

5.0 ALTERNATIVES

In accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines (Section 15126.6), an Environmental Impact Report (EIR) must describe a range of reasonable alternatives to the project, or to the location of the project, that would “feasibly attain most of the project's basic objectives, while avoiding or substantially lessening any of the significantly adverse environmental effects of the project.” An EIR does not need to consider every conceivable alternative to a project; rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. The range of alternatives required in an EIR is governed by a “rule of reason.”

The proposed project involves the implementation of the proposed Specific Plan, which would be implemented over 30 years and would result in the addition of approximately 10,800 residential units in Madera. The potential environmental effects of implementing the proposed project are analyzed in Chapter 4.0, Setting, Impacts, and Mitigation Measures. The proposed project has been described and analyzed in Chapter 4.0 with an emphasis on determining and evaluating potential significant impacts resulting from the project and identifying mitigation measures to avoid or reduce these impacts to a less-than-significant level. The following identifies and discusses three feasible alternatives to the proposed project, compares the impacts of each alternative to the impacts of the project, and determines whether the alternatives meet the basic project objectives and avoid or reduce project-related significant impacts.

SELECTION OF ALTERNATIVES

Section 21100 of the Public Resources Code and Section 15126.6 of the CEQA Guidelines require an EIR to identify and discuss a No Project Alternative and a reasonable range of alternatives to the proposed project that would feasibly attain most of the basic objectives of the proposed project and that would avoid or substantially lessen any of the significant environmental impacts. When selecting a set of alternatives to analyze, Section 15126.6(f) of the CEQA Guidelines also discusses the consideration of alternative locations and determining whether any of the significant effects of a proposed project would be avoided or substantially lessened by putting the project in another location. In the case of the proposed Specific Plan, no alternative locations were considered because the City of Madera designated the Specific Plan Area for development of a specific plan as part of “Village D” in the General Plan.

Based on the criteria listed above, three alternatives have been selected to avoid or substantially lessen the significant impacts of the proposed project. Therefore, the alternatives considered in this Draft EIR include the following:

- **Alternative 1: No Project Alternative.** This alternative assumes the Specific Plan Area would remain in its current state and the area would stay under the existing County zoning, but within the City's sphere of influence.

- **Alternative 2: Low Density Residential Alternative.** This alternative would reduce the overall density of housing to be developed in the Specific Plan Area to be consistent with the City's typical low density housing ratio of five residential units per acre. This alternative would result in a total buildout of approximately 7,600 residential units.
- **Alternative 3: Reduced Project Alternative.** This alternative would result in approximately 1,080 acres of low and medium density residential land uses and 500 acres of agricultural land. Additional land uses would include school sites, parks and recreation, natural areas, and major roadways.

Table 5.A provides a summary of the anticipated impacts and feasibility of each alternative. A complete discussion of each alternative is provided below.

For each alternative, the analysis provides the following:

- Description of the alternative;
- Environmental analysis of the potential impacts of the alternative and the significance of those impacts (per the *State CEQA Guidelines*, significant effects of an alternative shall be discussed but in less detail than those of the proposed project);
- Overview of the potential impacts of the alternative and the significance of those impacts; and
- Summary comparison of the alternative relative to the proposed project's impacts, specifically addressing whether the alternative would meet the project's objectives; whether it would eliminate or reduce impacts compared to the project; and its other comparative merits.

5.1 PROPOSED PROJECT

5.1.1 Project Characteristics

As described earlier in Chapter 3.0, Project Description, the proposed project would implement a proposed Specific Plan that would result in approximately 10,800 residential units, approximately 2.1 million square feet of commercial and office space, approximately 165 acres of parks and recreational area, and approximately 55 acres of public facilities including schools. The proposed Specific Plan would also include infrastructure improvements including roadways and utilities to facilitate buildout. As each phase of development is proposed, improvements would include site grading and the demolition of on-site existing vegetation and structures.

5.1.2 Project Objectives

Each alternative is analyzed to determine whether it achieves the basic objectives of the proposed project. As stated in Chapter 3.0, Project Description, the City has established the following intended specific objectives for the proposed Specific Plan that would serve to aid decision-makers in their review of the proposed project and its associated environmental impacts:

Table 5.A: Summary of Project Alternatives

Alternative	Description	Basis for Selection and Summary Analysis
Proposed Project	<ul style="list-style-type: none"> • 10,783 residential units of various densities within 1,371 acres • 1.83 million square feet of Village Mixed Use within 120 acres • 164 acres of parks and recreational facilities • 17 acres of natural areas • 258,600 square feet of industrial development within approximately 30 acres • 54 acres for elementary school sites • 128 acres of major roadways 	<ul style="list-style-type: none"> • Meets all Project Objectives • Requires certification of this EIR; General Plan Amendment; Specific Plan approval; Neighborhood Plan approvals; Municipal Code Amendments/Rezoning; and parcel and tentative map approvals • Requires annexation
Alternative 1: No Project Alternative	<ul style="list-style-type: none"> • No changes to land use designations • Does not provide new housing opportunities to facilitate fulfillment of the City’s Regional Housing Needs Assessment (RHNA) requirements 	<ul style="list-style-type: none"> • Required by CEQA • Reduced impacts for all topic areas, including air quality, GHG, noise, and traffic impacts • Does not meet any Project Objectives
Alternative 2: Low Density Residential Alternative	<ul style="list-style-type: none"> • 1,520 acres of low density residential use, totaling approximately 7,600 residential units • 164 acres of parks and recreational facilities (same as proposed Specific Plan) • 17 acres of natural areas (same as proposed Specific Plan) • 54 acres for elementary school sites (same as proposed Specific Plan) • 128 acres of major roadways (same as proposed Specific Plan) • No Village Mixed Use land uses • No Industrial land uses 	<ul style="list-style-type: none"> • Requires certification of this EIR; General Plan Amendment, Specific Plan approval; Neighborhood Plan approval; Municipal Code Amendments/Rezoning; and parcel and tentative map approvals. • Requires annexation • Reduced air quality, GHG, noise, and traffic impacts due to reductions in land use intensity • Consistent with some of the Project Objectives
Alternative 3: Reduced Project Alternative	<ul style="list-style-type: none"> • 1,084 acres of low and medium density residential use, totaling approximately 7,600 residential units • 500 acres of agricultural use • 100 acres of parks and recreational facilities • 17 acres of natural areas (same as proposed Specific Plan) • 54 acres for elementary school sites (same as proposed Specific Plan) • 128 acres of major roadways (same as proposed Specific Plan) • No Village Mixed Use land uses • No Industrial land uses 	<ul style="list-style-type: none"> • Requires certification of this EIR; General Plan Amendment; Specific Plan approval; Neighborhood Plan approval; Municipal Code Amendments/Rezoning; and parcel and tentative map approvals. • Requires annexation • Reduced air quality, GHG, noise, and traffic impacts due to reductions in land use intensity • Consistent with some of the Project Objectives

Source: LSA (September 2020)

- Address the City of Madera’s current and projected housing needs for all segments of the community by providing a range of single- and multi-family homes.
- Promote high quality retail and mixed-use development to attract an array of businesses and employment opportunities.
- Establish a mix of land uses and local-serving activities that meet the General Plan’s objectives concerning community character and pedestrian-friendly design.
- Implement the City’s General Plan Land Use Element goal to facilitate annexation of large areas of land that are governed by a specific plan, which provides for compatibility of land uses, fiscal balance, recreation, and resource protection.
- Establish a transportation network that will fulfill the policies of the Madera General Plan’s Circulation Element by allowing residents to live within proximity to schools, recreational opportunities, retail centers, and commercial development, and minimize vehicle trips through utilizing access to a variety of transportation opportunities, including pedestrian pathways, bikeways, regional arterials, and transit.
- Promote opportunities for water efficiency in Plan Area architecture and landscaping to promote water conservation.
- Incorporate green and sustainable practices, as practicable, in developing buildings and infrastructure.
- Undertake development of the Plan Area in a manner that is economically feasible and balanced to address the City’s economic interests.

5.1.3 Significant Unavoidable Impacts of the Proposed Project

As described in Chapter 4.0, Evaluation of Environmental Impacts, the proposed Specific Plan would result in less than significant impacts related to the following topics: biological resources, cultural resources and tribal cultural resources, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, and wildfire. The proposed project would result in significant unavoidable impacts related to aesthetics, agricultural resources, air quality, noise, public services and recreation, transportation, and utilities and service systems.

For the purpose of this analysis, it is assumed that all of the alternatives would comply with applicable federal, State, and local regulations, policies, and ordinances. It is also assumed that all mitigation measures required for implementation of the proposed Specific Plan would apply to the project alternatives and similar corresponding reductions in impacts would be achieved through such mitigation. Therefore, the following discussion focuses on the ability of the alternatives to reduce project impacts and the potential impacts of the project alternatives related to these issues.

5.2 ALTERNATIVE 1: NO PROJECT ALTERNATIVE

5.2.1 Description

Under this alternative, no development identified in the proposed Specific Plan would occur, and the Specific Plan Area would continue to be used for agricultural production within an unincorporated area of Madera County. Although the City includes the proposed Specific Plan Area within the Urban Growth Boundary, the proposed Specific Plan Area is located outside of the City limits. Under this Alternative no construction activities or long term operations associated with the proposed Specific Plan would occur.

5.2.2 Environmental Analysis

5.2.2.1 Aesthetics

Under this alternative, no changes to the Specific Plan Area would occur, and the existing agricultural character of the Specific Plan Area would not change. Increase in lighting and glare would not occur and views to and across the Specific Plan Area would not change. Because the No Project Alternative would not result in any physical changes, this alternative would not alter the Specific Plan Area. Impacts to aesthetics would not occur and would therefore be less than the proposed project.

5.2.2.2 Agriculture and Forestry Resources

This alternative would not change the existing land uses within the Specific Plan Area. The entire Specific Plan is comprised of agricultural resources, including Williamson Act Contract lands in the Southwest portion of the Specific Plan Area. No forestry resources are located within the Specific Plan Area. With no changes to the land uses included under this alternative, this alternative would not impact agricultural resources and would result in fewer impacts related to the conversion of agricultural resources when compared to the proposed Specific Plan, which was determined to have significant and unavoidable impacts to such resources.

5.2.2.3 Air Quality

Under this alternative, construction of approximately 10,800 residential units as well as commercial and industrial land uses would not occur within the approximately 1,900-acre Specific Plan Area. Although agricultural operations would continue to occur within the Specific Plan Area, compared to construction and operation of development under the proposed Specific Plan, this alternative would result in substantially fewer emissions when compared to the proposed Specific Plan. Therefore, this Alternative would avoid the significant and unavoidable air quality impacts associated with the proposed project.

5.2.2.4 Biological Resources

Under this alternative, the existing biological resources located within the Specific Plan Area would not be affected because the existing land uses would not change, and construction and operation of development under the proposed Specific Plan would not occur. As a result, this alternative would result in fewer impacts to such resources when compared to the proposed Specific Plan.

5.2.2.5 Cultural Resources and Tribal Cultural Resources

Although no known cultural resources are located within the Specific Plan Area, there are areas that have a higher likelihood of containing unrecorded sensitive cultural resources. Under this alternative, no development would occur and no cultural resources would potentially be affected. As a result, this alternative would result in fewer impacts to cultural resources and tribal cultural resources when compared to the proposed Specific Plan.

5.2.2.6 Energy

Under this alternative, construction of approximately 10,800 residential units as well as commercial and industrial land uses would not occur. As a result, electricity and natural gas usage, as well as energy used for the construction of the development proposed under the proposed Specific Plan would not occur. The existing energy demand of the existing agricultural uses and the few ancillary residential uses would be substantially less than the proposed Specific Plan. As a result, this alternative would result in fewer impacts related to energy use when compared to the proposed Specific Plan.

5.2.2.7 Geology and Soils

Under this alternative no physical changes would occur within the Specific Plan Area and no changes to geology or soils would occur outside of the effects of existing agricultural operations. In addition, the likelihood of discovering paleontological resources or unique geologic features would not increase under this alternative as no physical disturbance would occur under this alternative. As a result, this alternative would result in fewer impacts related to geology and soils and unknown paleontological resources.

5.2.2.8 Greenhouse Gas Emissions

Under this alternative, construction of approximately 10,800 residential units as well as commercial and industrial land uses would not occur. As a result, the greenhouse gas emissions occurring under the proposed Specific Plan would not occur. This alternative would not result in new greenhouse gas emissions and existing emissions would remain unchanged because no changes in land uses would occur. As a result, this alternative would result in fewer impacts resulting from greenhouse gas emissions when compared to the proposed Specific Plan.

5.2.2.9 Hazards and Hazardous Materials

Under this alternative, changes in land use would not occur and the existing conditions related to the accidental release of, or exposure to, hazardous materials would remain the same. Although the existing agricultural operations would continue to utilize fertilizers within the Specific Plan Area, no new land uses requiring clearers, solvents, or fuels would be implemented. Therefore, this alternative would result in fewer impacts when compared to the proposed Specific Plan.

5.2.2.10 Hydrology and Water Quality

Under this alternative, the existing pervious surfaces and agricultural land would not be altered. With no physical changes occurring within the Specific Plan Area, the existing drainage patterns would not be altered. In addition, this alternative would not create a potential to violate any water

quality standards or waste discharge requirements, or otherwise substantially degrade surface or ground water quality, because this alternative would not change the existing conditions within the Specific Plan Area. As a result, this alternative would result in fewer impacts related to hydrology and water quality when compared to the proposed Specific Plan.

5.2.2.11 Land Use and Planning

Under this alternative, the Specific Plan Area would not be annexed into the City, and no land use changes would occur. Similar to the proposed Specific Plan, this Alternative would not divide an established community. The City's General Plan establishes the Specific Plan Area, as well as other "villages" throughout the Planning Area of the General Plan, to be developed as an urban growth area. Although this alternative would not require a General Plan Amendment, annexation or rezoning, it would not result in development as envisioned under the General Plan. As a result, this alternative would result in greater impact when compared to the proposed Specific Plan.

5.2.2.12 Mineral Resources

There are no mineral resources located within the Specific Plan Area, and no mineral resources would be adversely affected under this alternative or the proposed Specific Plan. As a result, this alternative would similarly result in no impacts like the proposed Specific Plan.

5.2.2.13 Noise

Under this alternative, construction of approximately 10,800 residential units as well as commercial and industrial land uses would not occur within the approximately 1,900-acre Specific Plan Area. Although agricultural operations would continue to occur within the Specific Plan Area and would generate noise, compared to construction noise generated by the proposed development under the proposed Specific Plan, under this alternative would not result in noise generated from construction activities or vehicle noise. Noise generated during operational phases would increase as a result of vehicle traffic. As a result, this alternative would result in fewer noise impacts and would avoid significant and unavoidable noise impacts when compared to the proposed Specific Plan.

5.2.2.14 Population and Housing

Under this alternative the population and housing units within the Specific Plan Area would not change. In addition, under this alternative no housing units or people would be displaced. The proposed Specific Plan would substantially increase the number of residential units and population within the Specific Plan Area. Although the proposed Specific Plan would increase the overall population within the Specific Plan Area, because the proposed Specific Plan is identified in the City's General Plan as an area designated for future growth, it would not induce substantial unplanned population growth. Similarly to the proposed Specific Plan, this alternative would not induce substantial unplanned population growth. However, it would not provide housing as needed for the City to meet its regional housing need allocation (RHNA) goals. Overall, this alternative would result in similar impacts as the proposed Specific Plan, but greater impacts related to the provision of needed housing units.

5.2.2.15 Public Services and Recreation

Under this alternative, the population of the Specific Plan Area would not change and there would be no increased demand for public services, including fire protection, police protection, public schools, parks and recreational facilities. The proposed Specific Plan would substantially increase the population of the Specific Plan Area and would increase the demand for public services. In addition, the proposed Specific Plan would result in significant and unavoidable impacts related to construction of public facilities. As a result, this alternative would result in fewer impacts to public services when compared to the proposed Specific Plan.

5.2.2.16 Transportation

Under this alternative no land uses would change and no development would occur in the Specific Plan area. As a result, potential impacts related to transportation resulting from implementation of the proposed Specific Plan would not occur. The proposed Specific Plan would result in a significant impact resulting from increased levels of service that would conflict with established policies addressing roadways. Under this alternative, no increases in vehicle trips would occur and no conflicts with such policies would occur. As a result, this alternative would result in fewer impacts related to transportation when compared to the proposed Specific Plan, and would avoid significant and unavoidable transportation impacts.

5.2.2.17 Utilities and Service Systems

Under this alternative, no land uses or physical changes would occur within the Specific Plan Area, and therefore, no increased demand for utilities and service systems, including water supply, wastewater, stormwater, and electricity, natural gas, and telecommunications would occur. The proposed Specific Plan would result in a substantial increase in demand for utilities due to the proposed residential units, commercial space, and industrial uses. Although sufficient capacity to accommodate future development under the Specific Plan would be ensured by the City through implementation of the General Plan and infrastructure master plans, potential impacts would occur during construction of new and expanded facilities. This alternative would not increase demand for utilities because no population increase or development would occur. Because the Specific Plan would result in significant and unavoidable impacts related to utilities and service systems, this alternative would result in fewer impacts related to utilities and service systems when compared to the proposed Specific Plan. In addition, physical impacts resulting from construction-period impacts would not occur under this alternative. As a result, this alternative would result in fewer construction-related impacts.

5.2.2.18 Wildfire

The Specific Plan Area does not contain any lands classified as a Very High Fire Hazard Severity Zone. The proposed Specific Plan would result in less-than-significant impacts related to the impairment of an adopted emergency response plan or evacuation plan, and would not exacerbate wildfire risks or expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes. Because this alternative would not increase the population of the Specific Plan Area or change land uses in a fire hazard zone, when compared to the proposed Specific Plan, this alternative would result in similar, less than significant impacts related to wildfire.

5.2.3 Overview of Potential Impact/Comparison to Proposed Project

Under the No Project Alternative, no development would occur in the Specific Plan Area. As a result, significant and unavoidable impacts to aesthetics, agricultural resources, air quality, land use, noise, transportation, and utilities and service systems, would not occur. Overall, potential impacts under the No Project Alternative would be fewer when compared to the proposed Specific Plan as no physical impacts would occur.

5.2.4 Project Objectives

The No Project Alternative would not achieve any of the Project Objectives. The No Project Alternative would not include any development, and would not address the City's current or projected housing needs, would not create a mixed-use development to attract businesses and employment opportunities; achieve the goals related to community character and pedestrian-friendly design envisioned in the General Plan, or facilitate the annexation of the Specific Plan Area. In addition, without any development, the No Project Alternative would not create a transportation network as identified in the General Plan, promote opportunities for water efficiency and incorporate sustainable building and operating practices, incorporate sustainable practices, as practicable, in developing buildings and infrastructure; or result in an economically feasible and balanced development.

5.3 ALTERNATIVE 2: LOW DENSITY RESIDENTIAL ALTERNATIVE

5.3.1 Description

Under this alternative, the proposed Specific Plan would be implemented with residential zoning and densities that would be consistent with the City's residential zoning for low density. The City's residential zoning densities for low density range from 3 units to 7 units per acre. For the purpose of this analysis, an average of five units per acre was used to provide a reasonable estimate of development that could occur within the Specific Plan Area. In addition, the acreages identified in the proposed Specific Plan as Village Mixed Use (120 acres) and Village Business Park (30 acres), would be reallocated to low density residential, for a total of approximately 1,521 acres of low density residential acres with a total buildout of approximately 7,600 residential units. Acreages for Parks and Recreation, Natural Areas along the Fresno River, Elementary School Sites, and Major Roadways would be the same as the proposed Specific Plan.

5.3.2 Environmental Analysis

5.3.2.1 Aesthetics

Under this alternative, development would occur throughout all of the approximately 1,900 acres of the Specific Plan Area. Although the Low Density Residential Alternative would result in approximately 3,000 less housing units than the proposed Specific Plan, the total area would be developed and the character of the Specific Plan Area would be substantially altered. In addition, when compared to the proposed Specific Plan, views to and across the Specific Plan Area would be similar as both the proposed Specific Plan and this alternative would result in a change from agricultural uses to urbanized land uses. Under this alternative, the change resulting from existing farmland with no nighttime lighting to urban uses would result in a significant increase in both

daytime glare and nighttime light. As a result, when compared to the proposed Specific Plan, this alternative would result in similar significant and unavoidable impacts to aesthetics.

5.3.2.2 Agriculture and Forestry Resources

Under this alternative, development would occur throughout all of the approximately 1,900 acres of the Specific Plan Area. As a result, the existing agriculture land uses in the Specific Plan would be converted to non-agricultural land uses. Although the Specific Plan Area does not include forestry resources, Williamson Act Contract lands are located in the Southwest area of the Specific Plan. Because both this alternative and the proposed Specific Plan would result in conversion of the Specific Plan Area from agricultural land to non-agricultural land, the potential impacts would be similar, and considered significant and unavoidable.

5.3.2.3 Air Quality

Under this alternative, construction of approximately 7,600 residential units would occur. Construction impacts related to air quality would occur, but due to the reduced number of residential numbers, the overall emissions would not be as significant as the proposed Specific Plan. In addition, with no commercial or industrial land uses included under this alternative, the balance of housing and employment within the Specific Plan Area would result in greater vehicle miles travel (VMT) impacts, thereby increasing operational air quality emissions. As a result, construction-period impacts would be less than the proposed Specific Plan, but operational-period air quality impacts related to vehicle emissions would be greater than the proposed Specific Plan. On balance, this alternative would result in similar significant and unavoidable impacts when compared to the proposed Specific Plan.

5.3.2.4 Biological Resources

Under this alternative, development of the approximate 1,900-acre Specific Plan Area would occur, but the density of residential development would be less than that of the proposed Specific Plan. Because the same overall project area would be disturbed under this alternative, the potential impacts to biological resources, including potential impacts to sensitive species and habitat, would be similar when compared to the proposed Specific Plan. With implementation of the same mitigation identified in this EIR for the proposed project, both this alternative and the proposed project would result in less-than-significant impacts related to biological resources.

5.3.2.5 Cultural Resources and Tribal Cultural Resources

Under this alternative, development of the proposed Specific Plan Area would occur, but the density of residential development would be less than that of the proposed Specific Plan. Because the same overall project area would be disturbed under this alternative, the potential impacts to cultural resources and tribal cultural resources, including potential impacts related to the discovery of previously-unknown historic resources, would be similar to the proposed Specific Plan. With implementation of the same mitigation identified in this EIR for the proposed project, both this alternative and the proposed project would result in less-than-significant impacts related to cultural and tribal resources.

5.3.2.6 Energy

Under this alternative, approximately 3,000 fewer residential units would be developed when compared to the proposed Specific Plan. In addition, no commercial or industrial land uses would be included under this alternative. As a result, less electricity and natural gas, as well as energy used for the construction of the development would be used when compared to the proposed Specific Plan. Although the proposed Specific Plan would result in less-than-significant impacts with the implementation of mitigation measures to reduce potential energy impacts, this alternative would result in fewer impacts related to energy use when compared to the proposed Specific Plan. Overall, impacts would resulting from this alternative would be considered less than significant.

5.3.2.7 Geology and Soils

Under this alternative, development of the proposed Specific Plan Area would occur, but the density of residential development would be less than that of the proposed Specific Plan. Under this alternative, potential impacts related to geological hazards, including seismic ground shaking, ground failure, landslides, soil erosion, and unstable geologic unit would be considered less-than-significant because a Standard Condition of Approval would be incorporated to require future geotechnical analyses to be complete prior to issuance of building permits. Impacts would be similar to that of the proposed Specific Plan because ground disturbance would occur within the same project area. Potential impacts related to the discovery of as yet unknown paleontological resources or unique geologic feature would also be similar to the proposed Specific Plan due to the same disturbance area. With implementation of the same mitigation identified in this EIR for the proposed project, this alternative would result in similar impacts related to geology and soils and paleontological resources as the proposed Specific Plan.

5.3.2.8 Greenhouse Gas Emissions

Under this alternative, approximately 3,000 fewer residential units would be developed when compared to the proposed Specific Plan. In addition, no commercial or industrial land uses would be included under this alternative. Less overall development would occur under this alternative and greenhouse gas (GHG) emissions associated with the operation of the proposed Specific Plan. However, under this alternative employment opportunities associated with commercial or industrial land uses would not occur when compared to the proposed Specific Plan. As a result, the balance of housing and employment within the Specific Plan Area would result in greater VMT impacts, thereby increasing GHG emissions generated by vehicles. This alternative and the proposed Specific Plan would be required to prepare a Greenhouse Gas Reduction Plan referencing details of construction plans and specifications to document implementation and compliance with the City's Climate Action Plan (CAP). With implementation of this mitigation, this alternative would result in less-than-significant impacts. As a result, this alternative would result in similar impacts when compared to the proposed Specific Plan.

5.3.2.9 Hazards and Hazardous Materials

Under this alternative, development of the proposed Specific Plan Area would occur, but the density of residential development would be less than that of the proposed Specific Plan. No commercial and industrial development would be included in this alternative. As a result, the potential impacts related to the accidental release of, or exposure to, hazardous materials would be limited to typical

household cleaners and solvents, but not in the quantities that would result in substantial impacts. Potential impacts resulting from demolition of existing structures may result in the release of hazardous materials such as asbestos and lead based paint. Both this alternative and the proposed Specific Plan would require mitigation to prepare site-specific surveys and remove any hazardous materials consistent with applicable standards. Although there is a potential for airport hazards to substantially increase due to the proximity of the Specific Plan Area to the Madera Municipal Airport and safety zones, development would be required to be consistent with the General Plan and the Madera County Airport Land Use Compatibility Plan (ALUCP), similar to the proposed Specific Plan. As a result, this alternative would be similar to the proposed Specific Plan and would have less-than-significant impacts related to hazards and hazardous materials.

5.3.2.10 Hydrology and Water Quality

Under this alternative, development of the entire Specific Plan Area would occur, but the density of residential development would be less than that of the proposed Specific Plan. As a result, the entire Specific Plan Area would be altered and drainage features would be altered to the same degree as the proposed Specific Plan. With the lower density housing proposed under this alternative, it is likely that more pervious surfaces would be located within the Specific Plan Area when compared to the proposed Specific Plan because less density and hardscape (impervious area) would be constructed as a result of this alternative. As a result, this alternative would likely allow for more water to percolate into the Madera Subbasin. In addition, with less residential units included under this alternative, the groundwater supplies of the Madera Subbasin would be affected to a lesser effect when compared to the proposed Specific Plan. Similar to the proposed Specific Plan, this alternative would implement Regulatory Compliance Measure HYD-1 to ensure that grading plans for future projects would be completed to meet regulatory requirements, such as Best Management Practices (BMPs), to minimize pollution of stormwater runoff. As a result, this alternative would result in less-than-significant impacts to hydrology and water quality, and would be similar when compared to the proposed Specific Plan.

5.3.2.11 Land Use and Planning

Under this alternative, the overall buildout would result in fewer residential units when compared to the proposed Specific Plan, and no commercial and industrial development would be developed. Due to the existing agricultural land uses within the Specific Plan Area and the surrounding land uses, this alternative would not divide an existing community. In addition, this alternative would be consistent with the General Plan by developing an urban growth area. However, fewer residential units would be constructed and, when compared to the proposed Specific Plan, potential impacts related to conflicts with existing plans and ordinances would be fewer and would result in less-than-significant impacts. Implementation of this alternative would include a General Plan Amendment establishing the specific land uses and zoning applicable to the Specific Plan Area. As a result, both the proposed Specific Plan and this alternative would result in similar, less-than-significant impacts.

5.3.2.12 Mineral Resources

There are no mineral resources located within the Specific Plan Area, and no mineral resources would be adversely affected under this alternative or the proposed Specific Plan. As a result, when

compared to the proposed Specific Plan, this alternative would result in similar, less-than-significant impacts related to mineral resources.

5.3.2.13 Noise

Under this alternative, construction of approximately 3,000 fewer residential units would occur within the approximately 1,900-acre Specific Plan Area. The proposed Specific Plan would result in significant and unavoidable noise impacts resulting from temporary construction noise. Under this alternative, noise generated during construction of residential units, school facilities or parks and recreational facilities would still occur, but to a lesser degree as compared to the proposed Specific Plan because less construction would occur overall. In addition, traffic noise generated under this alternative would be less than the proposed Specific Plan, because fewer vehicle trips would be generated by fewer residential units. Commercial and industrial land uses would not be developed, which would also reduce noise generated under this alternative when compared to the proposed Specific Plan. Impacts related to groundborne vibration would occur under both the proposed Specific Plan and this alternative and would be mitigated to less-than-significant levels with the proposed mitigation in this Draft EIR. The proposed Specific Plan would result in significant and unavoidable impacts related to noise, as a result, when compared to the proposed Specific Plan, this alternative would result in fewer impacts related to noise.

5.3.2.14 Population and Housing

Under this alternative, the entire Specific Plan Area would be developed, but with 3,000 fewer residential units when compared to the proposed Specific Plan. Both the proposed Specific Plan and this alternative would result in similar, less-than-significant impacts related to the displacement of existing housing and population. Assuming the same household size as the proposed Specific Plan (3.55 resident per household), this alternative would result in a total population of approximately 26,980 residents, or approximately 11,300 fewer residents than the proposed Specific Plan. Because buildout of the Plan Area was identified and anticipated in the City's General Plan, buildout of either this alternative or the proposed Specific Plan would not induce substantial unplanned population growth. As a result, this alternative would result in similar, less-than-significant impacts related to population and housing when compared to the proposed Specific Plan.

5.3.2.15 Public Services and Recreation

Under this alternative, construction of approximately 7,600 residential units would occur within the approximately 1,900-acre Specific Plan Area. As a result, the demand for public services, including fire protection, police protection, public schools, parks and recreational facilities would increase over the existing demand. This alternative would result in approximately 11,300 fewer residents when compared to the proposed Specific Plan, representing a reduced impact when compared to the proposed Specific Plan. The proposed Specific Plan would result in significant and unavoidable impacts resulting from construction of public facilities. This alternative would also result in similar, significant and unavoidable impacts to public services when compared to the proposed Specific Plan.

5.3.2.16 Transportation

Under this alternative, construction of approximately 7,600 residential units would occur within the Specific Plan Area. As a result, the impacts related to transportation would increase when compared to existing conditions. However, when compared to the proposed Specific Plan, this alternative would result in approximately 3,000 fewer residential units and 11,300 fewer residents. The proposed project would result in a less-than-significant impact related to VMT impacts. A reduction in residents in the Specific Plan Area would represent fewer impacts to transportation impacts, including conflicts with existing policies. However, under this alternative, a mix of land uses would not occur, and residents would need to travel further for employment, thus increasing potential VMT impacts when compared to the proposed Specific Plan. Under this alternative, and similar to the proposed Specific Plan, impacts related to bicycle facilities, transit facilities, pedestrian facilities, hazards related to design features, and emergency access would be less-than-significant. However, overall, this alternative would result in greater impacts to transportation when compared to the proposed Specific Plan due to increased VMT.

5.3.2.17 Utilities and Service Systems

Under this alternative, construction of approximately 7,600 residential units would occur within the approximately 1,900-acre Specific Plan Area. As a result, the demand for utilities and service systems, including water, wastewater, stormwater and electricity, natural gas and telecommunications would increase over the existing demand. However, this alternative would result in approximately 11,300 fewer residents when compared to the proposed Specific Plan, representing reduced impacts related to public services when compared to the proposed Specific Plan. Although the proposed Specific Plan would result in less-than-significant impacts to public services in terms of capacities of facilities (water, wastewater, stormwater, and electricity, natural gas, and telecommunication facilities), the proposed Specific Plan would result in potential environmental impacts resulting from construction activities for those facilities. Mitigation measures required for the proposed Specific Plan would also be required for this alternative to assess available capacities of facilities when future development projects are proposed and would require the establishment of financing mechanism to fund future improvements. Although the General Plan requires confirmation of adequate public facilities prior to approval of construction, similar to the proposed Specific Plan, this alternative would also require future confirmation of adequacy of public facilities. As a result, this alternative would result in similar, significant and unavoidable impacts related to utilities and service systems when compared to the proposed Specific Plan.

5.3.2.18 Wildfire

The Specific Plan Area does not contain any lands classified as a Very High Fire Hazard Severity Zone. This alternative would be constructed within the same project area as the proposed Specific Plan. Therefore, both the proposed Specific Plan and this alternative would result in less-than-significant impacts related to the impairment of adopted emergency response plan or evacuation plan, exacerbate wildfire risks, or expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes. Similarly, because this alternative would be constructed within the same Specific Plan Area which is not designated as a Very High Fire Hazard Severity Zone, this alternative would result in similar, less-than-significant impacts related to wildfire when compared to the proposed Specific Plan.

5.3.3 Overview of Potential Impact/Comparison to Proposed Project

Under the Low Density Residential Alternative, development would occur, but the residential density would be lower than the proposed Specific Plan, and no commercial or industrial land uses would be included. Because the entire Specific Plan Area would be developed fully under both the proposed Specific Plan and this Alternative, impacts related to construction and site disturbance related to air quality and noise would be similar. In addition, construction-related impacts related to the provision of adequate capacity for public services and utilities and service systems would be similar to the proposed Specific Plan. Transportation impacts under this alternative would be fewer than the proposed Specific Plan, because less residential units would be included, and potential conflicts with existing plans would not occur to the same degree as the proposed Specific Plan. This alternative would also be able to potentially include an agriculture buffer, which the proposed Specific Plan does not include. Additionally, when compared to the proposed Specific Plan, fewer overall residents would reside within the Specific Plan Area, and fewer operational impacts related to energy, hydrology and water quality, and noise would occur.

5.3.4 Project Objectives

The Low Density Residential Alternative would achieve most of the Project Objectives, but with a limited set of land uses, this alternative would not create mixed-use development or result in community character and pedestrian-friendly design that would be facilitated by a mix of land uses. With development of the Specific Plan Area, this alternative would help address the City's current and projected housing needs, facilitate annexation of the Specific Plan area, and create a transportation network to meet objectives of the General Plan. Additionally, this alternative would promote opportunities for water efficiency and incorporate sustainable building and operating practices, incorporate sustainable practices, as practicable, in developing buildings and infrastructure; and result in an economically feasible and balanced development. However, overall this alternative would not achieve all of the objectives of the proposed Specific Plan to the same extent because the level of residential density and mix of land uses would not allow for sustainable development that balances housing and employment. Without the same level of residential development, this alternative would not address the City's current and project housing needs to the same level as the proposed Specific Plan.

5.4 ALTERNATIVE 3: REDUCED PROJECT ALTERNATIVE

5.4.1 Description

Under this alternative approximately 7,600 residential units would be constructed but the mixed-use development occurring within the Specific Plan Area would be removed to reduce potential significant and adverse environmental impacts related to air quality resulting from construction, greenhouse gas emissions, vehicle-generated noise, and conflicts with roadway policies. In addition, 500 acres of agricultural land would be preserved within the Specific Plan Area site to reduce significant and unavoidable impacts related agricultural conversion that would result from implementation of the proposed Specific Plan. This alternative would likely preserve agricultural land uses in the Southwest Neighborhood area where Williamson Act Contracts are still in place and in the Northwest Neighborhood to ensure that compatibility with the Madera County ALUCP. This

alternative was selected to allow for a mix of residential densities within the Specific Plan Area, and to preserve agricultural land uses that would be developed under the propose Specific Plan.

For the purpose of this analysis, acreages identified for the Village Mixed Use district (120 acres), Village Business Park (30 acres), Village Parks and Recreation (64 acres), Village Country Estates (36 acres), Village Low Density (145 acres), and Village High Density (105 acres) would be reallocated to agriculture land uses. This would result in a total of 500 acres of agriculture land uses and a total buildout of 7,601 residential units in the Specific Plan Area. Land uses designated Village Medium Density, Village Natural Open Space, Village Public Facilities, and Major Roadways would be the same as the proposed Specific Plan.

5.4.2 Environmental Analysis

5.4.2.1 Aesthetics

Under this alternative, development would occur throughout approximately 1,300 acres of the Specific Plan Area, and 500 acres would be preserved for agricultural uses. Although this alternative would result in approximately 3,000 less housing units than the proposed Specific Plan and would retain 500 acres of agricultural uses, the character of the Specific Plan Area would be substantially altered. In addition, when compared to the proposed Specific Plan, views to and across the Specific Plan Area would be similar as both the proposed Specific Plan and this alternative would result in a change from almost entirely agricultural uses to urbanized land uses. Although a portion of the project area would remain in agricultural production, the overall visual character of the Specific Plan Area would be developed, resulting in similar impacts as the proposed project. In addition, and similar to the proposed Specific Plan, the introduction of new light and glare that would result from the development of urban uses within an agricultural areas would result in significant and unavoidable impacts. As a result, when compared to the proposed Specific Plan, this alternative would result in similar impacts to aesthetics.

5.4.2.2 Agriculture and Forestry Resources

Under this alternative, development would occur within the Specific Plan Area, however, this alternative would preserve approximately 500 acres of agricultural land. Although the Specific Plan Area does not include forestry resources, Williamson Act Contract lands are located in the Southwest area of the Specific Plan. Because the proposed Specific Plan would result in the conversion of all agricultural land within the Specific Plan Area, this alternative would result in fewer impacts related to agricultural resources when compared to the proposed Specific Plan. Therefore, although this alternative would not eliminate all significant and adverse impacts related to agricultural resources, it would result in fewer acres being developed, and fewer impacts.

5.4.2.3 Air Quality

Under this alternative, construction of approximately 7,600 residential units would occur. Construction impacts related to air quality would occur, but due to the reduced number of residential numbers, the overall emissions would not be as significant as the proposed Specific Plan. In addition, with no commercial or industrial land uses included under this alternative, the balance of housing and employment within the Specific Plan Area would result in greater VMT impacts, thereby increasing air quality emissions. The proposed Specific Plan mitigation measures related to

construction-period air quality impacts would also apply to this alternative. As a result, construction-period impacts would be less than the proposed Specific Plan because less construction would occur under this alternative. However, similar to the proposed Specific Plan, construction air quality impacts would not be reduced to less-than-significant levels because the full extent and timing of all construction activities is not known at this time. Operational-period air quality impacts related to vehicle emissions and agricultural equipment would be greater than the proposed Specific Plan because vehicle miles related to residents commuting further for employment would increase as a result of this alternative. Mitigation measures related to air quality would still apply to this alternative, and similar air quality impacts would result. Overall, this alternative would result in fewer emissions but similar impacts when compared to the proposed Specific Plan.

5.4.2.4 Biological Resources

Under this alternative, development of the Specific Plan Area would occur, but the density of residential development would be less than that of the proposed Specific Plan and 500 acres of agricultural land would be preserved. Overall, because the same general areas would be disturbed under this alternative, mitigation measures requiring preconstruction surveys for special-status species, delineation of jurisdictional wetlands, and prescriptive measures required by the proposed Specific Plan would also apply to this alternative. As a result, impacts to biological resources under either the Specific Plan or this alternative would be less-than-significant after mitigation is implemented. Impacts resulting from this alternative would therefore be similar to the proposed Specific Plan.

5.4.2.5 Cultural Resources and Tribal Cultural Resources

Under this alternative, development of the Specific Plan Area would occur, but the density of residential development would be less than that of the proposed Specific Plan and 500 acres of agricultural land would be preserved. Overall, because the same general areas would be disturbed under this alternative and the proposed Specific Plan, the proposed mitigation measures required for the proposed Specific Plan related to the discovery of cultural and historic resources during construction activities would still apply to this alternative. As a result, after mitigation, this alternative would result in similar, less-than-significant impacts when compared to the proposed Specific Plan.

5.4.2.6 Energy

Under this alternative, approximately 3,000 fewer residential units would be developed when compared to the proposed Specific Plan. Although, no commercial or industrial land uses would be included under this alternative, 500 acres of agricultural land would be preserved. As a result, less operational electricity and natural gas, as well as less energy used for the construction of the development would be used when compared to the proposed Specific Plan. Although the proposed Specific Plan would result in less-than-significant impacts related to energy, this alternative would result in fewer impacts related to energy use when compared to the proposed Specific Plan because this alternative would preserve 500 acres of agricultural land.

5.4.2.7 Geology and Soils

Under this alternative, development of the Specific Plan Area would occur, but the density of residential development would be less than that of the proposed Specific Plan, and this alternative would include the preservation of 500 acres of agricultural land. Under this alternative, potential impacts related to geological hazards, including seismic ground shaking, ground failure, landslides, soil erosion, and unstable geologic unit would be considered less-than-significant because a Standard Condition of Approval would be incorporated to require future geotechnical analyses to be complete prior to issuance of building permits. Impacts would be similar to that of the proposed Specific Plan given the overall area of ground disturbance would be similar. Potential impacts related to the discovery of as yet unknown paleontological resources or unique geologic features would also be similar to the proposed Specific Plan given the overall area of ground disturbance within the Specific Plan Area. As a result, when compared to the proposed Specific Plan, this alternative would result in similar impacts related to geology and soils and paleontological resources.

5.4.2.8 Greenhouse Gas Emissions

Under this alternative, approximately 3,000 fewer residential units would be developed when compared to the proposed Specific Plan, and this alternative would include the preservation of 500 acres of agricultural land. In addition, no commercial or industrial land uses would be included under this alternative. Less overall development would occur under this alternative and fewer greenhouse gas emissions associated with the construction of the proposed Specific Plan. However, even with the preservation of agricultural uses, the balance of housing and employment within the Specific Plan Area would result in greater VMT impacts, thereby increasing GHG emissions generated by vehicles. But, this alternative, and the proposed Specific Plan, would be required to prepare a Greenhouse Gas Reduction Plan referencing details of construction plans and specifications to document implementation and compliance with the City's CAP. With implementation of this mitigation, this alternative would result in less-than-significant impacts. As a result, this alternative would result in similar impacts when compared to the proposed Specific Plan.

5.4.2.9 Hazards and Hazardous Materials

Under this alternative, development of the Specific Plan Area would occur, but the density of residential development would be less than that of the proposed Specific Plan and this alternative would include the preservation of 500 acres of agricultural land. As a result, the potential impacts related to the accidental release of, or exposure to, hazardous materials would be limited to typical household cleaners and solvents and fertilizers for agricultural uses but not in the quantities that would result in substantial impacts, similar to the proposed project. Potential impacts resulting from demolition of existing structures may result in the release of hazardous materials such as asbestos and lead based paint. Both this alternative and the proposed Specific Plan would require mitigation to prepare site-specific surveys and remove any hazardous materials consistent with applicable standards. There is a potential for airport hazards to substantially increase due to the proximity of the Specific Plan Area to the Madera Municipal Airport and safety zones, however, development would be required to be consistent with the General Plan and the Madera County Airport Land Use Compatibility Plan (ALUCP). These impacts are similar to the proposed Specific Plan and are

considered less than significant. As a result, this alternative would result in similar impacts related to hazards and hazardous materials when compared to the proposed Specific Plan.

5.4.2.10 Hydrology and Water Quality

Under this alternative, development of the Specific Plan Area would occur, but the density of residential development would be less than that of the proposed Specific Plan, and this alternative would include 500 acres of agricultural land uses. As a result, the Specific Plan Area would be altered and drainage features would be altered to a similar degree as the proposed Specific Plan. With the lower density housing and agricultural uses proposed under this alternative, it is likely that more pervious surfaces would be located within the Specific Plan Area when compared to the proposed Specific Plan. As a result, this alternative would allow for more water to percolate into the Madera Subbasin. In addition, with less residential units included under this alternative, the groundwater supplies of the Madera Subbasin would be affected to a lesser effect when compared to the proposed Specific Plan. Similar to the proposed Specific Plan, this alternative would implement Regulatory Compliance Measure HYD-1 to ensure that grading plans for future projects would be completed to meet regulatory requirements, such as BMPs, to minimize pollution of stormwater runoff. As a result, this alternative would result in less-than-significant impacts to hydrology and water quality, and would result in fewer impacts to hydrology and water quality when compared to the proposed Specific Plan.

5.4.2.11 Land Use and Planning

Under this alternative, although a Specific Plan would be implemented within the Specific Plan Area, the overall buildout would result in fewer residential units and no commercial or industrial land uses when compared to the proposed Specific Plan. No commercial and industrial development would be constructed under this alternative, but this alternative would include 500 acres of agricultural land. Due to the existing agricultural land uses within the Specific Plan Area and the surrounding land uses, this alternative would not divide an existing community. In addition, this alternative would be consistent with the General Plan by developing an urban growth area and establishing an agriculture buffer. However, fewer residential units would be constructed and, when compared to the proposed Specific Plan, potential impacts related to conflicts with existing plans and ordinances would be similar and would result in less-than-significant impacts. In addition, implementation of the proposed Specific Plan and this alternative would include a General Plan Amendment establishing the specific land uses and zoning applicable to the Specific Plan Area. As a result, both the proposed Specific Plan and this alternative would result in similar, significant and unavoidable impacts.

5.4.2.12 Mineral Resources

There are no mineral resources located within the Specific Plan Area, and no mineral resources would be adversely affected under this alternative or the proposed Specific Plan. As a result, when compared to the proposed Specific Plan, this alternative would result in similar, less-than-significant impacts related to mineral resources.

5.4.2.13 Noise

Under this alternative, construction of approximately 7,600 residential units and preservation of 500 acres of agricultural land would occur within the approximately 1,900-acre Specific Plan Area. The

proposed Specific Plan would result in significant and unavoidable noise impacts resulting from temporary constructions noise. Under this alternative, noise generated during construction of residential units, school facilities or parks and recreational facilities would occur, but to a lesser degree as the proposed Specific Plan as less would be constructed. In addition, traffic generated under this alternative would be less than the proposed Specific Plan, because fewer vehicle trips would be generated by fewer residential units and reduced mixed uses. Industrial land uses would not be developed, which would also reduce noise generated under this alternative when compared to the proposed Specific Plan. Impacts related to groundborne vibration would occur under both the proposed Specific Plan and this alternative would be mitigated to less-than-significant levels. Noise generated from agricultural use would occur, but given the relatively small area compared to the overall development area, when compared to the proposed Specific Plan, this alternative would result in fewer impacts related to noise.

5.4.2.14 Population and Housing

Under this alternative, the Specific Plan Area would be developed, but with 3,000 fewer residential units and 500 more acres of agricultural acres, when compared to the proposed Specific Plan. Both the proposed Specific Plan and this alternative would result in similar, less-than-significant impacts related to the displacement of existing housing and population. Assuming the same household size as the proposed Specific Plan (3.55 resident per household), this alternative would result in a total population of approximately 26,980 residents, or approximately 11,300 fewer residents than the proposed Specific Plan. Because buildout of the Specific Plan Area was identified and anticipated in the City's General Plan, buildout of this alternative or the proposed Specific Plan would not induce substantial unplanned population growth, and would result in far fewer residences when compared to the proposed Specific Plan. As a result, this alternative would result in similar, less-than-significant impacts related to population and housing when compared to the proposed Specific Plan.

5.4.2.15 Public Services and Recreation

Under this alternative, construction of approximately 7,600 residential units would occur within the Specific Plan Area. As a result, the demand for public services, including fire protection, police protection, public schools, parks and recreational facilities would increase over the existing demand. However, this alternative would result in approximately 11,300 fewer residents when compared to the proposed Specific Plan, representing a reduced impact when compared to the proposed Specific Plan. The proposed Specific Plan and this alternative would result in significant and unavoidable impacts resulting from construction of public facilities. As a result, this alternative would result in similar, significant and unavoidable impacts to public services when compared to the proposed Specific Plan.

5.4.2.16 Transportation

Under this alternative, construction of approximately 7,600 residential units would occur within the Specific Plan Area. As a result, the impacts related to transportation would increase when compared to existing conditions. However, when compared to the proposed Specific Plan, this alternative would result in approximately 3,000 fewer residential units and 11,300 fewer residents. The proposed project would result in a less-than-significant impact related to VMT impacts. A reduction in residents in the Specific Plan Area would represent fewer impacts to transportation impacts,

including conflicts with existing policies. However, under this alternative, even with the preservation of 500 acres of agricultural land, a mix of residential and employment land uses would not occur, and many of the residents would need to travel further for employment, thus increase potential VMT impacts when compared to the proposed Specific Plan. Under this alternative, and similar to the proposed Specific Plan, impacts related to bicycle facilities, transit facilities, pedestrian facilities, hazards related to design features, and emergency access would be less-than-significant. As a result, this alternative would result in greater impacts to transportation when compared to the proposed Specific Plan.

5.4.2.17 Utilities and Service Systems

Under this alternative, construction of approximately 7,600 residential units and the preservation of 500 acres of agricultural land would occur within the Specific Plan Area. As a result, the demand for utilities and service systems, including water, wastewater, stormwater and electricity, natural gas and telecommunications would increase over the existing demand. However, this alternative would result in approximately 11,300 fewer residents when compared to the proposed Specific Plan, representing a reduced impact when compared to the proposed Specific Plan. Although the proposed Specific Plan would result in less-than-significant impacts to public services in terms of capacities of facilities, the proposed Specific Plan would result in potential environmental impacts resulting from construction of those facilities. Mitigation measures required for the proposed Specific Plan would be required to assess available capacities of facilities when future development projects are proposed and would require the establishment of financing mechanism to fund future improvements. Although the General Plan requires confirmation of adequate public facilities prior to approval of construction, similar to the proposed Specific Plan, this alternative would also require future confirmation of adequacy of public facilities. As a result, this alternative would result in similar, significant and unavoidable impacts to utilities and service systems when compared to the proposed Specific Plan.

5.4.2.18 Wildfire

The Specific Plan Area does not contain any lands classified as a Very High Fire Hazard Severity Zone. This alternative would be constructed within the same project area as the proposed Specific Plan. Therefore, both the proposed Specific Plan and this alternative would result in less-than-significant impacts related to the impairment of adopted emergency response plan or evacuation plan, exacerbate wildfire risks, or expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes. Similarly, because this alternative would be constructed within the same Specific Plan Area which is not designated as a Very High Fire Hazard Severity Zone, this alternative would therefore result in similar, less-than-significant impacts related to wildfire when compared to the proposed Specific Plan.

5.4.3 Overview of Potential Impact/Comparison to Proposed Project

Under the Reduced Project Alternative, development would occur, but the residential density would be lower than the proposed Specific Plan, 500 acres of agricultural land would be preserved (and potentially used for a General Plan-required agriculture buffer), and no commercial or industrial land uses would be included. Because the Specific Plan Area would be developed under both the proposed Specific Plan and the Reduced Project Alternative, impacts related to construction and site

disturbance would be similar for both scenarios. In addition, construction-related impacts related to the provision of adequate capacity for public services and utilities and service systems would be similar to the proposed Specific Plan. Transportation impacts under this alternative would be fewer than the proposed Specific Plan, because less residential units would be constructed, and potential conflicts with existing plans would not occur to the same degree as the proposed Specific Plan. This alternative would also include 500 acres of agriculture land which could be used for the agriculture buffer required by the General Plan. Additionally, when compared to the proposed Specific Plan, fewer overall residents would reside within the Specific Plan Area, resulting in fewer operational impacts related to energy, hydrology and water quality, and noise.

5.4.4 Project Objectives

The Reduced Project Alternative would achieve most of the Project Objectives, but with a limited set of land uses, this alternative would not create the same amount of mixed-use development or result in community character and pedestrian-friendly design that would be facilitated by a mix of land uses. With development of the Specific Plan Area and preservation of 500 acres of agricultural land, this alternative would address the City's current and projected housing needs, facilitate annexation of the Specific Plan area, and create a transportation network to meet objectives of the General Plan. Additionally, this alternative would promote opportunities for water efficiency and incorporate sustainable building and operating practices, incorporate sustainable practices, as practicable, in developing buildings and infrastructure; and result in an economically feasible and balanced development. Overall, this alternative would not achieve all of the objectives of the proposed Specific Plan to the same extent because the level of residential density and mix of land uses would not allow for sustainable development that balances housing and employment. Without the same level of development, this alternative would not address the City's current and project housing needs to the same level as the proposed Specific Plan.

5.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an Environmentally Superior Alternative. State CEQA Guidelines Section 15126.6(e)(2) states that if the No Project Alternative is the Environmentally Superior Alternative, then the EIR shall also identify an Environmentally Superior Alternative among the other alternatives. Table 5.B provides, in summary format, a comparison of the level of impacts for each alternative to the proposed project.

The No Project/No Build Alternative has the least impact to the environment because it would not result in any development or new physical impacts. While the No Project Alternative would lessen or avoid the impacts of the proposed Specific Plan, the beneficial impacts of the proposed project—including implementing sustainable planning and development, creating job growth, accommodation of strategic growth near transit, and the provision of housing units required to meet State-mandated affordable housing targets and alleviate overcrowding—would not occur, and none of the Project Objectives would be met.

Table 5.B: Comparison of the Environmental Impacts of the Proposed Project to the Project Alternatives

Environmental Topic	Proposed Project Level of Impact After Mitigation	Alternative 1: No Project Alternative	Alternative 2: Low Density Residential Alternative	Alternative 3: Reduced Project Alternative
Aesthetics	Significant and Unavoidable	Fewer	Similar	Similar
Agriculture and Forestry Resources	Significant and Unavoidable	Fewer	Similar	Fewer
Air Quality	Significant and Unavoidable	Fewer	Similar	Similar
Biological Resources	Less than Significant with Mitigation	Fewer	Similar	Similar
Cultural Resources and Tribal Cultural Resources	Less than Significant with Mitigation	Fewer	Similar	Similar
Energy	Less than Significant with Mitigation	Fewer	Fewer	Fewer
Geology and Soils	Less than Significant with Mitigation	Fewer	Similar	Similar
Greenhouse Gas Emissions	Less than Significant with Mitigation	Fewer	Similar	Similar
Hazards and Hazardous Materials	Less than Significant with Mitigation	Fewer	Similar	Similar
Hydrology and Water Quality	Less than Significant	Fewer	Similar	Fewer
Land Use and Planning	Significant and Unavoidable	Greater	Similar	Similar
Mineral Resources	No Impact	Similar	Similar	Similar
Noise	Significant and Unavoidable	Fewer	Fewer	Fewer
Population and Housing	Less than Significant	Similar	Similar	Similar
Public Services and Recreation	Significant and Unavoidable	Fewer	Similar	Similar
Transportation	Significant and Unavoidable	Fewer	Greater	Greater
Utilities and Service Systems	Significant and Unavoidable	Fewer	Similar	Similar
Wildfire	Less than Significant	Similar	Similar	Similar
Attainment of Project Objectives	Meets all of the Project Objectives	Meets none of the Project Objectives	Meets some of the Project Objectives but not all, and not to the same degree as the proposed project	Meets some of the Project Objectives but not all, and not to the same degree as the proposed project

Source: LSA (December 2021).

Legend:

Greater = Greater impacts than the proposed project

Fewer = Fewer impacts than the proposed project

Similar = Similar impacts as the proposed project

With the exception of the No Project Alternative, the Environmentally Superior Alternative would be Alternative 3, Reduced Project Alternative. Overall, this alternative would lessen significant environmental impacts or result in impacts similar to those associated with the proposed project. Alternative 3 would achieve some of the Project Objectives; specifically, it would address housing needs in the City and would facilitate annexation of areas in the Specific Plan Area, and would incorporate sustainable practices in developing buildings and infrastructure. The reduced number of housing units in Alternative 3 would result in fewer impacts when compared to the proposed Specific Plan. However, although Alternative 3 would incrementally reduce impacts, significant and unavoidable impacts to aesthetics, agriculture, air quality, land use, noise, public services, transportation and utilities and service systems would still occur.