6.0 ALTERNATIVES TO THE PROPOSED PROJECT

6.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that "an Environmental Impact Report (EIR) shall describe a range of reasonable alternatives to the project, or to the location of the project. The alternatives should feasibly attain most of the basic objectives of the project, avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives" (State CEQA Guidelines Section 15126.6). The State CEQA Guidelines require that the EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the project. 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 must be discussed, but these effects may be discussed in less detail than the significant effects of the project as proposed (CCR Section 15126.6[d]). The EIR is not required to consider every conceivable alternative to a project but is guided by a rule of reason. An EIR is not required to consider alternatives which are infeasible. Section 15126.6[d]) states that the EIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. Key provisions of the State CEQA Guidelines on alternatives (Section15126.6(a) through (f)) are summarized below to explain the foundation and legal requirements for the alternatives analysis in the Draft EIR.

- "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" (Section15126.6(b)).
- "The specific alternative of 'no project' shall also be evaluated along with its impact" (Section15126.6(e)). "The no project analysis shall discuss the existing conditions at the time the Notice of Preparation (NOP) is published, and at the time the environmental analysis is commenced, as well as what would reasonably be 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. If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives" (Section15126.6(e)(2)).
- "The range of alternatives required in an EIR is governed by a 'rule of reason' that require the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project" (Section15126.6(f)).
- "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, 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)" (Section15126.6(f)(1)).

- For alternative locations, "only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR" (Section15126.6(f)(2)(A)).
- "An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative" (Section15126.6(f)(3)).

The lead agency is responsible for selecting this range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. This Chapter describes four Alternatives to the proposed project. These alternatives include the No Project Alternative, Existing Zoning Alternative, All Housing Alternative, and Wetland Preservation Alternative. The four alternatives are discussed in more detail below.

Alternatives were developed based on the following: information provided by the project applicant, and the City; input received from comments on the NOP; and feedback received from members of the community. At first, a larger group of alternatives was developed and after an initial review, the alternative was either retained for further analysis or discarded. Among the factors that may be taken into account when addressing the feasibility of alternatives, as described in Section 15126.6(f)(1) of the CEQA Guidelines, are environmental impacts, site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the project proponent could reasonably acquire, control, or otherwise have access to an alternative site. An EIR need not consider an alternative whose effects could not be reasonably identified, whose implementation is remote or speculative, and that would not achieve the basic project objectives. The alternatives that were selected for additional consideration were chosen in accordance with the above-listed CEQA Guidelines, represent a reasonable range of alternatives, are feasible, and will encourage discussion in a manner to foster meaningful public participation and informed decision making.

PROJECT OBJECTIVES

As discussed above, one of the evaluation criteria for the alternative discussion is the ability of a specific alternative to attain most of the basic project objectives. The basic project objectives as listed in Chapter 3, Project Description are as follows:

- Implement the objectives of the General Plan to leverage public infrastructure investment to catalyze a mix of new housing, commercial, retail, and recreational development in an opportunity area;
- 2. Develop a project in an opportunity area with an appropriate mix of uses to serve the needs of the public, including housing needs.
- 3. Develop a project in an opportunity area that is compatible with the density, intensity, scale and uses of surrounding development;

- 4. Develop a project in an opportunity area that is economically feasible and supports the extraordinary costs of required project infrastructure and physical features without imparting undue strain on existing public facilities, services or finances;
- 5. Develop a project that is sensitive to the environmental conditions of the site and surroundings by identifying and conserving a portion of the onsite natural resources to the extent feasible through project design;
- 6. Develop a project in an opportunity area that includes a pedestrian-friendly residential neighborhood with cohesive design that includes active and passive recreational opportunities and bike/pedestrian circulation amenities for future residents and users of the commercial space;
- 7. Develop a project that minimizes visual conflicts by including a thoughtful landscaping and planting plan that is compatible with surrounding development;
- 8. Develop a project in an opportunity area that enhances amenities and recreational opportunities for residents and visitors to the area;
- 9. Support economic development by developing a vacant, under-developed site with a project that provides a broad range of retail goods and services, retains a major source of sales tax revenue, generates significant additional sales tax revenues, and creates jobs for city residents.

Per Section 15126.6 (b) of the State CEQA Guidelines, the discussion of alternatives shall focus on alternatives to a project, or its location that are capable of avoiding or substantially lessening significant impacts of a project, even if the alternatives would impede to some degree the attainment of the project objectives or would be more costly. This alternatives analysis; therefore, focuses on project alternatives that could avoid or substantially lessen environmental impacts of the proposed project related to the environmental categories listed in Appendix G of the State CEQA Guidelines.

This project alternatives discussion consists of four project alternatives:

Alternative 1: No Project Alternative

As previously stated, the No Project Alternative is a required alternative that evaluates what potential impacts would or would not occur if the proposed project does not proceed and no action is taken with regard to the proposed development.

Alternative 2: Existing Zoning Alternative

Alternative 2 was developed to focus on impacts that would occur if no zoning map amendment was proposed. This alternative evaluates what development could occur if existing zoning, Pedestrian Shopping and Service District, were to remain.

Alternative 3: All Housing Alternative

This alternative was specifically developed to address a potential land use concept that would reduce potential traffic impacts. Impacts on traffic operations, specifically at the I-80/Redwood Parkway interchange, were the only potential impacts associated with the proposed project that were identified

as Significant and Unavoidable. As such, this alternative was included in the range of alternatives that could potentially reduce one or more significant impacts associated with the project.

Alternative 4: Wetland Preservation Alternative

This alternative was included in the range of alternatives as a way to reduce potential wetland impacts. While wetland impacts associated with the proposed traffic were determined to be less than significant with the incorporation of mitigation measures, impacts on wetland habitat were the only sensitive habitat adversely affected by the proposed project. As such, this alternative was developed to consider a land use concept that would eliminate filling of wetland habitat.

6.2 ALTERNATIVES CONSIDERED BUT REJECTED

The analysis of alternatives to the proposed project must also address "whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location" (CEQA Guidelines, Section 15126.6(f)(2)(A). Only those locations that would avoid or substantially lessen any of the significant effects of the project need be considered. If no feasible alternative locations exist, the agency must disclose the reasons for this conclusion (Section 15126.6(f)(2)(B). In this case, while it is feasible that an alternative site could be selected for the project, an alternative site would entail either the same or new significant environmental effects as the proposed project site. For example, development of the project on any suitable alternative site in or around the City may not avoid or substantially lessen the project's air quality or GHG impacts because emission-related impacts would occur no matter where the development is located. Additionally, these impacts could be worse if the alternative site is located further away from a major transportation corridor or in areas with existing unacceptable traffic levels. Moreover, an alternative site that is adjacent to undeveloped lands would likely result in greater impacts on aesthetics and utilities than the proposed project site, which is surrounded by existing development.

Furthermore, viable alternative locations for the project are limited to those that would feasibly attain most of the project objectives. There are no other appropriately located and sufficient sized lots in Vallejo along a major transportation corridor that would satisfy the project objectives and eliminate or reduce impacts from the proposed project. The proposed project would offer a commercial and retail development in proximity to a major transportation corridor. Furthermore, the applicant has indicated that it does not own other lands in Vallejo that could feasibly meet these project objectives. Additionally, the other vacant properties within the City are not adequately sized, are not in suitable locations (specifically adjacent to I-80), and would not be reasonable to acquire within a reasonable time frame.

In developing the proposed project and alternatives, consideration was given to the density of development that could meet project objectives and reduce significant impacts. Many of the anticipated significant impacts would result from the intensity of the development proposed.

Comments received during the NOP process suggested that an access driveway off Turner Parkway for the commercial area would help alleviate congestion on Admiral Callaghan. A driveway in this location was considered during the initial site planning process but was removed from further consideration for the following reasons:

- Existing culverts under Turner parkway would require the proposed access driveway to be located too close to the Admiral Callaghan intersection resulting in potentially unsafe intersection geometries;
- Removing and relocating the existing culverts would result in additional wetland habitat impacts;
 and
- The existing median on Turner Parkway would restrict ingress and egress to right turn in and right turn out movements. While the median could be modified, allowing these new turning movements could potentially create traffic congestion at other locations along Turner Parkway away from the project site.

Other proposed alternatives suggested by the public during the Notice of Preparation scoping period included:

- Developing an ice rink or a performing arts center on the project site;
- Develop a public park on the project site; and
- Developing an office park.

These alternatives were not considered for further evaluation because these developments would not leverage the economic opportunities (i.e., tax revenue) that the City is seeking by developing in an Opportunity Area along a major transportation corridor. Additionally, this type of development would not be expected to provide the financial return required to support the necessary infrastructure improvements.

6.3 COMPARISON OF PROJECT ALTERNATIVES

Per the State CEQA Guidelines Section15126.6(d), additional significant effects of the alternatives are discussed in less detail than the significant effects of the project as proposed. For each alternative, the analysis below describes each alternative, analyzes the impacts of the alternative as compared to the proposed project, identifies significant impacts of the proposed project that would be avoided or lessened by the alternative, assesses the alternative's ability to meet most of the project objectives, and evaluates the comparative merits of the alternative and the proposed project. The following sections provide a comparison of the environmental impacts associated with each of the project alternatives, as well as an evaluation of each project alternative to meet the project objectives.

6.4 ALTERNATIVE 1 – NO PROJECT ALTERNATIVE

Consistent with State CEQA Guidelines Section15126.6, the No Project Alternative assumes that the existing land uses and condition of the project site at the time the NOP was published (October 2018) would continue to exist without changes. The setting of the project site at the time the NOP was published is described as part of the existing conditions throughout Chapter 4 of this Draft EIR with respect to individual environmental issues and forms the baseline of the impact assessment of the proposed project.

The No Project Alternative assumes the proposed project would not be implemented and land uses and other improvements would not be constructed. The existing project site would remain unaltered and in

its current condition. All infrastructure improvements identified in the proposed project including water, wastewater, drainage, and roadway improvements would not be constructed. Because the project site would remain unchanged, few or no environmental impacts would occur. This alternative serves as the baseline against which the effects of the proposed project and other project alternatives are evaluated. Under this alternative none of the proposed improvements would occur and the project site would remain undeveloped.

- None of the impacts associated with the project would occur.
- No economic growth as per the General Plan would occur.
- No environmental protection of any of the onsite wetlands would occur.
- Existing nuisance uses such as unauthorized encampments, use of off-road vehicles, unauthorized access, and fire hazards associated with the site would likely continue.

IMPACTS COMPARED TO PROJECT IMPACTS

An evaluation of the potential environmental impacts of the No Project Alternative, as compared to those of the proposed project, is provided below.

Aesthetics

Under the No Project Alternative, the onsite topography, vegetation, and offsite view corridors would not be modified from their existing state. Visual impacts from offsite views, as well as the change in character/quality of the site (i.e., new residential development) as seen from the residents to the east would be eliminated. Although determined to be less than significant for the proposed project, incremental increases in light and glare impacts associated with the proposed project would be avoided under this alternative. Therefore, under this alternative, impacts regarding aesthetics, light, and glare would be eliminated compared to the proposed project.

Air Quality

Under this alternative, short-term construction and long-term operational air emissions would not occur as no construction would take place, no project operations would be established, and no project-related traffic or stationary source emissions would be generated by the new structures. Significant and unavoidable air quality impacts associated with NO₂ emissions under the proposed project would be avoided under this alternative. Air quality impacts associated with the No Project Alternative would be less than the proposed project.

Biological Resources

Under the No Project Alternative, the site would not be developed with commercial and residential development and avoid potential impacts to biological resources, including special-status species and sensitive habitats. In addition, implementation of the No Project Alternative would avoid the placement of 2.25 acres of permanent fill materials within identified wetlands. Direct impacts to biological resources

that would result from the proposed project would not occur under the No Project Alternative; therefore, impacts on biological resources would be less than the proposed project.

Cultural Resources and Tribal Cultural Resources

Under the No Project Alternative, no impacts would occur with respect to existing and/or undiscovered cultural resources because ground disturbance from the construction of the proposed project and supporting infrastructure would not occur. However, even in the undisturbed state, cultural resource sites will remain vulnerable to human disturbance or destruction. In addition, it is possible that cultural resources sites may also be altered over time due to weather conditions. If these sites are not fully documented, information from these sites could be lost. Nonetheless, the potential for direct impacts to cultural resources associated with the No Project alternative are less than the proposed project.

Geology/Soils

Because no development would occur under this alternative, soil disturbance associated with grading and building activities would not occur. No new buildings, roads, utilities, or other infrastructure would be constructed on the project site, thus, there would be no impacts associated with landslides, soil stability, or slopes as would occur under the proposed project. Therefore, compared to the proposed project, geology and soil impacts would be eliminated under this alternative.

Greenhouse Gas Emissions

This alternative would not result in greenhouse gas generation because the site would remain in an undeveloped condition. The No Project Alternative would not result in any uses that would result in the emission of greenhouse gases. As a result, although the proposed project would result in emission of greenhouse gasses, impacts under this alternative would be incrementally reduced and would remain less than significant.

Hazards and Hazardous Materials

Under the No Project Alternative, the existing environmental conditions, including those that may be defined as either adverse or significant, would remain. No petroleum products associated with a gas station would be on the project site under this alternative. Fire hazards from nuisance activities would remain as currently existing on the proposed project site, including the ability to fight fires with existing water flow that does not currently meet standards. This alternative would not introduce new people or structures to an area susceptible to wildfires, and under this alternative, public health and safety impacts related to project construction and operations would also not occur. Impacts would be less than the proposed project.

Hydrology and Water Quality

The No Project Alternative would avoid potential short-term and long-term impacts to water quality because grading and construction activities would not occur. Additionally, the No Project Alternative would not result in new development and water quality impacts from runoff from parking lots and other

hardscaped surfaces would not occur. Therefore, potential impacts to downstream and other waters would be less than those impacts identified under the proposed project.

Land Use

The No Project Alternative would have no impacts to land use as the project site would remain in its current state and existing land uses would persist. Therefore, the existing General Plan designations – Retail/Entertainment on the western portion of the property and Mix of Housing Types on the eastern portion of the property would remain. Continuation of the current use of the land would not conflict with any land use plan or policy, or conflict with any habitat or community conservation plan. Impacts in this regard would be less compared to the proposed project.

Noise

With no commercial or residential development occurring onsite, no new noise would be generated by construction, operations, or traffic generated by the proposed Costco, commercial site, or residences. Hence, noise-sensitive land uses in the vicinity of the project site would not experience any change in noise levels. Therefore, short-term and long-term noise impacts would be less when compared to that of the proposed project.

Energy Conservation

This Alternative would result in no energy use because of the site would remain in an undeveloped condition. As a result, energy use would be eliminated compared to the proposed project.

Population and Housing

The No Project Alternative would have no impacts to population and housing within the City. Under the No Project Alternative there would be no housing growth, and growth rates and the demand for additional housing would not increase. This alternative; however, would not provide any residential units to help meet the ABAG RHNA goal of 1,362 units. Nonetheless, the overall impacts would be similar to the proposed project because neither alternative would displace existing residents or require the construction of replacement housing elsewhere.

Public Services

Under the No Project Alternative, the existing conditions would continue to prevail. This alternative would not develop the proposed project site; therefore, there would not be an increased demand for public services including fire protection and emergency medical services, law enforcement, schools, and other general governmental services. Because no development would occur, there would be no need for additional services to be provided. Although some demand for law enforcement patrols and fire department support on the undeveloped project site would remain, impacts would be substantially less than the proposed project.

Recreation

Similar to the proposed project, the No Project Alternative would not result in an increased use of any area recreational facilities and would, therefore, not require construction of new or expansion of any other existing recreational facilities. Impacts would be eliminated compared to the proposed project.

Transportation and Traffic

This alternative would not result in direct changes to average daily vehicle trips (ADT) as no development is proposed. This alternative would not result in impacts on the intersections and roadway segments surrounding the proposed project, some of which need improvements, particularly by year 2040. Furthermore, no change in circulation patterns would occur, as there would be no development to create the need for changes in circulation patterns. Overall, the No Project Alternative would result in fewer impacts to traffic and circulation compared to the proposed project because additional traffic would not be generated. The following intersections are projected to operate unacceptably under Year 2040 Cumulative Conditions without the project and are evaluated in greater detail in Chapter 4.15, Transportation:

- Intersection #5: Admiral Callaghan Lane/Target Driveway
- Intersection #8: Admiral Callaghan/Commercial Driveway
- Intersection #13: Plaza Drive/Costco Driveway

Under the No Project Alternative there would be no improvements to Admiral Callaghan Lane along the project frontage. This section of Admiral Callaghan Lane along the project frontage does match the street improvements of other segments of this roadway. Improvement to this segment, including widening, have been a part of the City's Capital Improvement Program for approximately 20 years.

Utilities

Under the No Project Alternative, the existing conditions, including those that may not meet current standards or are not adequate to serve existing conditions, would continue on the project site. This alternative would not develop the proposed project site, therefore, there would not be an increased demand for utility and service systems including wet (water/sewer) and dry (electrical, gas, cable, telephone) utilities. Because no development would occur, there would be no need for additional services to be provided. While this alternative would not increase the demand, this alternative would not provide the infrastructure improvements that would occur under the proposed project. When compared to the proposed project, this alternative would not introduce new demand on utility and service systems; however, it would also not alleviate the existing condition that the wet utility services do not meet current standards. Nonetheless, impacts would be less than the proposed project.

CONCLUSION

Avoid or Substantially Lessen Project Impacts

The No Project Alternative would eliminate the majority of potentially significant impacts associated with the environmental categories discussed. As documented throughout Chapter 4.1 through Chapter 4.16 of

this Draft EIR, all impacts of the proposed project would be less than significant after mitigation, with the exception of operational air quality from NO_z emissions and traffic which would result in significant and unavoidable impacts at seven intersections and one freeway segment. The proposed project would not result in any other significant unavoidable impacts.

Attainment of Project Objectives

The "No Project" alternative fails to meet all of the stated objectives for the proposed project as described in Section 6.1 of this Chapter.

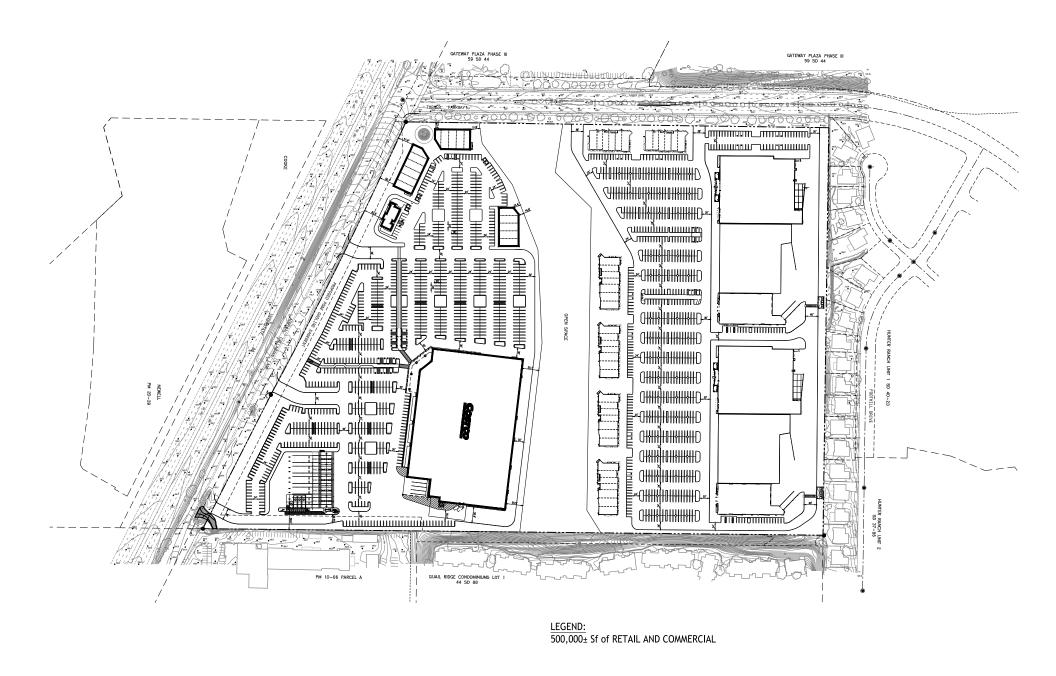
Comparative Merits

Under the "No Project" alternative, no physical changes would occur on the project site, and there would not be a potential for new environmental impacts to occur. The "No Project" alternative would not allow the project to move forward at this time; however, it would not preclude development at a future date. The "No Project" alternative is considered overall environmentally superior to the proposed project, as it would significantly reduce or eliminate the majority of short-term, long-term, and cumulative impacts in all categories when compared to the proposed project.

6.5 ALTERNATIVE 2 – EXISTING ZONING ALTERNATIVE

Under this alternative the project site would be developed under the existing zoning and no zone change would be proposed. Under the Existing Zoning Alternative all 51.3 acres of the project site would remain zoned Pedestrian Shopping and Service District. This alternative would develop approximately 500,000 total square feet of commercial and retail space with approximately 1,850 parking spaces. This would be an increase of 320,300 square feet of commercial area compared to the proposed project. A conceptual site plan is shown in **Figure 6-1: Existing Zoning Alternative**. Development under this alternative would be similar to the type of commercial development in Gateway Plaza located across Turner Parkway from the project site. Building height for larger stores would be approximately 30 to 35 feet and smaller stores would likely be 15 to 20 feet in height.

The overall layout of this alternative would include the same 5.7-acre open space corridor in the central portion of the site which would preserve wetland areas onsite. This alternative also assumes that Costco would relocate to the project site in the same location as the proposed project. Unlike the proposed project; however, this alternative would not include any residential component and no housing would be included. Driveway access to the project site from Admiral Callaghan Lane and Turner Parkway would be the same as the proposed project. The same PG&E natural gas and sewer utility line relocation would be required under this alternative as compared to the proposed project.



Source: MaKay and Somps, 2019





IMPACTS COMPARED TO PROJECT IMPACTS

An evaluation of the potential environmental impacts of the Existing Zoning Alternative, as compared to those of the proposed project, is provided below.

Aesthetics

The short-term visual impacts associated with grading and construction activities that would occur under the proposed project would similarly occur with the Existing Zoning Alternative. Comparatively, the construction-related impacts to the visual character/quality of the project site and its surroundings would be similar to the proposed project because both would result in development that replaces undeveloped land. The construction duration, timeline, and equipment of this alternative would be similar to the proposed project.

The project site's long-term visual character would be fundamentally different with this alternative, as the existing vacant land would be developed with approximately 500,000 square feet of commercial uses. The larger buildings would be approximately 30-35 feet in height and have a larger bulk and scale compared to the residential houses that would be constructed under the proposed project. It is anticipated that commercial development would be similar to the existing commercial development across Turner Parkway, known as Gateway Plaza. The view of the project site would generally be the same from Interstate 80 and Admiral Callaghan Lane; however, the commercial buildings in the eastern portion of the property would appear larger in the landscape and would be more obtrusive as viewed from Turner Parkway and other surrounding areas. The westerly views from the residences particularly along Foothill Drive would be partially blocked and interrupted by the increased height and massing of the structures under this alternative. Impacts in this regard would be incrementally greater than those of the proposed project.

Similar to the proposed project impacts as a result of Urban Decay would be less than significant. The Existing Zoning Alternative with additional commercial and retail space would add to the available supply of retail outlets. The current and projected strength of the retail demand within the Trade Areas would likely support this additional supply of commercial and retail space. Also, considering the overall leakage (loss of retail business) illustrated by the current and future retail market analyses, the addition of retail space, or re-tenanting of existing space would provide expanded opportunity for new retailers to enter the market and fulfill unmet consumer demand. Similar to the proposed project, potential impacts would be less than significant, and no mitigation is required.

Under this alternative, light and glare impacts would be neither greater nor lesser than the proposed project as street lighting, pedestrian lighting, and exterior building lighting would be positioned throughout the project site. However, the Existing Zoning Alternative would provide more 20-foot tall lighting poles within the parking lots. These lighting poles would be visible from residential uses to the east and south.

Therefore, potential aesthetics impacts would be incrementally increased compared to the proposed project, but still considered less than significant.

Air Quality

As shown in Table 4.2-6, the proposed project's short-term construction emissions would be below the BAAQMD's applicable thresholds, resulting in a less than significant impact. Short-term air quality impacts from grading, paving, trenching, and building construction would occur with the Existing Zoning Alternative. Comparatively, the construction-related air quality impacts would be similar to the proposed project, as the project footprint would be relatively comparable to the proposed project and the construction timeline would be similar. This alternative would also be required to comply with MM AQ-1, as described in Chapter 4.2, Air Quality, to reduce short-term construction air emissions to a less than significant level.

As indicated in Table 4.2-7, the proposed project would not exceed the BAAQMD's operational thresholds with implementation of mitigation measures with the exception of NO_x emissions which were found to be significant and unavoidable. The project would not result in CO hotspots at any of the study intersections. Long-term air quality emissions under the Existing Zoning Alternative would be increased compared to the proposed project because the increase in the amount of traffic trips. The replacement of 178 single-family homes with 320,300 square feet of commercial space would add approximately 13,664 total daily trips¹ to the surrounding roadways. There would no change in traffic generation from the commercial area on the western portion of the property as it is the same as the proposed project. The addition of approximately 8 times more new daily automobile trips compared to the residential component of proposed project (1,690 total daily trips) would significantly increase NO_x pollutants from auto emissions compared to the proposed project. Overall, impacts on long-term operational air emissions from the Existing Zoning Alternative would be greater when compared to the proposed project.

Biological Resources

The Existing Zoning Alternative would have the same development footprint as the proposed project. As such, potential impacts on biological resources would be the same as the proposed project and the same mitigation measures would be required for the Existing Zoning Alternative. Therefore; impacts would be similar compared to the proposed project.

Cultural Resources and Tribal Cultural Resources

The Existing Zoning Alternative would have the same development footprint as the proposed project. As such, potential impacts on cultural resource and tribal cultural resources would be the same as the proposed project and the same mitigation measures would be required for the Existing Zoning Alternative. Therefore; impacts would be similar compared to the proposed project.

Geology/Soils

The Existing Zoning Alternative would have the same development footprint as compared to the proposed project. The potential for development to be exposed to unstable soils and seismic activity would be similar to the proposed project. The Existing Zoning Alternative would require the same mitigation

¹ Using ITE Land Use Code 820 which identifies 42.7 trips per 1,000 square feet (320 x 42.7 = 13,664).

measures as the proposed project and would reduce potential impacts to less than significant. Overall, potential impacts related to geology and soils would be similar under the Existing Zoning Alternative as compared to the proposed project.

Greenhouse Gas Emissions

The Existing Zoning Alternative would have similar construction impacts compared to the proposed project as the project would have the same development footprint and a similar amount of grading. Approximately 35,000 cubic yards) would be required under this alternative. The equipment needed for construction and the construction timeline would be similar. Therefore, greenhouse gas emissions from construction activities would be similar compared to the proposed project.

Operationally, the Existing Zoning Alternative would result in a greater amount of greenhouse gas emissions than the proposed project. The increased building sizes would require more energy for heating, cooling, and lighting. However, the development under this alternative would have opportunities for rooftop solar and charging stations for electrical vehicles. However, this alternative would significantly increase the amount of vehicle trips which would result in a significant increase in greenhouse gas emissions from transportation sources compared to the proposed project. Overall potential impacts related to greenhouse gas emissions are greater under the Existing Zoning Alternative compared to the proposed project.

Hazards and Hazardous Materials

Hazards and hazardous material impacts associated with this alternative would be similar to the proposed project. The transportation, use, and disposal of hazardous materials would be subject to local, state, and federal laws intended to minimize the risk of exposure to hazardous materials. Consistency with these laws and policies would limit hazards to the public from the transportation, use, and disposal of these materials. As discussed above, the use of hazardous materials would be incidental to the operation of the proposed commercial sites and would be similar to uses proposed for operation under the proposed project. As such, the risks associated with the use of these materials would be similarly small. While the proposed project would involve the transportation, use, and disposal of limited small amounts of hazardous materials, compliance with local, state, and federal regulations and County policies would ensure that the proposed project would result in less than significant impacts and no mitigation is required.

Hazardous materials associated with the residential uses would be replaced with hazardous materials associated with commercial uses. These would include: heavy metals, household chemicals, oils, solvents, paints, pesticides, and fertilizers. Similar to the proposed project, the use of these hazardous materials would be incidental to the operation of the commercial uses under the Existing Zoning Alternative and would be similar to uses found in most commercial and residential areas. As such, the risks associated with the use of these materials would be similar compared to the proposed project. Both the proposed project and this alternative would involve the transportation, use, and disposal of limited small amounts of hazardous materials. Compliance with local, state, and federal regulations and County policies would

ensure that both would result in less than significant impacts and no mitigation is required. Therefore; impacts would be roughly equivalent.

Hydrology and Water Quality

The Existing Zoning Alternative would have a similar footprint as the proposed project. The commercial development of Admiral Callaghan Lane would be same as the proposed project. However, this alternative, would result in more impervious surfaces than the proposed project because landscaped yard areas and common open space areas within the residential component of the proposed project would be replaced with hardscape parking lot areas and rooftops within the commercial development on the eastern portion of the property. The overall drainage plan in this area would be similar compared to the proposed project and surface water runoff would drain to a bioretention basin for infiltration or release into the central drainage area. Due to the increased hardscape areas including parking lots and loss of undeveloped areas that would allow infiltration, potential impacts on hydrology and water quality would be greater than the proposed project under this alternative.

Land Use

The Existing Zoning Alternative is designed to develop the project site consistent with the existing zoning designation of Pedestrian Shopping and Service District. Under this alternative no rezone would be required, but a General Plan amendment would be required because the eastern portion of this property is designated for residential uses. However, because there are no specific environmental impacts due to this alternative's inconsistency with the General Plan, impacts related to land use would be similar to the proposed project and would remain less than significant.

Noise

Construction noise associated with the proposed project, with mitigation incorporated, would result in less than significant impacts to surrounding sensitive receptors to noise levels in excess of the established standards. Construction activities would cause less significant increased mobile noise along access routes to and from the site due to movement of equipment and workers. The proposed project's construction-related vibration impacts would be less than significant. Similar short-term noise impacts from grading and construction activities would occur with the Existing Zoning Alternative, as the development footprint would be the same as the proposed project. Although this alternative includes more commercial development, construction timing, duration, and equipment would be similar to the proposed project. Therefore, the less than significant short-term noise impacts (with mitigation incorporated) that would occur with the proposed project also would occur with the Existing Zoning Alternative. This alternative would also be required to comply with MM NOI-1 to reduce short-term construction noise impacts to a less than significant level.

Existing Plus project modeled noise levels from long-term mobile sources would range from 59.5 dBA to 65.4 dBA at 100 feet from the centerline. The proposed project would increase noise levels on the existing roadways in the project vicinity by a maximum of 1.5 dBA along Admiral Callaghan Drive from Turner Parkway to Rotary Drive, resulting in less than significant noise levels. Under the Existing Zoning

Alternative an additional 320,300 square feet of new commercial and retail space would be developed generating 13,664 total daily trips. These trips would replace the proposed 1,690 total trips generated from the residential development in the eastern portion of the site under the proposed project. The addition of approximately 12,000 total daily trips in this area would increase the amount of traffic noise along Turner Parkway. This alternative also would induce more vehicles to use the roadways that are closest to the existing residents adjacent to the site. Lastly, the increased area for commercial space would increase the truck trips and associated noise for delivering merchandise to the commercial buildings. Therefore, this alternative would result in noise impacts that are greater compared to the proposed project.

Energy Conservation

Development under the Existing Zoning Alternative would create a more intensive development with the addition of an additional 320,300 square feet of commercial space instead of residential development. Energy consumption during construction would be similar for the Existing Zoning Alternative as the proposed project because the construction equipment and duration of construction would be similar. Both types of development would have opportunities to install roof-mounted solar to reduce the amount of electricity consumed by the development. However, the Existing Zoning Alternative would generate 13,664 total daily trips compared to the proposed project which would consume more fuel than the proposed project. Therefore, this alternative would consume more energy when compared to the proposed project and impacts would be incrementally greater.

Population and Housing

The Existing Zoning Alternative would not develop or displace any housing. Under this alternative, an additional 320,300 square feet of commercial space would be developed on the eastern portion of the site in lieu of single-family housing. As discussed in Chapter 4.12, Population and Housing, one employee for every 860 square feet is assumed for the commercial space. As such, an additional 320,300 square feet of commercial space would generate approximately 372 additional employees. Under this alternative, a total of 404 employees would be generated. Similar to the proposed project, this number of employees would not result in the need for additional housing in the City of Vallejo as many of the employees would come from the surrounding area and would not require new housing for employees filling jobs created by the project. This alternative, however, would not provide any residential units to help meet the ABAG RHNA goal of 1,362 units. Nonetheless, the overall impacts would be similar to the proposed project because neither alternative would displace existing residents or require the construction of replacement housing elsewhere. Therefore, potential impacts on population and housing would be roughly equivalent compared to the proposed project.

Public Services

This alternative would involve the development of all commercial and no residential uses. Because of the reduction in the number of residential units and associated population increase, this alternative would involve a reduced demand for police and fire protection services, library services, and would reduce the

number of students that would need to be accommodated at local public schools. Impacts associated with public services would be less than significant and be reduced compared to the proposed project.

Recreation

This alternative would involve the development of all commercial uses and no residential uses. Because of the reduction in the number of residential units and associated population, this alternative would reduce demand for parks and recreation facilities. Impacts associated with recreation would be less than significant, and less than the proposed project.

Transportation and Traffic

Traffic impacts under the proposed project were identified as significant and unavoidable for seven intersections and one freeway segment. Under the Existing Zoning Alternative and increase in 13,664 total average daily traffic trips are anticipated as a result of replacing the residential development with commercial development as a result of the higher traffic generated associated with commercial uses. The addition of 13,664 traffic trips to failing intersections would adversely affect the performance of those intersection and other intersections in the surrounding area. As a result, traffic impacts under the Existing Zoning Alternative would be significantly increased compared to the proposed project.

Utilities

The Existing Zoning Alternative would construct approximately 500,000 total square feet of commercial and retail space. This would be an increase of 320,300 square feet of commercial area compared to proposed project. Compared to the proposed project, the Existing Zoning Alternative would reduce wastewater, solid waste generation, and water use because commercial uses have a reduced water demand than residential uses and, in turn, have lower wastewater generation than residential uses. Furthermore, as mentioned under Hydrology and Water Quality above, this alternative would result in more impervious surface coverage and increased stormwater runoff; but no new public stormwater facilities would be required. The proposed commercial uses would have a greater waste generation rate compared to the proposed project. Therefore; impacts related to water and wastewater would be less the proposed project, but solid waste generation and stormwater infrastructure impacts would greater compared to the proposed project. Overall, impacts on utilities would be reduced compared to the proposed project.

CONCLUSION

Avoid or Substantially Lessen Project Impacts

The Existing Zoning Alternative would reduce impacts related to water supply and wastewater generation, but would increase impacts related to air quality, greenhouse gas emission, hydrology and water quality, transportation, solid waste generation. Land use impacts would similar to the proposed project as the Existing Zoning Alternative would not require a rezone but would not meet the intent of the General Plan designation of Mix Housing Types. As documented throughout Chapter 4.1 through Chapter 4.16 of this Draft EIR, all impacts of the proposed project would be less than significant after mitigation, with the

exception of traffic which would result in significant and unavoidable impacts at seven intersections and one freeway segment.

Attainment of Project Objectives

The *Existing Zoning Alternative* fails to meet the following stated objectives for the proposed project as described in Section 6.1 of this Chapter:

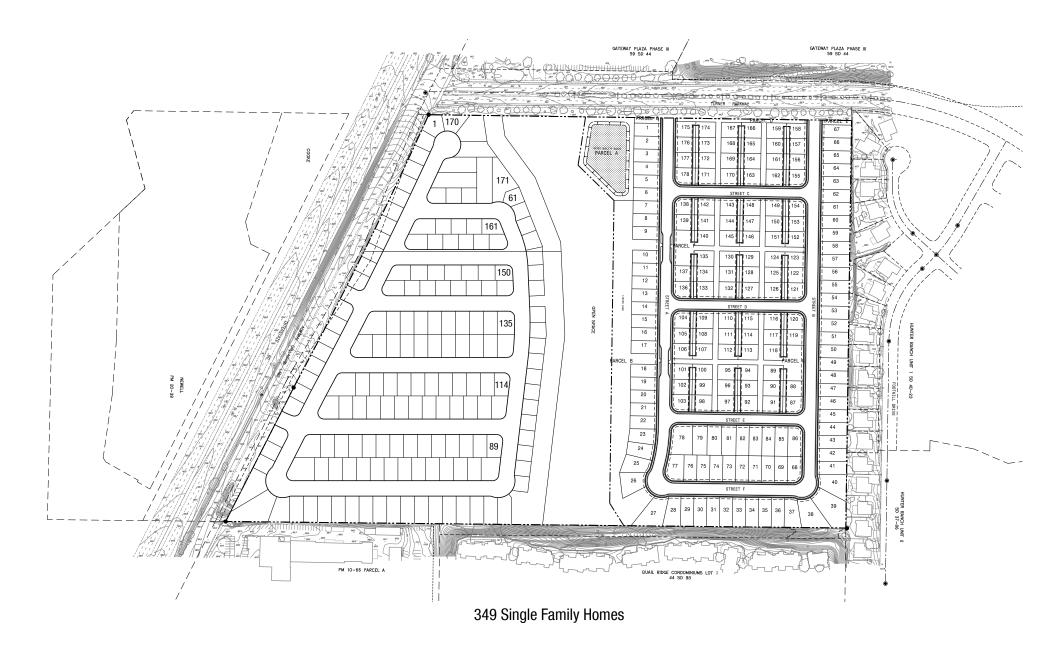
- Implement the objectives of the General Plan to leverage public infrastructure investment to catalyze a mix of new housing, commercial, retail, and recreational development in an opportunity area;
- Develop a project in an opportunity area with an appropriate mix of uses to serve the needs of the public, including housing needs;
- Develop a project in an opportunity area that includes a pedestrian-friendly residential neighborhood with cohesive design that includes active and passive recreational opportunities and bike/pedestrian circulation amenities for future residents and users of the commercial space;
- Develop a project that minimizes visual conflicts by including a thoughtful landscaping and planting plan that is compatible with surrounding development; and
- Develop a project in an opportunity area that enhances amenities and recreational opportunities for residents and visitors to the area.

Comparative Merits

Under the Existing Zoning Alternative, the development footprint would be the same as the proposed project; however, the intensity of development would be significantly increased and impacts on resources such as air quality, greenhouse gas emissions, and traffic also would be increased. This alternative would not provide any new housing opportunities in Vallejo to support the City's job housing balance. This alternative would not be consistent with the General Plan land use designation of Mix of Housing Types.

6.6 ALTERNATIVE 3 – ALL HOUSING ALTERNATIVE

Under the All Housing Alternative, only single-family residential units would be developed on the project site. The existing Costco in Gateway Plaza north of the project site would not relocate to the western portion of the property and there would be no retail component. The project design would maintain the 5.7-acre wetland designated as open space similar to the proposed project. The commercial area on the western portion of the project site would be replaced with 171 single-family homes. The eastern portion of the project would retain the same design as the proposed project and be developed with 178 single-family units. In total, the All Housing Alternative would result in 349 homes. The conceptual site plan for this alternative is shown in **Figure 6-2: All Housing Alternative**. The eastern portion of the project site would retain the same parks as the proposed project, and the residential development in the western portion of the project site would have a linear park along the eastern edge of the development. The same natural gas and sewer utility line relocation would be required under this alternative as compared to the proposed project.



Source: MaKay and Somps, 2019



IMPACTS COMPARED TO PROJECT IMPACTS

An evaluation of the potential environmental impacts of the All Housing Alternative, as compared to those of the proposed project, is provided below.

Aesthetics

The short-term visual impacts associated with grading and construction activities that would occur with the proposed project would similarly occur with the All Housing Alternative. Comparatively, the construction-related impacts to the visual character/quality of the project site and its surroundings would be similar to the proposed project because both would provide development that replaces undeveloped land. The construction duration, timeline, and equipment would be considered similar to the proposed project.

The project site's long-term visual character would be altered with this alternative, as the existing vacant land would be developed with approximately 349 single-family homes. The proposed homes on the western portion of the project site would be much closer to Interstate 80 and Admiral Callaghan Lane than the homes on the eastern portion of the project site. As such, the homes on the westernmost portion of the project site would be exposed to higher levels of traffic noise from the freeway. A sound wall along the western site perimeter, as well as portions of the northern and southern perimeter, would be required. To provide proper noise attenuation, the sound wall would have to be a solid continuous wall (with the exception of the project entry roads from Admiral Callaghan along the perimeter. Depending on the site topography, a berm and sound wall combination may be required to provide enough height to attenuate the noise levels for the proposed homes. While the proposed homes and sound wall would be closer to the Interstate 80 and Admiral Callaghan Lane and therefore more visible, the homes would have less mass and bulk than the Costco building and other commercial buildings. Overall, given the differences in aesthetics when compared to the proposed project, potential aesthetic impacts would be similar to the proposed project and less than significant.

Under this alternative, no commercial or retail space is would be constructed. There would be no additional supply of commercial or retail space as a result of the proposed project. As such, compared to the proposed project, this alternative would have less of an impact on urban decay, and potential impacts would be less than significant.

Under this alternative, light and glare impacts would be neither greater nor lesser than the proposed project. Street lighting, pedestrian lighting, and exterior building lighting would be positioned throughout the project site in a similar way as the proposed project. However, the All Housing Alternative would eliminate the need for 20-foot tall lighting poles needed for parking lots in the commercial area. Potential impacts from lighting and glare, therefore, would be incrementally reduced compared to the proposed project and considered less than significant.

Air Quality

As shown in Table 4.2-6, the proposed project's short-term construction emissions would be below the BAAQMD's applicable thresholds, resulting in a less than significant impact. Short-term air quality impacts from grading, paving, trenching, and building construction would occur with the All Housing Alternative. Comparatively, the construction-related air quality impacts would be similar to the proposed project, as the project footprint would be relatively comparable to the proposed project and the construction timeline would be similar. This alternative would also be required to comply with MM AQ-1, as described in Chapter 4.2, Air Quality, to reduce short-term construction air emissions to a less than significant level.

As indicated in Table 4.2-7, the proposed project would not exceed the BAAQMD's operational thresholds with implementation of mitigation measures with the exception of NO_x emissions which were found to be significant and unavoidable. The project would not result in CO_2 hotspots at any of the study intersections. Long-term air quality emissions under the All Housing Alternative would be decreased compared to the proposed project because the decrease in the amount of traffic trips. Replacing the 179,688 square feet of commercial space with 171 single-family homes would reduce the total number of daily trips on the surrounding roadways. The 171 single-family homes would generate 1,628 daily trips². As such the total daily trips under the All Housing Alternative would be 3,318, compared to 18,560 total daily trips of the proposed project. This would be a significant reduction of new daily automobile trips compared to the proposed project and would decrease pollutants from auto emissions compared to the proposed project.

Locating housing closer to the freeway would incrementally increase the exposure of residents to toxic air contaminants from the freeway. While potential impacts would be anticipated to be less than significant, they would be greater compared to the proposed project. Some mitigation such as providing enhanced air filtration systems could be included, but overall impacts would remain greater than the proposed project.

Overall, impacts on long-term operational air emissions from the All Housing Alternative would be less than significant and reduced when compared to the proposed project.

Biological Resources

The All Housing Alternative would have the same development footprint as the proposed project. As such, potential impacts on biological resources would be the same as the proposed project and the same mitigation measures would be required for the All Housing Alternative. Impacts would be the same as the proposed project.

Cultural Resources and Tribal Cultural Resources

The All Housing Alternative would have the same development footprint as the proposed project. As such, potential impacts on cultural resource and tribal cultural resources would be the same as the proposed

Using ITE Land Use Code 210 and the Project TIA which identifies 9.52 trips per house per day (171 x 9.52 = 1628 total daily trips)

project and the same mitigation measures would be required for the All Housing Alternative. Impacts would be the same as the proposed project.

Geology/Soils

The All Housing Alternative would have the same development footprint as compared to the proposed project. The potential for development to be exposed to unstable soils and seismic activity would be similar to the proposed project. The All Housing Alternative would require the same mitigation measures as the proposed project to reduce potential impacts to less than significant. This alternative could potentially be designed with less grading to preserve more of the existing slopes, but this could exacerbate other issues such as the control of water run, use of LIDs, and need for retaining walls leading to a greater risk of impacts to other resource areas. Potential impacts related to geology and soils would be roughly equivalent under the All Housing Alternative as compared to the proposed project.

Greenhouse Gas Emissions

The All Housing Alternative would have similar construction impacts compared to the proposed project. This alternative would have the same development footprint and a similar amount of grading (approximately 165,000 cubic yards) would be required under this alternative. The equipment needed for construction and the construction timeline would be similar. Therefore, greenhouse gas emissions from construction activities would be similar compared to the proposed project.

Operationally, the All Housing Alternative would result in a reduced amount of greenhouse gas emissions compared to the proposed project. The reduction in the number of traffic trips would significantly reduce the amount emissions from transportation sources, which is usually one the highest contributors to a project's greenhouse emissions. Overall potential impacts related to greenhouse gas emissions are reduced under the All Housing Alternative compared to the proposed project.

Hazards and Hazardous Materials

Hazards and hazardous materials impacts associated with this alternative would be similar to the proposed project. Similar to the proposed project, the transportation, use, and disposal of these materials would be subject to local, state, and federal laws intended to minimize the risk of exposure to hazardous materials. Consistency with these laws and policies would limit hazards to the public from the transportation, use, and disposal of these materials. As discussed above, the use of hazardous materials would be incidental to the operation of the site for all residential development and would be similar to other uses found in residential areas. Hazardous materials associated with the residential uses would be replaced with hazardous materials associated with commercial uses. These would include: heavy metals, household chemicals, oils, solvents, paints, pesticides, and fertilizers. As such, the risks associated with the use of these materials would be similarly small. While the proposed project would involve the transportation, use, and disposal of limited small amounts of hazardous materials, compliance with local, state, and federal regulations and City policies would ensure that the proposed project would result in less than significant impacts and no mitigation is required. Impacts would be roughly equivalent to the proposed project.

Hydrology and Water Quality

The All Housing Alternative would have a similar development footprint as the proposed project. The residential development on the eastern portion of the site would be the same as the proposed project. However, this alternative, would have less impervious surfaces than the proposed project because the residential component on the western portion of the property would have landscaped yard areas and common open space areas. When compared to the hardscape parking lot areas and rooftop areas from the commercial development as part of the proposed project, the number of impervious surfaces and potential for runoff would be reduced. Additionally, while the overall drainage plan in this area would be similar to the proposed project, this alternative would conduct less surface water runoff to the bioretention basin needed for infiltration or release into the central drainage area. Therefore, potential impacts on hydrology and water quality would be reduced compared to the proposed project under this alternative.

Land Use

The All Housing Alternative would require a rezone to a different zone classification from the existing zoning classification of Pedestrian Shopping and Service District. Under this alternative, it is anticipated that a Planned Development zone similar to the proposed project would be required. However, the City's updated General Plan 2040 identified the western portion of this property for retail and entertainment uses and a General Plan Amendment may be required for the development of residential uses in this area. Although an inconsistency with a General Plan guidance does not necessarily result in a significant impact, as discussed, this alternative would increase impacts related to noise, public services, recreation, and utilities. Therefore, potential impacts associated with land use would be greater compared to the proposed project.

Noise

Regarding exposure to noise levels in excess of the established standards, construction noise associated with the proposed project would result in less than significant impacts with mitigation incorporated. Construction activities also would cause less significant increased mobile noise along access routes to and from the site due to movement of equipment and workers and the proposed project's construction-related vibration impacts would be less than significant. Similar short-term noise impacts from grading and construction activities would occur with the All Housing Alternative, as the development footprint would be the same as the proposed project. Although this alternative only includes residential development, the construction timing, duration, and equipment would be similar to the proposed project. Therefore, the less than significant short-term noise impacts (with mitigation incorporated) that would occur with the proposed project would occur also with the All Housing Alternative. This alternative would also be required to comply with MM NOI-1 to reduce short-term construction noise impacts to a less than significant level.

Regarding traffic generated noise, Existing Plus project modeled noise levels from long-term mobile sources would range from 59.5 dBA to 65.4 dBA at 100 feet from the centerline. The proposed project would increase noise levels on the existing roadways in the project vicinity by a maximum of 1.5 dBA along

Admiral Callaghan Drive from Turner Parkway to Rotary Drive, resulting in less than significant noise levels. Under the All Housing Alternative, the replacement of commercial and retail space with single-family homes would generate approximately 1,231 daily trips which are substantially less than the approximate 10,000 daily trips from the commercial uses from the proposed project. The reduction of car trips would decrease the amount of traffic noise along Admiral Callaghan Lane and Turner Parkway. In this regard, this alternative would result in noise impacts that are reduced compared to the proposed project.

The placement of houses near Interstate 80 and Admiral Callaghan Lane would expose more people to traffic noise from those roadways. The level of traffic noise from these roadways would exceed the City's limits of 60 dBA for residential uses. Mitigation would be required in the form of sound attenuation barriers along the western perimeter of the houses in the western portion of the project site. As a result, this alternative would increase noise impacts on future residents from nearby traffic noise compared to the proposed project. Overall, the All Housing Alternative would have increased impacts compared to the proposed project.

Energy Conservation

Development under the All Housing Alternative would create a less intensive development with the replacement of approximately 180,000 square feet of commercial space with 171 single-family homes. Energy consumption during construction would be similar for the All Housing Alternative as the proposed project because the construction equipment and duration of construction would be similar.

Both types of development would have opportunities to install roof-mounted solar to reduce the amount of electricity consumed by the development. However, the All Housing Alternative would generate substantially fewer daily trips compared the proposed project which would consume less fuel. Therefore, this alternative would consume less energy when compared to the proposed project.

Population and Housing

Under the All Housing Alternative, approximately 180,000 square feet of commercial space would be replaced with 171 single-family homes. As discussed in Chapter 4.12, Population and Housing, 2.88 people are assumed per single-family home. Under this alternative, with 349 single-family homes, approximately 1,092 new residents would be generated compared to 513 with the proposed project. The All Housing Alternative would not generate any new permanent employees. Similar to the proposed project, this would be a negligible increase to the City's population and would be well within the range of population growth forecasted by ABAG, which is 131,800 people by 2040. In addition, as discussed above, this alternative would provide 171 more residences than the proposed project within the above moderate-income category. This alternative would do more than the proposed project to help the City meet its ABAG RHNA goal of 1,362 units. Therefore, the proposed project's growth would be consistent with ABAG's projections for the City. Impacts on population and housing would be less than significant and similar to the proposed project.

Public Services

This alternative would involve development of all residential uses and no commercial uses. Because of the increase in the number of residential units and associated population, this alternative would involve an increased demand for police and fire protection services, library services, and would increase the number of students that would need to be accommodated at local public schools. The existing enrolment of the school district is approximately 35% less than capacity. The schools that would serve students generated from the proposed project are anticipated to serve the increased number of students without further expansion. This alternative would increase the demand for other public services including police, fire, libraries, parks, and facilities needed to facilitate service to the increased population. Similar to the proposed project; however, payment of fees would offset potential increases in service requests. Therefore, impacts associated with public services under this alternative would remain less than significant.

Recreation

This alternative would involve development of all residential uses and no commercial uses. Because of the increase in the number of residential units and associated population, this alternative would increase the demand for parks and recreation facilities and increase the likelihood that new recreation facilities are needed to serve the increased population. Impacts associated with recreation would be less than significant, but greater than the proposed project.

Transportation and Traffic

Traffic impacts under the proposed project were identified as significant and unavoidable for seven intersections and one freeway segment. Under the All Housing Alternative, a decrease in approximately 15,242total average daily traffic trips³ is anticipated as a result of replacing commercial development with residential development. This significant reduction in traffic trips on the study intersections would reduce the impact on those intersections with the exception of the intersection at existing Plaza Drive/Costco Driveway used to access the existing Costco, which currently operates at an unacceptable level of service (LOS) with or without the addition of any project traffic. As a result, traffic impacts under the All Housing Alternative would be significantly reduced compared to the proposed project. This alternative would reduce the significant and unavoidable impact at the I-80/Redwood Parkway interchange.

Utilities

The All Housing Alternative would construct approximately 349 single-family residential houses. This would be an increase of 171 homes and no commercial development compared to the proposed project. Compared to the proposed project, the All Housing Alternative would increase water use, wastewater and solid waste generation compared to the proposed project because residential uses have an increased

³ As shown in the project TIA, the proposed project commercial uses would generate 16,870 total average daily tips, subtracting the 1,628 trips from the All Housing Alternative results in a reduction of 15,242 total daily trips (16,870 – 1,628 = 15,242).

water demand compared to commercial uses and in turn have a higher wastewater generation than commercial uses.

As mentioned under Hydrology and Water Quality above, this alternative would result in less impervious surface coverage and decreased stormwater runoff because there would be more landscaped areas (e.g., yard areas for homes) for water to infiltrate. Similar to the proposed project no new public stormwater facilities would be required. The proposed residential uses would have slightly less solid waste generation compared to the commercial uses with the proposed project. Therefore, overall impacts related to water and wastewater would be greater than proposed project and solid waste generation and stormwater infrastructure impacts would be reduced compared to the proposed project. Overall, impacts on utilities would be greater compared to the proposed project.

CONCLUSION

Avoid or Substantially Lessen Project Impacts

The All Housing Alternative would reduce impacts related to air quality, greenhouse gases, traffic, and energy conservation but would increase impacts related to noise, public services, recreation, and utilities. Land use impacts would be increased as the All Housing Alternative would still require a rezone but would not meet the intent of the General Plan designation of Retail/Entertainment and likely require an amendment to the General Plan.

Attainment of Project Objectives

The *All Housing Alternative* fails to meet the following stated objectives for the proposed project as described in Section 6.1 of this Chapter:

- Implement the objectives of the General Plan to leverage public infrastructure investment to catalyze a mix of new housing, commercial, retail, and recreational development in an opportunity area;
- Develop a project in an opportunity area with an appropriate mix of uses to serve the needs of the public, including housing needs.
- Develop a project in an opportunity area that enhances amenities and recreational opportunities for residents and visitors to the area; and
- Support economic development by developing a vacant, under-developed site with a project that provides a broad range of retail goods and services, retains a major source of sales tax revenue, generates significant additional sales tax revenues, and creates jobs for city residents.

Comparative Merits

Under the All Housing Alternative, the development footprint would be the same as the proposed project, however the intensity of development would be significantly less and impacts to resources such as air quality, greenhouse gas emissions, and traffic would be decreased. This alternative would not provide any new employment opportunities in Vallejo to support the City's job housing balance. The All Housing Alternative would not provide for an opportunity for the expansion and retention of Costco. This

alternative would not meet the intent of the General Plan land use designation of Retail/Entertainment for the western portion of the project site. This property was specifically identified in the City's Callaghan – Columbus opportunity area in the General Plan 2040. The key opportunity areas were identified as important infill sites where development could produce a significant positive impact on quality of life. This alternative would not help the City meet those General Plan goals.

6.7 ALTERNATIVE 4 – WETLAND PRESERVATION ALTERNATIVE

The Wetland Preservation Alternative has been designed to minimize impacts on the wetland areas onsite. Under this design, the majority of wetland areas onsite would be preserved, and no development would occur within the wetland areas, with the exception of internal roadway crossings. The Costco and retail areas would be developed similar to the proposed project, as would the 5.7-acre open space preservation area. On the eastern portion of the site, the development footprint of the residential area would be reduced to avoid wetland impacts. A 25-foot building setback is included around the edge of the wetlands to prohibit development within this area (with the exception of roadway crossings needed for building access and emergency vehicle access). A conceptual site plan is shown in Figure 6-3: Wetland Preservation Alternative. Preserving the wetland areas would result in a smaller development footprint and less area for constructing homes. Under this alternative, the residential component would be modified to include 510 multi-family residential units. The multi-family units would consist of 20 buildings located throughout the site. The building heights would range between 3-4 stories. Single-family development would not be feasible under this alternative because the number of units would be substantially reduced, and denser development scheme would be needed to support the construction and infrastructure costs associated with constructing roadways, wetland crossings, water and sewer lines, and wetland preservation costs. Under this alternative, there would be fewer opportunities for common open space areas and a linear park depending on parking requirements and where parking areas would be located.

IMPACTS COMPARED TO PROJECT IMPACTS

An evaluation of the potential environmental impacts of the All Housing Alternative, as compared to those of the proposed project, is provided below.

Aesthetics

The short-term visual impacts associated with grading and construction activities that would occur with the proposed project would similarly occur with the Existing Zoning Alternative. Comparatively, the construction-related impacts to the visual character/quality of the project site and its surroundings would be similar to the proposed project because both would provide development that replaces undeveloped land. The construction duration, timeline, and equipment would be considered similar to the proposed project. Similar to the proposed project, the project site's long-term visual character would be altered with this alternative, as the existing vacant land would be developed with commercial and residential uses. The residential buildings would be up between 35-45 feet in height and have a larger visible bulk

and scale compared to the residential houses in the proposed project. The view of the project site would generally be the same from Interstate 80 and Admiral Callaghan Lane. The bigger buildings would be more visible from Turner Parkway.

Under this alternative, the same amount of commercial and retail space would be proposed as the proposed project, and similar to the proposed project, potential impacts from urban decay would be less than significant

Under this alternative, light and glare impacts would be neither greater nor lesser than the proposed project as street lighting, pedestrian lighting, and exterior building lighting positioned throughout the project site. However, the Wetland Preservation Alternative would provide more outdoor lighting within the parking areas in the residential area. These lighting areas would be visible from residential uses to the east and south. Potential aesthetics impacts would be incrementally increased compared to the proposed project, but still considered less than significant.

Air Quality

As shown in Table 4.2-6, the proposed project's short-term construction emissions would be below the BAAQMD's applicable thresholds, resulting in a less than significant impact. Short-term air quality impacts from grading, paving, trenching, and building construction would occur with the Existing Zoning Alternative. Comparatively, the construction-related air quality impacts would be similar to the proposed project, as the project footprint would be relatively comparable to the proposed project and the construction timeline would be similar. Therefore, this alternative would also be required to comply with MM AQ-1, as described in Chapter 4.2, Air Quality, to reduce short-term construction air emissions to a less than significant level.

As indicated in Table 4.2-7, the proposed project would not exceed the BAAQMD's operational thresholds with implementation of mitigation measures with the exception of NO_x emissions which were found to be significant and unavoidable. Additionally, the proposed project would not result in CO hotspots at any of the study intersections. Long-term air quality emissions under the Wetland Preservation Alternative would be increased compared to the proposed project because the increase in the amount of traffic trips. Replacing 178 single-family units with 510 multi-family units would add approximately 1,055 daily trips⁴ to the surrounding roadways. The addition of approximately 1,500 new total daily automobile trips compared to the proposed project (1,690 total daily trips) would incrementally increase pollutants from auto emissions compared to the proposed project. Overall, impacts on long-term operational air emissions from the Wetland Preservation Alternative would be increased when compared to the proposed project.

_

⁴ Using ITE Land Use Code 221 which identifies 5.44 daily trips per multifamily unit (510 x 5.44 = 2,745 total daily trips). The residential component of the proposed project would generate 1,690 total daily trips (2,745 -1,690 = 1,055 total daily trips).

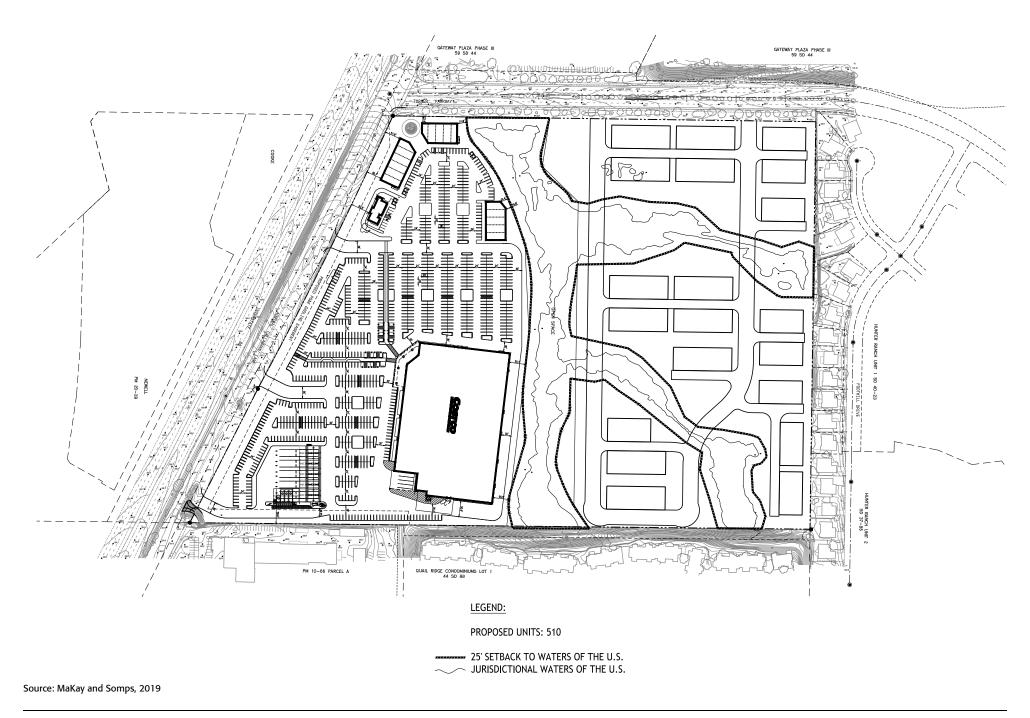
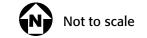


FIGURE 6-3: Wetland Preservation Alternative Fairview at Northgate Project





Biological Resources

The Wetland Preservation Alternative would have a reduced development footprint compared the proposed project with the intent of preserving as much of the wetland areas onsite as possible. The proposed project would impact approximately 2.5 acres of the approximately 5.0 acres of wetland habitat onsite. The Wetland Preservation Alternative would avoid the wetland habitat except in those areas where roadway crossings are necessary to provide access, including emergency access and emergency vehicle access. In these areas the impacts associated with increased shading from the widened roadway/bridge would be similar to the proposed project. In addition, impacts from indirect edge effects would be slightly reduced under this alternative because the proposed residential structures would be set back from the wetlands. As such, potential impacts on biological resources would be reduced compared to the proposed project. Mitigation measures for the protection of nesting birds, and the protection of preserved wetland areas would still be required under this alternative. No additional mitigation measures would be required for the Wetland Preservation Alternative.

Cultural Resources and Tribal Cultural Resources

The Wetland Preservation Alternative would have a reduced development footprint compared to the proposed project. However, potential impacts on cultural resource and tribal cultural resources would be similar to the proposed project and the same mitigation measures would be required for the Existing Zoning Alternative.

Geology/Soils

The Wetland Preservation Alternative would have a reduced development footprint compared to the proposed project. The potential for development to be exposed to unstable soils and seismic activity would be similar to the proposed project. The Wetland Preservation Alternative would require the same mitigation measures as the proposed project to reduce potential impacts to less than significant. Overall, potential impacts related to geology and soils would be similar under the Wetland Preservation Alternative as compared to the proposed project.

Greenhouse Gas Emissions

The Wetland Preservation Alternative would have similar construction impacts compared to the proposed project. This alternative would have a substantially reduced development footprint because most of the wetland areas would be preserved and grading in these areas would not occur. Grading under this alternative would be reduced compared to proposed project which would require approximately 165,000 cubic yards. The equipment needed for construction and the construction timeline would be similar. Therefore, greenhouse gas emissions from construction activities would be similar compared to the proposed project.

Operationally, the Wetland Preservation Alternative would result in a greater amount of greenhouse gas emissions compared to the proposed project. The increase in number of units building size would require more energy for heating and cooling, and lighting. However, the development under this alternative would have opportunities for rooftop solar and charging stations for electrical vehicles. This alternative

would increase the amount of vehicle trips by 1, of total daily trips which would result in an increase in the greenhouse gas emissions from transportation sources compared to the proposed project. Overall potential impacts related to greenhouse gas emissions are greater under the Wetland Preservation Alternative compared to the proposed project.

Hazards and Hazardous Materials

Hazards and hazardous materials impacts associated with this alternative would be similar to the proposed project. Similar to the proposed project, the transportation, use, and disposal of these materials would be subject to local, state, and federal laws intended to minimize the risk of exposure to hazardous materials. Consistency with these laws and policies would limit hazard impacts to the public. As discussed above, the use of these hazardous materials would be incidental to the operation of the commercial and proposed residential uses and would be similar to other such developments. Uses would include chemicals that may contain heavy metals, as well as household chemicals, oils, solvents, paints, pesticides, and fertilizers. As such, the risks associated with the common use of these materials would be small and similar to the proposed project. Additionally, the proposed project would involve the transportation, use, and disposal of limited small amounts of hazardous materials, compliance with local, state, and federal regulations and County policies would ensure that the proposed project would result in less than significant impacts and no mitigation is required.

Hydrology and Water Quality

The Wetland Preservation Alternative would have a reduced development footprint compared to the proposed project. The commercial development on the western portion of the site would be the same as the proposed project. However; this alternative would have less impervious surfaces than the proposed project because the residential component on the eastern portion of the property would have a smaller development footprint because the wetland areas that traverse this portion of the project site would remain. Unlike the proposed project, these areas would be left in their existing condition and would not be covered with impervious surfaces. The multi-family units would have some landscaped areas around the buildings and those areas not used for parking would also be landscaped allowing for infiltration. The overall drainage plan in this alternative would be similar with surface water runoff draining to a bioretention basin for infiltration or release into the central drainage area. Potential impacts on hydrology and water quality would be reduced compared to the proposed project under this alternative.

Land Use

The Wetland Preservation Alternative would require a rezone to a different zone classification from the existing zoning classification of Pedestrian Shopping and Service District. Under this alternative, it is anticipated that a Planned Development zone similar to the proposed project would be required. Therefore, potential impacts would be similar compared to the proposed project.

Noise

Construction noise associated with the proposed project would result in less than significant impacts with mitigation incorporated, regarding exposure to surrounding sensitive receptors to noise levels in excess

of the established standards. Construction activities would cause less significant increased mobile noise along access routes to and from the site due to movement of equipment and workers. The proposed project's construction-related vibration impacts would be less than significant. Similar short-term noise impacts from grading and construction activities would occur with the Wetland Preservation Alternative, as the development footprint would be less than the proposed project. Although this alternative includes a higher density of residential development, the construction timing, duration, and equipment would be similar to the proposed project. Therefore, the less than significant short-term noise impacts (with mitigation incorporated) that would occur with the proposed project also would occur with the Wetland Preservation Alternative. This alternative would also be required to comply with MM NOI-1 to reduce short-term construction noise impacts to a less than significant level.

Regarding traffic generated noise, Existing Plus project modeled noise levels from long-term mobile sources would range from 59.5 dBA to 65.4 dBA at 100 feet from the centerline. The proposed project would increase noise levels on the existing roadways in the project vicinity by a maximum of 1.5 dBA along Admiral Callaghan Drive from Turner Parkway to Rotary Drive, resulting in less than significant noise levels. Under the Wetland Housing Alternative, the replacement of single-family residential with multi-family residential homes generating and additional 1,055 total daily trips compared to the proposed project. The increase in vehicle trips would incrementally increase the amount of traffic noise along Admiral Callaghan Lane and Turner Parkway. In this regard, this alternative would result in noise impacts that are slightly greater compared to the proposed project.

Energy Conservation

Development under the Wetland Preservation Alternative would create a more intensive development with the replacement of 178 single-family homes with 510 multi-family homes. Energy consumption during construction would be similar for the Wetland Preservation Alternative as the proposed project because the construction equipment and duration of construction would be similar.

Both types of development would have opportunities to install roof-mounted solar to reduce the amount of electricity consumed by the development. However, the Wetland Preservation Alternative would generate more daily trips compared the proposed project which would consume more fuel. Therefore, this alternative would consume more energy when compared to the proposed project.

Population and Housing

Under the Wetland Preservation Alternative, 178 single-family homes would be replaced with 510 multifamily homes. As discussed on Chapter 4.12, Population and Housing, 2.88 people are assumed per household. Under this alternative, with 510 multi-family homes approximately 1,468 new residents would be generated compared to 513 with the proposed project. The Wetland Preservation Alternative would generate the same number of employees as the proposed project. Similar to the proposed project, this would be a negligible increase to the City's population and would be well within the range of population growth forecasted by ABAG, which is 131,800 by 2040. Therefore, the proposed project's growth would be consistent with ABAG's projections for the City. In addition, this alternative would provide more residential units compared to the proposed project and bring the City closer to meeting the ABAG RHNA

goal of 1,362 units. Nonetheless, the overall impacts would be similar to the proposed project because neither alternative would displace existing residents or require the construction of replacement housing elsewhere. Impacts on population and housing would be less than significant and similar to the proposed project.

Public Services

This alternative would involve development of an increased number of residential units and no commercial uses. Because of the increase in the number of residential units and associated population, this alternative would involve an increased demand for police and fire protection services, library services, and would increase the number of students that would need to be accommodated at local public schools. Impacts associated with public services would be less than significant, but greater than the proposed project.

Recreation

This alternative would involve development of all residential uses and no commercial uses. Because of the increase in the number of residential units and associated population, this alternative would increase the demand for parks and recreation facilities. Impacts associated with recreation would be less than significant, but greater than the proposed project.

Transportation and Traffic

Traffic impacts under the proposed project were identified as significant and unavoidable for seven intersections and one freeway segment. Under the Wetland Preservation Alternative, an increase of approximately 1,055 average total daily traffic trips is anticipated as a result of replacing the 178 single-family homes with 510 multi-family homes. The addition of 1,055 total traffic trips to failing intersections would adversely affect the performance of those intersection and other intersections in the surrounding area. As a result, traffic impacts under the Wetland Preservation Alternative would be significantly increased compared to the proposed project.

Utilities

The Wetland Preservation Alternative would construct approximately 510-multi-family residential homes and 189,000 square feet of commercial space. This would be an increase in residential uses compared to the proposed project. Compared to the proposed project, the Wetland Preservation Alternative would increase water use, wastewater and solid waste generation compared to the proposed project. Although multi-family residences have a reduced demand for utilities compared to single-family residences, the increased number of units would result in an increased water demand compared to commercial uses and in turn have a higher wastewater generation than commercial uses.

As mentioned under Hydrology and Water Quality above, this alternative would result in less impervious surface coverage and decreased stormwater runoff because there would be a smaller development footprint to avoid the wetland areas. Similar to the proposed project no new public stormwater facilities would be required. The proposed multi-family residential uses would have a similar waste generation rate

compared to the single-family uses with the proposed project, however the increase in number of units would result in more solid waste generation overall. Therefore, overall impacts related to water, wastewater, and solid waste generation would be greater than proposed project and stormwater infrastructure impacts would be reduced compared to the proposed project. Overall, impacts on utilities would be increased compared to the proposed project.

CONCLUSION

Avoid or Substantially Lessen Project Impacts

The Wetland Alternative would reduce impacts related to biological resources, hydrology and water quality but would increase impacts related to air quality, energy conservation, greenhouse gas emissions, noise, public services, recreation, traffic, and utilities. Land use impacts would be increased as the Wetland Preservation Alternative would still require a rezone but would not meet the intent of the General Plan designation of Retail/Entertainment and likely required a rezone. As documented throughout Chapter 4.1 through Chapter 4.16 of this Draft EIR, all impacts of the proposed project would be less than significant after mitigation, with the exception of traffic which would result in significant and unavoidable impacts at seven intersections.

Attainment of Project Objectives

The Wetland Preservation Alternative fails to meet the following stated objectives for the proposed project as described in Section 6.1 of this Chapter:

- Develop a project in an opportunity area that includes a pedestrian-friendly residential neighborhood with cohesive design that includes active and passive recreational opportunities and bike/pedestrian circulation amenities for future residents and users of the commercial space;
- Develop a project in an opportunity area that enhances amenities and recreational opportunities for residents and visitors to the area.

Comparative Merits

Under the Wetland Preservation Alternative, the development footprint would be slightly reduced compared to the proposed project; however, the intensity of residential development would be significantly greater. Impacts on resources such as air quality, energy consumption, greenhouse gas emissions, public services, recreation, traffic, and utilities would be substantially increased. The increased residential density (approximately 21 dwelling units per acre) proposed under this alternative would not provide the surrounding area with a development of a similar style and intensity as the existing residential development surrounding the property, particularly the adjacent residences to the east. Preserving all of the wetland habitat onsite would substantially reduce the area available for recreational opportunities onsite such as neighborhood parks and a linear park within the residential area. A wetland preservation design also substantially limits the design opportunities to create a walkable neighborhood with interconnected pathways for bike and pedestrian circulation on the project site because the residential development areas are isolated and only connected by bridges. As the commercial development would

be the same as the proposed project, this alternative would provide for an opportunity for the expansion and retention of Costco.

6.8 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. Section 15126.6 (e)(2) of the State CEQA Guidelines require that an environmentally superior alternative be designated and states that if the environmentally superior alternative is the No Project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

Based on the summary of information presented in *Table 6-1: Comparison of Project Alternatives Environmental Impacts with the Proposed Project,* the environmentally superior alternative is Alternative 1: No Project Alternative. Because Alternative 1 would leave the project site essentially unchanged and would not have the operational effects that would be associated with any of the alternatives, this alternative has fewer environmental impacts than the proposed project or any of the other alternatives.

Section 15126.6(e)(2) of the State CEQA Guidelines states that if the "No Project" alternative is found to be environmentally superior, "the EIR shall also identify an environmentally superior alternative among the other alternatives. Aside from the No Project Alternative, Alternative 3: All Housing Alternative would have the least environmental impacts because it would develop a total of 349 single-family homes and would have a reduction in most identified impacts; such as air quality, greenhouse gas emissions, noise, and traffic.

The context of an environmentally superior alternative is based on the consideration of several factors including the reduction of environmental impacts to a less than significant level, the project objectives, and an alternative's ability to fulfill the objectives with minimal impacts to the existing site and surrounding environment. According to Table 6-1, the No Project alternative would be the environmentally superior alternative because it would eliminate all of the potentially significant impacts of the proposed project. However, while the No Project alternative is the environmentally superior alternative, it is not capable of meeting any of the basic objectives of the proposed project.

After the No Project alternative, the environmentally superior alternative to the proposed project is the one that would result in the fewest or least significant environmental impacts. Based on the evaluation undertaken, Alternative 3: All Housing Alternative is the environmentally superior alternative. This is an environmentally superior project alternative because it is a less intense development compared to the proposed project. However, the development of 349 single-family homes proposed under this alternative would not meet most of the project objectives, and it would require a policy determination from the City regarding General Plan and zoning amendments. Most critically, the All Housing Alternative would not meet the project objectives of implementing the objective of the General Plan to leverage public infrastructure investment, developing with an appropriate mix of uses to serve the public, and supporting economic development on an under-developed site with a project that provides a broad range of retail

goods and services, retains a major source of sales tax revenue, generates significant additional sales tax revenues, and creates jobs for city residents.

Table 6-1: Comparison of Project Alternatives Environmental Impacts with the Proposed Project

	Alternative				
EIR Chapter	Proposed Project - Level of Impact After Mitigation	Alternative 1- No Project	Alternative 2- Existing Zoning	Alternative 3- All Housing	Alternative 4- Wetland Preservation
4.1 – Aesthetics	Less Than Significant	-	=	=	+
4.2 – Air Quality	Less Than Significant	-	+	-	+
4.3 – Biological Resources	Less Than Significant	-	=	=	-
4.4 – Cultural Resources and Tribal Cultural Resources	Less Than Significant	-	=	=	=
4.5 – Geology and Soils	Less Than Significant	-	=	=	=
4.6 – Greenhouse Gas Emissions	Less Than Significant	-	+	-	+
4.7 – Hazards and Hazardous Materials	Less Than Significant	-	=	=	=
4.8 – Hydrology and Water Quality	Less Than Significant	-	+	=	-
4.9 – Land Use	Less Than Significant	-	+=	+	=
4.10 – Noise	Less Than Significant	-	+	-	+
4.11 – Energy Conservation	Less Than Significant	-	+	-	+
4.12 – Population and Housing	Less Than Significant	-	=	=	=
4.13 – Public Services	Less Than Significant	-	-	+	+
4.14 – Recreation	Less Than Significant	-	-	+	+
4.15 – Transportation	Significant and Unavoidable	-	+	-	+
4.16 – Utilities	Less Than Significant	-	-	+	+
Attainment of Project Objectives	Meets all of the Project Objectives	Meets none of the Project Objectives	Meets some of the Project Objectives	Meets some of the Project Objectives	Meets most of the Project Objectives

Notes:

A minus (-) sign means the Project Alternative has reduced impacts from the proposed project.

A plus (+) sign means the Project Alternative has increased impacts from the proposed project.

An equal sign (=) means the Project Alternative has similar impacts to the proposed project.