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ALTERNATIVES ANALYSIS

6.1 INTRODUCTION

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

6.2 PURPOSE OF ALTERNATIVES

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

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

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

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

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

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

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

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

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

Project Objectives

Based on the above, reasonable alternatives to the project must be capable of feasibly attaining most of the basic objectives of the project. As discussed in Chapter 3, Project Description, of this EIR, the following objectives have been developed by the City of Davis and the Applicant for the proposed project:

1. Create a diverse community that provides housing for multiple generations and lifestyles and at densities consistent with City and Regional objectives.
2. Provide Davis residents and employees with housing options that are accessible to employment centers and are convenient to destinations for daily needs.

3. Activate an underutilized property to meet housing needs for a wide spectrum of community members with a rental housing community containing a range of unit types and sizes and a variety of indoor and outdoor amenities appropriate for long-term residency to create a safe, attractive, and active onsite community.
4. Provide convenient alternatives to auto travel by incorporating safe and convenient bicycle and pedestrian access within the site and facilitating access to the City's bicycle network, nearby parks, and transit stops.
5. Utilize advanced site and building design principles to address noise and air quality for future residents and for residential neighborhoods to the south of the site.
6. Allow appropriate transitional development on the site reflecting adjacent residential, commercial, and transportation uses.
7. Foster a sustainable community, addressing building efficiency, sustainable site design, transportation alternatives, and efficient use of land.

Impacts Identified in the EIR

In addition to attaining the majority of project objectives, reasonable alternatives to the project must be capable of reducing the magnitude of, or avoiding, identified significant environmental impacts of the proposed project. A summary of the environmental impacts identified for the proposed project are provide below.

Significant and Unavoidable

Impacts of the proposed project that have been determined to remain significant and unavoidable, even after implementation of the feasible mitigation measures set forth in this EIR, include the following:

- **Cultural Resources:** Cause a substantial adverse change in the significance of a historical resource.

Less Than Significant with Mitigation

Significant environmental impacts of the proposed project that have been identified as requiring mitigation measures to ensure that the level of significance is ultimately less than significant include the following:

- **Air Quality:** The EIR determined that implementation of the proposed project could result in a significant impact related to exposure of sensitive receptors to substantial pollutant concentrations, specifically associated with construction diesel particulate matter (DPM). The EIR requires mitigation in order to ensure that the impact is reduced to a less-than-significant level.
- **Hydrology and Water Quality:** The EIR determined that implementation of the proposed project could result in significant impacts related to the following: violation of water quality standards or the creation of a substantial additional source of polluted runoff during

construction; the creation of additional sources of polluted runoff or a substantial degradation of water quality during project operations; and altering existing site drainage patterns in such a way as to exceed the capacity of existing infrastructure or lead to flooding on- or off-site. The EIR requires mitigation in order to ensure that the aforementioned impacts are reduced to less-than-significant levels.

- **Noise:** The EIR determined that implementation of the proposed project could result in significant impacts related to the following: a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project; exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels; and transportation noise at new sensitive receptors at the project site (specifically related to the exterior noise levels at the single-family residences proposed under Alternative B only and interior noise levels under both project development scenarios). The EIR requires mitigation in order to ensure that the aforementioned impacts are reduced to less-than-significant levels.
- **Transportation and Circulation:** The EIR determined that implementation of the proposed project could result in significant impacts related to construction vehicle traffic. The EIR requires mitigation in order to ensure that the impact is reduced to a less-than-significant level.

Less Than Significant or No Impact

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

- **Air Quality**
 - Violate any air quality standard or contribute substantially to an existing or projected air quality violation during construction.
 - Violate any air quality standard or contribute substantially to an existing or projected air quality violation during operations, and a conflict with or obstruction of implementation of applicable air quality plans.
 - Create objectionable odors affecting a substantial number of people.
 - Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors).
- **Cultural Resources**
 - Cumulative development in the City of Davis, in conjunction with the development of the proposed project, could contribute incrementally to the regional loss of cultural resources in the City of Davis.

- ***Greenhouse Gas Emissions and Energy***
 - Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.
 - Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.
 - Result in the inefficient or wasteful use of energy associated with construction.
 - Result in the inefficient or wasteful use of energy associated with project operations.

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

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

- ***Noise***
 - Transportation noise impacts to existing sensitive receptors in the project vicinity.
 - Cumulative impacts on traffic noise-sensitive receptors.

- ***Transportation and Circulation***
 - Impacts to study roadway segments under Existing Plus Project Conditions.
 - Impacts to study intersections under Existing Plus Project Conditions.
 - Impacts to local or regional VMT under Existing Plus Project Conditions.
 - Impacts related to emergency access.
 - Impacts related to transit services.
 - Impacts related to bicycle and pedestrian facilities.
 - Impacts to study roadway segments under EPAP Plus Project Conditions.
 - Impacts to study intersections under EPAP Plus Project Conditions.
 - Impacts to study roadway segments under Cumulative Year 2035 Plus Project Conditions.
 - Impacts to study intersections under Cumulative Year 2035 Plus Project Conditions.
 - Impacts to study roadway segments under Super Cumulative Year 2035 Plus Project Conditions.
 - Cumulative impacts related to transit services.
 - Cumulative impacts related to bicycle and pedestrian facilities.

- **Utilities and Service Systems**

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

The Initial Study prepared for the proposed project during the scoping period (see Appendix C) includes a detailed environmental checklist addressing a range of technical environmental issues. For each technical environmental issue, the Initial Study identifies the level of impact for the proposed project. The Initial Study identifies the environmental effects as either "no impact," "less-than-significant," "less-than-significant with mitigation incorporated," or "potentially significant." Impacts identified for the proposed project in the Initial Study as "no impact," "less-than-significant," or "less-than-significant with mitigation incorporated" are listed below, and summarized further in Chapter 1, Introduction, of this EIR.

- Aesthetics (All Items);
- Agriculture and Forest Resources (All Items);
- Air Quality (e);
- Biological Resources (All Items);
- Cultural Resources (b, c, d);
- Geology and Soils (All Items);
- Hazards and Hazardous Materials (All Items);
- Hydrology and Water Quality (g-j);
- Land Use and Planning (a, c);
- Mineral Resources (All Items);
- Noise (e-f);
- Population and Housing (All Items);
- Public Services (All Items);
- Recreation (All Items);
- Transportation and Circulation (c); and
- Tribal and Cultural Resources (All Items).

As stated above, reasonable alternatives to the project must be capable of reducing the magnitude of, or avoiding, identified significant environmental impacts of the proposed project. Because the proposed project would not result in significant impacts related to the resource areas listed above, a comparison of potential impacts associated with the aforementioned resource areas as a result of

project alternatives versus the proposed project is not provided in this chapter. Rather, this chapter focuses on those resource areas and specific impacts listed above that have been identified for the proposed project as requiring mitigation measures to reduce impacts.

6.3 ALTERNATIVES CONSIDERED BUT DISMISSED

As discussed throughout this EIR, the proposed project would be consistent with the Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) adopted by the Sacramento Area Council of Governments (SACOG). One benefit of the CEQA streamlining process is that projects that are consistent SACOG's MTP/SCS requirements for Transportation Priority Projects (TPPs) are granted CEQA streamlining benefits. As noted in Chapter 1.0, Introduction, of this EIR, per CEQA streamlining benefits, the EIR is not required to reference, describe, or discuss project-specific or cumulative impacts from cars and light-duty truck trips generated by the project on global warming or the regional transportation network (Pub. Resources Code, §21159.28, subd. (a).); alternative locations, densities, and building intensities to the proposed project need not be considered (Pub. Resources Code, § 21159.28, subd. (b) and 21155.2, subd. (c)(2).); nor is this EIR required to consider potential impacts related to aesthetics or parking issues (Pub. Resources Code, § 21099, subd. (d)(1).).

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

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

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

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

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

Reduced Density Alternative

In addition to the proposed Preferred Site Plan, a project alternative, Alternative B, is being considered for the proposed project and has been evaluated at an equal level throughout this EIR. Alternative B would be considered a reduced density alternative, as 32 fewer units would be proposed for the site than the Preferred Site Plan. Other than Alternative B, further reduced density alternatives are not considered in this EIR given that the streamlining benefits applicable to qualifying in-fill projects that are consistent with SACOG's MTP/SCS, such as the proposed project, include that alternative locations, densities, and building intensities to the proposed project need not be considered (Public Resources Code, § 21159.28, subd. [b]).

6.4 ALTERNATIVES CONSIDERED IN THIS EIR

In addition to the Preferred Site Plan and Alternative B considered throughout this EIR, four alternatives were developed based on City of Davis staff and City Council input, input from the public during the NOP review period, and the technical analysis performed to identify the significant environmental effects of the proposed project. The following alternatives are considered feasible alternatives to the project, and are evaluated in further detail in this section:

- No Project Alternative;
- Commercial Mixed Use Alternative;
- Light Industrial/Business Park Alternative;
- Off-Site (Nugget Fields) Alternative; and
- Alternative B.

Each of the project alternatives is described in detail below, with a corresponding analysis of each alternative's impacts in comparison to the proposed project. While an effort has been made to include quantitative data for certain analytical topics, where possible, qualitative comparisons of the various alternatives to the project are primarily provided. Such an approach to the analysis is appropriate as evidenced by CEQA Guidelines Section 15126.6[d], which states that the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. The analysis evaluates impacts that would occur with the alternatives relative to the significant impacts identified for the proposed project. The following analysis focuses on potential impacts analyzed within this EIR. For impacts identified and fully-mitigated in the Initial Study prepared for the proposed project, the alternatives for new infill development would have a similar impact as the proposed project, and, accordingly, topics dismissed within the Initial Study prepared for the proposed project are not specifically addressed within this chapter. The one exception is a brief discussion of recreation impacts related to the Off-Site (Nugget Fields) Alternative. When comparing the potential impacts resulting from implementation of the foregoing alternatives, the following terminology is used:

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

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

A comparison of the environmental impacts resulting from the considered alternatives and the proposed project is provided in Table 6-3.

No Project Alternative

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

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

The City has decided to evaluate a No Project Alternative, which assumes that the project site would remain in its existing state and additional development would not occur. As described in this EIR, the current condition of the site consists of a two-story 53,248-square foot (sf) office building (built in 1966) and associated improvements, including two surface parking lots located to the north and east of the building. Approximately 118 trees are located at the site entry way, along the building perimeter, and throughout the parking lots. The remainder of the project site is primarily dominated by weedy, ruderal vegetation. An approximately 12-foot-high berm surrounds the existing building and extends along the northern side of the parking lot located to the east of the building.

The existing structure has been vacant since October 2016, despite two years of marketing effort supported by City and regional economic development authorities. Independent studies by the University, the owner and its contractor, architects and brokers, and by MarketOne Builders and Cushman & Wakefield each concluded that the current building and site are not viable for office/research and development. Furthermore, a consulting engineer hired by the University of California, Davis detected seismic deficiencies within the structure.

Considering the above, while the project site is currently developed and was previously operated for office uses, the future operation of the project site for office/research development uses is uncertain. Therefore, the analysis of this section assumes that under the No Project Alternative, the project site would remain in the current condition, with the existing office structure remaining vacant.

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

Air Quality

The No Project Alternative would involve the continuation of the existing conditions on the project site. Because the No Project Alternative would not involve construction, emissions associated with construction of the proposed project, including demolition, would not occur. Thus, construction-related air quality impacts would be eliminated under the No Project Alternative as compared to the proposed project, and Mitigation Measure 4.1-3 of this EIR would not be required.

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

Cultural Resources

The No Project Alternative would not involve demolition of the existing structure. Consequently, the Alternative would not have the potential to result in a substantial adverse change in the significance of a historical resource. It should be noted, however, that the existing structure would likely deteriorate due to the continued lack of use under the No Project Alternative. Considering that the No Project Alternative would not involve demolition of the existing structure or any other development-related activity within the project site, the No Project Alternative would result in no impacts related to cultural resources.

Hydrology and Water Quality

The No Project Alternative would involve the continuation of the existing conditions on the project site and would not involve any construction activities. Accordingly, significant impacts identified for the proposed project related to a violation of water quality standards, discharge requirements, or the creation of a substantial additional source of polluted runoff during construction would not occur under the No Project Alternative, and Mitigation Measure 4.4-1 would not be required.

Development of either the Preferred Site Plan or Alternative B would have the potential to result in impacts to stormwater volume discharge and stormwater discharge quality. Thus, this EIR requires that the proposed project implement Mitigation Measure 4.4-2 to ensure compliance with all applicable City and State stormwater standards. The existing on-site use does not currently incorporate any stormwater quality features, and, thus, runoff from the project site may contain pollutants associated with previous development of the site and continued maintenance of the structure. However, because the No Project Alternative would not include development within the project site, the No Project Alternative would not have the potential to increase stormwater discharge or create additional sources of polluted stormwater. Therefore, the significant impacts

identified for the proposed project associated with such would not occur under the No Project Alternative, and Mitigation Measures 4.4-2 and 4.4-4 would not be required.

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

Noise

As determine in the Noise section of this EIR, the proposed project could result in a temporary construction noise impact to nearby receptors, as well as related to exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels as a result of on-site use of heavy construction equipment. Because the No Project Alternative would not involve any construction activities, the significant impacts identified for the proposed project associated with temporary construction noise and groundborne vibration would not occur with the No Project Alternative and Mitigation Measures 4.6-1 and 4.6-2 would not be required. The No Project Alternative also does not include any residential uses that are sensitive to noise and Mitigation Measures 4.6-4(a) and (b) would not be required.

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

Transportation and Circulation

Construction activities would not occur under the No Project Alternative. Accordingly, the No Project Alternative would not result in impacts related to construction vehicle traffic. Accordingly, Mitigation Measure 4.7-4 requiring the preparation of a Construction Traffic Control Plan would not be required for the No Project Alternative.

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

Commercial Mixed Use Alternative

The Commercial Mixed Use Alternative assumes that the site could be redeveloped with uses and design standards established by the current zoning designation of the site as Commercial Mixed Use, and under the existing General Plan Land Use designation of General Commercial.

The range of potential uses under this alternative encompass a mix of retail, office, restaurant, and service commercial uses. The Commercial Mixed Use Alternative is not limited to one specific use, but reflects a mix of general uses that would be similar to the use on the existing site and those found in the nearby commercial area and retail shopping center. Residential uses would not be permitted under the Commercial Mixed Use Alternative, and, rather, the Commercial Mixed Use Alternative would be oriented to retail and services, unlike the Light Industrial/Business Park Alternative discussed below. The mix of retail, office, and service commercial uses under this Commercial Mixed Use Alternative is akin to the general uses that can be found in shopping centers and other general mixed retail categories.

The maximum allowable buildout intensity for the project site under existing zoning and land use designations permits a floor to area ratio (FAR) up to 0.50. However, the City has determined that buildout of the site at the maximum allowable intensity is not considered a realistic development scenario, and instead the more likely development scenario would be buildout of the site at a buildout FAR of 0.25. Considering that the site is approximately 7.19 acres (313,196.4 sf), development with a FAR of 0.25 would allow for the construction and operation of approximately 78,299 sf of commercial mixed use space. The maximum height of such development would be 35 feet. Implementation of the Commercial Mixed Use Alternative would result in an increase of 43,051 sf in on-site building space.

The Commercial Mixed Use Alternative would include demolition of the existing on-site structure to accommodate a greater mix of commercial site uses. Specific development standards such as building setbacks, height, open space, and lot coverage would be consistent with those set forth in the South Davis Specific Plan and the City's zoning code.

The Commercial Mixed Use Alternative would have the potential to meet proposed project Objectives 4, 6 and 7.

Air Quality

Similar to the proposed project, the existing on-site office structure and associated developments would be demolished during implementation of the Commercial Mixed Use Alternative. Emissions from the demolition of the existing on-site structure would be identical under the Commercial Mixed Use Alternative and the proposed project.

The Commercial Mixed Use Alternative would include construction of an estimated 78,229 sf of building space, whereas the Preferred Site Plan would include approximately 262,965 sf of building space. Considering that the Commercial Mixed Use Alternative would include construction of far less building space, implementation of the Commercial Mixed Use Alternative would be anticipated to result in fewer emissions of criteria pollutants and toxic air contaminants (TACs), as compared to the emissions estimated for the proposed project and presented in Section 4.1, Air Quality, of this EIR.

As further discussed in Section 4.1, Air Quality, of this EIR, Mitigation Measure 4.1-3 would be required to reduce TAC emissions resulting from implementation of the proposed project. Because the Commercial Mixed Use Alternative would involve far less construction activity than the proposed project, the Commercial Mixed Use Alternative would not be anticipated to have the potential to expose nearby sensitive receptors to excess concentrations of pollutants, and Mitigation Measure 4.1-3 may not be required under the Commercial Mixed Use Alternative.

Thus, while emissions resulting from demolition of the existing structure would be identical under the proposed project and the Commercial Mixed Use Alternative, emissions related to construction of new structures would be much less under the Commercial Mixed Use Alternative as compared to the proposed project. It should be noted that because the Commercial Mixed Use Alternative would result in greater vehicle trips than either of the proposed development scenarios, as discussed in further detail below, the Alternative would subsequently be expected to result in an

associated increase in operational emissions compared to the proposed development scenarios. Nonetheless, overall, the Commercial Mixed Use Alternative would be anticipated to result in fewer impacts to air quality.

Cultural Resources

As discussed in the Cultural Resources section of this EIR, demolition of the existing structure would result in a significant and unavoidable impact related to adverse effects on historic resources.

The Commercial Mixed Use Alternative would also involve demolition of the existing structure and disturbance of the project site. As such, the Commercial Mixed Use Alternative would result in similar impacts to cultural resources compared to the proposed project.

Hydrology and Water Quality

The Commercial Mixed Use Alternative would result in similar extent of ground disturbance as compared to the proposed project. Therefore, the significant impacts identified for the proposed project related to a violation of water quality standards, or the creation of a substantial additional source of polluted runoff during construction would still occur under the Commercial Mixed Use Alternative and Mitigation Measure 4.4-1 would still be required.

As stated in the Hydrology and Water Quality section of this EIR, the project site is currently developed with impervious areas associated with the existing office structures. The Commercial Mixed Use Alternative would involve new development on the project site, which would include an estimated 78,229 sf of building space and associated hardscapes related to circulation and parking infrastructure. Although the Commercial Mixed Use Alternative would result in development of less building area square footage, the additional hardscapes needed to facilitate circulation and parking under the Commercial Mixed Use Alternative would be anticipated to result in a similar increase in total impervious area within the site as would occur under the proposed project. Thus, the Commercial Mixed Use Alternative could increase the potential for the creation of additional sources of polluted runoff or the degradation of water quality during operations from what currently occurs at the site. Similarly, the Commercial Mixed Use Alternative would alter the existing site drainage patterns and potentially increase the amount of stormwater runoff from existing levels. Therefore, the significant impacts identified for the proposed project associated with polluted runoff or a degradation of water quality during project operations and alteration of the existing site drainage patterns would still occur under the Commercial Mixed Use Alternative, and Mitigation Measures 4.4-2 and 4.4-4 would continue to be required.

Based on the discussions above, the significant impacts related to hydrology and water quality identified for the proposed project would be similar under the Commercial Mixed Use Alternative, in comparison to the proposed project, and the same mitigation measures that were required for the proposed project would be required for the Alternative.

Noise

Because the Commercial Mixed Use Alternative would involve demolition of the existing on-site structure and a similar overall area of disturbance as the proposed project, construction-related noise and vibration would likely be similar to what would be expected for the proposed project. Accordingly, the impacts related to a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project and exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels identified for the proposed project would be similar under the Commercial Mixed Use Alternative. Mitigation Measures 4.6-1 and 4.6-2 would still be required for the Alternative.

The Commercial Mixed Use Alternative would not involve residential uses or any other land uses that would be considered sensitive to noise. For office land uses, the City of Davis considers exterior noise levels under 65 dB L_{dn} to be normally acceptable and requires that interior noise levels be below 55 dB. As discussed in the Noise section of the EIR, under worst-case conditions (i.e., Super Cumulative Year 2035 Plus Project Conditions), the project site would be exposed to exterior traffic noise levels of 70 dB L_{dn} at first-floor locations and up to 73 dB L_{dn} at upper-floor locations. For office uses, the noise standard should be applied to common outdoor activity areas. Similar to the proposed project, the Commercial Mixed Use Alternative buildings could be oriented in such a way as to shield outdoor common areas from I-80 traffic noise, thereby ensuring compliance with the City's exterior noise standard.

It should be noted that the Commercial Mixed Use Alternative could involve on-site stationary sources of noise, such as delivery trucks, loading activities, and HVAC equipment, which could affect the nearby residential receptors and school in the vicinity.

Modern construction typically provides a 25-dB exterior-to-interior noise level reduction with windows closed. Based on such, the Commercial Mixed Use Alternative would be expected to be exposed to interior noise levels of 45 dB at first-floor locations and 48 at upper-floor locations, which would be below the City's 55 dB standard for office uses. Consequently, the impacts identified for the proposed project related to interior noise levels would not occur under the Commercial Mixed Use Alternative.

Overall, the Commercial Mixed Use Alternative would result in fewer impacts related to noise than the proposed project.

Transportation and Circulation

Because the Commercial Mixed Use Alternative would involve demolition of the existing on-site structure and new development and construction activities at the site, the significant impact identified for the proposed project related to construction vehicle traffic would still occur under the Alternative and Mitigation Measure 4.7-4 would be required.

According to the trip generation estimate for the Commercial Mixed Use Alternative prepared by KD Anderson & Associates, Inc.,¹ the Alternative would result in daily, AM and PM peak hour trips as shown in Table 6-1 in comparison to the proposed project development scenarios. As shown in the table, the Commercial Mixed Use Alternative would result in greater daily and PM peak hour trips than either of the proposed development scenarios, but fewer AM peak hour trips. Consequently, the Alternative would likely result in increased delay at nearby intersections than the proposed project and would result in greater impacts related to transportation and traffic than the proposed project. The proposed project would not result in any significant traffic impacts, with the exception of short-term construction-related traffic; thus, the term “impact” used here is to provide a general sense of the severity of the effects of the Alternative to the effects of the proposed project. Mitigation may be required for the Commercial Mixed Use Alternative.

Table 6-1			
Proposed Project vs. Commercial Mixed Use Alternative Trip Generation			
Duration	Preferred Site Plan	Alternative B	Commercial Mixed Use Alternative Trips
Daily	1,323	1,184	2,956
AM Peak Hour	102	87	74
PM Peak Hour	120	104	298

Source: KD Anderson & Associates, Inc., 2018.

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

Light Industrial/Business Park Alternative

Under the Light Industrial/Business Park Alternative, the project site would be redeveloped with uses and design standards reflecting contemporary office/research and development construction. The City has determined that a FAR of 0.35 represents a reasonable buildout scenario for the Light Industrial/Business Park Alternative, which would allow for a total building area of approximately 110,000 sf. Such a buildout scenario would represent approximately double the amount of building space that currently occurs within the project site. The Light Industrial/Business Park Alternative would include an aggressive car management strategy in order to accommodate the estimated 110,000 sf of building space. Development of the project site under the Light Industrial/Business Park Alternative would require a General Plan amendment and rezone of the project site.

The Light Industrial/Business Park Alternative would include demolition of the existing on-site structure to redevelop the site under this alternative. Specific development standards such as building setbacks, height, open space, and lot coverage would be consistent with those set forth in the South Davis Specific Plan and the City’s zoning code.

The Light Industrial/Business Park Alternative would have the potential to meet Objectives 4, 6 and 7.

¹ KD Anderson & Associates, Inc. *Memorandum: Trip Generation for Alternative Land Uses – 3820 Chiles Road.* May 31, 2018.

Air Quality

Similar to the proposed project, the existing on-site office structure would be demolished during implementation of the Light Industrial/Business Park Alternative. Emissions from the demolition of the existing on-site structure would be identical under the Light Industrial/Business Park Alternative and the proposed project.

The Light Industrial/Business Park Alternative would include construction of an estimated 110,000 sf of building space, whereas the Preferred Site Plan would include approximately 262,965 sf of building space. Considering that the Light Industrial/Business Park Alternative would include construction of less building space, implementation of the Light Industrial/Business Park Alternative would be anticipated to result in fewer emissions of criteria pollutants and toxic air contaminants (TACs), as compared to the emissions estimated for the proposed project and presented in Section 4.1, Air Quality, of this EIR.

As further discussed in Section 4.1, Air Quality, of this EIR, Mitigation Measure 4.1-3 would be required to reduce TAC emissions resulting from implementation of the proposed project. Because the Light Industrial/Business Park Alternative would involve less construction activity than the proposed project, the Light Industrial/Business Park Alternative would have a reduced potential to expose nearby sensitive receptors to excess concentrations of pollutants, and Mitigation Measure 4.1-3 may not be required under the Light Industrial/Business Park Alternative.

Thus, while emissions resulting from demolition of the existing structure would be identical under the proposed project and the Light Industrial/Business Park Alternative, emissions related to construction of new structures would be less under the Light Industrial/Business Park Alternative as compared to the proposed project. It should be noted that because the Commercial Mixed Use Alternative would result in greater vehicle trips than either of the proposed development scenarios, as discussed in further detail below, the Alternative would subsequently be expected to result in an associated increase in operational emissions compared to the proposed development scenarios. Further, the Alternative would likely involve heavy-duty truck trips, which would increase the potential for exposure of nearby sensitive receptors to pollutant concentrations associated with such activity. Nonetheless, overall, the Light Industrial/Business Park Alternative would be anticipated to result in fewer impacts to Air Quality.

Cultural Resources

As discussed in the Cultural Resources section of this EIR, demolition of the existing structure would result in a significant and unavoidable impact related to adverse effects on historic resources.

The Light Industrial/Business Park Alternative would also involve demolition of the existing structure and disturbance of the project site. As such, the Light Industrial/Business Park Alternative would result in similar impacts to Cultural Resources compared to the proposed project.

Hydrology and Water Quality

The Light Industrial/Business Park Alternative would result in similar extent of ground disturbance as compared to the proposed project. Therefore, the significant impacts identified for the proposed project related to a violation of water quality standards, or the creation of a substantial additional source of polluted runoff during construction would still occur under the Light Industrial/Business Park Alternative and Mitigation Measure 4.4-1 would still be required.

As stated in the Hydrology and Water Quality section of this EIR, the project site is currently developed with impervious areas associated with the existing office structure. The Light Industrial/Business Park Alternative would involve new development on the project site, which would include an estimated 110,000 sf of building space and associated hardscapes related to circulation and parking infrastructure. Although the Light Industrial/Business Park Alternative would result in development of less building area square footage, the additional hardscapes needed to facilitate circulation and parking under the Light Industrial/Business Park Alternative would be anticipated to result in a similar increase in total impervious area within the site as would occur under the proposed project. Thus, the Light Industrial/Business Park Alternative would have the potential to increase the potential for the creation of additional sources of polluted runoff or the degradation of water quality during operations from what currently occurs at the site. Similarly, the Light Industrial/Business Park Alternative would alter the existing site drainage patterns and potentially increase the amount of stormwater runoff from existing levels. Therefore, the significant impacts identified for the proposed project associated with polluted runoff or a degradation of water quality during project operations and alteration of the existing site drainage patterns would still occur under the Light Industrial/Business Park Alternative, and Mitigation Measures 4.4-2 and 4.4-4 would continue to be required.

Based on the discussions above, the significant impacts related to hydrology and water quality identified for the proposed project would be similar under the Light Industrial/Business Park Alternative, in comparison to the proposed project, and the same mitigation measures that were required for the proposed project would be required for the Alternative.

Noise

Because the Light Industrial/Business Park Alternative would involve demolition of the existing on-site structure and a similar overall area of disturbance as the proposed project, construction-related noise and vibration would likely be similar to what would be expected for the proposed project. Accordingly, the impacts related to a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project and exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels identified for the proposed project would be similar under the Light Industrial/Business Park Alternative. Mitigation Measures 4.6-1 and 4.6-2 would still be required for the Alternative.

The Light Industrial/Business Park Alternative would not involve residential uses or any other land uses that would be considered sensitive to noise. For office, business commercial, and professional land uses, the City of Davis considers exterior noise levels under 65 dB L_{dn} to be normally acceptable and requires that interior noise levels be below 55 dB. As discussed in the Noise section

of the EIR, under worst-case conditions (i.e., Super Cumulative Year 2035 Plus Project Conditions), the project site would be exposed to exterior traffic noise levels of 70 dB L_{dn} at first-floor locations and up to 73 dB L_{dn} at upper-floor locations. For office uses, the noise standard should be applied to common outdoor activity areas. Similar to the proposed project, the Commercial Mixed Use Alternative buildings could be oriented in such a way as to shield outdoor common areas from I-80 traffic noise, thereby ensuring compliance with the City’s exterior noise standard.

It should be noted that the Light Industrial/Business Park Alternative could involve on-site stationary sources of noise, such as delivery trucks, loading activities, and HVAC equipment, which could affect the nearby residential receptors and school in the vicinity.

Modern construction typically provides a 25-dB exterior-to-interior noise level reduction with windows closed. Based on such, the Light Industrial/Business Park Alternative would be expected to be exposed to interior noise levels of 45 dB at first-floor locations and 48 at upper-floor locations, which would be below the City’s 55 dB standard for office uses. Consequently, the impacts identified for the proposed project related to interior noise levels would not occur under the Light Industrial/Business Park Alternative.

Overall, the Light Industrial/Business Park Alternative would result in fewer impacts related to noise than the proposed project.

Transportation and Circulation

Because the Light Industrial/Business Park Alternative would involve demolition of the existing on-site structure and new development and construction activities at the site, the significant impact identified for the proposed project related to construction vehicle traffic would still occur under the Alternative and Mitigation Measure 4.7-4 would be required.

According to the trip generation estimate for the Light Industrial/Business Park Alternative prepared by KD Anderson & Associates, Inc.,² the Alternative would result in daily, AM and PM peak hour trips as shown in Table 6-2 in comparison to the proposed project development scenarios.

Table 6-2			
Proposed Project vs. Light Industrial/Business Park Alternative Trip Generation			
Duration	Preferred Site Plan	Alternative B	Light Industrial/Business Park Alternative Trips
Daily	1,323	1,184	1,884
AM Peak Hour	102	87	44
PM Peak Hour	120	104	46

Source: KD Anderson & Associates, Inc., 2018.

² KD Anderson & Associates, Inc. *Trip Generation for Alternative Land Uses – 3820 Chiles Road*. May 31, 2018.

As shown in the table, the Light Industrial/Business Park Alternative would result in greater daily trips than either of the proposed development scenarios, but fewer AM and PM peak hour trips. Consequently, the Alternative would likely result in decreased delay at nearby intersections than the proposed project.

Overall, the Light Industrial/Business Park Alternative would result in similar impacts related to transportation and circulation as the proposed project.

Off-Site (Nugget Fields) Alternative

Firstly, as discussed above, projects consistent with an MTP/SCS need not consider alternative locations to a proposed project (Pub. Resources Code, § 21159.28, subd. (b) and 21155.2, subd. (c)(2)). Notwithstanding this, because developing the project at an alternative location would allow the historic building at the 3820 Chiles Road project site to be retained, the City elected to evaluate this off-site alternative.

The Nugget Fields location was identified as a “Green Light” site in the 2008 Resolution by City Council implementing the Housing Element Steering Committee recommendations, for consideration prior to the next comprehensive General Plan Update. The Nugget Fields location is of a similar size and could conceivably be developed with a project similar to the proposed project.

The Off-Site (Nugget Fields) Alternative is assumed to involve the development of a 225-unit residential development identical to the proposed project on the Nugget Fields site. This property is owned by the Davis Joint Unified School District and has City zoning as a School. The Nugget Fields site is currently maintained and managed by a youth soccer league and consists of landscaped grass areas used for soccer play fields, which are surrounded by pedestrian infrastructure including sidewalks along the perimeter of the site. Paved parking areas exist along Moore Boulevard on the northern portions of the fields. The Nugget Fields are adjacent to the City of Davis’ Sandy Motley Park, which includes an additional soccer play field as well as other park features including play structures. Unitrans and YoloBus serve the area with service routes along the nearby Moore Boulevard, Pole Line Road, and Covell Boulevard.

The Off-Site (Nugget Fields) Alternative would be capable of meeting project Objectives 1, 2, 4, 5, and 7. However, the Nugget Fields site is currently used as soccer play fields, while the proposed project site features a vacant building. Thus, the Off-Site (Nugget Fields) Alternative would not be considered an underutilized property and the Off-Site (Nugget Fields) Alternative would not meet Objective 3. Furthermore, the Nugget Fields site is not located near transportation or commercial land uses, would not provide a transitional development, and, as a result, would not meet Objective 6.

Air Quality

The Nugget Fields site does not contain any existing structures or substantial development; thus, implementation of the Off-Site (Nugget Fields) Alternative would not require demolition activity. Consequently, the Off-Site (Nugget Fields) Alternative would not result in substantial criteria pollutant or GHG emissions related to demolition activity. While demolition activity would not be

necessary, the Off-Site (Nugget Fields) Alternative would involve development of the same number of units, mix of unit type, layout, and building design as the proposed project, which would, subsequently, result in a similar area of disturbance and comparable construction activities. Overall, construction of the Off-Site (Nugget Fields) Alternative would result in less intense emissions during construction because demolition would not be required, yet all other construction-related emissions would be similar to the emissions that would occur from construction of the proposed project.

As further discussed in Section 4.1, Air Quality, of this EIR, Mitigation Measure 4.1-3 would be required to reduce TAC emissions resulting from construction of the proposed project. Because the Off-Site (Nugget Fields) Alternative would not involve demolition activity, the Off-Site (Nugget Fields) Alternative would have a reduced potential to expose nearby sensitive receptors to excess concentrations of pollutants associated with construction equipment, and Mitigation Measure 4.1-3 may not be required under the Off-Site (Nugget Fields) Alternative.

It should be noted that while not required pursuant to CEQA, in order to address potential public health impacts, the nearby air district, Sacramento Metropolitan Air Quality Management District (SMAQMD) is currently recommending that proposed developments that could expose sensitive receptors to existing sources that emit odors and/or TACs be analyzed and exposure reduced as part of the lead agency's planning process. In recognition of the recommendations from the nearby SMAQMD, a full health risk assessment was prepared for the proposed project to evaluate the health risks posed to future residents as a result of the site's proximity to I-80. Given that the Off-Site (Nugget Fields) Alternative site is not located in proximity to any existing sources of substantial TAC emissions, such as a high-volume roadway, preparation of a health risk assessment for the Alternative would not be necessary.

Thus, while emissions resulting from construction of the proposed structures would be similar under the Off-Site (Nugget Fields) Alternative to the proposed project, the Off-Site (Nugget Fields) Alternative would result in fewer overall construction-related emissions due to the lack of demolition activities. Overall, the Off-Site (Nugget Fields) Alternative would result in fewer impacts related to Air Quality than the proposed project.

Cultural Resources

As discussed in the Cultural Resources section of this EIR, demolition of the existing structure at the proposed project site would result in a significant and unavoidable impact related to adverse effects on a historic resource. In contrast, the Off-Site (Nugget Fields) Alternative site does not contain any existing structures that could be considered historic, and thus, the significant and unavoidable impact related to historic resources would not occur under the Alternative.

Although the Off-Site (Nugget Fields) Alternative would not involve demolition activities, the Off-Site (Nugget Fields) Alternative would require ground-disturbing activities related to grading and construction of the multi-family residential structure and associated parking. Such ground-disturbing activity would have the potential to disturb any currently unknown subsurface cultural resources that could exist within the Nugget Fields site. Such impacts to currently unknown

subsurface cultural resources within the Nugget Fields site would be similar to the potential impacts that would occur under the proposed project.

Considering the above, while the Off-Site (Nugget Fields) Alternative would have a similar potential to result in the disturbance of currently unknown subsurface cultural resources as compared to the proposed project, the Off-Site (Nugget Fields) Alternative would not result in the significant and unavoidable impact related to demolition of the existing historic structure on the proposed project site. Therefore, the Off-Site (Nugget Fields) Alternative would result in fewer impacts to cultural resources as compared to the proposed project.

Hydrology and Water Quality

The Off-Site (Nugget Fields) Alternative would result in a similar extent of ground disturbance within the Nugget Fields site as would occur on the proposed project site during construction activities. Therefore, the significant impacts identified for the proposed project related to a violation of water quality standards, or the creation of a substantial additional source of polluted runoff during construction would still occur under the Off-Site (Nugget Fields) Alternative and Mitigation Measure 4.4-1 would still be required.

Although the Nugget Fields site currently contains some areas of impervious surfaces, particularly the parking areas within the site, such impervious areas cover a smaller proportion of the property and represent a smaller total area as compared to the impervious surfaces within the proposed project site. Given that the Nugget Fields site contains less existing impervious surface area than the proposed project site, it is anticipated that the Nugget Fields site experiences a lower rate of stormwater runoff as compared to the proposed project site under existing conditions. Regardless, the solution to increased runoff and transport of urban pollutants from future residential land uses would be the same for the proposed project and the Off-Site (Nugget Fields) Alternative (i.e., incorporation of on-site hydromodification features to treat and control runoff). The significant impacts identified for the proposed project associated with polluted runoff or a degradation of water quality during project operations and alteration of the existing site drainage patterns would still occur under the Off-Site (Nugget Fields) Alternative, and Mitigation Measures 4.4-2 and 4.4-4 would continue to be required.

Based on the discussion above, the significant impacts related to hydrology and water quality identified for the proposed project would be anticipated to occur under the Off-Site (Nugget Fields) Alternative. Mitigation Measures 4.4-2 and 4.4-4 would continue to be required and would reduce potential impacts to the same degree as would occur with implementation of the proposed project. Therefore, the Off-Site (Nugget Fields) Alternative would result in overall similar hydrology and water quality impacts as compared to the proposed project.

Noise

Similar to the proposed project, the Off-Site (Nugget Fields) Alternative would include construction activities within close proximity to existing sensitive receptors. Given that the Alternative would involve a similar development footprint and would be located within a similar distance of existing sensitive receptors, short-term noise and vibration exposure at such receptors

would be similar to that which would occur with implementation of the proposed project. Accordingly, the impacts related to a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project and exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels identified for the proposed project would be similar under the Off-Site (Nugget Fields) Alternative. Mitigation Measures 4.6-1 and 4.6-2 would still be required for the Alternative.

Operation of the Off-Site (Nugget Fields) Alternative would result in similar sources of noise as the proposed project. The Nugget Fields site is located in similar proximity to existing receptors, as compared to the project site. Compared to the existing recreational use of the Nugget Fields site, residential use of the site would be expected to have less operational noise impacts. However, due to the identical nature of the Off-Site (Nugget Fields) Alternative and the proposed project uses, as well as the similar proximity to existing receptors, the Off-Site (Nugget Fields) Alternative would be anticipated to result in similar impacts related to the effects of operational noise on existing receptors as the proposed project.

It should be noted that the Off-Site (Nugget Fields) Alternative would be exposed to traffic noise associated with Pole Line Road and Moore Boulevard in the site vicinity. A site-specific noise analysis would be required to determine specific traffic noise levels at the common outdoor areas of the residential development. However, because the Off-Site (Nugget Fields) Alternative would not be located within the vicinity of a high-volume freeway, such as I-80, traffic noise levels would likely be reduced compared to the proposed project. Similar to the proposed project, the Off-Site (Nugget Fields) Alternative landscaped setbacks along the site frontage at both roadways would help to reduce on-site noise levels.

Based on the above, the significant impacts related to construction noise identified for the proposed project would be anticipated to occur under the Off-Site (Nugget Fields) Alternative, and Mitigation Measures 4.6-1 and 4.6-2 would still be required. However, because the Alternative would not include development of residential uses near a freeway, Mitigation Measures 4.6-4(a) and 4.6-4(b) would likely not be required. Therefore, the Off-Site (Nugget Fields) Alternative could result in fewer noise impacts as compared to the proposed project.

Transportation and Circulation

Although the Off-Site (Nugget Fields) Alternative would not involve demolition activities, other typical construction activities such as site preparation, building construction, and material delivery activities, would still be required, which would result in short-term increases in traffic along the transportation network near the project site. Thus, the impact identified for the proposed project related to such would still occur under the Alternative and Mitigation Measure 4.7-4 would still be required.

Because the Off-Site (Nugget Fields) Alternative would include development of a 225-unit residential development identical to the proposed project (Preferred Site Plan), associated vehicle trip generation would be equivalent to the proposed project. Vehicle trips would be distributed primarily on Pole Line Road and Moore Boulevard. In the absence of a detailed traffic impact study, specific effects of Off-Site (Nugget Fields) Alternative vehicle trips on area intersections

and roadway segments cannot be conclusively determined. However, local intersections, such as Pole Line Road with Moore Boulevard and East Covell Boulevard, currently experience moderate amounts of residential traffic and the intersection of Pole Line Road and East Covell Boulevard currently operates at an acceptable level of service.³ The modest amount of traffic added by the Alternative would be unlikely to result in substantial degradation of intersection operations. It should be noted that because the Alternative would not be located in close proximity to a freeway interchange, total vehicle miles travelled (VMT) could potentially increase relative to the proposed project. Nonetheless, in the absence of a project-specific traffic impact study and considering that vehicle trip generation would be similar, the Off-Site (Nugget Fields) Alternative, similar to the proposed project, would not result in any significant impacts related to transportation and circulation during project operations.

Overall, the Off-Site (Nugget Fields) Alternative would result in similar impacts related to transportation and circulation as the proposed project.

Recreation

As noted above, for impacts identified and fully-mitigated in the Initial Study prepared for the proposed project, the alternatives considered in this EIR would have a similar impact as the proposed project and, accordingly, topics dismissed within the Initial Study prepared for the proposed project are generally not addressed within this chapter. However, because the Off-Site (Nugget Fields) Alternative site currently contains recreational soccer fields, a brief discussion of the recreation impacts under the Alternative is provided herein for informational purposes.

As noted previously, the Nugget Fields site was identified as a “Green Light” site in the 2008 Resolution by City Council implementing the Housing Element Steering Committee recommendations, for consideration prior to the next comprehensive General Plan Update. At such time, the 2008 Housing Element Steering Committee noted that the soccer fields could be relocated, if necessary, to accommodate housing. However, development of the site for housing would result in recreation impacts through the loss of the existing on-site soccer fields, which would increase the use of other existing soccer fields within the City, and potential indirect impacts if development of new replacement fields elsewhere within the City would be required. Therefore, the Off-Site (Nugget Fields) Alternative would result in greater impacts related to recreation compared to the proposed project.

Alternative B

Alternative B has been evaluated at an equal level throughout this EIR and is described in detail in the Project Description chapter of the EIR. In summary, Alternative B would include a total of approximately 188 apartment units, including 12 studios, 76 one-bedroom units, 88 two-bedroom units, and 12 three-bedroom units, resulting in a total of 300 bedrooms. In addition, the western portion of the site fronting La Vida Way would include five detached, two-story, single-family homes ranging from 2,000 to 2,300 sf. Alternative B would include a similar on-site circulation system as the Preferred Site Plan, with the exception that an alley would be situated at the western

³ City of Davis. *Mace Ranch Innovation Center EIR* [Table 4.14-9A]. Certified September 19, 2017.

portion of the site to provide access to the single-family homes. Reciprocal access would not be provided between the multi-family development area and the alley.

Parking would be provided in the form of covered carports at the first floor of the proposed multi-family buildings rather than detached carports around the perimeter of the on-site driveway. A total of 270 on-site vehicle parking spaces and 304 bicycle parking spaces would be provided for the multi-family development under Alternative B, which would be consistent with the amount of vehicle and bike parking spaces required per the City's Municipal Code. Parking for the single-family homes will comply with City requirements.

Similar project entitlements would be required for Alternative B as the Preferred Site Plan. Alternative B would be capable of meeting all of the project objectives. A comparison of the impacts associated with Alternative B to those identified for the Preferred Site Plan is included in Table 6-3 below. Overall, impacts associated with Alternative B would be similar to what is anticipated to occur under the Preferred Site Plan, with the exception of impacts related to interior noise levels. Alternative B would result in an impact related to interior noise levels, specifically related to the upper-floor locations of single-family residences proposed along La Vida Way under the Alternative, where such an impact would not occur under the Preferred Site Plan.

Comparison of Alternatives

Table 6-3 summarizes the level of significance of the identified impacts for the proposed project and a comparison of impacts under each of the project alternatives.

6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. Section 15126(e)(2) of the CEQA Guidelines requires that an environmentally superior alternative be designated and states, "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives."

Designating a superior alternative depends in large part on what environmental effects one considers most important. This EIR does not presume to make this determination; rather, the determinations of which impacts are more important are left to the reader and the decision makers. Generally, the environmentally superior alternative is the one that would result in the fewest environmental impacts as a result of project implementation. However, it should be noted that the environmental considerations are one portion of the factors that must be considered by the public and the decisionmakers in deliberations on the proposed project and the alternatives. Other factors of importance include urban design, economics, social factors, and fiscal considerations. In addition, the superior alternative would, ideally, still provide opportunities to achieve the project objectives.

The No Project Alternative would not be considered to meet any of the project objectives. The Commercial Mixed Use Alternative and the Light Industrial/Business Park Alternative could be capable of meeting proposed project Objectives 4, 6 and 7. The Off-Site (Nugget Fields)

Alternative could be capable of meeting project Objectives 1, 2, 4, 5, and 7, while Alternative B would be capable of meeting all of the project objectives.

A comparison of the impacts that would occur under each of the alternatives, as discussed in detail above, to those anticipated for the proposed project is illustrated in Table 6-3 below. As shown in Table 6-3, all of the significant impacts identified for the proposed project would not occur or would be fewer under the No Project Alternative. Alternative B would result in similar impacts as the proposed project related to all resource areas except for noise, which would be greater. Both the Commercial Mixed Use Alternative and Light Industrial/Business Park Alternative would result in fewer impacts related to Air Quality and Noise, and similar impacts related to Cultural Resources and Hydrology and Water Quality. However, the Commercial Mixed Use Alternative would result in greater impacts related to Transportation and Circulation, where the Light Industrial/Business Park Alternative would result in similar impacts. Although the Off-Site (Nugget Fields) Alternative would result in greater impacts relative to recreation, the Alternative would result in fewer impacts than the proposed project in the greatest number of resource areas compared to all other alternatives, with the exception of the No Project Alternative. In addition, the significant and unavoidable impact related to cultural resources would be avoided under the Off-Site (Nugget Fields) Alternative. As a result, the Off-Site (Nugget Fields) Alternative would be considered the environmentally superior alternative to the proposed project.

**Table 6-3
 Environmental Impacts of the Proposed Project and Project Alternatives**

Impact	Proposed Project	No Project Alternative	Commercial Mixed Use Alternative	Light Industrial/Business Park Alternative	Off-Site (Nugget Fields) Alternative	Alternative B
Air Quality	Less-Than-Significant with Mitigation	Fewer	Fewer	Fewer	Fewer	Similar
Cultural Resources	Significant and Unavoidable	None	Similar*	Similar*	Fewer	Similar*
Hydrology and Water Quality	Less-Than-Significant with Mitigation	Fewer	Similar	Similar	Similar	Similar
Noise	Less-Than-Significant with Mitigation	Fewer	Fewer	Fewer	Fewer	Greater
Recreation	Less-Than-Significant	--	--	--	Greater	--
Transportation and Circulation	Less-Than-Significant with Mitigation	Fewer	Greater	Similar	Similar	Similar
No Impact = "None;" Less than Proposed Project = "Fewer;" Similar to Proposed Project = "Similar;" and Greater than Proposed Project = "Greater."						
* Significant and Unavoidable impact(s) determined for the proposed project would still be expected to occur under the Alternative.						