
ALTERNATIVES

INTRODUCTION

The primary intent of the alternatives evaluation in an EIR, as stated in Section 15126(d) 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 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." Further, the Guidelines state that "the discussion of alternatives shall focus on alternatives capable of eliminating any significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." An EIR must describe a range of reasonable alternatives to a proposed project that could feasibly attain most of the basic objectives of the project.

The following alternatives are evaluated in this chapter:

1. **Alternative 1, No Project/No Development:** Assumes that no new development would occur in the Plan area to the west of Crows Landing Road, which would remain largely in agricultural use. The G3 Enterprises facility and County facility would continue to build out their parcels, but would not annex to the City of Ceres.
2. **Alternative 2, No Project/General Plan Assumptions:** Assumes that the Plan area would develop consistent with the assumptions of the adopted City of Ceres General Plan, which are less intensive than the proposed Specific Plan.
3. **Alternative 3, Reduced Intensity, Some Mix of Uses:** Assumes that the Plan area would develop according to a reduced intensity development plan that preserves some mix of uses, including retail as proposed under the Plan, 20 acres of light industrial uses, and the remainder as low-density residential.
4. **Alternative 4, Reduced Intensity, All Low-Density Residential:** Assumes that the Plan area would develop entirely as low-density residential.

Each of the alternatives is described in more detail, below. In addition to the description provided for each alternative, this chapter provides a comparative analysis of the potential environmental effects resulting from each alternative and the extent to which each alternative supports the statutory objectives and stated purpose of the proposed Specific Plan.

ALTERNATIVES CONSIDERED AND ELIMINATED FROM FURTHER ANALYSIS

The requirement that an EIR evaluate alternatives to a proposed project or alternatives to the location of a proposed project is a broad one, since the primary intent of the alternatives analysis is to disclose

other ways that the objectives of the project could be attained while reducing the magnitude of, or avoiding, the environmental impacts of the proposed project. Alternatives that are included and evaluated in the EIR must be feasible alternatives. However, the Public Resources Code and the CEQA Guidelines direct that the EIR need "set forth only those alternatives necessary to permit a reasoned choice." The CEQA Guidelines provide definition for "a range of reasonable alternatives" and, thus, limit the number and type of alternatives that may need to be evaluated in a given EIR. According to the CEQA Guidelines:

“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.”¹

First and foremost, alternatives in an EIR must be feasible. In the context of CEQA, "feasible" is defined as: capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social and technological factors.²

Further, the following factors may be taken into consideration in the assessment of the feasibility of alternatives: site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and the ability of the proponent to attain site control.³ Finally, an EIR is not required to analyze alternatives when the effects of the alternative "cannot be reasonably ascertained and whose implementation is remote and speculative."⁴

The CEQA Guidelines do not provide specific direction regarding the methodology of comparing alternatives and the proposed Project. Each project must be evaluated for the issues and impacts that are most important; this will vary depending on the project type and the environmental setting. Issue areas that are generally given more weight in comparing alternatives are those with significant long-term impacts. Impacts that are short-term (e.g., construction-related impacts) or those that can be mitigated to less than significant levels are generally considered to be less important.

The following alternatives were considered briefly, but were not evaluated in detail because they would not achieve most of the project objectives and/or reduce impacts of the Proposed Project.

Off-Site Alternative

The purpose of the proposed Specific Plan can be summarized as developing a well-planned community that is responsive to current and anticipated future market conditions. The Plan area is unique because it includes the Crows Landing Road corridor. With established commercial development along other portions of this corridor, it is expected to support significant new commercial development and job creation in the Plan area and for the City of Ceres. Additionally, surrounding infrastructure will allow utility connections to the City and roadways have been planned to support increased traffic in the area.

A number of different alternatives for new growth were explored during the General Plan process, and while the Plan proposes a deviation from the exact uses and timing of development in the Plan

1. State of California, CEQA Guidelines, Section 15126(d)(5).
2. State of California, Public Resources Code, Section 21061.1.
3. State of California, CEQA Guidelines, Section 15126(d)(5)(A).
4. State of California, CEQA Guidelines, Section 15126(d)(5)(C).

area, the site was identified in the General Plan as a location suitable for future development. No other location identified for future growth in the General Plan would be comparable to the Crows Landing Road corridor in providing opportunities for commercial growth and job creation. Because of the size of the proposed development, there are no parcels within the city large enough to accommodate the proposed Specific Plan, and any alternative project site would need to be annexed into the city, and thus would need to be contiguous with the existing city boundaries. Development of other land appropriate for development and adjacent to the city would result in impacts similar to the proposed Specific Plan, including loss of prime farmland. Depending on location, some different location-specific impacts could occur, such as impacts on biological or cultural resources. Population-related impacts, such as increased traffic congestion and noise, degradation of air quality, and increased demand for public services and utilities, would occur regardless of location. For these reasons, an off-site alternative in the area was not further considered.

Other Reduced Intensity Alternatives

Reducing intensity of development was considered as a way to reduce or avoid significant and unavoidable traffic and regional emissions impacts by lowering the number of new trips. The focus in considering such an alternative was on significant and unavoidable impacts for which no feasible improvements were identified.

There are many different variations on such reduced intensity alternatives that could meet these objectives to varying degrees. The two included in the full analysis below were chosen because these two would avoid project-specific traffic impacts and regional emissions impacts (Alternatives 3 and 4, respectively).

An alternative that considered development of only a portion of the site was considered and rejected for further study. Because the General Plan anticipated growth in the entire proposed Plan area, growth throughout the area would need to be assumed on a cumulative basis. While the portion of the cumulative impact attributed to the alternative would be lessened, cumulative impacts as a whole would not be substantially changed.

No feasible reduced intensity alternative was identified that could avoid all cumulative traffic significant and unavoidable impacts, as some segments of Crows Landing Road and SR 99 would operate at unacceptable services even without *any* development in the Plan area. Therefore, it was concluded that further alternatives intended to reduce traffic impacts could be rejected without further consideration.

ALTERNATIVES TO THE PROPOSED PROJECT

As discussed in Chapter 3, the purpose of the proposed Specific Plan is to develop the Plan area to meet the existing and anticipated future needs of the expanding Ceres community, with the following objectives:

1. Develop land uses that will enhance or complement existing and surrounding land uses.
2. Program land uses in response to current and future market conditions in and around the City of Ceres.
3. Fully develop the commercial and employment potential of the Plan area.
4. Create compact and walkable neighborhoods, consistent with the small-town character of the City of Ceres.

5. Provide a diversity of active and passive parks and open space.
6. Locate land uses and networks to support non-motorized and alternative transportation modes
7. Promote LEED principles and Low Impact Development Practices.
8. Provide a safe and efficient neighborhood circulation network that promotes connectivity and access for motorists, pedestrians, bicyclists and transit throughout the Plan area;
9. Provide a sufficient system of public facilities and services that accommodate the needs of future residents within the Plan area and does not diminish current levels of public facilities and services.

The significant and unavoidable impacts of the proposed Specific Plan are:

- Loss of Important Farmland and development of lands currently under Williamson Act contracts (Impacts Ag-1, Ag-2 and cumulative impact Ag-5)
- Operational ozone and particulate matter emissions (Impact Air-2 and cumulative impacts Air-4 and Air-5)
- Increases in greenhouse gas emissions (Impact Climate-1)
- Traffic noise impacts on existing uses in the vicinity (Noise-3 and cumulative impact Noise-6) and construction noise over an extended period (Noise-4)
- Increased traffic on intersections, roadways, Highway 99 interchanges and mainlines.
 - o For some of these impacts, no feasible mitigation has been identified to reduce the impacts to less than significant (Traf-17, -18, and cumulative impacts -31, -57, -58, -59 because of the infeasibility of widening of Crows Landing Road beyond that contemplated in area plans; Traf-24, -28, and cumulative impacts -63, -64, -65, -66, -67, -68, -69 because SR 99 and some of its ramps would operate at substandard levels even with planned improvements; and cumulative impact Traf-61 because widening of Whitmore Avenue beyond that identified in the current Whitmore Interchange Improvement Project is considered by the City to be infeasible)
 - o Some of these impacts would be wholly or partially mitigated to a level of less than significant through implementation of another jurisdiction's existing fee and/or improvement program, but have been identified as significant and unavoidable because it is outside of the City's jurisdiction to implement (Impacts Traf-1 to -4, -9, -13 to -16, -20, -23, -25 to -29 and cumulative impacts Traf-32, -34, -37, -38, -42, -43, -45 -47, -48, and -60)
 - o For some of these impacts, mitigation has been identified, but implementation is uncertain because a portion of the improvements are not included in an existing improvement plan (Cumulative impacts Traf-30, -33, -37, -41, -44, -46, and -49 to -53)

This alternatives analysis focuses on each alternative's ability to avoid or reduce these significant and unavoidable impacts and notes any increases in the severity of other impacts. For traffic impacts, this analysis focuses on the impacts for which no feasible mitigation was identified (and not on those for which a significant and unavoidable impact was identified because of jurisdictional boundaries, as detailed in the second two sub-bullets above).

ALTERNATIVE 1: NO PROJECT/NO DEVELOPMENT

CEQA requires that a “No Project” alternative be evaluated. The purpose of the No Project alternative is to allow decision makers to compare the impacts of a proposed project with the impacts of not approving the project [CEQA Guidelines Section 15126.6(e)(1)]. One potential outcome from a decision not to approve the project would be a no development scenario. In the case of a revision to an existing land use plan, such as the General Plan or a Community Plan, the No Project alternative is the continuation of the existing plan [CEQA Guidelines Section 15126.6(e)(3)(A)].

Under a “no development” alternative, the Plan area would remain in the county, and the General Agriculture designation on those properties west of Crows Landing Road would be retained. The rural residences and agricultural operations would continue in their present form. Under this alternative, the G3 Enterprises facility would continue to build out under the County’s jurisdiction, as would the County facility east of Crows Landing Road. A No Project/No Development alternative would not meet any of the project objectives, because it would not annex the Plan area to the City or Ceres, and no new development would occur. There would be no impacts on the environment, because no new development would occur within the Plan area.

It could also be argued that rejecting development of this site would transfer the growth to another location, which would likely result in impacts similar to those seen with the proposed Plan in a different location. As such a different location has not been identified, such a comparison would be speculative and is not included in this analysis.

ALTERNATIVE 2: NO PROJECT/GENERAL PLAN ASSUMPTIONS

Alternative 2 would annex the Plan area to the City of Ceres and develop it as envisioned in the City’s General Plan. As shown in **Table 21.1**, the total number of acres to be developed would be the same as under the proposed Specific Plan. For comparison purposes, non-residential development areas were assumed to have the same development intensity as was presumed under the proposed Plan. These represent a discount from the maximum allowable development intensity in the GP and include a Floor Area Ratio (FAR) of 0.5 for the office area, 0.24 for the retail and 0.27 for business park/light industrial. Because high-density residential use is allowed in the office area and was assumed in the proposed Plan, the same ratio of multi-family units was assumed for the office area under Alternative 2. While the specifics of services and parks were not detailed in the GP residential reserve designation, a development capacity of 5.2 dwelling units per gross acre has been assumed for the Residential Reserve area, consistent with the assumptions in the General Plan EIR (sections 2.4 and 2.5), which factors in assumptions of appropriate parkland and services. All the residential units in this area are presumed to be single-family. Alternative 2 would result in significantly more industrial uses, but also significantly less commercial and office and fewer residential units. Assumed employment generation rates from the Ceres’ General Plan EIR (Table 2-6) were used to estimate that full build out under Alternative 2 would generate approximately 73% more employees than build out under the Plan.

Utility infrastructure may be sized for reduced capacity demanded under Alternative 2, but would otherwise be similar to the proposed Plan.

The policies, implementation measures and guidelines of the City’s General Plan would be implemented under this alternative.

TABLE 21.1: ROUGH ESTIMATES FOR COMPARISON OF ALTERNATIVE 2 TO THE PROPOSED PLAN

Land Use	Acreage	Development (in sq. ft. or residential units)	Daily Traffic Trips	Estimated Employees
Proposed Plan, Core Planning Area				
Retail (all)	85.9	884,200	16,485	1,768
Office	17.7	383,910	5,295	1,097
Business Park	67.5	802,100	10,625	2,005
Schools and Parks	63.0			
Residential (Single Family)	278.0	2,325	16,925	
Residential (Multi-Family)	40.0	1,310	7,560	
Roads	88.9 ¹			
Total	641¹		62,475	4,870
Alternative 2				
Office	36	784,080	10,814	2,240
Community Commercial	9	1494,090	1,754	188
Light Industrial	276	4,809,024	33,519	6,011
Residential Reserve (Single-Family)	320	1,664	12,250	
Residential (Multi-Family) ²		185	973	
Total	641		59,311	8,440
Difference from Proposed Plan		50% reduction in housing units	5% reduction in trips	73% increase in employees

1 For comparison to acreages under the General Plan, boundary roadway areas were removed from this table.

2 These multi-family units are assumed mixed-use development in the Office designated area. Note that under the proposed Plan, multi-family units are also assumed in the Office area as well as one of the retail areas. See Chapter 3: Project Description and specifically Table 3.1 for a breakdown of multi-family units under the proposed Plan.

RELATIONSHIP OF ALTERNATIVE 2 TO PROJECT OBJECTIVES

Assuming build out of so much light industrial acreage would be possible under existing market conditions, Alternative 2 would meet the project objective to develop the employment potential of the site. It can be assumed the residential area would also meet objectives to provide walkable neighborhoods, parks and open space, low impact development practices, a safe and efficient circulation network, and a sufficient system of public facilities and services.

However, Alternative 2 would not necessarily complement existing and surrounding uses or respond to current and projected market conditions. It would also not locate as much high-density residential or commercial uses near Crows Landing Road to support alternative transportation modes.

ENVIRONMENTAL ANALYSIS

Land Use and Plan Consistency

As with the proposed Specific Plan, impacts due to potential incompatibilities between residential uses and active agricultural operations would be less than significant with implementation of Mitigation Measure (MM) Ag-4, which requires deed notification of nearby agricultural operations.

Alternative 2 would be consistent with the City's General Plan, because it would represent build out of the area as currently anticipated under the General Plan.

Alternative 2, like the proposed Specific Plan, would require annexation of the Plan area to the City of Ceres, and would be consistent with LAFCO annexation policies. Alternative 2 development

would be a logical and well-ordered extension of city boundaries, and could be served efficiently by public service and utilities providers. Like the proposed Specific Plan, Alternative 2 would convert active farmland contiguous to the existing city and in the city's Urban Growth Area.

Alternative 2 does not include provisions for the existing Carol Lane neighborhood, which falls into the area designated for light industrial uses. As discussed in Chapter 3, the Carol Lane neighborhood is anticipated to remain in the foreseeable future. Retaining these residential uses within a new light industrial area would result in a significant land use incompatibility. This would be a new potentially significant impact under Alternative 2.

Agriculture

Like the proposed Specific Plan, Alternative 2 would convert 660 acres of farmland to urban uses (Impacts Ag-1 and Ag-5), including three parcels that are under Williamson Act contracts (Impact Ag-2). The loss of farmland would be a significant and unavoidable impact under either Alternative 2 or the proposed Specific Plan.

Like the proposed Specific Plan, Alternative 2 could interfere with existing agricultural irrigation lines that traverse the Plan area (Impact Ag-3). Mitigation Measure Ag-3 would ensure that these irrigation lines would remain viable until they are no longer needed.

Potential incompatibilities due to the development of residential uses in proximity to agricultural operations would occur under either the proposed Specific Plan or Alternative 2, although fewer residents would occupy the Plan area under Alternative 2. Nonetheless, residents could still be exposed to noise, odors and other aspects of farming that they find annoying or disruptive (Impact Ag-4). Under either Alternative 2 or the proposed Specific Plan, deed notifications to alert prospective buyers of potential agricultural annoyances (MM Ag-4), would reduce the potential incompatibilities to a less-than-significant level.

Air Quality and Climate Change

Construction dust impacts (Impact Air-1) would be similar to the proposed Specific Plan because the same acreage of land disturbed for new development. Compliance with SJVAPCD Regulation VIII, enhanced dust control measures (MM Air-1) would reduce the impact to less than significant under either the Plan or Alternative 2.

Alternative 2 would increase traffic and therefore operational vehicle emissions, above that existing today though to a lesser degree (about 5 percent less traffic) under Alternative 2 than would the proposed Plan. Alternative 2 would increase emissions of ozone precursors and particulate matter (Impact Air-2) and contribute to the cumulatively significant degradation of regional air quality (Impacts Air-4 and Air-5). These impact would remain significant and unavoidable and likely be less severe under Alternative 2, because the amount of growth would be reduced as compared to the Plan, the impact would remain significant and unavoidable.

Alternative 2 would also reduce the number of people who could be exposed to nuisance dust and odors from nearby agricultural uses, because fewer homes would be built within the Plan area (Impacts Ag-3). Therefore, this less-than-significant impact would be less severe under Alternative 2 than under the proposed Specific Plan, but would still require buffer setbacks, walls and/or landscaping and deeded right-to-farm (MM Ag-4).

Like the proposed Specific Plan, Alternative 2 would generate greenhouse gases, which contribute to global climate change (Impact Climate-1). Alternative 2 would have approximately 5 percent less

traffic so would generate fewer mobile emissions, and the impact could be less severe than under the proposed Specific Plan. However, businesses could be proposed in the light industrial area that would generate stationary emissions and increase the total amount of operational greenhouse gas emissions by an unknown amount. Alternative 2 would also not provide for higher densities, walkability, employment and shopping near homes, and would not promote alternative transportation choices that would result in fewer emissions per person.

Hazardous Materials

Like the proposed Specific Plan, Alternative 2 would contribute to a cumulative increase in the number of sites handling hazardous materials, both in the vicinity in general as well as near a school (Impact Haz-2), and would result in a cumulative increase in transportation, use, disposal, and potential for exposure to and/or accidental release of hazardous materials during both construction and operations (Impact Haz-1). While this impact would be considered less than significant with compliance with applicable laws and regulations (MMs Haz-1a, Haz-1b, Haz-1c, Haz-2, Hydro-1) for either the proposed Specific Plan or Alternative 2, the impact would be marginally greater under Alternative 2 because of the greater amount of industrial uses proposed, which are more likely to use hazardous materials and in greater amounts.

Noise

Although Alternative 2 would reduce traffic by about 5 percent from that assumed under the proposed Plan, traffic noise increases under Alternative 2 would exceed standards adjacent to proposed residential uses on Whitmore Road, Crows Landing Road and portions of the proposed B Street (Impact Noise-1) and at existing uses along Whitmore Avenue and Service Road (Impact Noise-3 and -6). Therefore, Mitigation Measures Noise-1a, -1b and -1c and Noise-3 would still be applicable under Alternative 2, requiring site-specific noise reduction measures such as increased wall heights, site planning to shield outdoor use areas, and/or enhanced building sound insulation. Additionally, residential uses would be located adjacent to industrial uses, and would not substantially reduce impacts related to incompatibilities between these uses (Impact Noise-2).

Alternative 2 would result in construction near noise sensitive uses, such as residences (Impact Noise-4). While Alternative 2 would result in lower-intensity development and therefore less construction, the total site is large and build out of the area would occur over an extended period of time, even with reduced intensity. Construction noise under Alternative 2 would be marginally lessened, but would remain significant and unavoidable.

Traffic and Circulation

Alternative 2 would generate approximately 5 percent less traffic than the proposed Specific Plan. Because there would be fewer trips, Alternative 2 would not increase congestion as much as the proposed Specific Plan. Alternative 2 could be expected to increase congestion at local intersections, roadway segments, freeway interchanges and freeway mainline segments. However, these impacts would be marginally reduced, likely resulting in the same or similar improvements, though potentially resulting in the need for fewer improvements.

As with the proposed Specific Plan, some impacts would remain significant and unavoidable, either because no feasible mitigation could be identified that would reduce the impact to less than significant or because the improvements are outside the jurisdiction of the City of Ceres or require additional right of way that may not be available. Again, the magnitude of these impacts would be marginally reduced (by about 5 percent) under Alternative 2.

Utilities

Alternative 2 would increase the demand for water supply, wastewater treatment and solid waste disposal, though the demand would be anticipated to be reduced as compared to the Plan. Mitigation measure Util-1, Util-2a, Util-2b and Util-3 would still be required to reduce potential impacts related to well water supply, interference with existing wells and potential temporary impacts if development proceeds before wastewater system capacity upgrades.

As with the Specific Plan, development under Alternative 2 would be expected to provide for water wells and infrastructure to serve the generated demand and to capture storm water in on-site retention facilities.

Other Impacts

Impacts related to the amount of acreage that is developed, such as loss of biological habitat, harm to special-status species, disturbance of archaeological resources or human remains, increased runoff and erosion, and exposure to contaminated soils or water, would be the same under Alternative 2 as identified under the Plan, because the amount and location of developed land would be the same as the proposed Plan.

Population-related impacts, such as increased exposure to geological and other hazards and demand for public services would be lessened, because the population would be reduced by about 55 percent. Like the proposed Specific Plan, Alternative 2 would increase demand for parks. It is presumed development under Alternative 2 would meet requirements for provision of parkland acreage or provide in lieu fees.

ALTERNATIVE 3: REDUCED INTENSITY, SOME MIX OF USES

Under Alternative 3, the Plan area would be annexed into the City of Ceres, but it would develop according to a reduced intensity development plan that preserves some mix of uses in the Plan area. Alternative 3 assumes retail will develop as proposed under the Plan and an additional 20 acres would be developed as light industrial uses. All the remaining area will develop as low density residential, with an assumed density of 5.2 units per acre, consistent with assumptions under the City's General Plan to take into account space for services and infrastructure. As shown in **Table 21.2**, the total number of acres to be developed would be the same as under the proposed Specific Plan.

Utility infrastructure may be sized for reduced capacity demanded under Alternative 3, but would otherwise be similar to the proposed Plan.

It is presumed that applicable policies, implementation measures and guidelines of the West Landing Specific Plan would be implemented under this alternative.

TABLE 21.2: ROUGH ESTIMATES FOR COMPARISON OF ALTERNATIVE 3 TO THE PROPOSED PLAN

Land Use	Acreage	Development (in sq. ft. or residential units)	Daily Traffic Trips	Estimated Employees
Proposed Plan, Core Planning Area				
Retail (all)	85.9	884,200	16,485	1,768
Office	17.7	383,910	5,295	1,097
Business Park	67.5	802,100	10,625	2,005
Schools and Parks	63.0			
Residential (Single Family)	278.0	2,325	16,925	
Residential (Multi-Family)	40.0	1,310	7,560	
Roads	88.9 ¹			
Total	641¹		62,475	4,870
Alternative 3				
Retail (all)	85.9	884,200	16,485	1,768
Light Industrial	20	348,480	2,429	436
Residential (Single-Family)	535.1	2,783	20,485	
Total	641		39,399	2,204
Difference from Proposed Plan		25% reduction in housing units	37% reduction in trips	49% decrease in employees
1 For comparison to acreages under the General Plan, boundary roadway areas were removed from this table.				

Alternative 3 would reduce residential units by 25% and generate approximately 49% less employees than build out under the Plan.

RELATIONSHIP OF ALTERNATIVE 3 TO PROJECT OBJECTIVES

Alternative 3 would meet the project objective to develop the employment potential of the site, though to a reduced degree than under the Plan (49% less). It can be assumed the residential area would also meet objectives to provide walkable neighborhoods, parks and open space, low impact development practices, a safe and efficient circulation network, and a sufficient system of public facilities and services.

However, Alternative 3 would not necessarily complement existing and surrounding uses or respond to current and projected market conditions. It would also not locate high-density residential near Crows Landing Road and its commercial uses to support alternative transportation modes.

ENVIRONMENTAL ANALYSIS

Land Use and Plan Consistency

As with the proposed Specific Plan, impacts due to potential incompatibilities between residential uses and active agricultural operations would be less than significant with appropriate walls and landscaped setbacks and implementation of Mitigation Measure (MM) Ag-4, which requires deed notification of nearby agricultural operations.

Alternative 3, like the proposed Specific Plan, would require annexation of the Plan area to the City of Ceres, and would be consistent with LAFCO annexation policies.

Agriculture

Like the proposed Specific Plan, Alternative 3 would convert 660 acres of farmland to urban uses (Impacts Ag-1 and Ag-5), including three parcels that are under Williamson Act contracts (Impact Ag-2). The loss of farmland would be a significant and unavoidable impact under either Alternative 3 or the proposed Specific Plan.

Though difficult to quantify, it could also be argued that by accommodating less development in this area, additional homes and commercial areas would eventually need to be developed elsewhere, which could ultimately lead to conversion of more agricultural land under Alternative 3 than under the Plan.

Air Quality and Greenhouse Gas Emissions

Construction dust impacts (Impact Air-1) would be similar to the proposed Specific Plan because the same acreage of land disturbed for new development. Compliance with SJVAPCD Regulation VIII, enhanced dust control measures (MM Air-1) would reduce the impact to less than significant under either the Plan or Alternative 3.

Alternative 3 would increase traffic and therefore operational vehicle emissions above that existing today though to a lesser degree (about 37 percent less traffic) under Alternative 3 than would the proposed Plan. Alternative 3 would increase emissions of ozone precursors and particulate matter (Impact Air-2) and contribute to the cumulatively significant degradation of regional air quality (Impacts Air-4 and Air-5). These impact would likely be less severe under Alternative 3, because the amount of growth would be reduced as compared to the Plan, but remain above significance thresholds and the impact would remain significant and unavoidable.

Alternative 3 would also reduce the number of people who could be exposed to nuisance dust and odors from nearby agricultural uses, because fewer homes would be built within the Plan area (Impacts Ag-3). Therefore, this less-than-significant impact would be less severe under Alternative 3 than under the proposed Specific Plan, but would still require buffer setbacks, walls and/or landscaping and deeded right-to-farm (MM Ag-4).

Like the proposed Specific Plan, Alternative 3 would generate greenhouse gases, which contribute to global climate change (Impact Climate-1). Alternative 3 would have approximately 37 percent less traffic so would generate fewer mobile emissions, and the impact could be less severe than under the proposed Specific Plan. However, Alternative 3 would not provide for higher residential densities, greater walkability, and more employment near homes, and would not support alternative transportation choices to the same degree that would result in fewer emissions per person under the Plan (considered under MM Climate-1). The significance of the impact is based on the ability to reduce emissions below business as usual emissions through specifics of plan and mitigation incorporated into projects. Since Alternative 3 would be less likely to be able to meet target reductions of greenhouse gasses compared to business as usual due to the nature of the lower-density development, the residual impact would likely be greater than that seen under the Plan, despite there being less traffic generated on site.

As discussed under the Agricultural header, it could also be argued that by accommodating less development in this area, additional homes and commercial areas would eventually need to be developed elsewhere to accommodate demand. Such sprawling development patterns would result in more and longer trips and actually greater greenhouse gas emissions than would be anticipated if the uses were clustered on one site, as under the proposed Plan.

Hazardous Materials

Like the proposed Specific Plan, Alternative 3 would contribute to a cumulative increase in the number of sites handling hazardous materials, both in the vicinity in general as well as potentially near a school (Impact Haz-2), and would result in a cumulative increase in transportation, use, disposal, and potential for exposure to and/or accidental release of hazardous materials during both construction and operations (Impact Haz-1). Under either the proposed Plan or Alternative 3, this impact would be considered less than significant with compliance with applicable laws and regulations (MMs Haz-1a, Haz-1b, Haz-1c, Haz-2, Hydro-1).

Noise

Alternative 3 would reduce traffic by about 37 percent from that assumed under the proposed Plan. However, noise from vicinity roadways is projected to be above standards with or without addition of traffic from the Plan area, so traffic noise increases under Alternative 3 would contribute to exceedances of standards for existing and proposed residential uses (Impact Noise-1, -3 and -6). Therefore, Mitigation Measures Noise-1a, -1b and -1c and Noise-3 would still be applicable under Alternative 3, requiring site-specific noise reduction measures such as increased wall heights, site planning to shield outdoor use areas, and/or enhanced building sound insulation. The impact from traffic noise on existing residential uses along Whitmore Avenue and Service Road (Noise-3 and -6) would remain significant and unavoidable. Additionally, residential uses could be located adjacent to commercial and industrial uses (Impact Noise-2), and would require measures to mitigate such adjacency (MM Noise-2)

Alternative 3 would result in construction near noise sensitive uses, such as residences (Impact Noise-4). While Alternative 3 would result in lower-intensity development and therefore less construction, the total site is large and build out of the area would occur over an extended period of time, even with reduced intensity. Construction noise under Alternative 3 would be marginally lessened, but would remain significant and unavoidable.

Traffic and Circulation

Alternative 3 would generate approximately 37 percent less traffic than the proposed Specific Plan. Alternative 3 could be expected to increase congestion at local intersections, roadway segments, freeway interchanges and freeway mainline segments, though to a lesser degree than under the Plan. This lower level of traffic would allow Crows Landing Road to operate at acceptable levels (though just barely at LOS D on the segment north of Hatch Road) with planned widening to three lanes in each direction and addition of project traffic only. However, once cumulative traffic increases are added, Crows Landing Road would operate at unacceptable levels at its planned build-out even without any development in the Plan area, so cumulative impacts to Crows Landing Road would remain Significant and Unavoidable under Alternative 3. Similar conclusions can be reached for the other significant and unavoidable traffic impacts for which no feasible mitigation was identified, which include project-specific impacts to southbound SR 99 north of Crows Landing Road, and the SR 99 southbound freeway off-ramp at Crows Landing Road.

As with the proposed Specific Plan, some impacts would remain significant and unavoidable because the improvements are outside the jurisdiction of the City of Ceres. Again, the magnitude of these impacts would be reduced (by about 37 percent) under Alternative 3 though it is anticipated that these impacts would in actuality be wholly or partially mitigated through implementation of existing fee programs and/or improvement plans in these other jurisdictions.

Utilities

Alternative 3 would increase the demand for water supply, wastewater treatment and solid waste disposal, though the demand would be anticipated to be reduced as compared to the Plan. Mitigation measure Util-1, Util-2a, Util-2b and Util-3 would still be required to reduce potential impacts related to well water supply, interference with existing wells and potential temporary impacts if development proceeds before wastewater system capacity upgrades.

As with the Specific Plan, development under Alternative 3 would be expected to provide for water wells and infrastructure to serve the generated demand and to capture storm water in on-site retention facilities.

Other Impacts

Impacts related to the amount of acreage that is developed, such as loss of biological habitat, harm to special-status species, disturbance of archaeological resources or human remains, increased runoff and erosion, and exposure to contaminated soils or water, would be the same under Alternative 3 as identified under the Plan, because the amount and location of developed land would be the same as the proposed Plan. However, while difficult to quantify, it can be argued that a reduction of intensity on this site would ultimately lead to development elsewhere to meet demand and therefore ultimately development of a greater amount of land.

Population-related impacts, such as increased exposure to geological and other hazards and demand for public services would be lessened, because the population would be reduced by about 25 percent. As with the Specific Plan, it is presumed development under Alternative 3 would meet requirements for provision of parkland acreage or provide in lieu fees.

ALTERNATIVE 4: REDUCED INTENSITY, LOW-DENSITY RESIDENTIAL ONLY

Under Alternative 4, the Plan area would be annexed into the City of Ceres, but it would develop entirely with low-density residential development. No non-residential uses, such as retail, office, business park or light industrial uses would be developed under this alternative. The low-density residential is assumed to develop with a density of 5.2 units per acre, consistent with assumptions under the City's General Plan to take into account space for services and infrastructure. As shown in **Table 21.3**, the total number of acres to be developed would be the same as under the proposed Specific Plan.

Utility infrastructure may be sized for reduced capacity demanded under Alternative 4, but would otherwise be similar to the proposed Plan.

It is presumed that applicable policies, implementation measures and guidelines of the West Landing Specific Plan would be implemented under this alternative.

TABLE 21.3: ROUGH ESTIMATES FOR COMPARISON OF ALTERNATIVE 4 TO THE PROPOSED PLAN

Land Use	Acreeage	Development (in sq. ft. or residential units)	Daily Traffic Trips	Estimated Employees
Proposed Plan, Core Planning Area				
Retail (all)	85.9	884,200	16,485	1,768
Office	17.7	383,910	5,295	1,097
Business Park	67.5	802,100	10,625	2,005
Schools and Parks	63.0			
Residential (Single Family)	278.0	2,325	16,925	
Residential (Multi-Family)	40.0	1,310	7,560	
Roads	88.9 ¹			
Total	641¹		62,475	4,870
Alternative 4				
Residential (Single-Family)	641	3,333	24,539	
Total	641		24,539	
Difference from Proposed Plan		11% reduction in housing units	61% reduction in trips	100% decrease in employees
1 For comparison to acreages under the General Plan, boundary roadway areas were removed from this table.				

Alternative 4 would reduce residential units by 11% as compared to the Plan and would not generate substantial employment opportunities.

RELATIONSHIP OF ALTERNATIVE 4 TO PROJECT OBJECTIVES

It can be assumed the residential uses developed under Alternative 4 would meet objectives to provide parks and open space, low impact development practices, a safe and efficient circulation network, and a sufficient system of public facilities and services.

However, Alternative 4 would not meet the project objective to develop the employment potential of the site, as residential uses are not anticipated to create substantial employment opportunities. Alternative 4 would not necessarily complement existing and surrounding uses or respond to current and projected market conditions. While new residential development is likely to meet standards for sidewalks and bicycle lanes, there would not be the mix of uses on site (such as jobs and retail near residential uses) or higher density residential areas to promote replacement of vehicle trips with non-motorized transportation or to support alternative transportation modes.

ENVIRONMENTAL ANALYSIS

Land Use and Plan Consistency

As with the proposed Specific Plan, impacts due to potential incompatibilities between residential uses and active agricultural operations would be less than significant with appropriate walls and landscaped setbacks and implementation of Mitigation Measure (MM) Ag-4, which requires deed notification of nearby agricultural operations.

Alternative 4, like the proposed Specific Plan, would require annexation of the Plan area to the City of Ceres, and would be consistent with LAFCO annexation policies.

Agriculture

As under the proposed Plan, Alternative 4 would convert 660 acres of farmland to urban uses (Impacts Ag-1 and Ag-5), including three parcels that are under Williamson Act contracts (Impact Ag-2). The loss of farmland would be a significant and unavoidable impact under either Alternative 3 or the proposed Specific Plan.

Though difficult to quantify, it could also be argued that by accommodating less development in this area, additional homes and commercial areas would eventually need to be developed elsewhere, which could ultimately lead to conversion of more agricultural land under Alternative 4 than under the Plan.

Air Quality and Greenhouse Gas Emissions

Construction dust impacts (Impact Air-1) would be similar to the proposed Specific Plan because the same acreage of land disturbed for new development. Compliance with SJVAPCD Regulation VIII, enhanced dust control measures (MM Air-1) would reduce the impact to less than significant under either the Plan or Alternative 4.

Alternative 4 would increase traffic and therefore operational vehicle emissions above that existing today though to a lesser degree (about 61 percent less traffic) under Alternative 4 than would the proposed Plan. Due to the lesser number of trips under Alternative 4, the increase in emissions of ozone precursors and particulate matter (Impact Air-2, -4 and -5) would remain below significance levels, avoiding a significant and unavoidable impact found under Plan development.

Alternative 4 would also reduce the number of people who could be exposed to nuisance dust and odors from nearby agricultural uses, because fewer homes would be built within the Plan area (Impacts Ag-3). Therefore, this less-than-significant impact would be less severe under Alternative 4 than under the proposed Specific Plan, but would still require buffer setbacks, walls and/or landscaping and deeded right-to-farm (MM Ag-4).

Like the proposed Specific Plan, Alternative 4 would generate greenhouse gases, which contribute to global climate change (Impact Climate-1). Alternative 4 would have approximately 61 percent less traffic so would generate fewer mobile emissions, and the impact could be less severe than under the proposed Specific Plan. However, Alternative 4 would not provide for higher residential densities, greater walkability, or retail and employment near homes, and would not support alternative transportation choices to the same degree that would result in fewer emissions per person under the Plan (considered under MM Climate-1). The significance of the impact is based on the ability to reduce emissions below business as usual emissions through specifics of plan and mitigation incorporated into projects. Since Alternative 4 would be less likely to be able to meet target reductions of greenhouse gasses compared to business as usual due to the nature of the low-density residential development, the residual impact would likely be greater than that seen under the Plan, despite there being less traffic generated on site.

As discussed under the Agricultural header, it could also be argued that by accommodating less development in this area, additional homes and commercial areas would eventually need to be developed elsewhere to accommodate demand. Such sprawling development patterns would result in more and longer trips and actually greater greenhouse gas emissions than would be anticipated if the uses were clustered on one site, as under the proposed Plan.

Hazardous Materials

Because Alternative 4 considers only residential development, which do not use substantial amounts of hazardous materials, impacts related to hazardous materials would be avoided or greatly reduced. The potential for exposure to and/or accidental release of hazardous materials during construction and operation (Impact Haz-1) would remain, with the need to comply with applicable laws and regulations and results of site assessments (MMs Haz-1a, Haz-1b, Haz-1c, and Hydro-1) reducing this impact to less than significant.

Noise

Alternative 4 would reduce traffic by about 61 percent from that assumed under the proposed Plan. However, noise from vicinity roadways is projected to be above standards with or without addition of traffic from the Plan area, so traffic noise increases under Alternative 4 would contribute to exceedances of standards for existing and proposed residential uses (Impact Noise-1, -3 and -6) on vicinity roadways. Site-specific noise reduction measures such as increased wall heights, site planning to shield outdoor use areas, and/or enhanced building sound insulation would still be required under Alternative 4. The impact from traffic noise on existing residential uses along Whitmore Avenue and Service Road (Noise-3 and -6) would remain significant and unavoidable.

Alternative 3 would result in construction near noise sensitive uses, such as residences (Impact Noise-4). While Alternative 3 would result in lower-intensity development and therefore less construction, the total site is large and build out of the area would occur over an extended period of time, even with reduced intensity. Construction noise under Alternative 3 would be marginally lessened, but would remain significant and unavoidable.

The potential for noise impacts due to the proximity of on-site residential uses and commercial or industrial uses (Impact Noise-2), which could be reduced to less than significant under the Plan, would instead be avoided under Alternative 4.

Traffic and Circulation

Alternative 4 would generate approximately 61 percent less traffic than the proposed Specific Plan. Alternative 4 could be expected to increase congestion at local intersections, roadway segments, freeway interchanges and freeway mainline segments, though to a lesser degree than under the Plan. This lower level of traffic would allow Crows Landing Road to operate at acceptable levels (though just barely at LOS D on the segment north of Hatch Road) with planned widening to three lanes in each direction and addition of project traffic only. However, once cumulative traffic increases are added, Crows Landing Road would operate at unacceptable levels at its planned build-out even without any development in the Plan area, so cumulative impacts to Crows Landing Road would remain Significant and Unavoidable under Alternative 4. Similar conclusions can be reached for the other significant and unavoidable traffic impacts for which no feasible mitigation was identified, which include project-specific impacts to southbound SR 99 north of Crows Landing Road, and the SR 99 southbound freeway off-ramp at Crows Landing Road.

As with the proposed Specific Plan, some impacts would remain significant and unavoidable because the improvements are outside the jurisdiction of the City of Ceres. Again, the magnitude of these impacts would be reduced (by about 61 percent) under Alternative 4 though it is anticipated that these impacts would in actuality be wholly or partially mitigated through implementation of existing fee programs and/or improvement plans in these other jurisdictions.

Utilities

Alternative 4 would increase the demand for water supply, wastewater treatment and solid waste disposal, though the demand would be anticipated to be reduced as compared to the Plan. Mitigation measure Util-1, Util-2a, Util-2b and Util-3 would still be required to reduce potential impacts related to well water supply, interference with existing wells and potential temporary impacts if development proceeds before wastewater system capacity upgrades.

As with the Specific Plan, development under Alternative 4 would be expected to provide for water wells and infrastructure to serve the generated demand and to capture storm water in on-site retention facilities.

Other Impacts

Impacts related to the amount of acreage that is developed, such as loss of biological habitat, harm to special-status species, disturbance of archaeological resources or human remains, increased runoff and erosion, and exposure to contaminated soils or water, would be the same under Alternative 4 as identified under the Plan, because the amount and location of developed land would be the same as the proposed Plan. However, while difficult to quantify, it can be argued that a reduction of intensity on this site would ultimately lead to development elsewhere to meet demand and therefore ultimately development of a greater amount of land.

Population-related impacts, such as increased exposure to geological and other hazards and demand for public services would be lessened, because the population would be reduced by about 25 percent. As with the Specific Plan, it is presumed development under Alternative 4 would meet requirements for provision of parkland acreage or provide in lieu fees.

ENVIRONMENTALLY SUPERIOR ALTERNATIVE

This section of the alternatives analysis provides a discussion of the environmentally superior alternative. **Table 21.4** lists each alternative and topic areas with potential impacts, and indicates whether or not that alternative would have impacts less than, the same as, or greater than the proposed project for each topic area. Note that, as discussed in the analysis above, in the case of this project the terms “greater” and “less” usually indicate only relatively small differences in the extent of resulting impact. Therefore, “less” impact usually does not equate to being “substantially less”, and the term usually applies to impacts that would already be “less than significant” after mitigation under the proposed project.

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. CEQA Section 15126(d)(2) states that if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives.

Resulting in no change from existing conditions and therefore no environmental impacts, the No Project/No Development Alternative (Alternative 1) would be the environmentally superior alternative. However, this alternative would fail to meet all of the project objectives.

TABLE 21.4: ALTERNATIVE COMPARISON

Impact Topic Areas	Alternative 1	Alternative 2	Alternative 3	Alternative 4
Agricultural and Forest Resources	Less	Same	Same	Same
Air Quality	Less	Less	Less	Less
Biological Resources	Less	Same	Same	Same
Cultural Resources	Less	Same	Same	Same
Geology and Soils	Less	Less	Less	Less
Greenhouse Gas Emissions	Less	Less	Less/Greater*	Less/Greater*
Hazards and Hazardous Materials	Less	Greater	Same	Less
Hydrology and Water Quality	Less	Same	Same	Same
Land Use and Planning	Less	Greater	Same	Less
Noise	Less	Less	Less	Less
Transportation and Traffic	Less	Less	Less	Less
Utilities and Services Systems	Less	Same	Same	Same

* There would be less total greenhouse gas emissions but also less ability to reduce the per-person emissions or emission over business as usual conditions because of the nature of the proposed development.

Following the No Project/No Development Alternative (Alternative 1), the Reduced Intensity/Low-Density Residential Alternative (Alternative 4) would be considered the environmentally superior alternative. However, many of the project objectives would remain unmet under Alternative 4 as this alternative does not provide substantial employment opportunities, complement surrounding uses, respond to market conditions or promote use of alternative travel modes.

The lower trip generation under Alternative 4 would result in emissions of air pollutants below significance thresholds, thereby avoiding some significant and unavoidable impacts and would avoid or reduce some traffic-related impacts.

However, note that the most concerning traffic impacts are those that cannot feasibly be mitigated to allow for acceptable service levels. These include impacts related to the capacity of Crows Landing Road and the infeasibility of expanding beyond 3 lanes in either direction due to existing development along this roadway; and impacts related to the capacity of SR 99 and its ramps, which tie into projected regional highway capacity issues. Even with the reduced trip generation under Alternative 4, which represents 61% less trips than the Plan would generate, the cumulative contribution to these impacts would remain significant and unavoidable and these roadways would operate below acceptable service levels.

Also note that while reducing intensity of development allowed on this site would seem to reduce impacts related to vehicle trips, such as traffic congestion and air quality, it can be argued that a reduction of development at this site would ultimately lead to development of additional area elsewhere to meet demand for homes, commercial areas and industrial uses, which could result in more and longer trips than would be seen under the Plan and greater regional impacts. With a mix of uses in proximity of each other and a mix of residential densities, the Plan could be said to support smarter development patterns that would reduce the per-person number of vehicle miles traveled and emissions. While Alternative 4 is superior when considering the total trips and level of emissions from this particular site only, this should be weighed against the movement toward recognizing the ultimate impacts of lower-intensity development on regional development and impacts. However, this is an argument only and has not been used to come to the conclusion that Alternative 4 would be the environmentally superior alternative in the absence of a No Project alternative.