11
Mixed-Use Alternative Trip Generation

Land Use	Description	Quantity	Units	Trip Rates			Trip Generation			Notes
				Daily	AM	PM	Daily	AM	PM	
Student Oriented Apartments, Moderate TDM	Moderate TDM	100	DU	6.88	0.34	0.48	688	34	48	Represents the final vehicle trip rates from the Lincoln40 EIR proposed project: Lexington/Arbors counts initial vehicle trip rates x 1.59 rooms/du adjustment for student oriented x 0.87 TDM adjustment (13% reduction)
Retail	Specialty Retail	40	KSF	44.32	6.84	2.71	1,773	274	108	ITE rates for Specialty Retail (Code 826), which reflects restaurant/café/salon/fitness/real estate offices/florist land uses. Conservatively uses AM peak hour of generator (peak hour of adjacent street data not available in ITE Manual).
						Gross Total	*2,461*	*308*	*156*	
						Reduction for Internalization in East Olive Drive Area Residential and Project Retail (6.4%)	-158	-20	-10	Internalization was determined through the difference between Existing Conditions and Existing Plus Mixed Use Alternative for the boundary of all East Olive Drive area land use between WB I-80 off-ramp and Richards Boulevard, using Mainstreet MXD+.
						Reduction of walk/bike/transit for Project Retail (6.9%)	-170	-21	-11	Reduction of vehicle trips for walk/bike/transit determined using Mainstreet MXD+ for the retail uses of the project site. (Walk/bike/transit for project residential already accounted for).
						Net New Vehicle Trips	**2,133**	**267**	**135**	

Table 6-12
Proposed Project vs. Mixed-Use Alternative Trip Generation

Duration	Proposed Project Trips	Mixed-Use Alternative Trips
Daily	894	2,133
AM Peak Hour	45	267
PM Peak Hour	63	135

Source: Fehr & Peers, May 2017.

Similar to the proposed project, the Off-Site (3820 Chiles Road) Alternative would include a mix of two-bedroom to five-bedroom furnished student apartments with a building three- to five-stories tall, for a maximum height of 60 feet. Parking would be provided consistent with City of Davis Municipal Code Section 40.25.090. The Off-Site (3820 Chiles Road) Alternative would include the same amenities as the proposed project. In addition, similar to the proposed project, the Off-Site (3820 Chiles Road) Alternative would be designed consistent with LEED Gold certification standards. Demolition of the existing structures on the 3820 Chiles Road property would occur under the Alternative.

Because the Off-Site (3820 Chiles Road) Alternative would involve similar development as the proposed project, the Alternative would meet the majority of the project objectives. However, the Off-Site (3820 Chiles Road) Alternative would be located nearly two miles further than the proposed project site from both downtown Davis and the UC Davis campus. As such, opportunities for alternate forms of transportation, such as public transit, walking, and bicycling, to such destinations would be less convenient under the Alternative than the proposed project. Because the Alternative would not provide easy access to UC Davis and would not be located on a property that would encourage and/or support the use of alternate forms of transportation to both downtown Davis and the UC Davis campus, the Off-Site (3820 Chiles Road) Alternative would only partially meet the two project objectives related to such. In addition, because the Off-Site (3820 Chiles Road) Alternative would not involve revitalizing an underutilized tract of land along East Olive Drive, the Alternative would only partially meet the project objective related to such.

Air Quality and GHG Emissions

As stated above, the Off-Site (3820 Chiles Road) Alternative site currently contains an existing UC Davis office building and associated parking lot that would be demolished with implementation of the Alternative. In addition, the Off-Site (3820 Chiles Road) Alternative would involve development on a larger site with 33 more units than the proposed project, which would result in a greater area of disturbance than that of the proposed project. Accordingly, construction activities under the Off-Site (3820 Chiles Road) Alternative would be more intensive than the proposed project, and emissions associated with construction would be expected to be greater than that of the proposed project. Therefore, construction-related air quality impacts would be greater under the Off-Site (3820 Chiles Road) Alternative than the proposed project, and Mitigation Measure 4.2-3 would still be required.

Overall, the Off-Site (3820 Chiles Road) Alternative would result in greater impacts than the proposed project related to air quality and GHG emissions.

Biological Resources

The existing habitat on the Off-Site (3820 Chiles Road) Alternative site is limited to ruderal grass areas and ornamental trees/landscaping associated with the existing UC Davis office building and associated parking lot. The on-site trees are not native or large, mature trees and are not considered landmark trees or trees of significance. Due to the lack of native or large, mature trees on the site, the on-site trees would not be considered suitable nesting habitat for Swainson's hawk. Accordingly, the significant impact identified for the proposed project related to Swainson's hawk

would not be expected to occur with implementation of the Off-Site (3820 Chiles Road) Alternative.

Burrowing owls are typically found in open grasslands, large urban vacant lots, golf courses, and agricultural fields. While the Off-Site (3820 Chiles Road) Alternative site would not represent essential habitat for burrowing owls, similar to the proposed project, in the event that all structures are removed and the open area is left undisturbed for an extended period of time prior to buildout of the Off-Site (3820 Chiles Road) Alternative, burrowing owl could move to the site and be disturbed during construction activities. As such, the significant impact identified for the proposed project related to burrowing owl would be similar under the Off-Site (3820 Chiles Road) Alternative, and Mitigation Measures 4.3-2(a) and (b) would be required.

Because the Off-Site (3820 Chiles Road) Alternative would involve the removal of the existing on-site trees and landscaping, disturbance or loss of an active nest or special-status bird or raptor species could occur during construction activities. Similarly, the potential to disturb bat roosts that may be present within the existing on-site vegetation exists under the Off-Site (3820 Chiles Road) Alternative. Thus, significant impacts identified for the proposed project related to raptors, nesting birds, or other birds protected under the MBTA, as well as related to special-status bats, could still occur under the Off-Site (3820 Chiles Road) Alternative, and Mitigation Measures 4.3-3 and 4.3-4 would be required.

The Off-Site (3820 Chiles Road) Alternative site does not contain any oak trees or other trees of significance. Thus, the Alternative would not involve the removal of such trees, and Mitigation Measure 4.3-7(b) would not be required. However, removal of the existing on-site ornamental trees and landscaping would occur, which would be subject to the same City Municipal Code requirements, including tree protection measures for any trees to be retained. Accordingly, Mitigation Measure 4.3-7(a) would still be required. Based on the above, the significant impact identified for the proposed project related to compliance with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, would be slightly less under the Off-Site (3820 Chiles Road) Alternative.

The Off-Site (3820 Chiles Road) Alternative would involve redevelopment of a property within the City similar to that of the proposed project, which would be subject to the same requirements pursuant to the draft Yolo HCP/NCCP, should the HCP/NCCP be adopted prior to development. Therefore, the significant impact identified for the proposed project related to a conflict with an adopted NCP, NCCP, or other approved local, regional, or state habitat conservation plan would still occur under the Off-Site (3820 Chiles Road) Alternative and Mitigation Measure 4.3-8 would be required.

Overall, the Off-Site (3820 Chiles Road) Alternative would result in fewer impacts than the proposed project related to biological resources.

Cultural Resources

Because the Off-Site (3820 Chiles Road) Alternative would be located on an alternate property, the significant impacts identified for the proposed project related to a substantial adverse change

in the significance of a historical resource, specifically related to Gould's Raisin Works, which is explicitly associated with the proposed project site, would not occur under the Off-Site (3820 Chiles Road) Alternative.

Similar to the proposed project, due to the currently developed nature of the Off-Site (3820 Chiles Road) Alternative site and lack of proximity to a stream or other feature known to be associated with the presence of resources, cultural resources, including archaeological resources, unique paleontological resources, unique geologic features, unique archeological resources, tribal cultural resources, or human remains would not be expected to occur on the site. However, because the Off-Site (3820 Chiles Road) Alternative would involve ground-disturbing activities, the potential exists for previously unknown cultural resources to be unearthed during construction. Therefore, the significant impacts identified for the proposed project related to such would still occur under the Off-Site (3820 Chiles Road) Alternative and Mitigation Measures 4.4-2 through 4.4-4(b) would be required.

Overall, the Off-Site (3820 Chiles Road) Alternative would result in fewer impacts related to cultural resources compared to the proposed project.

Hazards and Hazardous Materials

The Off-Site (3820 Chiles Road) Alternative site currently contains an existing UC Davis office building and associated parking lot that would be demolished with implementation of the Alternative. Due to the age of the existing building on the site, asbestos-containing materials and lead-based paint may be present within the structure. The existing building would be demolished under the Off-Site (3820 Chiles Road) Alternative. Accordingly, during construction of the Off-Site (3820 Chiles Road) Alternative, construction workers could be exposed to airborne asbestos and/or lead during demolition work. Therefore, a similar impact as the proposed project related to accidental release of hazardous materials during construction, specifically associated with asbestos and lead-based paint, would occur under the Off-Site (3820 Chiles Road) Alternative as well, and Mitigation Measures 4.5-1(a) and (b) would be required.

Overall, the Off-Site (3820 Chiles Road) Alternative would result in similar impacts related to hazards and hazardous materials as the proposed project.

Hydrology and Water Quality

The Off-Site (3820 Chiles Road) Alternative would involve urban development similar to that of the proposed project, but with more residential units over a larger area at an alternate location. Demolition of the existing structures on the Off-Site (3820 Chiles Road) Alternative site would be required. The area of disturbance and intensity of activities during construction of the Off-Site (3820 Chiles Road) Alternative would be greater than what would occur with the proposed project. Therefore, the Off-Site (3820 Chiles Road) Alternative would involve similar, if not slightly greater, potential for runoff containing sediment or contaminants to enter downstream receiving waters and degrade water quality, and would be subject to the same regulations regarding construction water quality. The significant impact identified for the proposed project related to a violation of water quality standards, or the creation of a substantial additional source of polluted

runoff during construction would still occur under the Off-Site (3820 Chiles Road) Alternative, and Mitigation Measure 4.6-1 would be required.

The Off-Site (3820 Chiles Road) Alternative would be expected to involve a greater amount of impervious surface area than the proposed project, which would have a higher potential for the creation of additional sources of polluted runoff and degradation water quality during operations. The Off-Site (3820 Chiles Road) Alternative would involve the alteration of existing site drainage patterns and could potentially increase the amount of stormwater runoff from existing levels occurring at the site, similar to the proposed project. Therefore, the significant impacts identified for the proposed project associated with polluted runoff or a degradation of water quality during project operations and alteration of the existing site drainage patterns would be similar under the Off-Site (3820 Chiles Road) Alternative, and Mitigation Measures 4.6-2 and 4.6-4 would be required.

Overall, the Off-Site (3820 Chiles Road) Alternative would result in greater impacts related to hydrology and water quality as the proposed project.

Noise

As discussed above, construction activities under the Off-Site (3820 Chiles Road) Alternative would be slightly more intensive than the proposed project due to the demolition required, the development of 33 more units, and the greater area of disturbance. Similar to the proposed project, the Off-Site (3820 Chiles Road) Alternative site is located adjacent to existing residential uses, particularly to the south and west of the Alternative site. As a result of the increased intensity of construction and similar proximity to nearby sensitive noise receptors compared to the proposed project, the Off-Site (3820 Chiles Road) Alternative may have a greater potential than the proposed project to cause a temporary construction noise impact to nearby receptors as a result of on-site use of heavy construction equipment. Therefore, the significant impacts identified for the proposed project associated with temporary construction noise could be slightly greater with the Off-Site (3820 Chiles Road) Alternative and Mitigation Measure 4.8-1 would still be required.

The Off-Site (3820 Chiles Road) Alternative site boundary is located approximately 350 feet from the centerline of the nearby railroad tracks, which is double the distance of the nearest residential building of the proposed project to the tracks. As discussed in the Noise chapter of this EIR, the interior noise level standard would be exceeded at the first row of residences nearest the railroad tracks by approximately one decibel. Because the boundary of the Off-Site (3820 Chiles Road) Alternative is located twice as far from the tracks as the nearest residential building of the proposed project, and the actual residences of the Off-Site (3820 Chiles Road) Alternative would be located even further away, the noise level associated with rail activity at the Off-Site (3820 Chiles Road) Alternative site would be expected to be below the interior noise level standard of 45 decibels. Therefore, the significant impact identified for the proposed project related to interior noise associated with nearby railroad activity would not be expected to occur under the Off-Site (3820 Chiles Road) Alternative and Mitigation Measure 4.8-5(a) and (b) would not be required. It should be noted, however, that the Off-Site (3820 Chiles Road) Alternative would be in much closer proximity to I-80 compared to the proposed project (approximately 100 feet, compared to approximately 600 feet under the proposed project). As such, noise levels associated with I-80

traffic would be higher at the Off-Site (3820 Chiles Road) Alternative site than the proposed project site, which could potentially result in transportation noise impacts to existing or new sensitive receptors in the project vicinity.

Overall, the Off-Site (3820 Chiles Road) Alternative would result in fewer impacts related to noise than the proposed project.

Transportation and Circulation

As stated above, the Off-Site (3820 Chiles Road) Alternative site currently contains an existing UC Davis office building and associated parking lot that would be demolished with implementation of the Alternative. In addition, the Off-Site (3820 Chiles Road) Alternative would involve development on a larger site with 33 more units than the proposed project, which would result in a greater area of disturbance than that of the proposed project. Accordingly, construction activities under the Off-Site (3820 Chiles Road) Alternative would be slightly more intensive than the proposed project. The Off-Site (3820 Chiles Road) Alternative would, similar to the proposed project, require implementation of a Construction Traffic Control Plan in order to reduce potential impacts related to construction activities to a less-than-significant level. Thus, the significant impact identified for the proposed project related to construction vehicle traffic would still occur under the Off-Site (3820 Chiles Road) Alternative, and Mitigation Measure 4.11-7 would be required.

The Off-Site (3820 Chiles Road) Alternative would involve 33 more units than the proposed project, which would consequently result in more future residents than what would be expected for the proposed project. The greater number of future residents would result in increased vehicle trips on the surrounding roadway network. In addition, the Off-Site (3820 Chiles Road) Alternative site is located further from the UC Davis campus than the proposed project site. As such, the likelihood for students to bike or walk to UC Davis would be less under the Alternative than the proposed project. Because access to UC Davis or downtown Davis from the Off-Site (3820 Chiles Road) Alternative would not be as convenient as the proposed project, the trip generation estimate does not include any reductions in vehicle trips associated with such or transportation demand management measures. According to the trip generation estimate for the Off-Site (3820 Chiles Road) Alternative prepared by Fehr & Peers, the vehicle trips associated with the Off-Site (3820 Chiles Road) Alternative in comparison to the proposed project are presented in Table 6-13.

Table 6-13
Proposed Project vs. Off-Site (3820 Chiles Road) Alternative Trip Generation

Duration	Proposed Project Trips	Off-Site (3820 Chiles Road) Alternative Trips
Daily	894	1,545
AM Peak Hour	45	111
PM Peak Hour	63	124

Source: Fehr & Peers, April 2017.

As shown in the table, the Off-Site (3820 Chiles Road) Alternative would result in greater vehicle trips on the surrounding roadway network than the proposed project, which would correlate to a higher increase in delay at nearby intersections and/or freeway off-ramps. In addition, the Off-Site

(3820 Chiles Road) Alternative would be in closer proximity to the I-80 and Mace Boulevard interchange, which is an already congested intersection. Consequently, the Off-Site (3820 Chiles Road) Alternative would likely involve a greater increase in delay at the I-80 and Mace Boulevard interchange. Therefore, impacts associated with intersections and freeway off-ramps under Cumulative Plus Project conditions would be greater under the Off-Site (3820 Chiles Road) Alternative compared to the proposed project.

Overall, the Off-Site (3820 Chiles Road) Alternative would result in greater impacts related to transportation and circulation than the proposed project.

Off-Site Woodland Alternative

The Off-Site Woodland Alternative would involve development similar to the proposed project at an off-site location within the City of Woodland. The same number of units, mix of unit type, layout, and building design would occur under the Off-Site Woodland Alternative as the proposed project. The assumption has been made that all dwelling units under the Off-Site Woodland Alternative would be market rate. Similar to the proposed project, the Off-Site Woodland Alternative would include a mix of two-bedroom to five-bedroom furnished student apartments with a building from three- to five-stories tall, for a maximum height of 60 feet. Parking would be provided consistent with City of Woodland standards. The Off-Site Woodland Alternative would include the same amenities as the proposed project. In addition, similar to the proposed project, the Off-Site Woodland Alternative would be designed consistent with LEED Gold certification standards. A particular parcel has not been identified at this time for the Off-Site Woodland Alternative; however, demolition is assumed to be necessary for the Alternative for analysis purposes. It should be noted that the project applicant does not currently own, control, or otherwise have access to a comparable property to the proposed project site in the City of Woodland and would have to be capable of finding and acquiring such a property in order to implement the Off-Site Woodland Alternative.

Because the Off-Site Woodland Alternative would involve similar development as the proposed project, the Alternative would meet the majority of the project objectives. However, although a particular parcel has not been identified at this time for the Off-Site Woodland Alternative, it can be reasonably concluded that any location within the jurisdictional boundaries of the City of Woodland would be located further from the UC Davis campus than the proposed project site. As such, the likelihood for students to bike or walk to UC Davis would be much less under the Alternative than the proposed project. Transit ridership may, however, increase under the Alternative. Because the Alternative would not provide easy access to UC Davis and would not be located on a property that would encourage and/or support the use of alternate forms of transportation to both downtown Davis and the UC Davis campus, the Off-Site Woodland Alternative would only partially meet the two project objectives related to such. In addition, because the Off-Site Woodland Alternative would not involve revitalizing an underutilized tract of land along East Olive Drive, the Alternative would not meet the objective related to such.

Air Quality and GHG Emissions

The Off-Site Woodland Alternative would involve the development of the same number of units, mix of unit type, layout, and building design as the proposed project, which would, subsequently, result in a similar area of disturbance and comparable construction activities. In addition, demolition is assumed to be necessary under the Off-Site Woodland Alternative, similar to the proposed project. Accordingly, the overall intensity of construction activities would be similar to what would occur with the proposed project. As a result, emissions associated with construction would be similar to that of the proposed project, and construction-related air quality impacts would be similar under the Off-Site Woodland Alternative.

Biological Resources

Although a particular parcel has not been identified at this time for the Off-Site Woodland Alternative, the assumption has been made for analysis purposes that the alternate site would be comparable in size to the proposed project site, and that the type of habitat present on the alternate site would be similar to the proposed project site as well. Accordingly, the Off-Site Woodland Alternative could involve a similar amount of tree removal and potential to result in the disturbance or loss of potential Swainson's hawk nesting trees and/or active nests on the project site, disturbance or loss of an active nest for special-status bird or raptor species, direct loss of burrowing owls or temporary disruption of feeding or breeding behavior during construction, or bat roosts. Therefore, similar impacts as identified for the proposed project related to such could occur under the Off-Site Woodland Alternative, and mitigation similar to Mitigation Measures 4.3-1(a) and (b), 4.3-2(a) and (b), 4.3-3, and 4.3-4 would be required.

Because tree removal similar to the proposed project could occur under the Off-Site Woodland Alternative, a similar impact as identified for the proposed project related to compliance with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, could be expected to occur under the Off-Site Woodland Alternative and mitigation similar to the requirements set forth within Mitigation Measures 4.3-7(a) and (b) of this EIR would likely be required.

The Off-Site Woodland Alternative would involve development similar to the proposed project at an off-site location within the City of Woodland. Because the City of Woodland is located within Yolo County, development of a site within the City of Woodland would be subject to the same requirements pursuant to the draft Yolo HCP/NCCP, should the HCP/NCCP be adopted prior to development. Therefore, the significant impact identified for the proposed project related to a conflict with an adopted NCP, NCCP, or other approved local, regional, or state habitat conservation plan would still occur under the Off-Site Woodland Alternative and Mitigation Measure 4.3-8 would be required.

Overall, the Off-Site Woodland Alternative would result in similar impacts as the proposed project related to biological resources.

Cultural Resources

Because the Off-Site Woodland Alternative would be located on an alternate property, the significant impacts identified for the proposed project related to a substantial adverse change in the significance of a historical resource, specifically related to Gould's Raisin Works, which is explicitly associated with the proposed project site, would not occur under the Off-Site Woodland Alternative.

A particular parcel has not been identified at this time for the Off-Site Woodland Alternative. Accordingly, the potential presence of cultural resources, including archaeological resources, unique paleontological resources, unique geologic features, unique archeological resources, tribal cultural resources, or human remains, on the Off-Site Woodland Alternative site is currently unknown. However, because the Off-Site Woodland Alternative would involve ground-disturbing activities, the potential exists for previously unknown cultural resources to be unearthed during construction. Therefore, the significant impacts identified for the proposed project related to such would still occur under the Off-Site Woodland Alternative and mitigation similar to the requirements set forth within Mitigation Measures 4.4-2 through 4.4-4(b) would be required.

Overall, the Off-Site Woodland Alternative could result in fewer impacts related to cultural resources compared to the proposed project.

Hazards and Hazardous Materials

Demolition is assumed to be necessary under the Off-Site Woodland Alternative, similar to the proposed project. Depending on the age of structures to be demolished as part of the Alternative, the potential exists for demolition activities to expose construction workers to airborne asbestos and/or lead during demolition work. Therefore, the significant impacts identified for the proposed project related to hazards and hazardous materials could still occur under the Off-Site Woodland Alternative and Mitigation Measures 4.5-1(a) and (b) may be required.

Overall, the Off-Site Woodland Alternative would result in similar impacts than the proposed project related to hazards and hazardous materials.

Hydrology and Water Quality

Demolition is assumed to be necessary under the Off-Site Woodland Alternative, similar to the proposed project. In addition, development of the same number of units, mix of unit type, layout, and building design as the proposed project would occur, which would, subsequently, result in a similar area of disturbance and comparable grading, paving, and building construction activities. Therefore, the Off-Site Woodland Alternative would be expected to involve a similar potential for runoff containing sediment or contaminants to enter downstream receiving waters and degrade water quality, and would be subject to the same regulations regarding construction water quality. Significant impacts identified for the proposed project related to a violation of water quality standards, or the creation of a substantial additional source of polluted runoff during construction would still occur under the Off-Site Woodland Alternative, and Mitigation Measure 4.6-1 would be required.

The Off-Site Woodland Alternative would be expected to involve a similar amount of impervious surface area and involve similar development as the proposed project, which would have the same potential for the creation of additional sources of polluted runoff and degradation water quality during operations. The Off-Site Woodland Alternative would involve the alteration of existing site drainage patterns and could potentially increase in the amount of stormwater runoff from existing levels occurring at the off-site location, similar to the proposed project. Therefore, the significant impacts identified for the proposed project associated with polluted runoff or a degradation of water quality during project operations and alteration of the existing site drainage patterns would be similar under the Off-Site Woodland Alternative, and mitigation similar to the requirements set forth within Mitigation Measures 4.6-2 and 4.6-4 would be required.

Overall, the Off-Site Woodland Alternative would result in similar impacts related to hydrology and water quality as the proposed project.

Noise

As discussed above, the Off-Site Woodland Alternative would involve the development of the same number of units, mix of unit type, layout, and building design as the proposed project, which would, subsequently, result in a similar area of disturbance and comparable construction activities. In addition, demolition is assumed to be necessary under the Off-Site Woodland Alternative, similar to the proposed project. Accordingly, the overall intensity of construction activities would be similar to what would occur with the proposed project. Although a particular parcel has not been identified at this time for the Off-Site Woodland Alternative, the Off-Site Woodland Alternative site would likely be located in close proximity to other existing residential development, similar to the proposed project. As a result, the Off-Site Woodland Alternative would be expected to have a similar potential as the proposed project to cause a temporary construction noise impact to nearby receptors as a result of on-site use of heavy construction equipment. Therefore, the significant impacts identified for the proposed project associated with temporary construction noise would be expected to occur with the Off-Site Woodland Alternative and Mitigation Measure 4.8-1 would still be required.

Although tracks owned by the California Northern Railroad Company run in a north-south orientation through the City of Woodland, the rail activity along that rail line is much less than that of the Union Pacific Railroad (UPRR) tracks that run alongside the proposed project site. In addition, the likelihood that the Off-Site Woodland Alternative is located in close proximity to the railroad tracks is low. Therefore, the significant impact identified for the proposed project related to interior noise associated with nearby railroad activity would not be expected to occur under the Off-Site Woodland Alternative and Mitigation Measure 4.8-5(a) and (b) would not be required.

Overall, the Off-Site Woodland Alternative would result in fewer impacts related to noise than the proposed project.

Transportation and Circulation

As discussed above, the Off-Site Woodland Alternative would involve the development of the same number of units, mix of unit type, layout, and building design as the proposed project, which would, subsequently, result in a similar area of disturbance and comparable construction activities. In addition, demolition is assumed to be necessary under the Off-Site Woodland Alternative, similar to the proposed project; thus, construction vehicle trips associated with hauling off demolition debris would still occur. Accordingly, the overall intensity of construction activities would be similar to what would occur with the proposed project. Therefore, implementation of a Construction Traffic Control Plan would still be required for the Off-Site Woodland Alternative in order to ensure that traffic impacts related to construction activities would be less than significant. Thus, the significant impact identified for the proposed project related to construction vehicle traffic would still occur under the Off-Site Woodland Alternative, and Mitigation Measure 4.11-7 would be required.

As discussed above, the Off-Site Woodland Alternative would involve the development of the same number of units, mix of unit type, layout, and building design as the proposed project. As discussed above, any location within the jurisdictional boundaries of the City of Woodland would be located further from the UC Davis campus than the proposed project site. As such, the likelihood for students to bike or walk to UC Davis would be much less under the Alternative than the proposed project. Because the Off-Site Woodland Alternative would not provide easy access to UC Davis or downtown Davis and would not be located on a property that would encourage and/or support the use of alternate forms of transportation, the trip generation estimate does not include any reductions in vehicle trips associated with such or transportation demand management measures. According to the trip generation estimate for the Off-Site Woodland Alternative prepared by Fehr & Peers, the vehicle trips associated with the Off-Site Woodland Alternative in comparison to the proposed project are presented in Table 6-14.

Table 6-14
Proposed Project vs. Off-Site Woodland Alternative Trip Generation

Duration	Proposed Project Trips	Off-Site Woodland Alternative Trips
Daily	894	1,374
AM Peak Hour	45	105
PM Peak Hour	63	129

Source: Fehr & Peers, April 2017.

As shown in the table, the Off-Site Woodland Alternative would result in greater vehicle trips on the surrounding roadway network than the proposed project, which would correlate to a higher increase in delay at nearby intersections and/or freeway off-ramps. Therefore, significant impact associated with such would be greater under the Off-Site Woodland Alternative compared to the proposed project.

Overall, the Off-Site Woodland Alternative would result in greater impacts related to transportation and circulation than the proposed project.

Off-Site UC Davis On-Campus Alternative

The City concurs with interested citizens that analysis of an on-campus student housing alternative within this EIR would be consistent with the intent of the Resolution adopted by Davis City Council on December 20, 2016 concerning the scope of the UC Davis Long Range Development Plan (LRDP). As stated in the adopted Resolution, UC Davis has the responsibility to both plan and deliver the infrastructure, dwelling units, and facilities necessary to support its anticipated growth, and to do so with adherence to sound planning and sustainability principles, including, but not limited to, consideration of high-density on-campus housing of at least five to six stories in height. Accordingly, the City has chosen to include an Off-Site UC Davis On-Campus Alternative within this chapter.

The Off-Site UC Davis On-Campus Alternative would involve development similar to the proposed project (i.e., 130 student-oriented units with 708 total beds) at an off-site location within the UC Davis campus. Similar to the proposed project, the Off-Site UC Davis On-Campus Alternative would include a mix of two-bedroom to five-bedroom furnished student apartments with a building two- to five-stories tall, for a maximum height of approximately 60 feet. The Off-Site UC Davis On-Campus Alternative is assumed to include the same amenities as the proposed project, and would be designed consistent with LEED Gold certification standards. An exact site to accommodate the Off-Site UC Davis On-Campus Alternative cannot be specified at this time; however, a reasonable assumption has been made that a similar project could be accommodated if UC Davis chose to do so. Although a particular site has not been identified at this time for the Off-Site UC Davis On-Campus Alternative, the overall area of disturbance that would occur during construction is assumed to be similar to the proposed project for analysis purposes. Based on a review of conceptual Long Range Development Plan land use exhibits for the UC Davis campus, demolition of existing structures may be required in order to implement the Off-Site UC Davis On-Campus Alternative. As such, demolition is assumed to be possible for the Alternative for analysis purposes. It should be noted that the City of Davis and UC Davis have separate jurisdictions and, thus, development on the UC Davis campus is not regulated by the City of Davis. In addition, the project applicant does not currently and would not be capable of owning, controlling, or otherwise having access to the UC Davis property.

Because Off-Site UC Davis On-Campus Alternative would involve similar development as the proposed project on the UC Davis campus and in close proximity to downtown Davis, the Alternative would meet the majority of the project objectives. However, because the Off-Site UC Davis On-Campus Alternative would not involve revitalizing an underutilized tract of land along East Olive Drive, the Alternative would only partially meet the project objective related to such.

Air Quality and GHG Emissions

As stated above, demolition may be required in order to implement the Off-Site UC Davis On-Campus Alternative, depending on the ultimate site location. Thus, demolition is assumed to be possible for the Off-Site UC Davis On-Campus Alternative for analysis purposes. In addition, the Off-Site UC Davis On-Campus Alternative is assumed to involve development on a similar size site as the proposed project, which would result in a similar area of disturbance as the proposed project. Accordingly, construction activities under the Off-Site UC Davis On-Campus Alternative

would be similar to the proposed project, and emissions associated with construction would be expected to be similar to that of the proposed project. Therefore, construction-related air quality impacts would be similar under the Off-Site UC Davis On-Campus Alternative, and Mitigation Measure 4.2-3 would be required.

Biological Resources

Although a particular site within the UC Davis campus has not been identified for the Off-Site UC Davis On-Campus Alternative, the assumption has been made for analysis purposes that the on-campus site would be comparable in size to the proposed project site, and that the type of habitat present on the on-campus site would be similar to the proposed project site as well. Accordingly, the Off-Site UC Davis On-Campus Alternative could involve a similar amount of tree removal and potential to result in the disturbance or loss of potential Swainson's hawk nesting trees and/or active nests on the project site, disturbance or loss of an active nest for special-status bird or raptor species, direct loss of burrowing owls or temporary disruption of feeding or breeding behavior during construction, or bat roosts. Therefore, similar impacts as identified for the proposed project related to such could occur under the Off-Site UC Davis On-Campus Alternative, and mitigation similar to the requirements set forth within Mitigation Measures 4.3-1(a) and (b), 4.3-2(a) and (b), 4.3-3, and 4.3-4 could still be required.

Because tree removal similar to the proposed project could occur under the Off-Site UC Davis On-Campus Alternative, a similar impact as identified for the proposed project related to compliance with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, could be expected to occur under the Off-Site UC Davis On-Campus Alternative. While the same City regulations would not apply to the Off-Site UC Davis On-Campus Alternative, as the UC Davis campus is not regulated by the City of Davis, UC Davis has their own Campus Standards and Design Guide (CSDG) manual that sets forth mandatory design constraints for all construction on the UC Davis campus. The CSDG includes a Tree Protection and Removal Process with which the Off-Site UC Davis On-Campus Alternative would be required to comply. Thus, while Mitigation Measures 4.3-7(a) and (b) of this EIR would not be required, the Off-Site UC Davis On-Campus Alternative would be subject to similar requirements.

The Off-Site UC Davis On-Campus Alternative would involve development similar to the proposed project at an off-site location within the UC Davis campus. The UC Davis campus does not fall within and is not adjacent to the boundaries of an adopted regional HCP/NCCP. In addition, UC Davis is not a participating agency of the draft Yolo HCP/NCCP. Thus, development of a site on the UC Davis campus would not be subject to the requirements pursuant to the Yolo HCP/NCCP. It should be noted, however, that UC Davis has prepared Low-Effect HCPs for Valley Elderberry Longhorn Beetle. The relevant areas identified in the Low-Effect HCPs are designated as Teaching and Research Open Space areas in the in the 2003 LRDP, which is consistent with purposes of the HCPs. As such, the Off-Site UC Davis On-Campus Alternative would not be located in any area identified within the Low-Effect HCPs. Therefore, the significant impact identified for the proposed project related to a conflict with an adopted NCP, NCCP, or other approved local, regional, or state habitat conservation plan would not occur under the Off-Site UC Davis On-Campus Alternative and Mitigation Measure 4.3-8 would not be required.

Overall, the Off-Site UC Davis On-Campus Alternative would result in fewer impacts as the proposed project related to biological resources.

Cultural Resources

Because the Off-Site UC Davis On-Campus Alternative would be located on an alternate property, the significant impacts identified for the proposed project specifically related to Gould's Raisin Works, which is explicitly associated with the proposed project site, would not occur under the Off-Site UC Davis On-Campus Alternative. However, according to the 2003 LRDP EIR, many of the existing buildings on the UC Davis campus are over 50 years old and may potentially be considered historic. Depending on the Off-Site UC Davis On-Campus Alternative site, demolition or disturbance of such buildings may occur. Thus, impacts related to a substantial adverse change in the significance of a historical resource could still occur under the Off-Site UC Davis On-Campus Alternative.

A particular site within the UC Davis campus has not been identified at this time for the Off-Site UC Davis On-Campus Alternative. Accordingly, the potential presence of cultural resources, including archaeological resources, unique paleontological resources, unique geologic features, unique archeological resources, tribal cultural resources, or human remains, on the Off-Site UC Davis On-Campus Alternative site is currently unknown. Based on the 2003 LRDP EIR, the zone of cultural sensitivity occurs along Putah Creek. Development of the Off-Site UC Davis On-Campus Alternative would not be expected to occur within the aforementioned zone. However, because the Off-Site UC Davis On-Campus Alternative would involve ground-disturbing activities, the potential exists for previously unknown cultural resources to be unearthed during construction. Therefore, the significant impacts identified for the proposed project related to such could still occur under the Off-Site UC Davis On-Campus Alternative and Mitigation Measures 4.4-2 through 4.4-4(b) would be required.

Overall, the Off-Site UC Davis On-Campus Alternative could result in similar impacts related to cultural resources compared to the proposed project.

Hazards and Hazardous Materials

Demolition similar to the proposed project is assumed to possibly be necessary in order to implement the Off-Site UC Davis On-Campus Alternative. Depending on the age of structures to be demolished as part of the Alternative, the potential exists for demolition activities to expose construction workers to airborne asbestos and/or lead during demolition work. Therefore, the significant impacts identified for the proposed project related to hazards and hazardous materials could still occur under the Off-Site UC Davis On-Campus Alternative and Mitigation Measures 4.5-1(a) and (b) may be required.

Overall, the Off-Site UC Davis On-Campus Alternative could result in similar impacts than the proposed project related to hazards and hazardous materials.

Hydrology and Water Quality

Demolition similar to the proposed project is assumed to possibly be necessary in order to implement the Off-Site UC Davis On-Campus Alternative. In addition, development of the same number of units, mix of unit type, layout, and building design as the proposed project would occur, which would, subsequently, result in a similar area of disturbance and comparable grading, paving, and building construction activities. Therefore, the Off-Site UC Davis On-Campus Alternative would be expected to involve a similar potential for runoff containing sediment or contaminants to enter downstream receiving waters and degrade water quality, and would be subject to the same regulations regarding construction water quality. The significant impact identified for the proposed project related to a violation of water quality standards, or the creation of a substantial additional source of polluted runoff during construction would still occur under the Off-Site UC Davis On-Campus Alternative, and Mitigation Measure 4.6-1 would be required.

The Off-Site UC Davis On-Campus Alternative would be expected to involve a similar amount of impervious surface area and involve similar development as the proposed project, which would have the same potential for the creation of additional sources of polluted runoff and degradation of water quality during operations. The Off-Site UC Davis On-Campus Alternative would involve the alteration of existing site drainage patterns and could potentially increase the amount of stormwater runoff from existing levels occurring at the off-site location, similar to the proposed project. Therefore, the significant impacts identified for the proposed project associated with polluted runoff or a degradation of water quality during project operations and alteration of the existing site drainage patterns would be similar under the Off-Site UC Davis On-Campus Alternative, and Mitigation Measures 4.6-2 and 4.6-4 would be required.

Overall, the Off-Site UC Davis On-Campus Alternative would result in similar impacts related to hydrology and water quality as the proposed project.

Noise

As discussed above, the Off-Site UC Davis On-Campus Alternative would involve the development of the same number of units, mix of unit type, layout, and building design as the proposed project, which would, subsequently, result in a similar area of disturbance and comparable construction activities. In addition, demolition similar to the proposed project is assumed to possibly be necessary in order to implement the Off-Site UC Davis On-Campus Alternative. Accordingly, the overall intensity of construction activities would be similar to what would occur with the proposed project. Although a particular site within the UC Davis campus has not been identified for the Off-Site UC Davis On-Campus Alternative, the Alternative site could be located in close proximity to other existing residential development, similar to the proposed project. As a result, the Off-Site UC Davis On-Campus Alternative could have a similar potential as the proposed project to cause a temporary construction noise impact to nearby receptors as a result of on-site use of heavy construction equipment. Therefore, the significant impacts identified for the proposed project associated with temporary construction noise could occur with the Off-Site UC Davis On-Campus Alternative and Mitigation Measure 4.8-1 would still be required.

A specific site within the UC Davis campus has not been identified for the Off-Site UC Davis On-Campus Alternative. The nearby railroad tracks make up a portion of the eastern boundary of the UC Davis campus area and go through the southeastern portion of the campus area. The Off-Site UC Davis On-Campus Alternative would involve the creation of new housing and would be considered a sensitive noise receptor. Depending on the location of the new residences (i.e., if placed within 150 feet from the centerline of the nearby railroad tracks), the Alternative, similar to the proposed project, may result in interior noise levels in excess of the applicable noise level standard. Therefore, the significant impact identified for the proposed project related to interior noise associated with nearby railroad activity could still occur under the Off-Site UC Davis On-Campus Alternative, and Mitigation Measure 4.8-5(a) and (b) may be required.

Overall, the Off-Site UC Davis On-Campus Alternative could result in similar impacts related to noise as the proposed project.

Transportation and Circulation

As discussed above, the Off-Site UC Davis On-Campus Alternative would involve the development of the same number of units, mix of unit type, layout, and building design as the proposed project, which would, subsequently, result in a similar area of disturbance and comparable construction activities. In addition, demolition similar to the proposed project is assumed to possibly be necessary in order to implement the Off-Site UC Davis On-Campus Alternative; thus, construction vehicle trips associated with hauling off demolition debris would still occur. Accordingly, the overall intensity of construction activities could be similar to what would occur with the proposed project. Therefore, implementation of a Construction Traffic Control Plan would still be required for the Off-Site UC Davis On-Campus Alternative in order to ensure that traffic impacts related to construction activities would be less than significant. Thus, the significant impact identified for the proposed project related to construction vehicle traffic would still occur under the Off-Site UC Davis On-Campus Alternative, and Mitigation Measure 4.11-7 would be required.

The Off-Site UC Davis On-Campus Alternative would involve development of the same number of units, mix of unit type, layout, and building design as the proposed project. As such, the same number of future residents would be expected under the Alternative. However, because the Off-Site UC Davis On-Campus Alternative would be located within the UC Davis campus, the majority of future residents would be expected to walk or bike to class, which would reduce the number of vehicle trips on the surrounding roadway network. Similarly, due to the proximity to the downtown Davis area, the likelihood for the future residents of the Off-Site UC Davis On-Campus Alternative to walk or bike to the downtown area would be high, which would also help to reduce the number of vehicle trips on the surrounding roadway network. Consequently, the Off-Site UC Davis On-Campus Alternative would be expected to result in fewer vehicle trips on the surrounding roadway network than the proposed project, which would correlate to a decrease in delay at nearby intersections and/or freeway off-ramps from what is anticipated to occur under the proposed project. Moreover, due to the Off-Site UC Davis On-Campus Alternative location, the Alternative may not involve any effects to some of the intersections studied for the proposed project, and the specific impacts identified for the proposed project may not occur.

Overall, the Off-Site UC Davis On-Campus Alternative would result in fewer impacts related to transportation and circulation than the proposed project.

Comparison of Alternatives

Table 6-15 summarizes the level of significance of the identified impacts for the proposed project and each of the project alternatives.

6.5 Environmentally Superior Alternative

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. Section 15126(e)(2) of the CEQA Guidelines requires that an environmentally superior alternative be designated and states, "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." As shown in Table 6-15, all of the significant impacts identified for the proposed project would not occur or would be fewer under the No Project Alternative. Thus, the No Project Alternative would be considered the environmentally superior alternative. In addition, the Existing Gateway/Olive Drive Specific Plan Alternative would reduce the majority of significant impacts identified for the proposed project compared to the remaining project alternatives. However, given that a "no project" alternative shall not be selected as the environmentally superior alternative, the No Project Alternative nor the Existing Gateway/Olive Drive Specific Plan Alternative may be chosen as the environmentally superior alternative, and the environmentally superior alternative among the other alternatives must be chosen.

Table 6-15 demonstrates that the Aggressive Transportation and Parking Demand Management Alternative would result in the most reductions of significant impacts identified for the proposed project compared to the remaining project alternatives. It is noted, however, that the Reduced Density Student Apartments Alternative would have the potential to reduce project impacts in a similar number of categories as the Aggressive Transportation and Parking Demand Management Alternative. However, given that the Aggressive Transportation and Parking Demand Alternative would more clearly result in reduced on-site disturbance area due to the substantial reduction in parking spaces, it is concluded that the Aggressive Transportation and Parking Demand Management Alternative would be considered the environmentally superior alternative to the proposed project.

Table 6-15
Environmental Impacts of the Proposed Project and Project Alternatives

Impact	Proposed Project	No Project Alternative	Existing Gateway/Olive Drive Specific Plan Alternative	Conventional Apartments Alternative	Reduced Density Student Apartments Alternative	Aggressive Transportation and Parking Demand Management Alternative	Mixed-Use Alternative	Off-Site (3820 Chiles Road) Alternative	Off-Site Woodland Alternative	Off-Site UC Davis On-Campus Alternative
Air Quality and GHG Emissions	Less-Than-Significant with Mitigation	Fewer	Fewer	Similar	Similar or Slightly Reduced	Fewer	Similar	Greater	Similar	Similar
Biological Resources	Less-Than-Significant with Mitigation	None	Fewer	Similar	Similar or Slightly Reduced	Fewer	Similar	Fewer	Similar	Fewer
Cultural Resources	Less-Than-Significant with Mitigation	None	Fewer	Similar	Similar or Slightly Reduced	Fewer	Similar	Fewer	Fewer	Similar
Hazards and Hazardous Materials	Less-Than-Significant with Mitigation	None	Fewer	Similar	Similar	Similar	Similar	Similar	Similar	Similar
Hydrology and Water Quality	Less-Than-Significant with Mitigation	Fewer	Fewer	Similar	Similar or Slightly Reduced	Fewer	Similar	Greater	Similar	Similar
Noise	Less-Than-Significant with Mitigation	Fewer	Similar	Similar	Similar	Similar	Similar or Slightly Increased	Fewer	Fewer	Similar
Transportation and Circulation	Less-Than-Significant with Mitigation	Fewer	Greater	Fewer	Fewer	Fewer	Greater	Greater	Greater	Fewer

No Impact = "None;" Less than Proposed Project = "Fewer;" Similar to Proposed Project = "Similar;" and Greater than Proposed Project = "Greater."