

6. ALTERNATIVES ANALYSIS

6.1 INTRODUCTION

The Alternatives Analysis chapter of the Subsequent Environmental Impact Report (SEIR) 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, a 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 Public Resources Code (PRC) 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 (PRC 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:

1. Construct a housing development project within the City of Davis that includes a broad mix of housing types and levels of affordability.
2. Subdivide an underutilized 25-acre infill parcel, putting the property to a higher and better use to help address the housing crisis.
3. Provide new for-sale housing opportunities without the need to expand into City-adjacent agriculture.
4. Increase housing opportunities in Davis for low- and middle-income households.
5. Include at least 20 percent of units as affordable.
6. Help address climate change by increasing opportunities for those currently commuting to and from Davis to reduce travel by living in town in housing that is all-electric and includes solar generation on every residence.
7. Support the Davis Joint Unified School District (DJUSD) by offering a first-time homebuyer program designed to attract young families and put Davis residents into the schools.
8. Provide a location for the construction of a new pentathlon training facility that includes a pool to also be used by local community swim organizations.



9. Create a neighborhood that respects its surroundings and is compatible with the scale of the adjacent community.
10. Construct housing and public amenities at a location where valuable infrastructure already exists including, but not limited to, a roadway intersection, off-grade pedestrian crossing, nearby parks, and an abutting agricultural buffer/greenbelt system.

Impacts Identified in the SEIR

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. The significance levels of impacts identified in the SEIR are presented below.

No New Significant Impacts or Substantial Increase in Severity of Previously Identified Significant Impacts

In cases where an approved project has already undergone environmental review, and the environmental document has been adopted by the lead agency, the current review can be restricted to the incremental effects of the modified project, rather than having to reconsider the overall impacts of the project. The CEQA Guidelines provide guidance in this process by requiring an examination of whether, since the certification of the EIR, changes in the approved project or circumstances under which the approved project would be undertaken have occurred to such an extent that the proposal may result in a new significant impact (not previously identified in the certified EIR) or substantial increase in the severity of a previously identified significant impact. As discussed in each respective chapter of this SEIR, the proposed project would not result in changes in the Wildhorse Ranch Project or circumstances under which the Wildhorse Ranch Project would be undertaken such that a new significant impact or substantial increase in the severity of a previously identified significant impact within the certified Wildhorse Ranch Project EIR (2009 EIR) would occur related to the following topics associated with the resource area indicated. It should be noted that the analysis within this SEIR identifies the mitigation measures set forth within the 2009 EIR that remain applicable to the proposed project, and new or modified mitigation measures related to the following topics would not be required. Minor revisions to Mitigation Measures 4.5-3, 4.7-2(a) and (b), 4.8-2, 4.9-5, and 4.9-3 from the 2009 EIR, and Mitigation Measure VI-2 from the 2007 Initial Study (IS) prepared for the Wildhorse Ranch Project were made only to fix typographical errors or to remove text that does not apply to the currently proposed project.

- **Aesthetics**
 - Have a substantial adverse effect on a scenic vista.
 - Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway.
 - Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.
 - Creation of new sources of light or glare associated with development of the proposed project in combination with future buildout of the City of Davis and present and probable future projects.
- **Air Quality, Greenhouse Gas Emissions, and Energy**
 - Conflict with or obstruct implementation of the applicable air quality plan during project construction.



- Conflict with or obstruct implementation of the applicable air quality plan during project operation.
 - Expose sensitive receptors to substantial pollutant concentrations.
 - Result in other emissions (such as those leading to odor) adversely affecting a substantial number of people.
 - Result in the inefficient or wasteful use of energy.
 - Conflict with a State or local plan for renewable energy or energy efficiency.
 - 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 greenhouse gas (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.
 - Result in a cumulatively considerable inefficient or wasteful use of energy or conflict with a State or local plan for renewable energy or energy efficiency.
- **Biological Resources**
 - Have a substantial adverse effect on any riparian habitat or other Sensitive Natural Community identified in local or regional plans, policies, regulations or by the CDFW or USFWS.
 - Have a substantial adverse effect on State or federally protected wetlands (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.
 - Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
 - Cumulative loss of habitat for special-status species.
- **Noise**
 - Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.
 - Generation of a substantial permanent increase in ambient noise levels associated with cumulative development of the proposed project in combination with future buildout of the City of Davis.
- **Public Services, Utilities, and Service Systems**
 - Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or 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 services.
 - Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or 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 services.

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives for schools.
 - Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable performance objectives for parks or other government services.
 - Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
 - Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.
 - Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.
 - Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.
 - Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.
 - Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.
 - Conflict with federal, State, and local management and reduction statutes and regulations related to solid waste.
 - Development of the proposed project, in combination with future buildout in the City of Davis, would increase demand on fire and police protection services.
 - Development of the proposed project, in combination with future buildout in the City of Davis, would increase demand on utilities and service systems.
- **Transportation**
 - Conflict with a program, plan, ordinance, or policy addressing the circulation system during construction activities.
 - Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit.
 - Result in inadequate emergency access.
 - Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
 - **Other Effects**
 - *Agriculture and Forestry Resources*
 - Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.



- Conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC Section 12220[g]), timberland (as defined by PRC Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g]).
- Result in the loss of forest land or conversion of forest land to non-forest use.
- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.
- *Cultural Resources*
 - Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.
 - Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.
 - Disturb any human remains, including those interred outside of dedicated cemeteries.
- *Geology and Soils*
 - Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
 - ii. Strong seismic ground shaking.
 - iii. Seismic-related ground failure, including liquefaction.
 - iv. Landslides.
 - Result in substantial soil erosion or the loss of topsoil.
 - Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.
 - Be located on expansive soil, as defined in Table 18-1B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.
 - Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.
 - Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- *Hazards and Hazardous Materials*
 - Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
 - Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
 - Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.
 - For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use



- airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area.
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- Expose people or structures, either directly or indirectly, to the risk of loss, injury or death involving wildland fires.
- *Hydrology and Water Quality*
 - Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.
 - Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
 - Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
 - i. Result in substantial erosion or siltation on- or off-site;
 - ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
 - iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
 - iv. Impede or redirect flood flows.
 - In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.
 - Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.
- *Land Use and Planning*
 - Physically divide an established community.
- *Mineral Resources*
 - Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State.
 - Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.
- *Population and Housing*
 - Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through projects in an undeveloped area or extension of major infrastructure).
 - Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

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 any new significant impacts or a substantial increase in severity of previously identified significant impacts related to the resource areas listed above, a comparison of 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 below that have been identified for the proposed project in this SEIR as requiring new or modified mitigation to reduce



the new or more severe significant impacts to less than significant, or have been found to remain significant and unavoidable.

No New Significant Impacts or Substantial Increase in Severity of Previously Identified Significant Impacts with Implementation of New or Modified Mitigation

Environmental impacts (including cumulative impacts) of the proposed project that have been identified as requiring new or modified mitigation measures to ensure that a new significant impact or a substantial increase in severity of a previously identified significant impact, as compared to the 2009 EIR, would not occur, and the level of significance is ultimately less than significant, include the following:

- **Biological Resources.** The SEIR determined that, unlike the conclusions in the 2009 EIR, the proposed project could result in a new significant impact or substantially more severe significant impact related to the project having a substantial adverse effect, either directly or through habitat modifications, on a special-status plant species, monarch butterfly, valley elderberry longhorn beetle (VELB), Crotch's bumble bee, northwestern pond turtle, giant garter snake, tricolored blackbird, burrowing owl, Swainson's hawk, white-tailed kite, nesting birds and raptors protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFGC), roosting bats, and American badger. However, implementation of new Mitigation Measures SEIR 4.3-1, SEIR 4.3-2, SEIR 4.3-3, SEIR 4.3-4, SEIR 4.3-5, SEIR 4.3-6, SEIR 4.3-7, and modified versions of Mitigation Measures 4.6-2, 4.6-5, 4.6-6, 4.6-3, 4.6-4, and 4.6-1(a), (c), and (d) would reduce potential significant impacts associated with special-status plant species and the aforementioned special-status wildlife species to a less-than-significant level by requiring special-status plant surveys, preconstruction surveys, and, if detected, avoidance or relocation of protected species identified in areas that could be affected by project construction.

The 2009 EIR was certified prior to the adoption of the Yolo Habitat Conservation Plan and Natural Community Conservation Plan (Yolo HCP/NCCP). As such, potential impacts to special-status plant and wildlife species that would have resulted from the Wildhorse Ranch Project required direct consultation with U.S. Fish and Wildlife Service (USFWS) and/or the California Department of Fish and Wildlife (CDFW), and impacts were not evaluated for consistency with the Yolo HCP/NCCP. The proposed project is a Covered Activity under the Yolo HCP/NCCP, and therefore, the proposed project would be required to comply with the applicable Yolo HCP/NCCP Avoidance and Minimization Measures (AMMs). Thus, the SEIR determined that, unlike the conclusions in the 2009 EIR, without compliance with the Yolo HCP/NCCP, the proposed project could result in a new significant impact or substantially more severe significant impact related to conflicts with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan

Lastly, the SEIR determined that, unlike the conclusions in the 2009 EIR, the proposed project could result in a new significant impact or substantially more severe significant impact related to conflicts with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan. New Mitigation Measures SEIR 4.3-3, SEIR 4.3-17(a) through (g) would ensure that the proposed project complies



with all applicable AMMs set forth by the Yolo HCP/NCCP, which would reduce potential impacts to a less-than-significant level.

- **Noise.** The SEIR determined that, unlike the conclusion in the 2009 EIR, the pool complex and obstacle course associated with the proposed project could result in the generation of a substantial permanent increase in ambient noise levels in the vicinity of the project due to the public address (PA) system, which could be in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. However, implementation of new Mitigation Measure SEIR 4.4-2, would reduce potential significant impacts associated with pool complex and obstacle course PA system noise to a less-than-significant level by requiring an acoustical noise study with recommendations for reducing PA system noise levels projected to exceed the City's applicable noise standards.
- **Public Services and Utilities.** Similar to the conclusions in the 2009 EIR, the SEIR determined that the proposed project could require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. However, unlike the 2009 EIR, the SEIR concluded the proposed project would require a future design-level water report to further refine the proposed water line sizes throughout the project site in order to meet domestic and fire flow demands. New Mitigation Measure SEIR 4.5-5 would ensure that the potential impact is less than significant by requiring the project applicant to submit the design-level water report in conjunction with improvement plans. The SEIR concluded that the proposed project would not require or result in the relocation or construction of new or expanded stormwater drainage, electric power, natural gas, or telecommunications facilities that would require new or modified mitigation measures beyond what were included in the 2009 EIR in order to prevent significant environmental effects from occurring. In addition, although the SEIR includes modifications to Mitigation Measure 4.9-3 from the 2009 EIR to address the potential impact related to wastewater conveyance infrastructure, such modifications are minor and serve to revise text that does not apply to the currently proposed project.
- **Transportation.** The SEIR determined that, unlike the conclusion in the 2009 EIR, the proposed project could conflict with a program, plan, ordinance, or policy addressing the circulation system, including roadway, bicycle, and pedestrian facilities. However, implementation of Mitigation Measure 4.3-3 from the 2009 EIR, as well as new Mitigation Measures SEIR 4.6-2(a) and (b), would reduce potential significant impacts associated with bicycle and pedestrian facilities to a less-than-significant level by reducing conflicts involving bicyclists or pedestrians.
- **Other Effects: Hazards and Hazardous Materials.** The SEIR determined that, unlike the conclusion in the 2009 EIR, the proposed project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment. However, implementation of Mitigation Measure SEIR 4.7-1 would reduce potential significant impacts associated with on-site treated wood waste (TWW) to a less-than-significant level by requiring all on-site TWW to be removed and disposed of in compliance with California Health and Safety Code Section 25230.



New Significant and Unavoidable Impacts

The SEIR determined that the proposed project would result in a new significant impact or substantial increase in the severity of a previously identified significant impact, as compared to the 2009 EIR, related to the following impacts. Even with implementation of all feasible mitigation measures, as set forth in this SEIR, the impacts would remain significant and unavoidable.

Aesthetics. The SEIR determined that, unlike the 2009 EIR, even with implementation of mitigation, the proposed project would conflict with applicable zoning and other regulations governing scenic quality. As noted above, the proposed project was submitted pursuant to a settlement agreement with the City that provides that the project will be processed without legislative entitlements, including a General Plan amendment or zoning amendment. Because the proposed project was submitted pursuant to Builder's Remedy and without any legislative entitlements, the project is not consistent with the site's General Plan land use designation. As the City cannot disapprove the project on the grounds of inconsistency with the site's zoning or General Plan designation, the inconsistency cannot be fully mitigated. The inconsistency can be partially mitigated by the implementation of new Mitigation Measure SEIR 4.1-2, which would require that the project comply with conditions of approval imposed by the City on the project's Tentative Map in order to ensure visual consistency with adjacent uses to the north, south, and west of the project site. Even with the imposition of new Mitigation Measure SEIR 4.1-2, the development of the project site with the currently proposed uses would be inconsistent with the designation of the site in the General Plan as Agricultural and its PD 3-89 zoning, and the potential impact would remain significant and unavoidable. For similar reasons, the project's incremental contribution to the significant cumulative aesthetic impact would also be cumulatively considerable and significant and unavoidable.

- **Noise.** The SEIR determined that, unlike the 2009 EIR, even with implementation of mitigation, the proposed project could result in a significant and unavoidable impact related to generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The SEIR includes a modified version of Mitigation Measure 4.5-3 from the 2009 EIR, which requires noise-reduction measures to be incorporated within the construction documents. However, certainty that the measures would reduce construction-related noise levels to both a state of compliance with Davis Municipal Code requirements and to levels which do not substantially exceed baseline ambient conditions cannot be determined, and the impact is conservatively concluded to remain significant and unavoidable.
- **Transportation.** The SEIR determined that, unlike the 2009 EIR, even with implementation of mitigation, the proposed project would result in a significant and unavoidable impact related to conflicts or inconsistencies with CEQA Guidelines Section 15064.3, subdivision (b). The SEIR includes a new mitigation measure, Mitigation Measure SEIR 4.6-4, which requires implementation of transportation demand management (TDM) strategies to reduce per capita residential vehicle miles travelled (VMT). However, even with implementation of the new mitigation measure, the project's VMT per capita would exceed the applicable thresholds of significance. Therefore, impacts would remain significant and unavoidable.



- **Other Effects: Agriculture and Forestry Resources.** The SEIR determined that, unlike the 2009 EIR, the proposed project would result in a significant and unavoidable impact related to conflicts with existing zoning for agricultural use. Because the proposed project was submitted pursuant to Builder's Remedy and without any legislative entitlements, the project is not consistent with the site's General Plan land use designation (Agriculture) or the PD 3-89 zoning district. As such, the currently proposed project would result in a new potentially significant impact related to conflicting with existing zoning for agricultural use beyond what was previously identified in the 2009 EIR. The SEIR includes a modified version of Mitigation Measures 4.1-3 and 4.1-4(a) from the 2009 EIR, which require mitigation of agricultural land and a deed restriction disclosure to prospective buyers about adjacent agricultural activities consistent with the City's Farmland Preservation Ordinance and Right-to-Farm Ordinance, respectively. However, feasible mitigation does not exist to reduce the foregoing potentially significant impact to a less-than-significant level. Because the proposed project was submitted pursuant to Builder's Remedy and without any legislative entitlements, the proposed project would be inconsistent with the City's zoning and General Plan land use designations for the site. Due to the limitations placed on the City by State law, mitigation to ensure the project's consistency with the site's zoning is infeasible. Therefore, the impact is significant and unavoidable.
- **Other Effects: Land Use and Planning.** The SEIR determined that, unlike the 2009 EIR, the proposed project would result in a significant and unavoidable impact related to conflicts with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As discussed above, because the proposed project was submitted pursuant to Builder's Remedy and without any legislative entitlements, the project is not consistent with the site's General Plan land use designation (Agriculture) or the PD 3-89 zoning district. As such, the proposed project could cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Feasible mitigation does not exist to reduce the foregoing potentially significant impact to a less-than-significant level. As the applicant is submitting the project without legislative entitlements and invoking Builder's Remedy, bringing the project into consistency with the zoning of the site is infeasible. Therefore, the impact is significant and unavoidable.

6.3 SELECTION OF ALTERNATIVES

The requirement that an EIR evaluate alternatives to the proposed project or alternatives to the location of the proposed project is a broad one; the primary intent of the alternatives analysis is to disclose other ways that the objectives of the project could be attained, while reducing the magnitude of, or avoiding, one or more of the significant environmental impacts of the proposed project. Alternatives that are included and evaluated in the EIR must be feasible alternatives. However, the CEQA Guidelines require the EIR to "set forth only those alternatives necessary to permit a reasoned choice." As stated in Section 15126.6(a), an EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. The CEQA Guidelines provide a definition for "a range of reasonable alternatives" and, thus, limit the number and type of alternatives that may need to be evaluated in a given EIR. According to the CEQA Guidelines Section 15126.6(f):

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.

First and foremost, alternatives in an EIR must be feasible. 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.

Finally, 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.”

Alternatives Considered But Dismissed From Further Analysis

Consistent with CEQA, primary consideration was given to alternatives that could reduce significant project 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:

- (i) failure to meet most of the basic project objectives,
- (ii) infeasibility, or
- (iii) inability to avoid significant environmental impacts.

Regarding item (ii), 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). None of these factors establish a fixed limit on the scope of reasonable alternatives.

The off-site alternative was considered but dismissed from detailed analysis in this SEIR. The reason(s) for dismissal, within the context of the three above-outlined permissible reasons, are provided below.

Off-Site Alternative

An Off-Site Alternative would involve construction of the proposed project on an alternative site. However, the project site is located within an area that has been previously approved by the Davis City Council for 191 residential units as part of the Wildhorse Ranch Project, which was subject to prior environmental review but did not proceed after failing to gain approval by Davis voters. Therefore, it is reasonable to conclude that the project site is generally a suitable location for the proposed project. In addition, as noted previously, the purpose of an alternatives analysis is to develop alternatives to the proposed project that avoid or substantially lessen at least one of the significant environmental effects identified as a result of the project, while still meeting most, if not all, of the basic project objectives. While there are other sites where the project could be accommodated, such as the Signature Site, located inside the Mace Curve, these sites would not be anticipated to avoid or substantially lessen the proposed project’s significant impacts. The Signature Site is also designated Agriculture and unlike the Palomino Place project site, is located outside of the City limits.



CEQA Guidelines Section 15126.6(b) provides that only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the SEIR. The significant and unavoidable impact related to noise is associated with construction, which would still be expected to occur under an Off-Site Alternative that is located adjacent to existing residences. The significant and unavoidable impact related to transportation identified for the proposed project in this SEIR is related to VMT. An Off-Site Alternative would have the same type and intensity of uses as the proposed project. Given that commute characteristics and access to public transit services at any off-site location within the City would likely be similar to the project vicinity, development of an Off-Site Alternative would be expected to result in similar, if not greater, VMT per capita as compared to the proposed project. Thus, an Off-Site Alternative would not avoid the significant and unavoidable impacts identified by this SEIR related to noise and transportation.

Development of the proposed project at an off-site location would not be capable of meeting Objective #2, to subdivide an underutilized 25-acre infill parcel, putting the property to a higher and better use to help address the housing crisis; or Objective #3, to provide new for-sale housing opportunities without the need to expand into City-adjacent agriculture. Therefore, a feasible off-site location that would meet all of the project objectives does not exist.

Finally, the project applicant does not own or control an alternative location that would be adequate to construct the proposed project. The project site is located in an area served by existing regional infrastructure and arterial roadways, and is located adjacent to existing urban development in the City of Davis. Overall, a feasible off-site location that would meet the requirements of CEQA, as well as meet the basic objectives of the proposed project, does not exist. Therefore, an Off-Site Alternative was dismissed from detailed analysis within this SEIR.

Alternatives Considered in this EIR

The following alternatives are considered and evaluated in this section:

- No Project (No Build) Alternative;
- Increased Density Alternative;
- Reduced Density Alternative; and
- No Pentathlon Facility 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. As discussed above, reasonable alternatives to the project must be capable of avoiding or substantially lessening a new significant impact or substantial increase in severity of a significant impact, as identified by this SEIR. Therefore, this chapter focuses on the resource areas and specific impacts listed above that have been identified in this SEIR for the proposed project as requiring new or modified mitigation to reduce significant impacts to less than significant, or have been found to remain significant and unavoidable. 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. When comparing the potential impacts resulting from implementation of the foregoing alternatives, 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. Similarly, use of the term “greater” does not necessarily imply that an alternative would require additional mitigation beyond what has been required for the proposed project. To the extent possible, this analysis will distinguish between the two implications of the comparative words “fewer” and “greater”.

Please see Table 6-2 for a comparison of the environmental impacts resulting from the considered alternatives and the proposed project.

No Project (No Build) 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 (No Build) Alternative, which assumes that the current conditions of the project site would remain, and the site would not be developed. As described in this SEIR, the majority of the project site is undeveloped and consists of ruderal grasses that were previously used as pasture/grazing land. Within the central portion of the project site, the site includes a ranch home, two duplexes, a horse barn, and an equestrian training facility that is not currently in use. A paved driveway extends into the site from East Covell Boulevard and bisects the majority of the site in a north-to-south direction. Trees are located adjacent to the driveway, on-site structures, and project site boundaries. The No Project (No Build) Alternative would not meet any of the project objectives.



Aesthetics

The No Project (No Build) Alternative would result in the continuation of the existing conditions of the project site. As such, the Alternative would remain consistent with the project site's current land use and zoning designations. Therefore, the Alternative would not conflict with applicable zoning and other regulations governing scenic quality. As such, new Mitigation Measure SEIR 4.1-2 required for the proposed project would not be required under the Alternative, and significant impacts identified for the proposed project related to aesthetics would not occur under the No Project (No Build) Alternative.

Biological Resources

Under the No Project (No Build) Alternative, construction activities, including ground disturbance, would not occur on the project site. As such, the Alternative would not have the potential to impact special-status plants, monarch butterfly, VELB, Crotch's bumble bee, northwestern pond turtle, giant garter snake, tricolored blackbird, burrowing owl, Swainson's hawk, white-tailed kite, roosting bats, American badger, and migratory nesting birds and raptors. In addition, the No Project (No Build) Alternative would not result in a substantial adverse effect on riparian habitat, other Sensitive Natural Communities, or federally or State-protected aquatic resources. The Alternative would not include removal of trees and, thus, would not conflict with local policies and/or ordinances that protect biological resources, such as a tree preservation policy or ordinance. The Alternative would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan. Furthermore, the Alternative would not result in the cumulative loss of habitat for special-status species. As such, none of the new or modified mitigation measures related to biological resources required for the proposed project would be required under the Alternative. Overall, the impacts identified for the proposed project related to biological resources would not occur under the No Project (No Build) Alternative.

Noise

The No Project (No Build) Alternative would result in the continuation of the existing conditions of the project site. Because the No Project (No Build) Alternative would not involve development of the pool complex or obstacle course, the Alternative would not result in the generation of a substantial permanent increase in ambient noise levels, and new Mitigation Measure SEIR 4.4-2 would not be required. Additionally, the Alternative would not introduce any new development on-site and construction would not occur, new temporary noise sources would not be generated on-site. Therefore, the modified version of Mitigation Measure 4.5-3, which requires noise-reduction measures to be incorporated within the construction documents, would not be required under the Alternative, and impacts related to noise would not occur under the No Project (No Build) Alternative.

Public Services and Utilities

The No Project (No Build) Alternative would not involve any development of the project site, and would therefore not result in any additional water demand. Thus, the No Project (No Build) Alternative would not require a future design-level water report to further refine the proposed water line sizes throughout the project site in order to meet domestic and fire flow demands, and new Mitigation Measure SEIR 4.5-5 would not be required. Overall, the impacts identified for the proposed project related to public services and utilities would not occur under the No Project (No Build) Alternative.



Transportation

Because the No Project (No Build) Alternative would not involve any development of the project site, construction and operational activities would not occur under the Alternative. Thus, the No Project (No Build) Alternative would not conflict with a program, plan, ordinance or policy addressing the circulation system, including roadway, bicycle, and pedestrian facilities, and new Mitigation Measures SEIR 4.6-2(a) and (b), related to development of a bikeway facility and modification of the East Covell Boulevard/Monarch Lane intersection, would not be required. Similarly, the Alternative would not have the potential to increase vehicle trips and, thus, would not contribute to an increase in VMT, and new Mitigation Measure SEIR 4.6-4 would not be required. Overall, the impacts identified for the proposed project related to transportation would not occur under the No Project (No Build) Alternative.

Other Effects: Hazards and Hazardous Materials

Under the No Project (No Build) Alternative, construction activities, including ground disturbance, would not occur on the project site. However, on-site TWW would be left in its current state and location, and therefore, a risk of creating a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions would remain. New Mitigation Measure SEIR 4.7-1, which requires all on-site TWW to be removed and disposed of in compliance with Health and Safety Code Section 25230, would not be implemented under the Alternative, and impacts related to hazards and hazardous materials would be greater under the No Project (No Build) Alternative.

Other Effects: Agriculture and Forestry Resources

The No Project (No Build) Alternative would result in the continuation of the existing conditions of the project site. As such, the Alternative would remain consistent with the project site's current land use and zoning designations related to agriculture. Therefore, the Alternative would not have the potential to conflict with zoning for agricultural use. As such, the significant and unavoidable impact identified for the proposed project related to agricultural resources would not occur under the No Project (No Build) Alternative.

Other Effects: Land Use and Planning

The No Project (No Build) Alternative would result in the continuation of the existing conditions of the project site. As such, the Alternative would remain consistent with the project site's current land use and zoning designation. Therefore, the Alternative would not conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As such, the significant and unavoidable impact identified for the proposed project related to land use and planning would not occur under the No Project (No Build) Alternative.

Increased Density Alternative

Under the Increased Density Alternative, a total of 260 residential units would be developed on the project site. The 260-unit count was selected for the Alternative in order to reduce per capita VMT below both City and regional average VMT thresholds. The 260 total residential units would be comprised of 50 single-family residences, 158 townhomes, and 52 affordable multi-family units, as compared to the currently proposed 175 units, which include 19 cottage units, 29 half-plex townhomes, 82 single-family residences, and up to 45 multi-family apartments. The 52 affordable multi-family units would be located in the southern portion of the project site to provide ease of access to East Covell Boulevard. The 158 medium-high-density townhomes would be located primarily in the western portion of the project site to allow for more efficient lotting patterns.



The Alternative would also include a Multi-Modal Transit Center in the southwestern corner of the project site along East Covell Boulevard (see Figure 6-1).

The proposed development area of the project site would not change under the Increased Density Alternative, and all other site improvements required under the proposed project would still be developed under the Increased Density Alternative, including an internal roadway network and on- and off-site utility improvements. The Increased Density Alternative would involve the same type and amount of recreational uses, as the USA Pentathlon Training Facility, pool complex, and obstacle course would still be developed under the Alternative. The Alternative would include similar open space area as compared to the currently proposed project, including a 1.09-acre open space area north of the USA Pentathlon Training Facility, and the 0.85-acre, 20-foot-wide tree easement along the western boundary of the project site.

The tree easement open space area would be maintained by the Homeowners Association (HOA) associated with the proposed project.

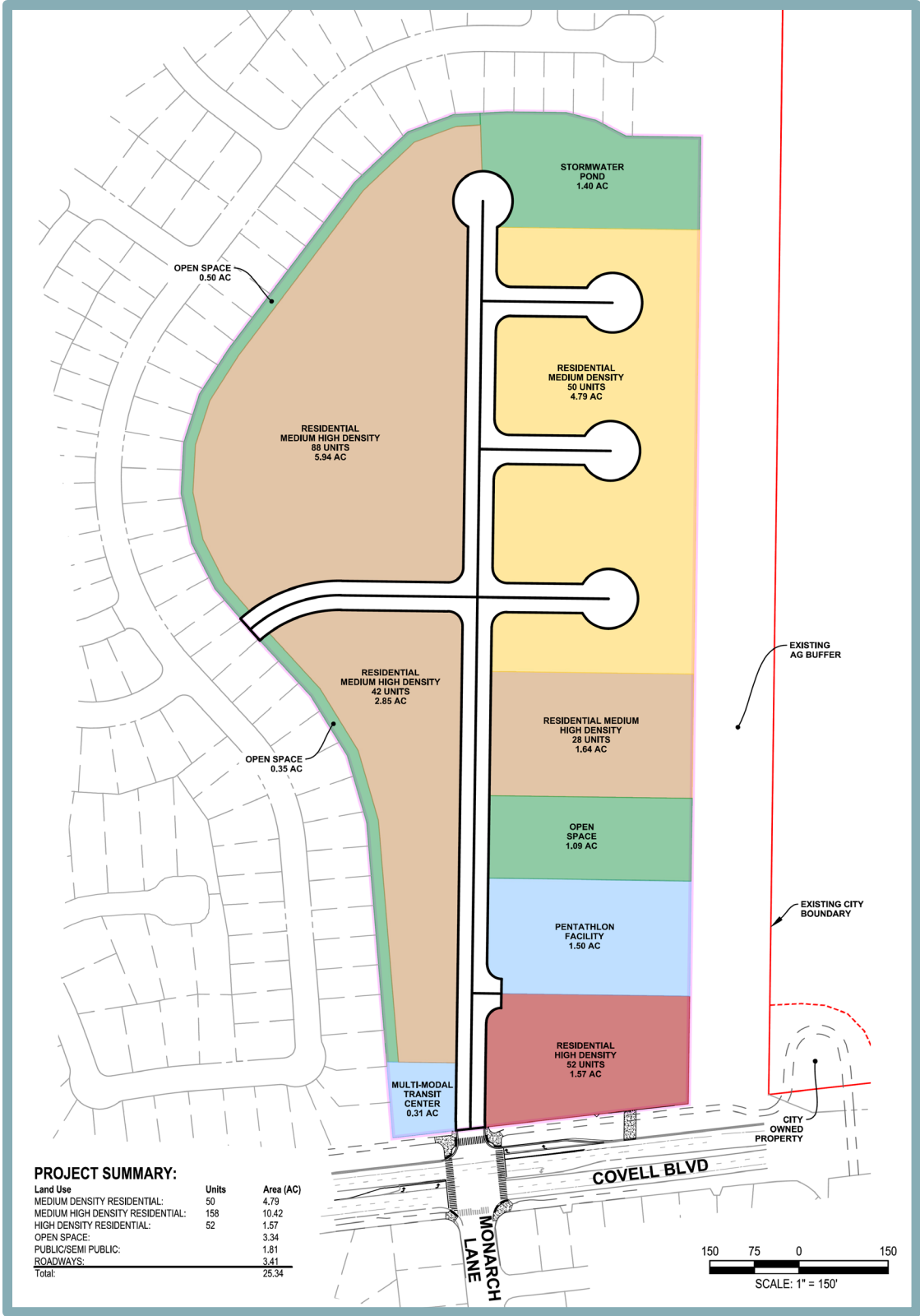
Similar to the proposed project, the Increased Density Alternative would invoke Builder's Remedy, which is a provision of California's Housing Accountability Act that prevents jurisdictions without a substantially compliant housing element from denying eligible housing projects on the basis of inconsistency with the jurisdiction's general plan or zoning ordinance. Therefore, similar to the proposed project, the Increased Density Alternative would not include a General Plan Amendment or Rezone. The Alternative would still require the approval of a Vesting Tentative Subdivision Map, Site Plan and Architectural Review for the Pentathlon Facility, and Affordable Housing Plan. Furthermore, because the Increased Density Alternative would generally result in similar development as the proposed project, nine of the ten project objectives would be met by the Alternative. The Alternative would not meet Objective #9, to create a neighborhood that respects its surroundings and is compatible with the scale of the adjacent community, because the Alternative would result in greater inconsistencies with the General Plan.

Aesthetics

Similar to the proposed project, the Increased Density Alternative would include development of residential and recreational uses and would be submitted pursuant to Builder's Remedy. Therefore, the Alternative would still be inconsistent with the project site's General Plan land use designation as Agricultural and the Planned Development (PD) 3-89 zoning district. Under Builder's Remedy, the City cannot deny the project based on inconsistency with the General Plan or zoning code. Therefore, the inconsistency cannot be fully mitigated. The Alternative would still be subject to new Mitigation Measure SEIR 4.1-2, which would require that the project comply with conditions of approval imposed by the City on the project's Tentative Map in order to ensure visual consistency with adjacent uses to the north, south, and west of the project site. Similar to the proposed project, the development of the project site with the proposed uses under the Increased Density Alternative would be inconsistent with the designation of the site in the General Plan as Agricultural and its PD 3-89 zoning, resulting in a significant and unavoidable impact. Overall impacts to aesthetics would be greater under the Increased Density Alternative given the increased intensity of development and greater inconsistency with the General Plan designation and zoning regulations, as compared to the proposed project.



**Figure 6-1
 Increased Density Alternative Site Plan**



Biological Resources

Similar to the proposed project, the Increased Density Alternative would include ground-disturbing activities on the project site and along the off-site sewer line alignment, and would have the same development footprint as the proposed project. Thus, the Alternative would have similar potential to impact special-status plants, monarch butterfly, VELB, Crotch's bumble bee, northwestern pond turtle, giant garter snake, tricolored blackbird, burrowing owl, Swainson's hawk, white-tailed kite, roosting bats, American badger, and migratory nesting birds and raptors. In addition, the Alternative could result in a substantial adverse effect on riparian habitat, other Sensitive Natural Communities, or federally or State-protected wetlands through direct removal, filling, hydrological interruption, or other means. As such, new Mitigation Measures SEIR 4.3-1 through SEIR 4.3-6 and modified versions of Mitigation Measures 4.6-1 through 4.6-5 from the 2009 EIR, which require species-specific preconstruction surveys, additional protective measures for identified species, and compliance with the Yolo HCP/NCCP, would still be required under the Alternative. Similarly, new Mitigation Measures SEIR 4.3-17(a) through (g), which require the project applicant to comply with general AMMs established by the Yolo HCP/NCCP, would still be required under the Alternative. Therefore, overall impacts to biological resources would be similar under the Increased Density Alternative as compared to the proposed project.

Noise

Similar to the proposed project, the Increased Density Alternative would include noise-generating construction activities on the project site. Thus, the Alternative would have the potential to result in a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. The modified version of Mitigation Measure 4.5-3 from the 2009 EIR, which requires noise-reduction measures to be incorporated within the construction documents, would still be required under the Alternative. Like the proposed project, the Increased Density Alternative could be constructed at once and would not have to be phased, but it should be noted that due to the construction of additional residential units as compared to the proposed project, construction noise levels may occur over a longer period of time. Despite this, construction noise levels would not be anticipated to further exceed thresholds of significance as compared to the proposed project. Therefore, overall impacts related to construction noise would be similar under the Increased Density Alternative, and the significant and unavoidable impact associated with increased noise levels generated during project construction would remain.

Public Services and Utilities

The Increased Density Alternative would involve similar uses as the proposed project, and would occur within the same development footprint. Thus, the Alternative would still require a future design-level water report to further refine the proposed water line sizes throughout the project site in order to meet domestic and fire flow demands, and Mitigation Measure 4.5-5 would still be required. However, the Increased Density Alternative is not anticipated to exceed thresholds of significance as compared to the proposed project. Overall impacts related to public services and utilities would be similar under the Increased Density Alternative as compared to the proposed project.

Transportation

The Increased Density Alternative would involve similar uses at a greater density as compared to the proposed project, and would occur within the same development footprint. Like the proposed project, the Alternative would create new bicycle and pedestrian desire lines (defined as the preferred path of travel between two points) and generate new demand for bicycle and pedestrian



travel within the project site and between the project site and other local neighborhoods and activity centers. The lack of a contiguous bikeway facility between East Covell Boulevard and on-site pentathlon and multi-family uses under the Alternative, as well as the lack of existing or proposed bicycle and pedestrian crossings of East Covell Boulevard at Monarch Lane could result in adverse effects on bicycle and pedestrian travel and safety. Thus, the Alternative would be inconsistent with City plans and policies that promote bicycle and pedestrian travel, including City of Davis General Plan Goals #1, #2, #3, and #4, Policies TRANS 1.6, 2.1, 2.2, 2.5, and 4.3, and the City of Davis Beyond Platinum Bicycle Action Plan. Because the Increased Density Alternative would include 85 more units than the proposed project, the potential for vehicle and bicycle conflicts would be greater as compared to the proposed project. In order to address this, Mitigation Measure SEIR 4.6-2(a), which requires the applicant to construct a contiguous bikeway facility with dedicated physical space for bicyclists between East Covell Boulevard and the project's non-residential uses, would still be required and could be enhanced to ensure a connection to the multi-family parcel with sufficient physical space to accommodate the additional bicyclists generated under the Alternative. Similarly, new Mitigation Measure SEIR 4.6-2(b), which requires the applicant to modify the East Covell Boulevard/Monarch Lane intersection, would be required to ensure that the Alternative does not conflict with a program, plan, ordinance, or policy addressing the circulation system, including roadway, bicycle, and pedestrian facilities.

While the Increased Density Alternative would include the same recreational uses as the proposed project, the Alternative would incorporate additional residential units at an increased density, which is a California Air Pollution Control Officers Association (CAPCOA) VMT-reduction strategy and, thus, would result in a reduction in VMT as compared to the proposed project. As discussed in Chapter 4.6, Transportation, of this SEIR, the threshold of significance for the residential component of the proposed project is residential VMT per capita 15 percent below the baseline City and/or regional average VMT per capita for residential uses. According to Fehr & Peers, 260 residential units is required in order to reduce per capita VMT to at least 15 percent below both the City of Davis and Sacramento Area Council of Governments (SACOG) region existing average per capita VMT. The Alternative would result in a per capita VMT of 17.9, which is approximately 17.5 percent less than the existing SACOG regional per capita VMT of 21.7 and approximately 31.6 percent less than the existing City of Davis per capita VMT of 30.1. Thus, the Alternative would not result in a residential VMT per resident that would exceed the applicable threshold, and new Mitigation Measure SEIR 4.6-4 would not be required under the Alternative. Overall, impacts related to transportation under the Increased Density Alternative would be fewer than the proposed project and the significant and unavoidable impact associated with project-generated VMT would be avoided.

Other Effects: Hazards and Hazardous Materials

Similar to the proposed project, the Increased Density Alternative would include ground-disturbing activities and new development on the project site and installation of the off-site sewer line extension. The on-site stockpiled railroad ties located within the western portion of the project site are subject to TWW regulations, requiring proper management, storage, off-site disposal, and/or permitted on-site re-use. Thus, without proper handling of the on-site TWW, the Alternative would have the potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment. New Mitigation Measure SEIR 4.7-1, which requires all on-site TWW to be removed and disposed of in compliance with California Health and Safety Code Section 25230, would still be required under the Alternative. Therefore, overall impacts related to



hazards and hazardous materials would be similar under the Increased Density Alternative as compared to the proposed project.

Other Effects: Agriculture and Forestry Resources

The Increased Density Alternative would include development of similar uses as the proposed project and would be submitted pursuant to Builder's Remedy. Therefore, similar to the proposed project, the Increased Density Alternative would be inconsistent with the site's General Plan land use designation (Agriculture) and the PD 3-89 zoning district. As such, the Alternative would result in conflicts with existing zoning for agricultural use. Modified Mitigation Measures 4.1-3 and 4.1-4(a) from the 2009 EIR, which require agricultural land mitigation and a right-to-farm disclosure consistent with the City's ordinances, would still be required under the Alternative. However, because the City cannot disapprove the project based on inconsistency with zoning or General Plan, mitigation to require a Rezone or General Plan Amendment is infeasible. Therefore, similar to the proposed project, feasible mitigation does not exist and the impact of the Alternative with respect to agricultural resources would remain significant and unavoidable. Overall impacts related to agricultural resources would be similar under the Increased Density Alternative as compared to the proposed project.

Other Effects: Land Use and Planning

The Increased Density Alternative would include development of similar uses as the proposed project and would be submitted pursuant to Builder's Remedy, but under the Alternative, the intensity of uses would be greater and the resultant conflicts with adopted plans and policies (e.g., related to transportation safety) could be greater. Similar to the proposed project, the Increased Density Alternative would be inconsistent with the site's General Plan land use designation (Agriculture) and the PD 3-89 zoning district. As such, the Alternative would conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Because the City cannot disapprove the project based on inconsistency with the General Plan or zoning under Builder's Remedy, bringing the project into consistency with the zoning of the site is infeasible. Therefore, similar to the proposed project, feasible mitigation does not exist and the impact would remain significant and unavoidable. Overall impacts related to land use and planning would be greater under the Increased Density Alternative as compared to the proposed project.

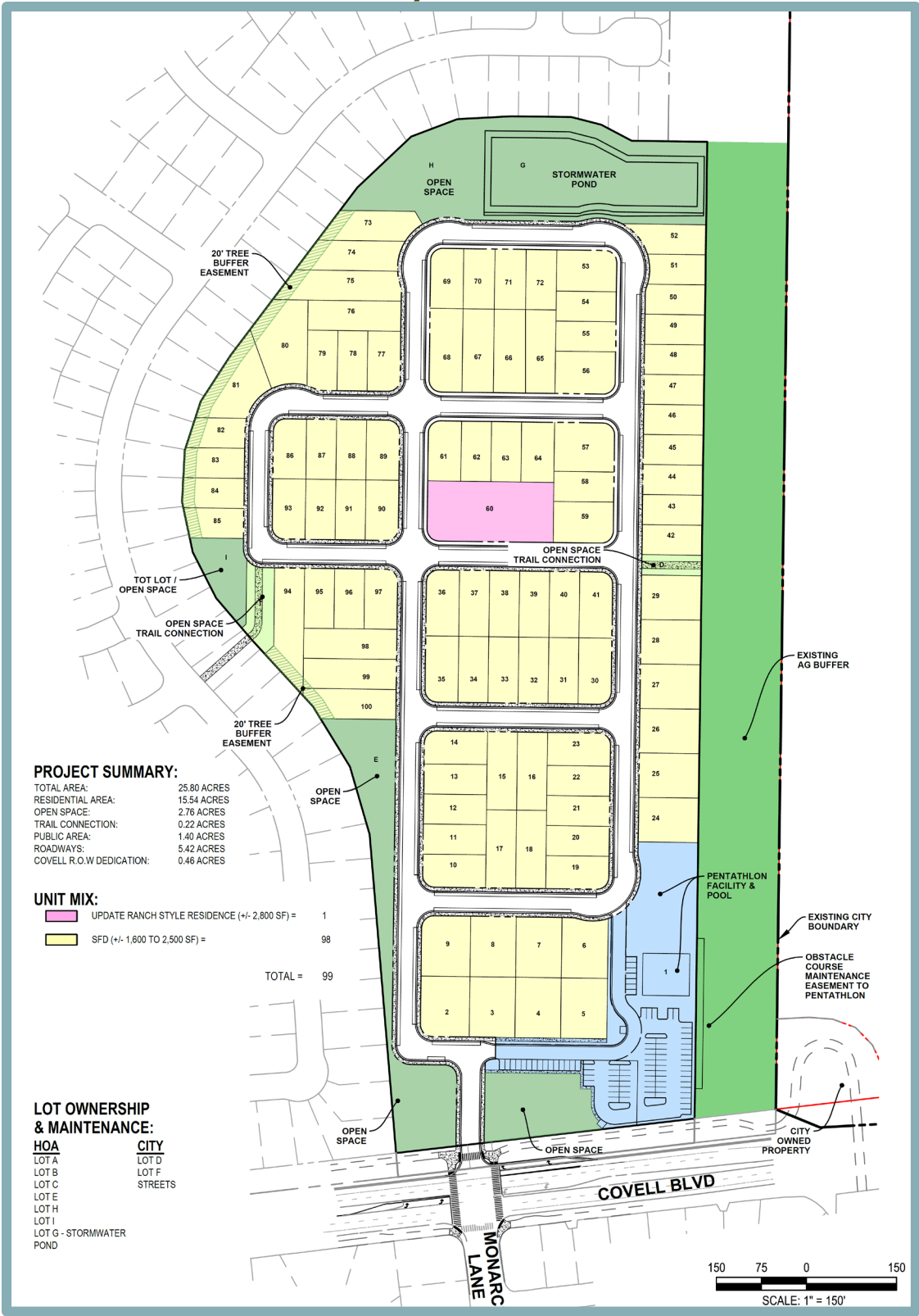
Reduced Density Alternative

The Reduced Density Alternative would include the development of 98 single-family detached residential units, ranging from 1,600 to 2,500 square feet (sf), in addition to the single existing ranch home, for a total residential area of 15.54 acres (see Figure 6-2). A total of 98 residential units was selected for the Alternative in order to result in a density of four to five dwelling units per acre (du/ac), similar to the density of the adjacent Wildhorse neighborhood. The Alternative would not include the development of any multi-family residential units.

The proposed development area of the project site would not change under the Reduced Density Alternative, and the Alternative would still include the USA Pentathlon Training Facility, pool complex, and obstacle course. All other site improvements required under the proposed project would still be developed under the Alternative, including an internal roadway network and on-site and off-site utility improvements. The Reduced Density Alternative would also include the same type and amount of open space areas as the proposed project. Similar to the proposed project, the 20-foot tree buffer in the northwestern portion of the project site would remain as part of the Alternative.



**Figure 6-2
 Reduced Density Alternative Site Plan**



Similar to the proposed project, the Reduced Density Alternative would invoke Builder's Remedy. Therefore, the Reduced Density Alternative would not submit an application for a General Plan Amendment or Rezone. Additionally, in order to comply with Builder's Remedy affordable housing requirements, the Alternative would still be required to include 20 percent of the single-family units as deed restricted, affordable units. Thus, the Alternative would still require approval of an Affordable Housing Plan. The Alternative would also still require the approval of a Vesting Tentative Subdivision Map and Site Plan and Architectural Review for the USA Pentathlon Facility.

Because the Alternative would include the development of only single-family residences, Objective #1, to construct a housing development project within the City of Davis that includes a broad mix of housing types and levels of affordability, would not be met. Objective #2 and Objective #6 would be partially met; however, developing the project site with low-density residential uses would not maximize the potential of the project site in helping to address the housing crisis or climate change. The remaining project objectives would be met by the Reduced Density Alternative. Arguably, the Alternative would better meet Objective #9 by creating a neighborhood that respects its surroundings and is compatible with the scale of the adjacent community, which is currently comprised primarily of single-family homes.

Aesthetics

Similar to the proposed project, the Reduced Density Alternative would include development of residential and recreational uses and would be submitted pursuant to Builder's Remedy. Therefore, the Alternative would still be inconsistent with the project site's General Plan land use designation as Agricultural and the PD 3-89 zoning district. As is the case with the proposed project, the Alternative would not submit for legislative entitlements, such as a General Plan Amendment or Rezone. Therefore, the inconsistency with the site's General Plan land use designation and zoning cannot be fully mitigated.

The Alternative would still be subject to new Mitigation Measure SEIR 4.1-2, which would require that the project comply with conditions of approval imposed by the City on the project's Tentative Map in order to ensure visual consistency with adjacent uses to the north, south, and west of the project site. Similar to the proposed project, the development of the project site with the proposed uses under the Reduced Density Alternative would be inconsistent with the designation of the site in the General Plan as Agricultural and its PD 3-89 zoning, resulting in a significant and unavoidable impact. Notwithstanding, the Reduced Density Alternative would reduce aesthetic effects by eliminating the three- to four-story multi-family apartment building located adjacent to the north of East Covell Boulevard.

Overall impacts to aesthetics would be similar under the Reduced Density Alternative as compared to the proposed project.

Biological Resources

Similar to the proposed project, the Reduced Density Alternative would include ground-disturbing activities on the project site and along the off-site sewer line alignment, and would have the same development footprint as the proposed project. Thus, the Alternative would have a similar level of potential to impact special-status plants, monarch butterfly, VELB, northwestern pond turtle, giant garter snake, tricolored blackbird, burrowing owl, Swainson's hawk, white-tailed kite, roosting bats, American badger, and migratory nesting birds and raptors. In addition, the Alternative could



result in a substantial adverse effect on riparian habitat, other Sensitive Natural Communities, or federally or State-protected wetlands.

As such, new Mitigation Measures SEIR 4.3-1 through SEIR 4.3-6, and modified versions of Mitigation Measures 4.6-1 through 4.6-5 from the 2009 EIR, which require species-specific preconstruction surveys, additional protective measures for identified species, and compliance with the Yolo HCP/NCCP, would still be required under the Alternative. Similarly, new Mitigation Measures SEIR 4.3-17(a) through (g), which require the project applicant to comply with general AMMs established by the Yolo HCP/NCCP, would still be required under the Alternative. Therefore, overall impacts to biological resources would be similar under the Reduced Density Alternative as compared to the proposed project.

Noise

Similar to the proposed project, the Reduced Density Alternative would include noise-generating construction activities on the project site. Thus, the Alternative would have the potential to result in a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of applicable standards. The modified version of Mitigation Measure 4.5-3 from the 2009 EIR, which requires noise-reduction measures to be incorporated within the construction documents, would still be required under the Alternative. Due to the reduction in residential units, the duration of increased noise levels due to project construction would be reduced. Therefore, overall impacts related to noise would be fewer under the Reduced Density Alternative as compared to the proposed project. Nonetheless, the significant and unavoidable impact associated with increased noise levels generated during project construction would remain.

Public Services and Utilities

The Reduced Density Alternative would involve similar uses as the proposed project, and would occur within the same development footprint. Thus, the Alternative would still require a future design-level water report to further refine the proposed water line sizes throughout the project site in order to meet domestic and fire flow demands, and Mitigation Measure 4.5-5 would still be required. Overall, the impacts identified for the proposed project related to public services and utilities would be similar under the Reduced Density Alternative.

Transportation

The Reduced Density Alternative would involve similar uses as the proposed project and would occur within the same development footprint. Considering the similar land uses to the proposed project and location within the City of Davis, the Alternative would generate new demand for bicycle and pedestrian travel within the project site and between the project site and other local neighborhoods and activity centers. Because the Alternative would result in substantially fewer residential units than the proposed project, new demand for bicycle and pedestrian facilities would be lower relative to the demand anticipated to be generated by the proposed project, and the potential for vehicle and bicycle conflicts would be reduced as compared to the proposed project. Nonetheless, new Mitigation Measure SEIR 4.6-2(a), which requires the applicant to construct a contiguous bikeway facility with dedicated physical space for bicyclists between East Covell Boulevard and the project's non-residential uses, would still be required. Similarly, new Mitigation Measure SEIR 4.6-2(b), which requires the applicant to modify the East Covell Boulevard/Monarch Lane intersection, would be required to ensure that the Alternative does not conflict with a program, plan, ordinance, or policy addressing the circulation system, including roadway, bicycle, and pedestrian facilities.



While the Alternative would include the same recreational uses as the proposed project, the Reduced Density Alternative would include development of 98 single-family residential units. As previously discussed, increasing residential density is a CAPCOA VMT-reduction strategy. Thus, the reduction in residential density under the Alternative to four to five du/ac would result in an increase in VMT from what would be generated by the proposed project. Because the Alternative would still result in a per capita residential VMT that would exceed the applicable threshold of 15 percent below the baseline City and/or regional average VMT per capita for residential uses, new Mitigation Measure SEIR 4.6-4 would still be required under the Alternative. Mitigation Measure SEIR 4.6-4 requires the implementation of TDM strategies to reduce the number of vehicle trips that would be generated by the project residential component, which would reduce per capita VMT. However, the TDM strategies would not be sufficient to reduce the project's VMT per capita below the applicable City threshold. Therefore, the significant and unavoidable impact related to transportation would still occur under the Alternative. Additionally, because the Reduced Density Alternative would result in an increase in VMT as compared to the proposed project, impacts related to transportation under the Reduced Density Alternative would be greater than the proposed project.

Other Effects: Hazards and Hazardous Materials

Similar to the proposed project, the Reduced Density Alternative would include ground-disturbing activities and new development on the project site and installation of the off-site sewer line extension. The on-site stockpiled railroad ties located within the western portion of the project site are subject to TWW regulations requiring proper management, storage, off-site disposal, and/or permitted on-site reuse. Thus, without proper handling of the on-site TWW, the Alternative would have the potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment. New Mitigation Measure SEIR 4.7-1, which requires all on-site TWW to be removed and disposed of in compliance with California Health and Safety Code Section 25230, would still be required under the Alternative. Therefore, overall impacts related to hazards and hazardous materials would be similar under the Reduced Density Alternative as compared to the proposed project.

Other Effects: Agriculture and Forestry Resources

The Reduced Density Alternative would include development of similar uses as the proposed project and would be submitted pursuant to Builder's Remedy. Therefore, similar to the proposed project, the Reduced Density Alternative would be inconsistent with the site's General Plan land use designation (Agriculture) and the PD 3-89 zoning district. As such, the Alternative would result in conflicts with existing zoning for agricultural use. Modified Mitigation Measures 4.1-3 and 4.1-4(a) from the 2009 EIR, which require agricultural land mitigation and a right-to-farm disclosure consistent with the City's ordinances, would still be required under this Alternative. However, because the Alternative, through invoking Builder's Remedy, would proceed without submitting for legislative entitlements such as a General Plan Amendment or Rezone, bringing the project into consistency with the zoning of the site would be infeasible. Therefore, similar to the proposed project, feasible mitigation does not exist and the impact would remain significant and unavoidable. Overall impacts related to agricultural resources would be similar under the Reduced Density Alternative as compared to the proposed project.

Other Effects: Land Use and Planning

The Reduced Density Alternative would include development of similar uses as the proposed project and would be submitted pursuant to Builder's Remedy. Therefore, similar to the proposed



project, the Reduced Density Alternative would be inconsistent with the site’s General Plan land use designation (Agriculture) and the PD 3-89 zoning district. As such, the Alternative would conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Because the Alternative, through invoking Builder’s Remedy, would proceed without submitting for legislative entitlements such as a General Plan Amendment or Rezone, bringing the project into consistency with the zoning of the site is infeasible. Therefore, similar to the proposed project, feasible mitigation does not exist and the impact would remain significant and unavoidable. Overall impacts related to land use and planning would be similar or slightly reduced under the Reduced Density Alternative as compared to the proposed project.

No Pentathlon Facility Alternative

The No Pentathlon Facility Alternative would eliminate the USA Pentathlon Training Facility, pool complex, and obstacle course, and would instead develop the space with a mix of townhomes and multi-family residential units (see Figure 6-3). Similar to the proposed project, the Alternative would include development of 19 cottage units, up to 45 multi-family apartment units, and 31 medium-sized single-family residences. However, the Alternative would include 50 large-sized single-family residences, a reduction of one unit as compared to the proposed project. The Alternative would also include 39 townhome units, an increase of 10 units as compared to the proposed project. Table 6-1 below includes a summary of the unit count under the Alternative as compared to the proposed project.

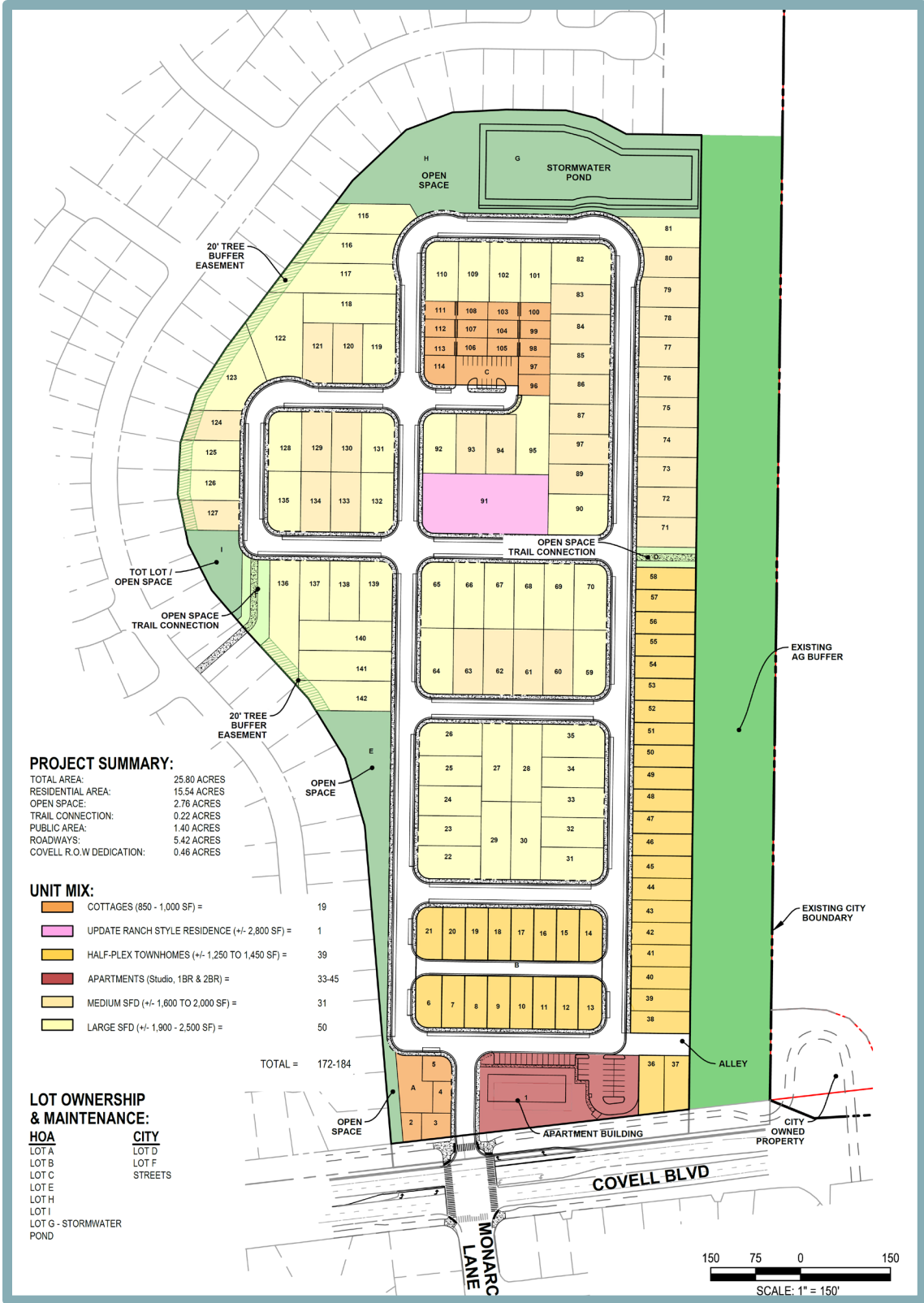
Table 6-1		
No Pentathlon Facility Alternative vs. Proposed Project		
Unit Type	Number of Units	
	No Pentathlon Facility Alternative	Proposed Project
Cottages	19	19
Half-Plex Townhomes	39	29
Multi-Family Apartments	33-45	45*
Single-Family Residences – Medium	31	31
Single-Family Residences – Large	50	51
Existing Ranch Home	1	1
Total	172-184	175*
* The number of multi-family units could be up to 45 units at the City Council’s discretion. For purposes of this SEIR, the project will be analyzed as such.		

Overall, the Alternative would develop a maximum of up to 184 units, while the proposed project would include a maximum of up to 175 units. All other site improvements required under the proposed project would still be developed under the No Pentathlon Facility Alternative, including an internal roadway network and on- and off-site utility improvements. The No Pentathlon Facility would also include the same type and amount of open space.

Similar to the proposed project, the No Pentathlon Facility Alternative would invoke Builder’s Remedy. Therefore, the No Pentathlon Facility Alternative would not include a General Plan Amendment or Rezone. The Alternative would still require the approval of a Vesting Tentative Subdivision Map and Affordable Housing Plan.



**Figure 6-3
 No Pentathlon Facility Alternative Site Plan**



Although the No Pentathlon Facility Alternative would generally result in similar residential development as the proposed project, because the Alternative would not include the development of the USA Pentathlon Training Facility, pool complex, or obstacle course, Objective #8, to provide a location for the construction of a new pentathlon training facility that includes a pool to also be used by local community swim organizations, would not be met. All other project objectives would be met by the Alternative.

Aesthetics

Similar to the proposed project, the No Pentathlon Facility Alternative would include development of residential uses and would be submitted pursuant to Builder's Remedy. Therefore, the Alternative would still be inconsistent with the project site's General Plan land use designation as Agricultural and the PD 3-89 zoning district. Under Builder's Remedy, the City cannot deny the project based on inconsistency with the General Plan or zoning code. Therefore, the inconsistency cannot be fully mitigated. The Alternative would still be subject to new Mitigation Measure SEIR 4.1-2, which would require that the project comply with conditions of approval imposed by the City on the project's Tentative Map in order to ensure visual consistency with adjacent uses to the north, south, and west of the project site. Similar to the proposed project, the development of the project site with the proposed uses under the No Pentathlon Facility Alternative would be inconsistent with the designation of the site in the General Plan as Agricultural and its PD 3-89 zoning, resulting in a significant and unavoidable impact. Therefore, overall impacts to aesthetics would be similar under the No Pentathlon Facility Alternative as compared to the proposed project.

Biological Resources

Similar to the proposed project, the No Pentathlon Facility Alternative would include ground-disturbing activities on the project site and along the off-site sewer line alignment, and would have the same development footprint as the proposed project. Thus, the Alternative would have a similar level of potential to impact special-status plants, monarch butterfly, VELB, northwestern pond turtle, giant garter snake, tricolored blackbird, burrowing owl, Swainson's hawk, white-tailed kite, roosting bats, American badger, and migratory nesting birds and raptors. In addition, the Alternative could result in a substantial adverse effect on riparian habitat, other Sensitive Natural Communities, or federally or State-protected wetlands. As such, new Mitigation Measures SEIR 4.3-1 through SEIR 4.3-6, and modified versions of Mitigation Measures 4.6-1 through 4.6-5 from the 2009 EIR, which require species-specific preconstruction surveys, additional protective measures for identified species, and compliance with the Yolo HCP/NCCP, would still be required under the Alternative. Similarly, new Mitigation Measures SEIR 4.3-17(a) through (g), which require the project applicant to comply with general AMMs established by the Yolo HCP/NCCP, would still be required under the Alternative. Therefore, overall impacts to biological resources would be similar under the No Pentathlon Facility Alternative as compared to the proposed project.

Noise

Both the No Pentathlon Facility Alternative and the proposed project would result in a similar level of overall construction. Therefore, similar to the proposed project, the Alternative would include noise-generating construction activities on the project site, and the Alternative would have the potential to result in a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of applicable standards. The modified version of Mitigation Measure 4.5-3 from the 2009 EIR, which requires noise-reduction measures to be incorporated within the construction documents, would still be required under the Alternative. Therefore, overall impacts related to



noise would be similar under the No Pentathlon Facility Alternative as compared to the proposed project, and the significant and unavoidable impact associated with increased noise levels generated during project construction would remain. It should be noted that while not identified as a new or substantially increased significant impact, the Alternative would reduce operational noise because the USA Pentathlon Training Facility, pool complex, and obstacle course would be eliminated.

Public Services and Utilities

The No Pentathlon Facility Alternative would involve similar residential uses as the proposed project, and would occur within the same development footprint. Thus, the Alternative would still require a future design-level water report to further refine the proposed water line sizes throughout the project site in order to meet domestic and fire flow demands, and Mitigation Measure 4.5-5 would still be required. It should be noted that while not identified as a new or substantially increased significant impact, the Alternative would not include recreational uses because the USA Pentathlon Training Facility, pool complex, and obstacle course would be eliminated. However, similar to the proposed project, the Alternative would still be required to comply with the parkland provision in-lieu fees established by Davis Municipal Code Section 36.08.040, and the Alternative would still be subject to Mitigation Measure 4.9-8. Overall, the impacts identified for the proposed project related to public services and utilities would be similar under the No Pentathlon Facility Alternative.

Transportation

The No Pentathlon Facility Alternative would involve similar uses as the proposed project, and would occur within the same development footprint. Considering the similar land uses to the proposed project and location within the City of Davis, the Alternative would also generate new demand for bicycle and pedestrian travel within the project site and between the project site and other local neighborhoods and activity centers. As such, new Mitigation Measure SEIR 4.6-2(b), which requires the applicant to modify the East Covell Boulevard/Monarch Lane intersection, would be required to ensure that the Alternative would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including roadway, bicycle, and pedestrian facilities. Because the Alternative would not include development of the USA Pentathlon Training Facility, pool complex, or obstacle course, such uses would not generate demand for bicycle and pedestrian travel through the project site. Therefore, the Alternative would not require a contiguous bikeway facility between East Covell Boulevard and the community-serving recreational uses and new Mitigation Measure SEIR 4.6-2(a) would not be required.

Compared to the proposed project, changes to land uses included in the Alternative would result in a reduction of vehicle travel demand to and from the project site. Daily vehicle trip generation for the Alternative would be approximately 37 percent less than the proposed project. Additionally, total annual project-generated VMT for the Alternative would be approximately 15 percent less than the proposed project.

The Alternative would include an overall increase in nine residential units and an expanded residential development footprint as compared to the proposed project. Residential density for the Alternative would be 11.8 dwelling units per acre, greater than the residential density of 11.5 dwelling units per acre for the proposed project. Thus, the Alternative would result in a slight decrease in residential VMT per capita as compared to the proposed project due to increased density. However, as discussed above, the required residential density in order to reduce per capita residential VMT to below the applicable threshold of 15 percent below the baseline City



and/or regional average VMT per capita for residential uses was determined to be 17.1 dwelling units per acre. Because the Alternative would include development of a maximum of 184 residential units with a density of 11.8 dwelling units per acre, new Mitigation Measure SEIR 4.6-4 would still be required under the Alternative. Similar to the proposed project, even with implementation of new Mitigation Measure SEIR 4.6-4, the per capita residential VMT could still exceed the applicable threshold. Therefore, the significant and unavoidable impact related to transportation would still occur under the No Pentathlon Alternative.

It should be noted that the proposed project's non-residential component (i.e., the USA Pentathlon Training Facility, pool complex, and obstacle course) would reduce total VMT within the region by 1,089 VMT. Thus, while the Alternative would result in lower residential per capita VMT, the elimination of the USA Pentathlon Training Facility, pool complex, and obstacle course under the Alternative would contribute to an associated increase in regional VMT.

Because the No Pentathlon Facility Alternative would not require new Mitigation Measure SEIR 4.6-2(a), impacts related to transportation under the Alternative would be fewer as compared to the proposed project. However, the significant and unavoidable impact related to VMT would still occur under the Alternative.

Other Effects: Hazards and Hazardous Materials

Similar to the proposed project, the No Pentathlon Facility Alternative would include ground-disturbing activities and new development on the project site and installation of the off-site sewer line extension. The on-site stockpiled railroad ties located within the western portion of the project site are subject to TWW regulations. Thus, new Mitigation Measure SEIR 4.7-1, which requires all on-site TWW to be removed and disposed of in compliance with California Health and Safety Code Section 25230, would still be required under the Alternative. Therefore, overall impacts related to hazards and hazardous materials would be similar under the No Pentathlon Facility Alternative as compared to the proposed project.

Other Effects: Agriculture and Forestry Resources

The No Pentathlon Facility Alternative would include development of similar residential uses as the proposed project and would be submitted pursuant to Builder's Remedy. Therefore, similar to the proposed project, the No Pentathlon Facility Alternative would be inconsistent with the site's General Plan land use designation (Agriculture) or the PD 3-89 zoning district. As such, the Alternative would result in conflicts with existing zoning for agricultural use. Modified Mitigation Measures 4.1-3 and 4.1-4(a) from the 2009 EIR, which require agricultural land mitigation and a right-to-farm disclosure consistent with the City's ordinances, would still be required under this Alternative. However, because the Alternative, through invoking Builder's Remedy, would proceed without submitting for legislative entitlements such as a General Plan Amendment or Rezone, bringing the project into consistency with the zoning of the site is infeasible. Therefore, similar to the proposed project, feasible mitigation does not exist and the impact would remain significant and unavoidable. Overall impacts related to agricultural resources would be similar under the No Pentathlon Facility Alternative as compared to the proposed project.

Other Effects: Land Use and Planning

The No Pentathlon Facility Alternative would include development of similar uses as the proposed project and would be submitted pursuant to Builder's Remedy. Therefore, similar to the proposed project, the No Pentathlon Facility Alternative would be inconsistent with the site's General Plan land use designation (Agriculture) or the PD 3-89 zoning district. As such, the Alternative would



conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Because the Alternative, through invoking Builder's Remedy, would proceed without submitting for legislative entitlements such as a General Plan Amendment or Rezone, bringing the project into consistency with the zoning of the site is infeasible. Therefore, similar to the proposed project feasible mitigation does not exist and the impact would remain significant and unavoidable. Overall, impacts related to land use and planning would be similar under the No Pentathlon Facility Alternative as compared to the proposed project.

6.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. The environmentally superior alternative is generally the alternative that would be expected to generate the least number of significant impacts. However, the lead agency may consider certain issue areas as a higher priority than others. For the purposes of this SEIR, reduction of impacts related to VMT are considered a high priority due to the potential consequences of climate change for the City of Davis. Identification of the environmentally superior alternative is an informational procedure and the alternative selected may not be the alternative that best meets the goals or needs of the City. 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." In this case, the No Project (No Build) Alternative would be considered the environmentally superior alternative, because the project site is assumed to remain in its current condition under the alternative. Consequently, none of the impacts resulting from the proposed project would occur under the Alternative, as shown in Table 6-2 below. In addition, the No Project (No Build) Alternative would result in fewer impacts than the proposed project related to seven resources areas where new or more severe significant impacts were identified for the proposed project. In addition, the significant and unavoidable impacts identified for the proposed project would not occur under the No Project (No Build) Alternative. However, the No Project (No Build) Alternative would not meet any of the project objectives, and thus, an environmentally superior alternative among the other alternatives must be identified pursuant to CEQA.

Apart from the No Project (No Build) Alternative, the Increased Density Alternative would meet the majority of the project objectives. In addition, as discussed above and shown in Table 6-2, the Increased Density Alternative would result in fewer impacts than the proposed project related to transportation; specifically, the significant and unavoidable project impact associated with transportation would not occur under the Increased Density Alternative. The Alternative would result in similar impacts as the proposed project related to biological resources, noise, hazards and hazardous materials, public services and utilities, and agricultural resources, whereas greater impacts could occur in the areas of aesthetics and land use and planning. Overall, this alternative is the only alternative that eliminates the proposed project's significant and unavoidable VMT impact. Thus, the Increased Density Alternative is considered the environmentally superior alternative.



**Table 6-2
Comparison of Environmental Impacts for Project Alternatives**

Resource Area	Proposed Project	No Project (No Build) Alternative	Increased Density Alternative	Reduced Density Alternative	No Pentathlon Facility Alternative
Aesthetics	Significant and Unavoidable	None	Greater*	Similar*	Similar*
Biological Resources	Less-Than-Significant with Mitigation	None	Similar	Similar	Similar
Noise	Significant and Unavoidable	None	Similar*	Fewer*	Similar*
Public Services and Utilities	Less-Than-Significant with Mitigation	None	Similar	Similar	Similar
Transportation	Less-Than-Significant with Mitigation and Significant and Unavoidable	None	Fewer	Greater*	Fewer*
Other Effects: Hazards and Hazardous Materials	Less-Than-Significant with Mitigation	Greater	Similar	Similar	Similar
Other Effects: Agriculture and Forestry Resources	Significant and Unavoidable	None	Similar*	Similar*	Similar*
Other Effects: Land Use and Planning	Significant and Unavoidable	None	Greater*	Similar*	Similar*
Total Greater:		1	2	1	0
Total Fewer:		7	1	1	1
Total Similar:		0	5	6	7
Note: No Impact = "None;" Greater than the Proposed Project = "Greater," Less than Proposed Project = "Fewer;" and Similar to Proposed Project = "Similar"					
* Significant and Unavoidable impact(s) determined for the proposed project would still be expected to occur under the Alternative.					

