

5.1 CEQA REQUIREMENTS

CEQA requires that an EIR analyze a reasonable range of feasible alternatives that meet most or all project objectives while reducing or avoiding one or more significant environmental effects of the project. The range of alternatives required in an EIR is governed by a “rule of reason” that requires an EIR to set forth only those alternatives necessary to permit a reasoned choice (CEQA Guidelines Section 15126.6[f]). Where a potential alternative was examined but not chosen as one of the range of alternatives, the CEQA Guidelines require that the EIR briefly discuss the reasons the alternative was dismissed.

Alternatives that are evaluated in the EIR must be potentially feasible alternatives. However, not all possible alternatives need to be analyzed. An EIR must “set forth only those alternatives necessary to permit a reasoned choice.” (CEQA Guidelines, Section 15126.6(f).) The CEQA Guidelines provide a definition for a “range of reasonable alternatives” and, thus limit the number and type of alternatives that need to be evaluated in an EIR.

First and foremost, alternatives in an EIR must be potentially feasible. In the context of CEQA, “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. (CEQA Guidelines 15364)

The inclusion of an alternative in an EIR is not evidence that it is feasible as a matter of law, but rather reflects the judgment of lead agency staff that the alternative is potentially feasible. The final determination of feasibility will be made by the lead agency decision-making body through the adoption of CEQA Findings at the time of action on the Project. (Mira Mar Mobile Community v. City of Oceanside (2004) 119 Cal.App.4th 477, 489 see also CEQA Guidelines, §§ 15091(a)) (3)(findings requirement, where alternatives can be rejected as infeasible); 15126.6 ([an EIR] must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation”). The following factors may be taken into consideration in the assessment of the feasibility of alternatives: site suitability, economic viability, availability of infrastructure, general plan consistency, other plan or regulatory limitations, jurisdictional boundaries, and the ability of the proponent to attain site control (Section 15126.6 (f) (1)).

Equally important to attaining the project objectives is the reduction of some or all significant impacts, particularly those that could not be mitigated to a less than significant level. The following significant and unavoidable impact of the Theta Xi Fraternity Redevelopment Project is discussed in Section 3.1:

- Impact 3.1-1: Project implementation has the potential to cause a substantial adverse change to a significant historical resource, as defined in CEQA Guidelines §15064.5.

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The following analysis of alternatives focuses on significant impacts, including both those that can be mitigated to a less than significant level and the one impact that would remain significant even if mitigation is applied or for which no feasible mitigation is available.

A Notice of Preparation was circulated to the public to solicit recommendations for a reasonable range of alternatives to the proposed project. Additionally, a public scoping meeting was held during the public review period to solicit recommendations for a reasonable range of alternatives to the proposed project. The following comment was received related to potential alternatives to the project to be addressed in the EIR:

- The EIR should include a project alternative that preserves two of the three buildings: preserve one for ultimate sale (i.e., the building near the Natsoulas Gallery), and renovate one for use by the fraternity.

This suggested alternative is discussed below (see the Preservation, Renovation, and Addition Alternative and Preservation, Renovation, and New Build Alternative).

PROJECT OBJECTIVES

The alternatives to the proposed project selected for analysis in the EIR were developed to minimize significant environmental impacts while fulfilling the basic objectives of the project. As described in Chapter 2.0, Project Description, the following objectives have been identified for the Theta Xi Fraternity Redevelopment Project:

1. Address deficiencies in the structural integrity of the three houses used to house the undergraduate members of the Theta Xi Fraternity on First Street in Davis, CA, as identified in the report by Pemberton Engineering, dated July 27, 2016;
2. Renovate the subject properties in a way that provides for the needs of UCD students by ensuring that housing is competitive both in rent and amenities available within the City of Davis, including on-campus housing, in order to ensure the sustainability of the fraternity;
3. Use the value embedded in the three owned lots to assist in funding the renovation project by consolidating the housing needs of the fraternity onto a smaller footprint;
4. Construct the new building with features that will allow it to achieve a high level of energy efficiency and reduce ongoing maintenance costs; and
5. Continue to use the new facility as classrooms that, through fellowship and alumni guidance, lead to the wholesome mental, moral, physical, and spiritual growth that is the purpose of the Theta Xi Fraternity.

ALTERNATIVES NOT SELECTED FOR FURTHER ANALYSIS

The City of Davis and the project applicant considered alternative locations early in the public scoping process. The City's key considerations in identifying an alternative location were as follows:

- Is there an alternative location where significant effects of the project would be avoided or substantially lessened?
- Is there a site available within the City or the City's Sphere of Influence with the appropriate size and characteristics such that it would meet the basic project objectives?

Two hypothetical off-site alternatives were developed: the New Construction (Off-Site) Alternative, and the Acquisition and Renovation (Off-Site) Alternative. It is noted that alternative locations for these project alternatives have not been specifically identified, and may or may not be available or feasible for the project applicant. Under the New Construction (Off-Site) Alternative, land would be purchased off-site and the proposed facilities would be constructed at an off-site location. This alternative would be very similar to the proposed project, except that: 1) the project would not be constructed on First Street in an area determined to be ideally situated among the campus, the downtown area, and the Amtrak Railroad Station; and 2) the project could be more expensive because of land acquisition costs that would include costs for previously installed infrastructure (e.g., roads, sewer, flood control, utilities, etc.), and could also necessitate expenditures for required infrastructure if the infrastructure has not been previously provided. The number of beds and bathrooms is assumed to be comparable to the proposed project.

The project applicant has not been able to identify a potential site for acquisition that meets the fraternity's project objectives. Because of the size of the rural land surrounding UC Davis and the City of Davis, any potential land acquisition would be at a considerable distance from campus and much farther away from downtown Davis and the Amtrak Station. This alternative could also result in additional environmental impacts compared to the proposed project because of increased construction impacts (noise, air quality, water runoff, etc.) stemming from the provision of the basic infrastructure. Therefore, the New Construction (Off-Site) Alternative is dismissed from further analysis.

Under the Acquisition and Renovation (Off-Site) Alternative, existing improved land (i.e., land which is currently developed with residential uses) in the project area with a comparable proximity to the campus, the downtown area, and the Amtrak Station would be purchased, and the structures would be remodeled to meet the needs of the fraternity. The number of beds and bathrooms is assumed to be comparable to the proposed project.

The project applicant has not been able to identify a site that is currently on the market for potential acquisition, and it is unlikely that such a site would be on the market in the near future. The potential land acquisition cost would significantly increase the cost of the project and would likely be prohibitive. Additionally, if such a site were to be identified, neighborhood opposition to a new fraternity in the neighborhood would be anticipated, which would present a substantial obstacle to implementation. Therefore, the Acquisition and Renovation (Off-Site) Alternative is dismissed from further analysis.

In addition, as discussed in *Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553 (Goleta II)*, where a project is consistent with an approved general plan, no off-site alternative

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need be analyzed in the EIR. The EIR “is not ordinarily an occasion for the reconsideration or overhaul of fundamental land-use policy.” (Goleta II, supra, 52 Cal.3d at p. 573.) In approving a general plan, the local agency has already identified and analyzed suitable alternative sites for particular types of development and has selected a feasible land use plan. “Informed and enlightened regional planning does not demand a project EIR dedicated to defining alternative sites without regard to feasibility. Such ad hoc reconsideration of basic planning policy is not only unnecessary, but would be in contravention of the legislative goal of long-term, comprehensive planning.” (Goleta II, supra, 52 Cal.3d at pp. 572-573.) Here, the proposed Project is generally consistent with the types of uses considered in the Davis General Plan and associated EIR. As discussed in Section 3.2, Land Use, of this EIR, the project site is in the Core Area Specific Plan (CASP), which also includes the City of Davis General Plan and its Land Use Map and Zoning. The General Plan and CASP Land Use designation of the site is Retail Stores. The CASP further encourages retail uses at the ground floor level in the Retail Stores area, with professional and administrative offices and residential units in the upper stories. However, the CASP does not explicitly prohibit ground floor residential uses in the Retail Stores area, and does note that some residential uses exist in the Retail Stores area of the Downtown Core. The CASP, therefore, does not prohibit ground floor residential uses in the Retail Stores area, and the Planning Commission, or City Council, could find that the proposed project is consistent with the CASP and the General Plan, provided that the project as a whole is consistent with the CASP and the General Plan. As discussed above, the project is consistent with the City’s General Plan. Additionally, because the CASP does not prohibit ground floor residential uses in the Retail Stores area, the proposed residential uses would not conflict with the applicable CASP land use designation. Thus, in addition to the reasons discussed above, an off-site alternative need not be further discussed in this EIR.

In addition to the two off-site alternatives discussed above, the City and applicant contemplated two additional alternatives: the Building Relocation Alternative, and the Preservation, Renovation, and Addition Alternative. Under the Building Relocation Alternative, two of the three existing buildings proposed to be demolished would be relocated to another location within the City of Davis. Once the buildings are relocated, they would be restored and preserved. While this alternative would preserve each building, finding a suitable parcel inside the City of Davis may not be possible for the project applicant. In addition, the City of Davis Historical Resources Management Ordinance states that inappropriate relocation of a designated historical resources is a demolition. Additionally, the challenges of moving each building, including high costs, could make this alternative prohibitive. Further, given the structural condition of the buildings as reported by the applicant’s hired structural engineer, each building may not be safely and successfully moved intact to a new location. Therefore, the Building Relocation Alternative is dismissed from further analysis.

Under the Preservation, Renovation, and Addition Alternative, all three of the existing buildings would be retained and renovated. Appropriate additions to the buildings, resulting in building enlargement and expansion, would be constructed in order accommodate the objectives of the proposed project. This alternative has been previously discussed by City staff with the project

applicant team. The applicant team indicated that, given the structural engineering report prepared for the three buildings, and the cost associated with renovating and constructing additions to the buildings, this alternative is not a feasible option. The financial hardship claim made by the applicant team is further articulated in the project narrative and the Notice of Preparation comment letter for the project that was submitted by the project applicant (see Appendix A for the comment letter). Therefore, the Preservation, Renovation, and Addition Alternative is dismissed from further analysis.

5.2 ALTERNATIVES CONSIDERED IN THIS EIR

Three alternatives to the proposed project were developed based on City of Davis staff and Historical Resources Management Commission input and the technical analysis performed to identify the environmental effects of the proposed project. The alternatives analyzed in this EIR include the following three alternatives in addition to the proposed Theta Xi Fraternity Redevelopment Project:

- No Project (No Build) Alternative;
- Renovation and Preservation Alternative;
- Preservation, Renovation, and New Build Alternative.

NO PROJECT (NO BUILD) ALTERNATIVE

The CEQA Guidelines (Section 15126.6[e]) require consideration of a No Project Alternative that represents the existing conditions, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved. For purposes of this analysis, the No Project (No Build) Alternative assumes that the project site remains in its existing state and no additional development would occur. The project site is currently developed with three two-story adjacent Theta Xi fraternity houses, totaling 19,800 square feet (sf). From east to west, the fraternity houses include the “TX Main House” located at 515 First Street (3,964 total sf, excluding the basement), the “Bryson House” located at 509 First Street (2,009 total sf, excluding the basement), and the “Jackson House” located at 503 First Street (2,065 total sf, excluding the basement). There is a detached garage in the northwest corner of the project site, and the side yard of the Jackson House is used for off-street parking for approximately seven vehicles. Additionally, a paved recreation/patio area is situated behind the Jackson House and Bryson House.

It is noted that the No Project (No Build) Alternative would fail to meet the project applicant’s objectives.

RENOVATION AND PRESERVATION ALTERNATIVE

Under the Renovation and Preservation Alternative, the three existing buildings would be preserved and undergo modest interior renovations that do not require significant structural changes to the building for Theta Xi Fraternity Use. This alternative would avoid the loss of any or all of the fraternity buildings that would occur under the proposed project as a result of demolition. While this alternative would retain all three buildings in their current exterior

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design, this alternative would not address deficiencies as a result of recommendations made by Pemberton Engineering of Davis, who conducted a structural/engineering study of the buildings in 2017. Additionally, this alternative would not meet the applicant objective relative to current and future needs of the Theta Xi Fraternity in regards to providing a safe, secure, and livable space for its fraternity members.

PRESERVATION, RENOVATION, AND NEW BUILD ALTERNATIVE

Under the Preservation, Renovation, and New Build Alternative, two of the three existing buildings would be preserved and/or renovated, and one would be demolished. The two buildings that would be preserved and/or renovated would include the TX Main House (located at 515 First Street, totaling 3,964 total sf, excluding the basement) and the Bryson House (located at 509 First Street, totaling 2,009 total sf, excluding the basement), while the Jackson House (located at 503 First Street, totaling 2,065 total sf, excluding the basement) and associated garage would be demolished and the site redeveloped.

Similar to the proposed project, under this alternative, the TX Main house would be vacated and placed for sale or lease to a third party on the open market. The Bryson House would be renovated for continued use by the Theta Xi Fraternity for housing and study. The renovation would include structural and safety improvements only and would not change the number of beds or bathrooms. Once the Jackson House and associated garage are demolished, this alternative would redevelop the Jackson House lot with a new three-story residential structure for use by the Theta Xi Fraternity. This new residential structure would include 22 beds and seven bathrooms. The capacity of the overall site would be similar to the proposed project.

Under this alternative, the parking capacity would remain comparable to the existing condition, and outdoor activities would take place in the backyard of the renovated Bryson House. The other proposed amenities and landscaping would be comparable to the proposed project.

It is noted that the Preservation, Renovation, and New Build Alternative would fail to meet most of the project objectives and would partially meet some of the project objectives identified by the City of Davis.

5.3 ENVIRONMENTAL ANALYSIS

The alternatives analysis provides a summary of the relative impact level of significance associated with each alternative for each of the environmental issue areas analyzed in this EIR. Following the analysis of each alternative, Table 5.0-1 summarizes the comparative effects of each alternative.

NO PROJECT (NO BUILD) ALTERNATIVE

Cultural and Tribal Resources

The No Project (No Build) Alternative assumes that the project site remains in its existing state and no additional development or renovation would occur. The No Project (No Build)

Alternative would not result in ground disturbing activities and would reduce the potential to disturb or destroy cultural, tribal, historic, archaeological, and paleontological resources. The No Project (No Build) Alternative would reduce the risk of the unintentionally discovery of such resources. Therefore, impacts to cultural and tribal cultural resources would be reduced under this alternative. The significant and unavoidable impact to historical resources would not occur under this alternative.

Land Use

The No Project (No Build) Alternative would not require a Conditional Use Permit to continue the existing living group use at the site as the fraternity house that is currently located on the project site is a legal nonconforming use, based on a Settlement Agreement and Release of all Claims entered into by and between the City and Theta Xi in 1995. It is noted that, if future changes and/or renovations to the buildings were proposed in the future under this alternative, a Conditional Use Permit may be required. The No Project (No Build) Alternative would also not require Design Review as alterations to the site and/or structures would not occur.

While the proposed project would require Design Review and a Conditional Use Permit, the No Project (No Build) Alternative would maintain this site in its current state with no new construction or housing. Maintenance of the site for fraternity uses would be consistent with the Settlement Agreement and Release of all Claims. While the analysis in Section 3.2 concluded that the proposed project would not result in any significant land use impacts, the No Project (No Build) Alternative would not reduce impacts related to land use, and therefore, would have similar impacts related to land use compared to the proposed project.

RENOVATION AND PRESERVATION ALTERNATIVE

Cultural and Tribal Resources

Under the Renovation and Preservation Alternative, the three existing buildings would be preserved and renovated for Theta Xi Fraternity Use. This alternative would avoid the loss of any or all of the fraternity buildings that would occur under the proposed project as a result of demolition. As such, impacts to historical resources would be reduced compared to the proposed project. Additionally, because major ground disturbance would not be required for this alternative, impacts to human remains, tribal cultural, archaeological, and paleontological resources would be reduced compared to the proposed project. The significant and unavoidable impact to historical resources would not occur under this alternative.

Land Use

Unlike the proposed project, the Renovation and Preservation Alternative would not require a Conditional Use Permit because demolition would not be required. Similarly, this alternative would not require Design Review because new construction would not occur, and the renovations would be internal to the buildings only. This alternative would be required to be consistent with the General Plan, including the goals, policies, and standards and with the

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Zoning Code. Because the analysis in Section 3.2 concluded that the proposed project would not result in any significant land use impacts, the Renovation and Preservation Alternative would not reduce impacts related to land use, and therefore, would have similar impacts related to land use compared to the proposed project.

PRESERVATION, RENOVATION, AND NEW BUILD ALTERNATIVE

Cultural and Tribal Resources

Under this alternative, two of the three existing buildings would be preserved and/or renovated, and one would be demolished. The TX Main House (located at 515 First Street) would be vacated and placed for sale or lease to a third party on the open market, the Bryson House (located at 509 First Street) would be renovated, and the Jackson House (located at 503 First Street) and associated garage would be demolished and the site redeveloped. Because demolition of one of the buildings would be required for this alternative, this alternative would not avoid the loss of one of the fraternity buildings. As such, impacts to historical resources would be similar to the proposed project. Because major ground disturbance would be required for redevelopment of the Jackson House site under this alternative, impacts to human remains, tribal cultural, archaeological, and paleontological resources would be similar to the proposed project. It is worth noting, however, that because two buildings would be preserved and/or renovated (compared to one building preserved under the proposed project), the significant and unavoidable impact to historical resources would be reduced (although not avoided).

Land Use

Similar to the proposed project, the Preservation, Renovation, and New Build Alternative would require a Conditional Use Permit because demolition would be required. Similarly, this alternative would require Design Review because new construction would occur associated with redevelopment of the Jackson House site under this alternative. This alternative would be required to be consistent with the General Plan, including the goals, policies, and standards and with the Zoning Code. Because the analysis in Section 3.2 concluded that the proposed project would not result in any significant land use impacts, the Preservation, Renovation, and New Build Alternative would not reduce impacts related to land use, and therefore, would have similar impacts related to land use compared to the proposed project.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires that an environmentally superior alternative be identified among the alternatives that are analyzed in the EIR. If the No Project (No Build) Alternative is the environmentally superior alternative, an EIR must also identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6(e)(2)). The environmentally superior alternative is that alternative with the least adverse environmental impacts when compared to the proposed project.

A comparative analysis of the proposed project and each of the project alternatives is provided in Table 5.0-1 below. The table includes a numerical scoring system, which assigns a score of “2,” “3,” or “4” to the proposed project and each of the alternatives with respect to how each alternative compares to the proposed project in terms of the severity of the environmental topics addressed in this EIR. A score of “2” indicates that the alternative would have a better (or lessened) impact when compared to the proposed project. A score of “3” indicates that the alternative would have the same (or equal) level of impact when compared to the proposed project. A score of “4” indicates that the alternative would have a worse (or greater) impact when compared to the proposed project. The project alternative with the lowest total score is considered the environmentally superior alternative.

TABLE 5.0-1: COMPARISON OF ALTERNATIVE PROJECT IMPACTS TO THE PROPOSED PROJECT

<i>ENVIRONMENTAL ISSUE</i>	<i>PROPOSED PROJECT</i>	<i>NO PROJECT (NO BUILD) ALTERNATIVE</i>	<i>RENOVATION AND PRESERVATION ALTERNATIVE</i>	<i>PRESERVATION, RENOVATION, AND NEW BUILD ALTERNATIVE</i>
Cultural and Tribal Resources	3 – Same	3 – Same	3 – Same	3 – Same
Land Use	3 – Same	2 – Lesser	2 – Lesser	3 – Same
Summary	6	5	5	6

As shown in Table 5.0-1, the No Project (No Build) Alternative and the Renovation and Preservation Alternative are the environmentally superior alternatives when looked at in terms of all potentially significant environmental impacts. However, the No Project (No Build) Alternative would not achieve the project objectives. The Renovation and Preservation Alternative would result in five points and would reduce impacts similar to the No Project (No Build) Alternative, while the Preservation, Renovation, and New Build Alternative would result in six points. The Renovation and Preservation Alternative would reduce impacts to cultural and tribal cultural resources compared to the project. The Preservation, Renovation, and New Build Alternative would not reduce any impacts compared to the project. Therefore, the Renovation and Preservation Alternative is the next environmentally superior alternative to the proposed project. It is noted that the superior alternative would depend on the City’s local priorities (i.e., preservation of historical resources, etc.), as well as the ability to meet the proposed project’s objectives. Each alternative’s ability to satisfy the project objectives is discussed in the following section.

5.4 COMPARATIVE EVALUATION OF THE PROJECT AND ALTERNATIVES TO SATISFY PROJECT OBJECTIVES

This section examines how each of the alternatives selected for more detailed analysis meets the project objectives.

1. *Address deficiencies in the structural integrity of the three houses used to house the undergraduate members of the Theta Xi Fraternity on First Street in Davis, CA, as identified in the report by Pemberton Engineering, dated July 27, 2016.*

The No Project (No Build) Alternative would not satisfy this project objective because under this alternative, no development would occur and the structural deficiencies would continue. The

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Renovation and Preservation Alternative would also not meet this objective because the renovations would not address the current structural deficiencies, only interior form and functionality. In contrast, the Preservation, Renovation, and New Build Alternative would partially meet this objective because the alternative would address the structural deficiencies at the Jackson House, but would not address the deficiencies at the other two buildings.

- 2. Renovate the subject properties in a way that provides for the needs of University of California, Davis students by ensuring that housing is competitive both in rent and amenities available within the City of Davis, including on-campus housing, in order to ensure the sustainability of the fraternity.*

The No Project (No Build) Alternative would not satisfy this project objective because under this alternative, no development would occur and the buildings would remain unchanged. This alternative would not be competitive in amenities. The Renovation and Preservation Alternative would partially meet this objective because the alternative would renovate the structures, which could increase the competitiveness of the houses by providing additional amenities and updates. However, this alternative would not achieve this objective to the same degree as the proposed project. The Preservation, Renovation, and New Build Alternative would meet this objective by providing structural and safety improvements at the Bryson House and redeveloping the Jackson House site with additional space and amenities. However, this alternative would also not achieve this objective to the same degree as the proposed project.

- 3. Use the value embedded in the three owned lots to assist in funding the renovation project by consolidating the housing needs of the fraternity onto a smaller footprint.*

The No Project (No Build) Alternative would not satisfy this project objective because under this alternative, no building sale or consolidation would occur. The Renovation and Preservation Alternative would also not meet this objective because the alternative would not consolidate the housing needs onto a smaller footprint in order to assist in funding. The Preservation, Renovation, and New Build Alternative would partially meet this objective as redevelopment of the Jackson House lot and renovations to the Bryson House would add value to the two lots in the long-term, and the sale of the TX Main House would assist in funding. However, because this alternative would not consolidate the housing needs onto a smaller footprint, this objective is only partially satisfied.

- 4. Construct the new building with features that will allow it to achieve a high level of energy efficiency and reduce ongoing maintenance costs.*

The No Project (No Build) Alternative would not satisfy this project objective because under this alternative, no development would occur, the energy efficiency would not be increased, and the maintenance costs would not be reduced. The Renovation and Preservation Alternative would partially meet this objective because the renovations would slightly increase the efficiency (i.e., by potentially improving the lighting and appliance efficiency) of the buildings and reduce some of the maintenance costs. However, this alternative would not achieve this objective to the

same degree as the proposed project. The Preservation, Renovation, and New Build Alternative would largely meet this objective because the renovations to the Bryson House would slightly increase the efficiency (i.e., by potentially improving the lighting and appliance efficiency), and would slightly decrease maintenance costs. Additionally, redevelopment of the Jackson House lot would decrease maintenance costs and increase energy efficiency. However, this alternative would not achieve this objective to the same degree as the proposed project.

5. *Continue to use the new facility as classrooms that, through fellowship and alumni guidance, lead to the wholesome mental, moral, physical, and spiritual growth that is the purpose of the Theta Xi Fraternity.*

The No Project (No Build) Alternative would not satisfy this project objective because under this alternative, no new facilities would be provided. The Renovation and Preservation Alternative would also not meet this objective because new facilities with classrooms would not be provided, although the renovated buildings could be used for educational purposes. The Preservation, Renovation, and New Build Alternative would meet this objective because a new facility would be constructed which may have classrooms and/or opportunities for gathering and hosting alumni.

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