

# 6 ALTERNATIVES ANALYSIS

## 6.1 INTRODUCTION

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

## 6.2 PURPOSE OF ALTERNATIVES

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

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

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

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

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

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

- An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives (CEQA Guidelines Section 15126.6[a]).
- Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these



alternatives would impede to some degree the attainment of the project objectives, or would be more costly (CEQA Guidelines Section 15126.6[b]).

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

### **Project Objectives**

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

1. Develop a vibrant mixed-use center that maintains and enhances the community and neighborhood retail uses and services and incorporates complementary residential uses.
2. Increase the supply and variety of housing options close to employment centers and convenient for daily needs.
3. Create a diverse community that utilizes the site's proximity to the UC Davis campus and provides housing for students, employees, and university-related personnel.
4. Foster a sustainable community that addresses building efficiency, transportation, efficient use of land, and reduces the community's carbon footprint and vehicle miles travelled.
5. Redevelop and revitalize an aged, existing shopping center with a financially feasible, vertical mixed-use project consistent with SACOG's sustainable community strategies.
6. Increase the variety of retail providers and uses in the City.
7. Increase the capture of local sales tax through increased retail activity within City limits.
8. Increase the opportunity for vehicle trip reduction through the provision of additional housing within close proximity to the UC Davis campus, additional employment and new retail uses.



9. Develop a vertical mixed-use infill project that balances adequate parking needs between commercial and residential uses.

### **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:

- **Transportation and Circulation:** The EIR determined that even with mitigation, the proposed project could result in significant and unavoidable impacts to bicycle and pedestrian facilities. In addition, impacts to study intersections under Cumulative Plus Project conditions were determined to remain significant and unavoidable, even with mitigation, as elements of the required mitigation measure would be subject to final approval and actions by UC Davis, and the preferred intersection improvements cannot be determined at this time, as they will be determined through the City's Corridor Plan process.

### **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.
- **Greenhouse Gas Emissions and Energy:** The EIR determined that implementation of the proposed project could generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. The EIR requires mitigation in order to ensure that the impact is reduced to a less-than-significant level.
- **Noise:** The EIR determined that implementation of the proposed project could result in significant impacts related to the following: generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the City's Noise Ordinance and stationary noise at existing sensitive receptors in the project vicinity. 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 the following: transit facilities



and services under Existing Plus Project conditions; construction vehicle traffic; project-related hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). The EIR requires mitigation in order to ensure that the impacts are reduced to less-than-significant levels.

### **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**
  - Conflict with or obstruct implementation of the applicable air quality plan during project construction.
  - Conflict with or obstruct implementation of the applicable air quality plan during project operation.
  - 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).
- **Greenhouse Gas Emissions and Energy**
  - Result in the inefficient or wasteful use of energy associated with construction.
  - Result in the inefficient or wasteful use of energy, or conflict with a State or local plan for renewable energy or energy efficiency, associated with project operations.
  - Result in cumulative impacts related to the inefficient or wasteful consumption of energy, or cumulatively contribute to a conflict with State or local plan for renewable energy or energy efficiency associated with project operations.
- **Land Use and Planning**
  - Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.
  - Cause a significant cumulative environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.
- **Noise**
  - Transportation noise impacts to existing sensitive receptors in the project vicinity.
  - Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.
  - Cumulative traffic noise impacts on sensitive receptors.
- **Public Services and Utilities**
  - Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services.



- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental services and/or facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services.
  - Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.
  - Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.
  - Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.
  - Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, or conflict with federal, state, and local management and reduction statutes and regulations related to solid waste.
  - Development of the proposed project, in combination with future buildout in the City of Davis, would increase demand on fire and police protection services.
  - Development of the proposed project, in combination with future buildout in the City of Davis, would increase demand on utilities and service systems.
- **Transportation and Circulation**
    - Impacts to study intersections under Existing Plus Project conditions.
    - Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).
    - Impacts related to emergency access.
    - Result in cumulative conflicts or inconsistencies with CEQA Guidelines Section 15064.3, subdivision (b).

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 (All items);
- Geology and Soils (All Items);
- Hazards and Hazardous Materials (All Items);
- Hydrology and Water Quality (All items);
- Land Use and Planning (a and c);
- Mineral Resources (All Items);



- Noise (e and f);
- Population and Housing (All Items);
- Public Services (c through e);
- Recreation (All Items);
- Transportation and Circulation (c); and
- Tribal and Cultural Resources (All Items).

The alternatives discussed herein have been chosen based on feasibility to meet project objectives, as well as the ability to reduce potential impacts analyzed within this EIR. Impacts identified and fully-mitigated in the Initial Study prepared for the proposed project would be similar or fewer for all of the alternatives included in this chapter. Accordingly, topics dismissed within the Initial Study prepared for the proposed project are not specifically addressed within the sections below.

### **6.3 ALTERNATIVES CONSIDERED BUT DISMISSED**

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



### **Off-Site Alternative**

As noted previously, for projects consistent with an MTP/SCS, such as the proposed project, analysis of alternative locations to the project is not required (Pub. Resources Code, § 21159.28, subd. (b) and 21155.2, subd. (c)(2)). Furthermore, the purpose of an alternatives analysis is to develop alternatives to the proposed project that substantially lessen at least one of the significant environmental effects identified as a result of the project, while still meeting most, if not all, of the basic project objectives. Development of the proposed project at an off-site location would be capable of meeting the majority of project objectives. However, a number of the project objectives are specific to the existing University Mall operations and/or site. For example, Objective #3 directly relates to the site's proximity to the UC Davis campus and the availability of the site to provide housing for students, employees, and university-related personnel. Objective #5 relates to redevelopment of the project site and revitalization of an aged, existing shopping center. Furthermore, the City of Davis includes relatively few properties that are capable of accommodating multi-story mixed-use development close to existing employment centers. Thus, an off-site alternative would not be likely to meet Objectives #1 and #2.

Overall, an environmentally feasible off-site location that would meet the requirements of CEQA, as well as meet the basic objectives of the proposed project, does not exist. Therefore, an Off-Site Alternative was dismissed from detailed analysis within this EIR.

### **Conventional Apartments Alternative**

Development of the project site with conventional apartments, as opposed to the mixed-use development currently proposed, was briefly considered by the City. Under a Conventional Apartments Alternative, the site would be redeveloped with residential uses only, which would not be focused on student use. However, a Conventional Apartments Alternative would not reduce any significant impacts identified in this EIR or provide any new information or analysis. In addition, the Alternative would not meet Objectives #1, #4, #5, #6, or #7, and would only partially meet #8.

As noted above, per Section 15126.6(f) of CEQA Guidelines “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.” Therefore, a Conventional Apartments Alternative was dismissed from detailed analysis within this EIR.

## **6.4 ALTERNATIVES CONSIDERED IN THIS EIR**

A total of four alternatives were developed based on City of Davis staff 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. City staff also presented these recommended alternatives to City Council for informational purposes on May 1, 2018, when the EIR contract was approved. The following alternatives are considered potentially feasible alternatives to the project, and are evaluated in further detail in this section:

- No Project Alternative;
- Retail Project Only Alternative;
- Existing Zoning Mixed Use Build Out Alternative; and
- Low Parking Alternative.



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

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

When the term “fewer” is used, the reader should not necessarily equate this to elimination of significant impacts identified for the proposed project. For example, in many cases, an alternative would reduce the relative intensity of a significant impact identified for the proposed project, but the impact would still be expected to remain significant under the alternative, thereby requiring mitigation. In other cases, the use of the term “fewer” may mean the actual elimination of an impact identified for the proposed project altogether. Similarly, use of the term “greater” does not necessarily imply that an alternative would require additional mitigation beyond what has been required for the proposed project. To the extent possible, this analysis will distinguish between the two implications of the comparative words “fewer” and “greater”.

A comparison of the environmental impacts resulting from the considered alternatives and the proposed project is provided in Table 6-7.

### **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]).

Consistent with CEQA Guidelines, the City has evaluated 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 90,653-square



foot (sf) portion of a community shopping center (University Mall) that includes a variety of commercial uses and restaurants. Current tenants of the University Mall include Cost Plus World Market, Starbucks, Forever 21, Fluffy Donuts, and smaller shops and services. Professional offices are located on a partial second floor. For the purpose of this analysis, the portion of the existing University Mall to be analyzed in the No Project Alternative does not include the existing 13,200-sf Trader Joe's.

The original University Mall buildings are located on the northern portion of the roughly rectangular site. In addition to the existing structures, the project site contains a paved parking lot that provides approximately 427 parking spaces and extends throughout the south, east, and west portions of the site. Mature trees are located in parking lot landscape islands. Access to the project site is provided by a main access point at Russell Boulevard and several driveways along Sycamore Lane and Anderson Road.

The analysis of this section assumes that under the No Project Alternative, the project site would remain in the current condition, and the existing on-site commercial uses would remain in operation. 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.

### **Greenhouse Gas Emissions and Energy**

As determined under the GHG Emissions and Energy section of this EIR, net new emissions resulting from project operations and amortized construction emissions are anticipated to exceed the City's adopted goal of carbon neutrality by the year 2040. As a result, implementation of the proposed project could generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG. As demonstrated in Table 4.2-6 of this EIR, operations associated with the existing University Mall result in estimated annual GHG emissions of 185.53 MTCO<sub>2</sub>e/yr, or approximately 326.69 MTCO<sub>2</sub>e fewer than total annual GHG emissions associated with the proposed project. Because the No Project Alternative would not result in net positive operational emissions in the year 2040, Mitigation Measures 4.2-3(a) and 4.2-3(b) would not be required. Overall the No Project Alternative would result in fewer impacts related to GHG Emissions and Energy compared to 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. Because the No Project Alternative would not involve any construction activities, the significant impacts identified for the proposed project associated with temporary construction noise would not occur with the No Project Alternative and Mitigation Measure 4.4-1 would not be required. In addition, because the No Project Alternative would not introduce new stationary noise sources to the site, impacts associated with the



proposed loading dock area would not occur and Mitigation Measure 4.4-5 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**

Given that the No Project Alternative would not include the introduction of new bicycle or pedestrian traffic to the local transportation network, the significant and unavoidable impacts identified in the EIR for bicycle and pedestrian facilities would be avoided, and Mitigation Measures 4.6-2(a) through 4.6-2(f) would not be required. The existing southbound bus stop on Anderson Road would continue to lack a shelter, seating, or dedicated passenger waiting area, which results in dwelling passengers waiting in the sidewalk or in the adjacent landscaped area. Under the No Project Alternative, the deficiencies at the transit stop would continue to occur; however, because the No Project Alternative would not add additional transit passengers to the Unitrans route serving the bus stop, associated impacts would be reduced and Mitigation Measure 4.6-4 would not be required.

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 4.6-7 requiring the preparation of a Construction Traffic Control Plan would not be required for the No Project Alternative. Because the project would not alter the existing on-site circulation layout or add additional vehicle trips to the site access driveways, Mitigation Measures 4.6-8(a) and 4.6-8(b) would not be required. Furthermore, because the Alternative would not add vehicle traffic to the local roadway network, the Alternative's incremental contribution to cumulative impacts at the Russel Boulevard/Anderson Road/La Rue Road, Russell Boulevard/Orchard Park Drive, and Russell Boulevard/California Avenue intersections would not occur, and Mitigation Measure 4.6-9 would not be required. The significant and unavoidable impact identified in the EIR for the three impacted intersections would not be required.

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

### **Retail Project Only Alternative**

Under the Retail Project Only Alternative, only the retail portion of the proposed project would be developed. The Alternative assumes demolition of 90,563-sf of the existing shopping center and redevelopment of the site with a total of 136,800 sf of retail uses, an increase of approximately 46,237 sf relative to the existing shopping center. The Retail Project Only Alternative does not include residential uses. Under the Alternative, the site would continue to operate as community retail center, albeit with additional square footage and possibly a smaller parking structure for additional required parking.

As noted previously, the proposed project is consistent with the MTP/SCS and is eligible for CEQA streamlining benefits. Pursuant to Senate Bill (SB) 375, streamlined CEQA review and analysis is available to Transit Priority Projects (TPPs) and residential or mixed-use residential projects that are consistent with the SCS. To be considered a qualifying TPP, the project must be located within a Transit Priority Area and at least 50 percent of the total building square footage must be residential. Given that the Retail Project Only would not include residential uses, the Alternative would not qualify as a TPP. In addition, the Alternative would not qualify as a residential or mixed-use residential project consistent with the SCS. Thus, SB 375 streamlining benefits would not apply to the Alternative.



The Retail Project Only Alternative would result in a floor-to-area ratio (FAR) of 0.38, which is permitted under the project site's existing zoning and land use designations, which allow for a maximum FAR of 0.50. Thus, a General Plan Amendment would not be required. In addition, because the Alternative would not include multiple stories of residential uses, the overall height of the proposed buildings would be substantially reduced compared to the proposed project, likely to a height of 32 feet or less. Therefore, unlike the proposed project, the Retail Project Only Alternative would not require amendment of the site's current PD #2-97B zoning designation, which establishes a building height limitation of 50 feet.

Because the Retail Project Only Alternative would not include any residential uses, the Alternative would not meet Objectives #1, #2, #3, #5, or #8. In addition, the Alternative would only partially meet Objective #4.

### **Air Quality**

Similar to the proposed project, the existing on-site retail uses within the project footprint would be demolished during implementation of the Retail Project Only Alternative. Emissions from the demolition of the existing on-site structure would be identical under the Alternative and the proposed project. However, because the Alternative would not include any residential uses and would include a smaller parking garage compared to the proposed project, the Alternative would include construction of far less building space compared to the proposed project. Therefore, implementation of the Retail Project Only 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 Retail Project Only Alternative would involve far less construction activity than the proposed project, the 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 Alternative.

Overall, the Retail Project Only Alternative would result in fewer impacts related to air quality compared to the proposed project.

### **Greenhouse Gas Emissions and Energy**

The Retail Project Only Alternative would include an increase of approximately 46,237 sf of retail space as compared to the existing University Mall. Increased retail operations within the project site would have the potential to increase operational emissions related to sources such as indoor climate control, building upkeep, food preparation, and others. However, portions of the existing University Mall structure were originally constructed as early as 1966, and, as such, the existing structures are less energy efficient than a modern retail structure would be, given the current Title 24 standards and the City of Davis CalGreen Code Tier 1 requirements. Table 6-1 below provides a comparison of natural gas and electricity use associated with the existing University Mall and the Retail Project Only Alternative. The Trader Joe's building is not included for either scenario.

As shown in the table, due to the age of the existing University Mall structure, implementation of the Retail Project Only Alternative would result in a reduction in on-site energy demand relative to existing conditions, as the older existing structures would be replaced by new more efficient structures. Reduced energy demand would reduce emissions from operations of the project site



associated with the off-site generation of electricity or on-site consumption of natural gas. Consequently, the Retail Project Only Alternative would not result in net positive operational GHG emissions in the year 2040, and Mitigation Measures 4.2-3(a) and 4.2-3(b) would not be required. In addition, overall operational emissions would likely be less under this Alternative as compared to the proposed project. Therefore, overall impacts under the Retail Project Only Alternative would be fewer than the proposed project.

Energy Type	Existing University Mall	Retail Project Only Alternative	Difference
Natural Gas Use (kBTU/yr)	243,049	122,000	-121,049
Electricity Use (kWh/yr)	1,019,640	269,825	-749,815

Note: These numbers do not include any energy usage associated with parking areas.

**Source: CalEEMod June 2019 (Appendix F).**

It should be noted that the comparison of impacts presented above relies on the net zero carbon emissions thresholds used in this CEQA analysis. However, it is important to consider that mixed-use developments are typically considered a more efficient form of development from a GHG emissions perspective. In the case of the project site, a mixed-use development would place residents in closer proximity to existing transit and pedestrian facilities, as well as retail uses, all of which reduce per capita emissions. Nevertheless, because the CEQA threshold used within this analysis is based on the total net emissions of the proposed project, rather than emissions calculated per resident or per employee, any increase in net emissions is considered an impact. If instead impacts were considered per employee or per resident, emissions of a Retail Project Only Alternative would be much higher than the proposed project.

### Noise

Because the Retail Project Only Alternative would involve demolition of the existing on-site structure and a similar overall area of disturbance as the proposed project, construction-related noise 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 identified for the proposed project would be similar under the Retail Project Only Alternative. Mitigation Measure 4.4-1 would still be required for the Alternative.

Similar to the proposed project, the Retail Project Only Alternative would include development of an on-site loading dock area on the north side of the proposed retail uses. The Alternative would include the same amount of retail development as the proposed project and, thus, would involve a similar amount of loading dock activity. Therefore, impacts related to stationary source noise would be similar under the Alternative compared to the proposed project, and Mitigation Measure 4.4-5 would still be required.

Overall, the Retail Project Only Alternative would result in similar impacts related to noise compared to the proposed project.



## Transportation and Circulation

The Retail Project Only Alternative would not include development of residential uses and, thus, would add a reduced number of pedestrians, bicyclists, and transit passengers to the existing transportation network compared to the proposed project. Pedestrian and bicycle trip generation estimates for the Retail Project Only Alternative were prepared by Fehr & Peers (see Table 6-2).<sup>1</sup> As shown in the table, the Alternative would result in substantially reduced AM and PM peak hour trips compared to the proposed project. However, because the Retail Project Only Alternative would include an increased amount of retail development relative to the existing University Mall, overall, the Alternative would still increase demands on pedestrian, bicycle, and transit infrastructure. Therefore, the significant and unavoidable impacts identified in the EIR for bicycle and pedestrian facilities would likely remain, and Mitigation Measures 4.6-2(a) through 4.6-2(f) and Mitigation Measure 4.6-4 may still be required.

Mode	Time Period	Proposed Project	Retail Project Only Alternative
Pedestrian Trips	AM Peak Hour	70	10
	PM Peak Hour	160	35
Bicycle Trips	AM Peak Hour	170	10
	PM Peak Hour	170	25

*Source: Fehr & Peers, 2019.*

Because the Retail Project Only 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 4.6-7 would be required.

Vehicle trip generation estimates for the Retail Project Only Alternative were prepared by Fehr & Peers (see Table 6-3).<sup>2</sup> As shown in the table, the Alternative would result in substantially reduced daily, AM peak hour, and PM peak hour trips compared to the proposed project. Consequently, the Alternative would result in decreased delay at nearby intersections compared the proposed project and would result in fewer impacts related to study intersections than the proposed project. However, because the Alternative would add traffic to the Russell Boulevard/Anderson Road/La Rue Road, Russell Boulevard/Orchard Park Drive, and Russell Boulevard/California Avenue intersections, Mitigation Measure 4.6-9 may still be required. Because full implementation of Mitigation Measure 4.6-9 cannot be guaranteed, the Alternative's incremental contribution to the cumulative impact would remain cumulatively considerable and significant and unavoidable.

Time Period	Proposed Project	Retail Project Only Alternative
Daily	2,978	1,288
AM Peak Hour	91	22

<sup>1</sup> Greg Behrens, AICP, Fehr & Peers. Personal communication [email] with Nick Pappani, Vice President, Raney Planning & Management, Inc. July 24, 2019.

<sup>2</sup> Greg Behrens, AICP, Fehr & Peers. Personal communication [email] with Nick Pappani, Vice President, Raney Planning & Management, Inc. July 18, 2019.



PM Peak Hour	208	115
<b>Source: Fehr &amp; Peers, 2019.</b>		

Overall, the Retail Project Only Alternative would result in fewer impacts related to transportation and circulation than the proposed project.

### **Existing Zoning Mixed Use Build Out Alternative**

Under the Existing Zoning Mixed Use Build Out Alternative, the majority of existing on-site retail uses would be demolished (e.g., not including Trader Joe's). The site would be redeveloped and the mixed uses, building heights, and floor area would be per the property's current Community Retail land use designation and PD 2-97B zoning district. The Community Retail designation allows a maximum floor area ratio of 0.50 with an additional 0.15 for the residential component of a mixed use project. Under the existing standards, the 8.25-acre parcel could accommodate up to 179,685 sf of retail uses and an additional 53,905 sf of residential uses, for a total allowable floor area of 233,590 sf.

The Existing Zoning Mixed Use Build Out Alternative assumes that the same amount of retail proposed for the proposed project (136,800 sf) is included on-site (not including the existing 13,200-sf Trader Joe's), with the remaining allowable space comprising residential uses (83,590 sf), resulting in 220,390 sf of retail and residential space. The existing PD 2-97B zoning district for the University Mall site permits residential uses above the first floor and a maximum building height of 50 feet. The total number of residential units included in the Alternative is assumed to be 53, with the mixed-use buildings anticipated to be between two and three stories. Similar to the proposed project, the Alternative would include a parking structure; however, the overall size of the structure would be reduced to accommodate the reduction in residential units.

With the exception of Objective #4, the Existing Zoning Mixed Use Build Out Alternative would generally meet all of the project objectives. Objective #4 would only be partially met, as the Alternative would include a reduced amount of development compared to the proposed project, but would include a similar building footprint, thereby resulting in a less efficient use of land compared to the proposed project and an increased per capita carbon footprint.

### **Air Quality**

Similar to the proposed project, the existing on-site retail uses would be demolished during implementation of the Existing Zoning Mixed Use Build Out Alternative. Emissions from the demolition of the existing on-site structure would be identical under the Alternative and the proposed project. However, the Alternative would include construction of a total of 220,390 sf of retail and residential space, a reduction of 328,910 sf compared to the 549,300-sf included in the proposed project. In addition, the parking structure would be smaller compared to the proposed project. Therefore, implementation of the Existing Zoning Mixed Use Build Out Alternative would be anticipated to result in fewer emissions of criteria pollutants and 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 Existing Zoning Mixed Use Build Out Alternative would involve less construction activity than the proposed project, construction related emissions would be reduced under this alternative. Despite the anticipated reduction in construction related emissions, because the site



is in close proximity to existing receptors, emissions related to building construction would still have the potential to expose nearby sensitive receptors to excess concentrations of pollutants, and Mitigation Measure 4.1-3 would likely still be required.

Overall, the Existing Zoning Mixed Use Build Out Alternative would result in fewer impacts related to air quality compared to the proposed project.

### Greenhouse Gas Emissions and Energy

The Existing Zoning Mixed Use Build Out Alternative would include a similar amount of retail development as the proposed project (136,800 sf), as well as construction of 53 residential units. The increase in building intensity of the project site relative to existing conditions would have the potential to result in a net increase in GHG emissions from site operations. However, as discussed under the Retail Only Project Alternative, replacement of the existing structures with modern more efficient structures could result in the more efficient consumption of energy within the project site. Table 6-4 below provides a comparison of natural gas and electricity use associated with the existing University Mall and the Existing Zoning Mixed Use Build Out Alternative. The Trader Joe's building is not included for either scenario.

<b>Table 6-4</b>			
<b>Existing University Mall vs. Existing Zoning Mixed Use Build Out Alternative Natural Gas and Electricity Use</b>			
Energy Type	Existing University Mall	Existing Zoning Mixed Use Build Out Alternative	Difference
Natural Gas Use (kBTU/yr)	243,049	386,177	+143,128
Electricity Use (kWh/yr)	1,019,640	296,097	-723,543
Note: These numbers do not include any energy usage associated with parking areas.			
<b>Source: CalEEMod June 2019 (Appendix F).</b>			

As shown in the table, due to the age of the existing University Mall structure, implementation of the Existing Zoning Mixed Use Build Out Alternative would result in a reduction in on-site electricity demand, as the older existing structures would be replaced by new more efficient structures. However, natural gas use would increase relative to the existing structure. Therefore, total net emissions from operations at the project site under the Existing Zoning Mixed Use Build Out Alternative would be expected to increase compared to existing conditions. Consequently, Mitigation Measures 4.2-3(a) and 4.2-3(b) would still be required for the Existing Zoning Mixed Use Build Out Alternative. Although Mitigation Measures 4.2-3(a) and 4.2-3(b) would continue to be required, the total emissions reductions required by Mitigation Measure 4.2-3(a) would likely be less under this alternative as compared to the mitigation requirement of the proposed project. Due to the decrease in net emissions that would result from implementation of the Retail Project Only Alternative, as compared to the proposed project, overall impacts would be fewer than the proposed project.

### Noise

Because the Existing Zoning Mixed Use Build Out Alternative would involve demolition of the existing on-site structure and a similar overall area of disturbance as the proposed project, construction-related noise 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 identified for the proposed project would be similar under the Existing Zoning Mixed Use Build Out Alternative. Mitigation Measure 4.4-1 would still be required for the Alternative.

Similar to the proposed project, the Existing Zoning Mixed Use Build Out Alternative would include development of an on-site loading dock area on the north side of the proposed retail uses. The Alternative would include the same amount of retail development as the proposed project and, thus, would involve a similar amount of loading dock activity. Therefore, impacts related to stationary source noise would be similar under the Alternative compared to the proposed project, and Mitigation Measure 4.4-5 would still be required.

Overall, the Existing Zoning Mixed Use Build Out Alternative would result in similar impacts related to noise compared to the proposed project.

### **Transportation and Circulation**

The Existing Zoning Mixed Use Build Out Alternative would include a total of 53 residential units, a reduction of 211 units compared to the proposed project. Thus, the Alternative would add a reduced number of pedestrians, bicyclists, and transit passengers to the existing transportation network compared to the proposed project. However, because the Existing Zoning Mixed Use Build Out Alternative would include an increased amount of development relative to the existing University Mall, overall, the Alternative would still increase demands on pedestrian, bicycle, and transit infrastructure. Therefore, the significant and unavoidable impacts identified in the EIR for bicycle and pedestrian facilities would likely remain, and Mitigation Measures 4.6-2(a) through 4.6-2(f) and Mitigation Measure 4.6-4 may still be required.

Because the Existing Zoning Mixed Use Build Out 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 4.6-7 would be required.

Vehicle trip generation estimates for the Existing Zoning Mixed Use Build Out Alternative were prepared by Fehr & Peers (see Table 6-5). As shown in the table, the Alternative would result in slightly reduced daily, AM peak hour, and PM peak hour trips compared to the proposed project. Consequently, the Alternative would likely result in decreased delay at nearby intersections compared the proposed project and could result in fewer impacts related to study intersections than the proposed project. However, because the Alternative would add traffic to the Russell Boulevard/Anderson Road/La Rue Road, Russell Boulevard/Orchard Park Drive, and Russell Boulevard/California Avenue intersections, Mitigation Measure 4.6-9 may still be required. Because full implementation of Mitigation Measure 4.6-9 cannot be guaranteed, the Alternative's incremental contribution to the cumulative impact would remain cumulatively considerable and significant and unavoidable.

Overall, the Existing Zoning Mixed Use Build Out Alternative would result in fewer impacts related to transportation and circulation than the proposed project.



<b>Table 6-5 Proposed Project vs. Existing Zoning Mixed Use Build Out Alternative Trip Generation</b>		
<b>Time Period</b>	<b>Proposed Project</b>	<b>Existing Zoning Mixed Use Build Out Alternative</b>
Daily	2,978	2,640
AM Peak Hour	91	36
PM Peak Hour	208	134

*Source: Fehr & Peers, 2019.*

### **Low Parking Alternative**

Under the Low Parking Alternative, the project site would be redeveloped as a mixed use center of similar scale and intensity as the proposed project. However, the Alternative would include aggressive transportation demand strategies and parking demand management measures with incentives to encourage alternative transportation and disincentives to discourage car ownership by residents and vehicle trips by customers.

In order to discourage the use of single-occupancy vehicles at the project site, a maximum of 50 resident permit parking spaces would be provided on-site under the Low Parking Alternative, compared to 264 under the proposed project. The full retail parking requirement of 429 spaces would continue to be provided under this Alternative. The Low Parking Alternative could also include advanced bicycle and pedestrian facilities, connections, and improvements, bicycle- and car-sharing programs, shuttle services, monetary incentives, parking charges, and other similar measures. Similar to the proposed project, the Alternative would include a parking structure; however, the overall size of the structure would be reduced to accommodate the reduction in resident permit parking spaces.

With the exception of Objective #9, the Low Parking Alternative would generally meet all of the project objectives. Objective #9 would be only partially met, as the Alternative would include substantially reduced residential parking relative to the City’s standard requirements.

### **Air Quality**

Similar to the proposed project, the existing on-site retail uses would be demolished during implementation of the Low Parking Alternative. Emissions from the demolition of the existing on-site structure would be identical under the Alternative and the proposed project. In addition, the Alternative would include construction of a similar amount of retail and residential building space. However, due to the reduced amount of residential parking required, the parking structure would be smaller compared to the proposed project. Therefore, implementation of the Low Parking Alternative would be anticipated to result in fewer emissions of criteria pollutants and 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 Low Parking Alternative would involve slightly less construction activity than the proposed project, construction related emissions would be slightly reduced under this alternative. Despite the anticipated reduction in construction-related emissions, because the site is in close proximity to existing receptors, emissions related to building construction would still have the



potential to expose nearby sensitive receptors to excess concentrations of pollutants, and Mitigation Measure 4.1-3 would still be required.

Overall, the Low Parking Alternative would result in fewer impacts related to air quality compared to the proposed project.

### **Greenhouse Gas Emissions and Energy**

Under the Low Parking Alternative, the intensity of development within the project site would be similar to that of the proposed project, albeit with slightly reduced development space due to the reduced need for residential parking space. Similar to the proposed project, the development of the site with a mixed use center would replace the less efficient existing structure with a modern structure built to more stringent energy efficiency requirements. Despite the increase in energy efficiency within the site, the increase in building intensity within the site and inclusion of residences on the site would result in an increase in total net emissions. Therefore, Mitigation Measures 4.2-3(a) and 4.2-3(b) would continue to be required. Although the foregoing mitigation measures would be anticipated to continue to be required, the overall operational emissions from the project would likely be somewhat reduced by the reduction in parking area within the project site. As a result, overall impacts would be fewer than the proposed project.

### **Noise**

Because the Low Parking Alternative would involve demolition of the existing on-site structure and a similar overall area of disturbance as the proposed project, construction-related noise would likely be similar to what would be expected for the proposed project. Accordingly, the Low Parking Alternative would result in similar impacts as the proposed project related to a substantial temporary or periodic increase in ambient noise levels. Mitigation Measure 4.4-1 would still be required for the Alternative.

Similar to the proposed project, the Low Parking Alternative would include development of an on-site loading dock area on the north side of the proposed retail uses. The Alternative would include the same amount of retail development as the proposed project and, thus, would involve a similar amount of loading dock activity. Therefore, impacts related to stationary source noise would be similar under the Alternative compared to the proposed project, and Mitigation Measure 4.4-5 would still be required.

Overall, the Low Parking Alternative would result in similar impacts related to noise compared to the proposed project.

### **Transportation and Circulation**

The Low Parking Alternative would include the same amount of residential development as the proposed project. However, due to the reduction in on-site residential parking spaces, the Alternative could potentially increase the number of pedestrians, bicyclists, and transit passengers added to the existing transportation network compared to the proposed project. Therefore, the significant and unavoidable impacts identified in the EIR for bicycle and pedestrian facilities would remain, and Mitigation Measures 4.6-2(a) through 4.6-2(f) and Mitigation Measure 4.6-4 would still be required. The increased amount of pedestrian and bicycle traffic and transit ridership associated with the Alternative would not be likely to necessitate additional mitigation measures.



Because the Low Parking 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 4.6-7 would be required.

Vehicle trip generation estimates for the Low Parking Alternative were prepared by Fehr & Peers (see Table 6-6). As shown in the table, the Alternative would result in slightly reduced daily, AM peak hour, and PM peak hour trips compared to the proposed project. Consequently, the Alternative would likely result in decreased delay at nearby intersections compared the proposed project and could result in fewer impacts related to study intersections than the proposed project. However, because the Alternative would add traffic to the Russell Boulevard/Anderson Road/La Rue Road, Russell Boulevard/Orchard Park Drive, and Russell Boulevard/California Avenue intersections, Mitigation Measure 4.6-9 may still be required. Because full implementation of Mitigation Measure 4.6-9 cannot be guaranteed, the Alternative’s incremental contribution to the cumulative impact would remain cumulatively considerable and significant and unavoidable.

Time Period	Proposed Project	Low Parking Alternative
Daily	2,978	2,725
AM Peak Hour	91	81
PM Peak Hour	208	194

*Source: Fehr & Peers, 2019.*

Based on the above, under the Low Parking Alternative, reductions in vehicle traffic impacts would generally be offset by increased impacts related to alternative transportation modes. Thus, overall, the Low Parking Alternative would result in similar impacts related to transportation and circulation compared to the proposed project.

### **Comparison of Alternatives**

Table 6-7 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 decision makers 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 Retail Project Only Alternative would not meet Objectives #1, #2, #3, #5, or #8, and would only partially meet Objective #4. The Existing Zoning Mixed Use Build Out Alternative and the Low Parking Alternative would generally meet all of the project objectives, with the exception of Objectives #4 and #9, respectively, which would be only partially met.

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 6-7 below. As shown in Table 6-7, all of the significant impacts identified for the proposed project would not occur or would be fewer under the No Project Alternative. Compared to the proposed project, both the Retail Project Only Alternative and the Existing Zoning Build Out Alternative would both result in fewer impacts related to Air Quality, GHG Emissions and Energy, and Transportation and Circulation, with similar impacts related to noise. The Low Parking Alternative would result in fewer impacts related to Air Quality and GHG Emissions and Energy and similar impacts related to Noise and Transportation and Circulation. Of the alternatives considered, only the No Project Alternative would avoid the significant and unavoidable impacts identified for Transportation and Circulation issues.

Both the Retail Project Only Alternative and the Existing Zoning Mixed Use Build Out Alternative result in fewer impacts than the proposed project for three resource areas, as opposed to only two resource areas under the Low Parking Alternative. However, the Retail Project Only Alternative would result in a reduced number of pedestrian, bicycle, transit, and vehicle trips during operations relative to the Existing Zoning Mixed Use Build Out Alternative, thereby resulting in fewer traffic impacts. In addition, the Retail Project Only Alternative would not require implementation of Mitigation Measures 4.2-3(a) and 4.2-3(b) related to GHG emissions. As a result, the Retail Project Only Alternative would be considered the environmentally superior alternative to the proposed project.



**Table 6-7  
 Environmental Impacts of the Proposed Project and Project Alternatives**

<b>Impact</b>	<b>Proposed Project</b>	<b>No Project Alternative</b>	<b>Retail Project Only Alternative</b>	<b>Existing Zoning Mixed Use Build Out Alternative</b>	<b>Low Parking Alternative</b>
Air Quality	Less-Than-Significant with Mitigation	Fewer	Fewer	Fewer	Fewer
Greenhouse Gas Emissions and Energy	Less-Than-Significant with Mitigation	Fewer	Fewer	Fewer	Fewer
Noise	Less-Than-Significant with Mitigation	Fewer	Similar	Similar	Similar
Transportation and Circulation	Significant and Unavoidable	Fewer	Fewer*	Fewer*	Similar*
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.					

