

5 ALTERNATIVES TO THE PROPOSED PROJECT

The Project was described and analyzed in the previous chapters with an emphasis on potentially significant impacts and recommended mitigation measures to avoid those impacts. As described in Chapter 3, Project Description, the Project involves the development of approximately 1,780 acres of land with commercial, office, business park industrial, and park and recreational uses. Specifically, the Project includes 591,980 square feet of commercial, 2,465,932 square feet of office, and 27, 789,102 square feet of business park industrial uses, as well as 88.5 net acres of parks and open space.

The State CEQA Guidelines require the description and comparative analysis of a range of alternatives to the proposed Project, including, if appropriate, alternative locations for the project, which would feasibly attain most of the basic objectives but would avoid or substantially lessen any of the significant effects. The Guidelines also require that an EIR evaluate the comparative merits of the alternatives, focusing on alternatives that would avoid or substantially lessen any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. (CEQA Guideline § 15126.6(a), (b).)

“There is no ironclad rule governing the nature or scope of the alternatives to be discussed [in an EIR] other than the rule of reason.” (CEQA Guidelines § 15126.6(a).) Under the rule of reason, an EIR need discuss only those alternatives necessary to permit a reasoned choice. (CEQA Guidelines § 15126.6(f).) An EIR need only contain a “range of reasonable alternatives to the project” which would “feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant [impacts] of the project.” (CEQA Guidelines § 15126.6(a).)

The following discussion is intended to inform the public and decision makers of feasible alternatives that would avoid or substantially lessen any significant effects of the Project, and to compare such alternatives to the proposed Project.

A. Alternatives Evaluated

CEQA requires that an EIR analyze a “no project” alternative. (CEQA Guidelines, § 15126.6(e).) Where, as here, this alternative means a proposed project would not proceed, the discussion “[sh]ould compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved.” (Id. at (e)(3)(B).)

CEQA Guidelines also require the lead agency to identify the environmentally superior alternative. If the alternative with the least environmental impact is the No Project Alternative, then the lead agency must also identify the next most environmentally superior alternative.

1. Alternatives Evaluated

The four alternatives are as follows:

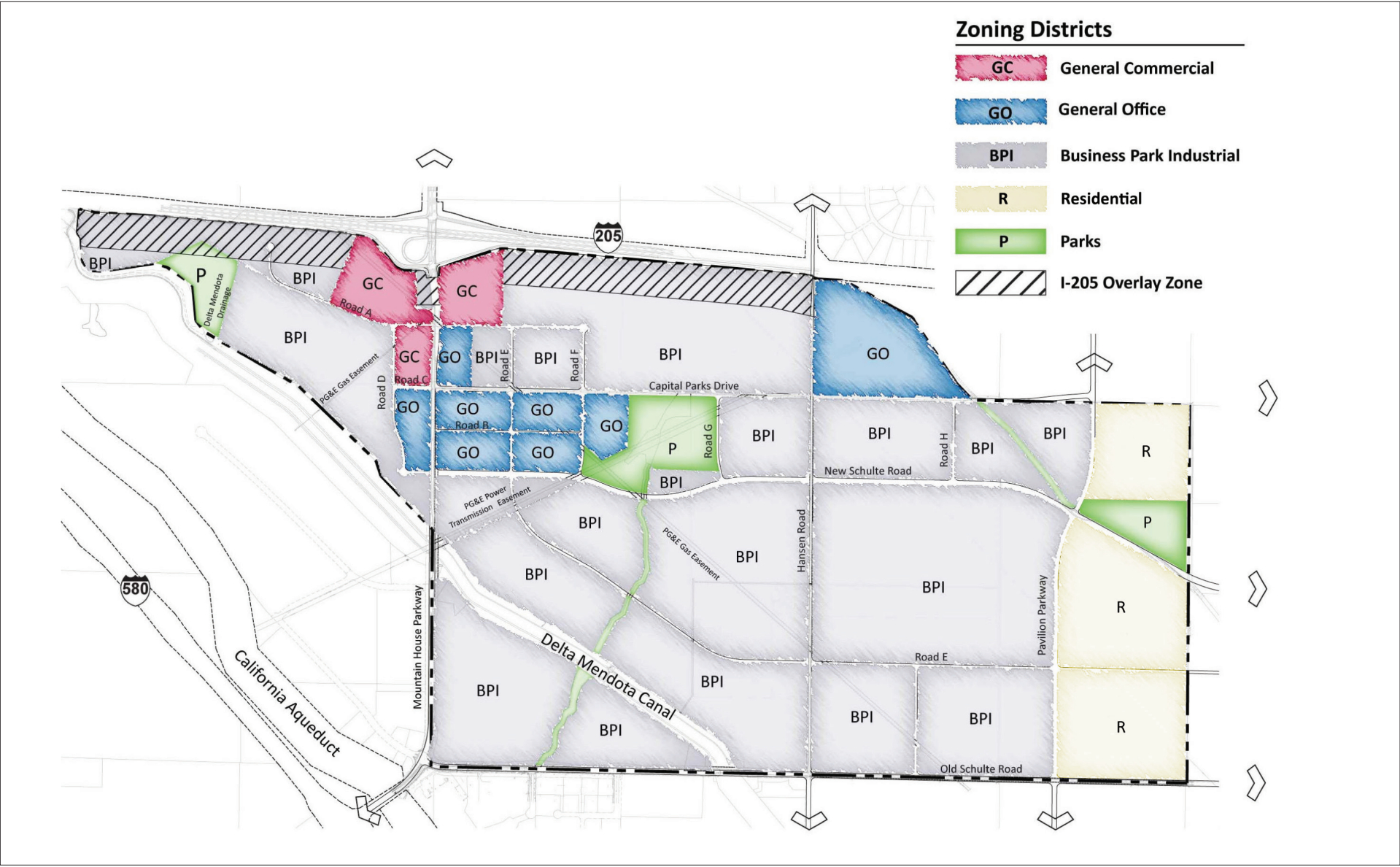
- “ **No Project Alternative.** Under the No Project Alternative, the Specific Plan Area would remain in the jurisdiction of San Joaquin County and retain the existing County zoning. No new development would occur in the proposed Specific Plan Area, and no action would be taken to annex the Specific Plan Area to the City or otherwise change its land use designation.
- “ **Reduced Intensity Alternative.** This alternative would reduce the level of development that would be permitted in the Specific Plan Area to reduce the intensity and resultant environmental effects of the proposed Project. The boundaries of the Specific Plan Area would remain the same. This alternative would reduce the level of development allowed in the Specific Plan Area by roughly half, resulting in 295,990 square feet of commercial, 1,232,966 square feet of office, and 13,894,551 square feet of business park industrial uses. This reduction would be due to a reduction in the allowable floor area ratios (FARs) for the respective uses, although the general location of uses would remain the same as proposed under the Project. In addition, the 88.5 net acres of park and recreational uses and

open space provided under this alternative would be the same as that under the proposed Project.

- “ **Mixed Use Alternative.** This alternative would replace approximately 150 acres of Business Park Industrial uses along the eastern boundary of the Specific Plan Area with housing. Assuming a residential density of 25 units per acre, this alternative would include approximately 3,838 residential units. Like the proposed Project, this alternative would include approximately 591,980 square feet of General Commercial and 2,465,932 square feet of General Office space. In addition, this alternative would include approximately 24,445,872 square feet of business park industrial uses. The boundaries of the Specific Plan Area would remain the same. In addition, the 88.5 net acres of park and recreational uses and open space provided under this alternative would be the same as that under the proposed Project. The land use map for the Mixed Use Alternative is shown in Figure 5-1.
- “ **Reconfigured Specific Plan Boundary.** Under this alternative, the boundary of the proposed Specific Plan Area would be modified to exclude the area south of New Schulte Road and west of the Westside Open Space. North of New Schulte Road and east of the Westside Open Space, the land use map would be the same as under the proposed Project. Like the proposed Project, this alternative would include approximately 591,980 square feet of General Commercial and 2,465,932 square feet of General Office space. This alternative would include 9,641,570 square feet of Business Park Industrial uses, compared to the 27,789,102 square feet of Business Park Industrial uses under the proposed Project. The land use map for the Reconfigured Specific Plan Boundary is shown in Figure 5-2.

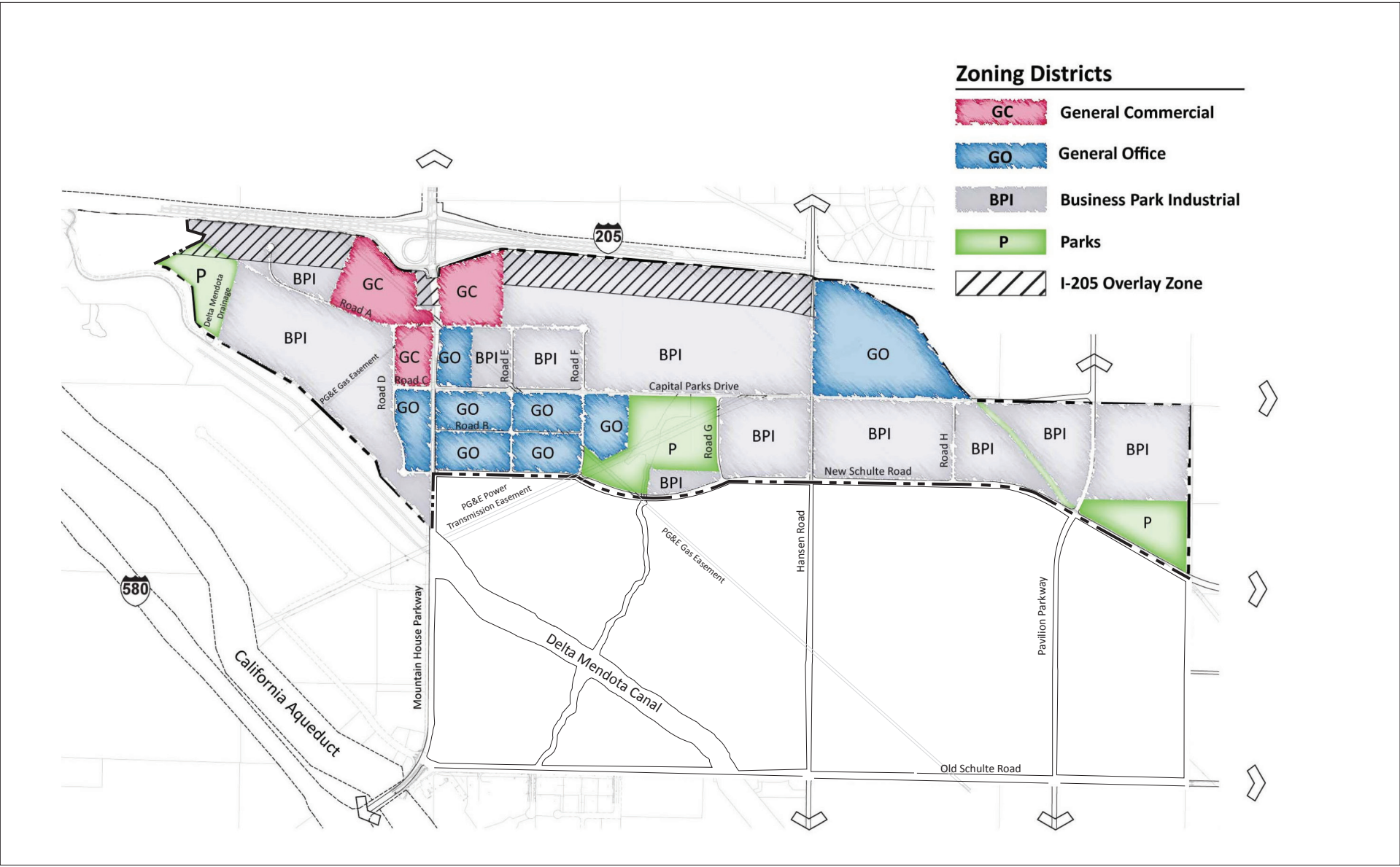
2. Alternatives Considered but Rejected from Further Consideration

The City considered another alternative to the proposed Project that would have involved an alternative location for the proposed Project. The City rejected this alternative from further consideration for several reasons. First, the General Plan vision for the Specific Plan Area calls for the area to be



Source: Cordes Ranch Specific Plan, January 2013; The Planning Center | DC&E, 2013.

FIGURE 5-1
 MIXED USE ALTERNATIVE



Source: Cordes Ranch Specific Plan, January 2013; The Planning Center | DC&E, 2013.

FIGURE 5-2
 RECONFIGURED SPECIFIC PLAN BOUNDARY ALTERNATIVE

developed with a mix of commercial, office, and industrial uses consistent with those included in the proposed Project. Second, the large parcel sizes in the Specific Plan Area, in comparison to the parcel sizes in other areas of the City and Sphere of Influence (SOI), lend themselves to the scale and form of development proposed by the Project, consistent with the planning vision in the General Plan. Third, the Specific Plan Area is located away from most residential uses in the City, reducing potential conflicts with existing neighborhoods. Fourth, no infill areas exist in the City that could accommodate the campus-style development called for in the proposed Project.

The City considered alternative locations in the SOI that could potentially accommodate the proposed Project in terms of acreage, proximity to existing infrastructure, and distance from existing neighborhoods. Other areas identified by the City as potential locations for the Project are located along Lammers Road or east of the city, along Interstate 205 or east of Highway 99. However, these areas were recently considered for inclusion in the City's SOI and were rejected by the San Joaquin Local Agency Formation Commission (LAFCO). Therefore, the other areas that could be appropriate for the proposed Project would not be consistent with recent planning efforts and SOI adjustments.

Accordingly, no further evaluation of an alternative location will be presented in this DEIR.

B. Comparison of Alternatives

Sections C through F evaluate the potential environmental effects from each alternative to determine whether its effects are more or less severe than the anticipated effects from the proposed Project. Table 5-1 summarizes these determinations for each category of potential effects and for each alternative.

CITY OF TRACY
 CORDES RANCH SPECIFIC PLAN DRAFT EIR
 ALTERNATIVES TO THE PROPOSED PROJECT

TABLE 5-1 COMPARISON OF ALTERNATIVES

Topic	Proposed Project	No Project Alternative	Reduced Density Alternative	Mixed Use Alternative	Reconfigured Specific Plan Boundary Alternative
Aesthetics	SU	LTS ^à	SU ^à	SU ^à	SU ^à
Agricultural Resources	SU	LTS ^à	SU ^à	SU ^á	SU ^à
Air Quality	SU	LTS ^à	SU ^à	SU ^à	SU ^à
Biological Resources	SU	LTS ^à	SU ^à	SU ^à	SU ^à
Cultural Resources	SBM	LTS ^à	SBM ^à	SBM ^à	SBM ^à
Geology and Soils	SBM	LTS ^à	SBM ^à	SBM ^à	SBM ^à
Greenhouse Gas Emissions	SU	LTS ^à	SU ^à	SU ^à	SU ^à
Hazards and Hazardous Materials	SBM	LTS ^à	SBM ^à	SBM ^á	SBM ^à
Hydrology and Water Quality	SBM	LTS ^à	SBM ^à	SBM ^à	SBM ^à
Land Use and Planning	LTS	LTS ^à	LTS ^à	LTS ^à	SBM ^á
Noise	SU	LTS ^à	SU ^à	SU ^á	SU ^à
Population, Housing, and Employment	LTS	LTS ^à	LTS ^à	SBM ^á	LTS ^à
Public Services	SBM	LTS ^à	SBM ^à	SBM ^á	SBM ^à
Transportation and Traffic	SU	LTS ^à	SU ^à	SU ^à	SU ^à
Utilities and Service Systems	SU	LTS ^à	SU ^à	SU ^á	SU ^à

Notes:

- LTS Less-Than-Significant Impact
- SBM Significant but Mitigable Impact
- SU Significant and Unavoidable Impact

- ^á More severe impacts than the proposed Project
- ^à Similar level of impacts as the proposed Project
- ^â Less severe impacts than the proposed Project

C. No Project Alternative

1. Principal Characteristics

Consistent with Section 15126.6(e)(2) of the CEQA Guidelines, under the No Project Alternative, the Specific Plan Area would remain in the jurisdiction of San Joaquin County and retain its existing agricultural zoning designation and

land uses, and would not be annexed into the City. The Specific Plan Area would remain in its current condition and no new development would occur.

2. Impact Discussion

a. Aesthetics

As explained in Section 4.1, Aesthetics, implementation of the proposed Project would result in changes to the visual character of the Specific Plan Area, and would have adverse effects on scenic vistas and public views, including views from Interstate 580, a State-designated scenic route. In addition, the proposed Project would redevelop the Specific Plan Area with urban uses, which would substantially degrade the existing visual quality of the Specific Plan Area and create new sources of light and glare although the Project's light and glare impacts would be mitigated. In comparison, none of the above impacts would occur under the No Project Alternative since no buildings, signage or other development would occur on the Specific Plan Area. Therefore, the No Project Alternative would have less severe impacts than the proposed Project.

b. Agricultural Resources

As described in Section 4.2, Agricultural Resources, implementation of the proposed Project would convert approximately 1,700 acres of existing agricultural land within the Specific Plan Area, including 100 acres of Prime Farmland and 1,600 acres of other Important Farmland, to urban uses, and would contribute to a cumulative loss of farmland; although the Project would pay an agricultural mitigation fee, these impacts would remain significant and unavoidable. In addition, the proposed Project could be incompatible with adjacent agricultural land uses, although this impact would be mitigated to a less-than-significant level as a result of buffers. The No

Project Alternative would not result in any new development in or otherwise change the Specific Plan Area and therefore would avoid the adverse environmental effects on agricultural resources that would occur under the proposed Project. Therefore, the No Project Alternative would have less severe impacts than the proposed Project.

c. Air Quality

As discussed in Section 4.3, Air Quality, implementation of the proposed Project is expected to generate substantially more air emissions than existing activities in the Specific Plan Area and would exceed applicable San Joaquin Valley Air Pollution Control District (SJVAPCD) and other thresholds in several respects, due to the construction and operation of new business park industrial, office, and commercial uses in the Specific Plan Area. While the Project has been designed in a manner consistent with the City's long-term planning vision and the Specific Plan contains numerous policies and regulations designed to reduce the proposed Project's potential air quality effects, including a pedestrian-friendly central core, grid pattern of streets, and non-vehicular transportation options, these effects cannot be fully eliminated. Although the Project's air quality impact on day care centers can be reduced to a less-than-significant level after mitigation, other impacts are expected to be significant and unavoidable. As the No Project Alternative would not result in any new development in or changes to the Specific Plan Area, and therefore would not generate any new air quality emissions, implementation of the No Project Alternative would avoid the significant impacts of the proposed Project and would have less severe impacts than the proposed Project.

d. Biological Resources

As described in Section 4.4, Biological Resources, implementation of the proposed Project could result in adverse effects on biological resources in the Specific Plan Area. While significant impacts to special-status animal species, loss of bird nests, and modification of jurisdictional waters would be mitigated to less-than-significant levels, the impact to habitat species movement would be significant and unavoidable under the proposed Project.

The No Project Alternative would not change the environmental conditions in the Specific Plan Area and would avoid the significant impacts of the proposed Project. Therefore, this alternative would result in less severe impacts to biological resources than the proposed Project.

e. Cultural Resources

As described in Section 4.5, Cultural Resources, implementation of the Project could result in adverse impacts to cultural or paleontological resources if they are discovered during the construction period. The No Project Alternative would not result in changes to the Specific Plan Area, and therefore no ground-disturbing activities would occur. Therefore, this alternative would not have the potential to damage or destroy any unknown cultural or paleontological resources. As a result, the No Project Alternative would avoid the significant impacts of the proposed Project. Therefore, this alternative would result in less severe impacts to cultural, historical, and paleontological resources than the proposed Project.

f. Geology, Soils, and Seismicity

As described in Section 4.6, Geology, Soils, and Seismicity, implementation of the Project would not result in any significant impacts with respect to geology, soils and seismicity since the Project would be required to comply with the applicable laws and regulations in this regard, including, without limitation, relevant provisions in the Tracy Municipal Code, the California Building Code, and the Tracy General Plan. However, construction of the proposed Project would create new impervious areas, such as sidewalks, driveways, parking lots, and rooftops. Without imposition of controls and safeguards in Regional Water Quality Control Board (RWQCB) standards, NPDES permit requirements, the City of Tracy's Storm Drainage Master Plan and the City's Manual of Stormwater Quality Control Standards, as identified in Mitigation Measure GEO-1, the Project's impacts associated with substantial soil erosion and loss of topsoil would be significant. Under the No Project Alternative, the site would remain in its existing state and no impervious surfaces would be created. The No Project Alternative would avoid the significant environmental impacts of the proposed Project.

Therefore, this alternative would result in less severe geology, soils, and seismicity impacts than the proposed Project.

g. Greenhouse Gas Emissions

As described in Section 4.7, Greenhouse Gas Emissions, implementation of the proposed Project would result in an increase in greenhouse gas (GHG) emissions resulting from the development and operation of the proposed Project; despite the implementation of numerous Project sustainability features and the imposition of identified mitigation measures, the Project's generation of GHG emissions would remain significant and unavoidable. Under the No Project Alternative, the Specific Plan Area would remain in its existing state, and would not be developed. Therefore, the significant impact associated with GHG emissions would be avoided and this alternative would result in less severe impacts than the proposed Project.

h. Hazards and Hazardous Materials

As identified in Section 4.8, Hazards and Hazardous Materials, impacts associated with the Project may be significant given the location of existing pipelines that traverse the Specific Plan Area. However, these impacts would be mitigated to a less than significant level with adherence to applicable laws and regulations. The No Project Alternative would not introduce new people or structures on a site traversed by natural gas and oil pipelines and would therefore be environmentally superior to the proposed Project in this regard; however, because the proposed Project impacts associated with the pipelines are less than significant, the No Project Alternative would not reduce or avoid a significant effect of the Project.

As described in Section 4.8, Hazards and Hazardous Materials, implementation of the Project would result in an increase in the use, storage, and transport of hazardous materials and activities associated with safety hazards and hazardous material sites. These potential impacts related to hazards and hazardous materials would be reduced to a less-than-significant level through implementation of State and local regulations which are further required through the implementation of Mitigation Measures HAZ-1 and

HAZ-2a through HAZ-2d. Under the No Project Alternative, no new land uses would be introduced that would involve the routine use, storage, and transport of hazardous materials, and existing structures in the Specific Plan Area would not be demolished and therefore would not pose the risk of releasing hazardous materials. As a result, the No Project Alternative would avoid the significant impact of the proposed Project. Therefore, this alternative would result in less severe hazards and hazardous materials impacts than the proposed Project.

i. Hydrology and Water Quality

As described in Section 4.9, Hydrology and Water Quality, construction and operation of the proposed Project could potentially degrade surface water quality, cause soil erosion, increase stormwater runoff, and introduce pollutants to stormwater runoff. However, these impacts would be reduced to a less than a significant level through imposition of Mitigation Measures HYDRO-1a, HYDRO-1b, HYDRO-2a, HYDRO-2b, and HYDRO-2c. The No Project Alternative would present no change to the existing hydrological or water quality conditions of the Specific Plan Area. As a result, the No Project Alternative would avoid the significant impacts of the proposed Project. Therefore, this alternative would have less severe impacts than the proposed Project.

j. Land Use and Planning

As described in Section 4.10, Land Use and Planning, implementation of the Project would create office, commercial, and business park industrial uses but would not result in land use conflicts or exacerbate existing conflicts between land uses in the Specific Plan Area and on surrounding properties. In addition, Section 4.10 evaluates the proposed Project against relevant plans, programs, and policies, including those set forth by LAFCO and City of Tracy General Plan and Municipal Code, and concludes that the Project would be consistent with applicable land use policies and regulations, including guidelines for preferred uses and intensity in Urban Reserve 6. The No Project Alternative would not introduce new land uses to the Specific Plan Area and would not have the potential to result in land use impacts.

Therefore, because neither the proposed Project nor the No Project Alternative would result in a significant impact, the No Project Alternative would have a similar level of impacts as the proposed Project.

k. Noise

As described in Section 4.11, Noise, implementation of the Project would increase noise and vibration levels due to construction activities and increased volumes of traffic. While the noise impacts related to construction activities could be reduced to less-than-significant levels after mitigation, traffic-related noise impacts would be significant and unavoidable. In comparison, the No Project Alternative would not involve any construction activities and would not generate noise emissions. Therefore, this alternative would result in less severe impacts than the proposed Project and would avoid the significant impacts of the proposed Project.

l. Population, Housing and Employment

As described in Section 4.12, Population, Housing, and Employment, implementation of the Project would not directly induce population growth but would cause some indirect population growth through the creation of jobs. Nevertheless, the Project would not result in a significant impact because the Project would not cause a substantial population growth (either directly or indirectly), and development of the Specific Plan Area as proposed is consistent with the City's planned growth for this area. The No Project Alternative would not result in a change to population or housing. Therefore, because neither the proposed Project nor the No Project Alternative would result in a significant impact, the No Project Alternative would result in a similar level of impacts as the proposed Project.

m. Public Services

As described in Section 4.13, Public Services, implementation of the Project would result in an indirect increase in population, a direct increase in service population, and therefore an increased demand for public services and recreation, although the Project would be providing a significant amount of park and recreational facilities and open space for Project users and the

broader community. Project impacts associated with fire protection and law enforcement services would be potentially significant but would be mitigated to a less-than-significant level with the payment of development impact fees that would be used to systematically implement the improvements identified in the Citywide Public Facilities and Public Safety Master Plans. Impacts to schools would be significant but would be mitigated to a less-than-significant level with the payment of school impact fees in accordance with SB 50. Impacts to libraries, parks, and recreation would be less than significant.

The No Project Alternative would not increase service population for any public services or recreation and would therefore result in less severe impacts than the proposed Project.

n. Transportation and Traffic

As described in Section 4.14, Transportation and Traffic, implementation of the Project would increase the number of vehicle trips in the Specific Plan Area and vicinity and result in significant and unavoidable impacts related to over-capacity conditions on roadway and freeway systems, inadequate emergency access, and level of service (LOS) standards. In comparison, the No Project Alternative would not propose any development that would alter vehicular, pedestrian, or bicycle traffic within the Specific Plan Area or in its vicinity. Therefore, the No Project Alternative would avoid the significant impacts of the proposed Project.

o. Utilities and Service Systems

As described in Section 4.15, Utilities and Service Systems, the proposed Project would increase demand for utilities and service systems, resulting in significant impacts associated with water supply, wastewater service, and stormwater drainage facilities. The Project's impacts to water supply service would be reduced to a less-than-significant level after mitigation, but the impacts to wastewater and stormwater drainage facilities would remain significant and unavoidable. Impacts to solid waste facilities would be less than significant. The No Project Alternative would not result in an increase in service population, and therefore would not affect utility and infrastructure

demands, nor require any of the proposed infrastructure improvements. Because the No Project Alternative would avoid the significant impacts of the proposed Project, this alternative would result in less severe impacts than the proposed Project.

D. Reduced Intensity Alternative

1. Principal Characteristics

This alternative would lessen the intensity of the proposed land uses in the Specific Plan Area roughly by 50 percent. This reduction would be due to a reduction in the allowable floor area ratios (FARs) allowed under the Reduced Intensity Alternative. Under this alternative, development of 295,990 square feet of commercial, 1,232,966 square feet of office, and 13,894,551 business park industrial uses would be allowed on the Specific Plan Area, compared to 591,980 square feet of commercial, 2,465,932 square feet of office, and 27,789,102 square feet of business park industrial uses. Less intense uses on site would be attributed to a combination of smaller building footprints and lower building heights than proposed under the Project. The boundaries of the Specific Plan Area would remain the same, and all of the policies in the Specific Plan would apply. The park acreage provided under this alternative would be the same as that under the proposed Project.

2. Impact Discussion

a. Aesthetics

As explained in Section 4.1, Aesthetics, implementation of the proposed Project would result in changes to the visual character of the Specific Plan Area, and would have adverse effects on scenic vistas and public views, including views from Interstate 580, a State-designated scenic route. In addition, the proposed Project would redevelop the Specific Plan Area with urban uses, which would substantially degrade the existing visual quality of the Specific Plan Area and create new sources of light and glare although the Project's light and glare impacts would be mitigated. Implementation of the Project and Reduced Intensity Alternative would include landscaping and gateway feature to enhance the visual character of the Specific Plan Area.

The Reduced Intensity Alternative would result in less development as a result of the lower FARs in comparison to the proposed Project, but would still result in the conversion of open grassland to urban uses, including buildings visible from Interstate 580. The Reduced Intensity Alternative would not avoid the significant impacts of the proposed Project. Therefore, this alternative would result similar levels of impacts as the proposed Project.

b. Agricultural Resources

As described in Section 4.2, Agricultural Resources, implementation of the proposed Project would convert approximately 1,700 acres of existing agricultural land within the Specific Plan Area, including 100 acres of Prime Farmland and 1,600 acres of other Important Farmland, to urban uses, and would contribute to a cumulative loss of farmland; although the Project would pay an agricultural mitigation fee, these impacts would remain significant and unavoidable. In addition, the proposed Project could be incompatible with adjacent agricultural land uses, although this impact would be mitigated to a less-than-significant level as a result of buffers. Because the Reduced Intensity Alternative would still result in the conversion of the same acreage within the Specific Plan Area from agricultural land to urban uses, this alternative would not reduce or avoid the adverse environmental effects to agricultural resources of the proposed Project and would result in a similar level of impacts as the proposed Project.

c. Air Quality

As discussed in Section 4.3, Air Quality, implementation of the proposed Project is expected to generate substantially more air emissions than existing activities in the Specific Plan Area and would exceed applicable SJVAPCD and other thresholds in several respects, due to the construction and operation of new business park industrial, office, and commercial uses in the Specific Plan Area. While the Project has been designed in a manner consistent with the City's long-term planning vision and the Specific Plan contains numerous policies and regulations designed to reduce the proposed Project's potential air quality effects, including a pedestrian-friendly central core, grid pattern of streets, and non-vehicular transportation options, these

effects cannot be fully eliminated. Although the Project's air quality impact on day care centers can be reduced to a less-than-significant level after mitigation, other impacts are expected to be significant and unavoidable. The Reduced Intensity Alternative would result in less development in the Specific Plan Area, and consequently would involve less construction truck traffic, fewer employees traveling to the site, and reduced emissions associated with ongoing operation of the Project. The Reduced Intensity Alternative would increase the number of vehicle trips in the area; however, the total new trip generation would be about 50 percent of that generated with the Project. Thus, buildout of the Reduced Intensity Alternative would generate roughly 50 percent of the emissions generated by the Project, and fewer air quality impacts would occur. Reduced criteria air pollutants and toxic air contaminants would be produced, and the significant and unavoidable cancer risk of the proposed Project would likely be avoided. However, the significant and unavoidable construction and operation impacts of the proposed Project would be reduced but not avoided because the overall area to be graded would not differ from the proposed Project. As a result, the Reduced Intensity Alternative would have less severe impacts when compared to the Project, although not all impacts would be avoided.

d. Biological Resources

As described in Section 4.4, Biological Resources, implementation of the proposed Project could result in adverse effects on biological resources in the Specific Plan Area. While significant impacts to special-status animal species, loss of bird nests, and modification of jurisdictional waters would be mitigated to less-than-significant levels, the impact to habitat species movement would be significant and unavoidable under the proposed Project. The Reduced Intensity Alternative would affect the same geographical area as the proposed Project and, although the intensity of the Project would be reduced under this alternative, similar adverse effects to special-status species and waters would occur because the overall development footprint would remain the same, and would be graded and developed in the same manner as the proposed Project, and therefore would convert agricultural land to urban

uses. Therefore, this alternative would have a similar level of impacts as the proposed Project.

e. Cultural Resources

As described in Section 4.5, Cultural Resources, implementation of the Project could result in adverse impacts to cultural and paleontological resources if they are discovered during the construction period. The Reduced Intensity Alternative would include ground-disturbing construction activities within the same geographical area as the proposed Project and therefore could also adversely impact previously-unknown cultural or paleontological resources. As a result, the Reduced Intensity Alternative would not avoid or reduce the significant impacts of the proposed Project. Therefore, this alternative would have a similar level of impacts as the proposed Project.

f. Geology, Soils and Seismicity

As described in Section 4.6, Geology, Soils, and Seismicity, implementation of the Project would not result in any significant impacts with respect to geology, soils and seismicity since the Project would be required to comply with the applicable laws and regulations in this regard, including, without limitation, relevant provisions in the Tracy Municipal Code, the California Building Code, and the Tracy General Plan. However, construction of the proposed Project would create new impervious areas, such as sidewalks, driveways, parking lots, and rooftops. Without imposition of controls and safeguards in RWQCB standards, NPDES permit requirements, the City of Tracy's Storm Drainage Master Plan and the City's Manual of Stormwater Quality Control Standards, as identified in Mitigation Measure GEO-1, the Project's impacts associated with substantial soil erosion and loss of topsoil would be significant. The Reduced Intensity Alternative would include construction activities within the same geographical area and with the same overall development footprint as the proposed Project and therefore could also result in similar environmental effects due to an increase in impervious surfaces. As a result, the Reduced Intensity Alternative would not avoid or reduce the significant impacts of the proposed Project. Therefore, this alternative would have a similar level of impacts as the proposed Project.

g. Greenhouse Gas Emissions

As described in Section 4.7, Greenhouse Gas Emissions, implementation of the proposed Project would result in an increase in GHG emissions resulting from the construction and operation of the proposed Project; despite the implementation of numerous Project sustainability features and the imposition of identified mitigation measures, the Project's generation of GHG emissions would remain significant and unavoidable. As discussed in section c. Air Quality, the Reduced Intensity Alternative would reduce trip generation about 50 percent when compared to the proposed Project, and therefore GHG emissions associated with the development and operation of projects would be decreased by approximately 50 percent. The emissions would be reduced but the alternative would not entirely avoid the significant and unavoidable impacts of the proposed Project. Therefore, the Reduced Intensity Alternative would result in less severe impacts than the proposed Project, although the significant impacts of the Project would not be eliminated.

h. Hazards and Hazardous Materials

As identified in Section 4.8, Hazards and Hazardous Materials, impacts associated with the Project may be significant given the location of existing pipelines that traverse the Specific Plan Area. However, these impacts would be mitigated to a less than significant level with adherence to applicable laws and regulations. The Reduced Intensity Alternative would introduce fewer people (approximately 18,185 employees, compared to 36,708 employees under the proposed Project) and structures to a site traversed by natural gas and oil pipelines and therefore risks in this regard would be lower, although impacts would be less than significant under both the proposed Project and the Reduce Intensity Alternative.

As described in Section 4.8, Hazards and Hazardous Materials, implementation of the Project would result in an increase in the use, storage, and transport of hazardous materials and activities associated with safety hazards and hazardous materials sites. These potential impacts related to hazards and hazardous materials would be reduced to a less-than-significant

level through implementation of State and local regulations which are further required through the implementation of Mitigation Measures HAZ-1 and HAZ-2a through HAZ-2d. Similarly, the Reduced Intensity Alternative would include similar land uses that would involve the routine use, storage, and transport of hazardous materials, as well as the demolition of existing structures in the Specific Plan Area that could pose the risk of releasing hazardous materials. As a result, the Reduced Intensity Alternative would have a similar level of impacts as the proposed Project.

i. Hydrology and Water Quality

As described in Section 4.9, Hydrology and Water Quality, construction and operation of the proposed Project could potentially degrade surface water quality, cause soil erosion, increase stormwater runoff, and introduce pollutants to stormwater runoff. However, these impacts would be reduced to a less than a significant level through imposition of Mitigation Measures HYDRO-1a, HYDRO-1b, HYDRO-2a, HYDRO-2b, and HYDRO-2c.

Similarly, the Reduced Intensity Alternative would also involve construction and operation activities that could affect water quality, would result in an increase of impervious surfaces within the Specific Plan Area, and would require mitigation measures to reduce the potential for impacts. Although the Reduced Intensity Alternative would result in less overall development of the Specific Plan Area, mitigation measures would still be required to reduce potential impacts resulting from impervious surfaces and stormwater runoff. As a result, the Reduced Intensity Alternative would have a similar level of impacts as the proposed Project.

j. Land Use and Planning

As described in Section 4.10, Land Use and Planning, implementation of the Project would create office, commercial, and business park industrial uses but would not result in land use conflicts or exacerbate existing conflicts between land uses in the Specific Plan Area and on surrounding properties. In addition, Section 4.10 evaluates the proposed Project against relevant plans, programs and policies, including those set forth by LAFCO and City of

Tracy General Plan and Municipal Code, and concludes that the Project would be consistent with applicable land use policies and regulations, including guidelines for preferred uses and intensity of development in Urban Reserve 6.

The Reduced Intensity Alternative would introduce the same land uses to the Specific Plan Area, although would result in less overall development. Therefore, the Reduced Intensity Alternative would have a similar level of impacts as the proposed Project.

k. Noise

As described in Section 4.11, Noise, implementation of the Project would increase noise and vibration levels due to construction activities and increased volumes of traffic. The noise impacts related to construction activities could be reduced to less-than-significant levels after mitigation for the Project. For construction in the Reduced Intensity Alternative, since the general location of uses would remain the same as proposed under the Project, construction noise impacts from one parcel to the next may not change appreciably for this alternative. Thus, construction noise impacts and necessary mitigation measures would be comparable between the Project and this alternative.

In the Project assessment (Section 4.11, Noise), traffic-related noise impacts were shown to be significant and unavoidable. In comparison, the Reduced Intensity Alternative would introduce less overall traffic, relative to the Project. However, if the Reduced Intensity Alternative produced 50 percent of the trip generation rates and the associated roadway segment traffic flows (as compared to the Project), then this would nominally result in a -3 dB change relative to the projected noise impacts for the Project.¹ With such a -3 dB change relative to the Project noise results, there would be less individual

¹ It is assumed that the 50 percent reduction in trip generation estimates from the traffic consultant would result in a similar 50 percent reduction in average daily traffic (ADT) flows on the Project's area roadway segments. This also assumes all else is similarly held constant regarding flow distributions, alignment modifications, vehicle speeds, and fleet mixes.

roadway segments that would experience a significant impact with regard to traffic noise. Other segments, though, will remain being a significant and unavoidable impact – even with the -3 dB change. While the Reduced Intensity Alternative would result in less severe roadway impacts than the proposed Project, the changes would be on a segment-by-segment basis and the fundamental impact determination for traffic noise (i.e. significant and unavoidable) will be the same for this alternative as for the Project.

l. Population, Housing, and Employment

As described in Section 4.12, Population, Housing, and Employment, implementation of the Project would not directly induce population growth but would cause some indirect population growth through the creation of jobs. Nevertheless, the Project would not result in a significant impact because the Project would not cause a substantial population growth (either directly or indirectly), and development of the Specific Plan Area as proposed is consistent with the City's planned growth for this area.

The Reduced Intensity Alternative would result in a reduced employee population of 18,185 employees, compared to 36,708 employees under the proposed Project. Similar to the proposed Project, the Reduced Intensity Alternative could result in indirect population growth or housing demand, but the impact would be less than significant. Neither the proposed Project nor the Reduced Intensity Alternative would result in a significant impact. Therefore, the Reduced Intensity Alternative would have a similar level of impacts as the proposed Project.

m. Public Services

As described in Section 4.13, Public Services, implementation of the Project would result in an indirect increase in population, a direct increase in service population, and therefore an increased demand for public services and recreation, although the Project would be providing a significant amount of park and recreational facilities and open space for Project users and the broader community. Project impacts associated with fire protection and law enforcement services would be potentially significant but would be mitigated

to a less-than-significant level with the payment of development impact fees that would be used to systematically implement the improvements identified in the Citywide Public Facilities and Public Safety Master Plans. Impacts to schools would be significant but would be mitigated to a less-than-significant level with the payment of school impact fees in accordance with SB 50. Impacts to libraries, parks, and recreation would be less than significant.

The Reduced Intensity Alternative would bring less service population than the proposed Project, and therefore less demand for public services and recreation would occur. Therefore, the Reduced Intensity Alternative would reduce, but would not avoid, the significant effects of the proposed Project. Therefore, this alternative would have less severe impacts than the proposed Project

n. Transportation and Traffic

As described in Section 4.14, Transportation and Traffic, implementation of the Project would increase the number of vehicle trips in the Specific Plan Area and vicinity and result in significant and unavoidable impacts related to over-capacity conditions on roadway and freeway systems, inadequate emergency access, and level of service (LOS) standards. The Reduced Intensity Alternative would also increase the number of vehicle trips in the area; however, the total new trip generation would be about 50 percent of that generated with the Project. Thus, buildout of the Reduced Intensity Alternative would generate about 7,608 AM peak hour / 8,207 PM peak hour trips, as compared to 15,215 AM peak hour / 16,415 PM peak hour trips with the Project. Therefore, the Reduced Intensity Alternative would reduce, but not entirely avoid, the significant effects of the proposed Project. Therefore, this alternative would have less severe impacts than the proposed Project. Some, but not all, of the significant and unavoidable impacts on roadway segments and freeway segments identified in Impacts TRANS-7 and TRANS-10 would be avoided due to the reduced trip generation.

o. Utilities and Service Systems

As described in Section 4.15, Utilities and Service Systems, the proposed Project would increase demand for utilities and service systems, resulting in significant impacts associated with water supply, wastewater service, and stormwater drainage facilities. The Project's impacts to water supply service would be reduced to a less-than-significant level after mitigation, but the impacts to wastewater and stormwater drainage facilities would remain significant and unavoidable. Impacts to solid waste facilities would be less than significant.

The Reduced Intensity Alternative would result in a decreased service population in comparison to the proposed Project. With respect to water, both the proposed Project and the Reduced Intensity Alternative would rely on the City's existing and future water portfolio and would require the extension of necessary infrastructure to serve the Specific Plan Area; while the Reduced Intensity Alternative would require less water because of the reduced service population, impacts under both the proposed Project and this alternative would be less than significant after mitigation. With respect to wastewater, the Reduced Intensity Alternative would result in a decreased service population; however, it would still require new infrastructure to create the capacity and the distribution facilities to serve the Specific Plan Area as identified in the Citywide Water and Wastewater Master Plans. Regarding stormwater treatment, impacts would remain significant and unavoidable under both the proposed Project and this alternative because both would require construction of new infrastructure resulting in significant construction-related impacts. Therefore, the Reduced Intensity Alternative would result in similar impacts than the proposed Project.

E. Mixed Use Alternative

1. Principal Characteristics

This alternative would lessen the intensity of business park industrial, commercial and office uses within the Specific Plan Area when compared to the Project, and instead would include a residential component. Specifically,

this alternative would replace approximately 150 acres of Business Park Industrial uses along the eastern boundary of the Specific Plan Area with housing. Assuming a residential density of 25 units per acre, this alternative would include approximately 3,838 residential units. Like the proposed Project, this alternative would include approximately 591,980 square feet of General Commercial and 2,465,932 square feet of General Office space. The boundaries of the Specific Plan Area would remain the same, and the park acreage provided under this alternative would be the same as that under the proposed Project.

This alternative would include a residential component within the Specific Plan Area in order to allow employees to live within close proximity of employment opportunities.

2. Impact Discussion

a. Aesthetics

As explained in Section 4.1, Aesthetics, implementation of the proposed Project would result in changes to the visual character of the Specific Plan Area, and would have adverse effects on scenic vistas and public views, including views from Interstate 580, a State-designated scenic route. In addition, the proposed Project would redevelop the Specific Plan Area with urban uses, which would substantially degrade the existing visual quality of the Specific Plan Area and create new sources of light and glare although the Project's light and glare impacts would be mitigated. Implementation of the Project and Reduced Intensity Alternative would include landscaping and gateway feature to enhance the visual character of the Specific Plan Area.

The Mixed Use Alternative would result in less overall development than the proposed Project, but would still result in the conversion of open grassland to urban uses, including buildings visible from Interstate 580. The Mixed Use Alternative would not avoid the significant impacts of the proposed Project. Therefore, this alternative would result similar levels of impacts as the proposed Project.

b. Agricultural Resources

As described in Section 4.2, Agricultural Resources, implementation of the proposed Project would convert approximately 1,700 acres of existing agricultural land within the Specific Plan Area, including 100 acres of Prime Farmland and 1,600 acres of other Important Farmland, to urban uses, and would contribute to a cumulative loss of farmland; although the Project would pay an agricultural mitigation fee, these impacts would remain significant and unavoidable. In addition, the proposed Project could be incompatible with adjacent agricultural land uses, although this impact would be mitigated to a less-than-significant level as a result of buffers.

The Mixed Use Alternative would convert the same amount of agricultural land to urban uses as the proposed Project. In addition, the Mixed Use Alternative would involve high-density housing along the eastern edge of the Specific Plan Area, which could pose more significant impacts as it relates to compatibility with adjacent agricultural uses than the business park industrial uses that would occur in this area under the proposed Project. Therefore, the Mixed Use Alternative would not reduce or avoid the adverse environmental effects to agricultural resources of the proposed Project, and would result in more severe impacts than the proposed Project with respect to compatibility issues.

c. Air Quality

As discussed in Section 4.3, Air Quality, implementation of the proposed Project is expected to generate substantially more air emissions than existing activities in the Specific Plan Area and would exceed applicable SJVAPCD and other thresholds in several respects, due to the construction and operation of new business park industrial, office, and commercial uses in the Specific Plan Area. While the Project has been designed in a manner consistent with the City's long-term planning vision and the Specific Plan contains numerous policies and regulations designed to reduce the proposed Project's potential air quality effects, including a pedestrian-friendly central core, grid pattern of streets, and non-vehicular transportation options, these effects cannot be fully eliminated. Although certain of the Project's identified

air quality impacts can be mitigated to less-than-significant levels through design features and Project-level mitigation plans, respectively, other impacts are expected to be significant and unavoidable.

The Mixed Use Alternative would result in a similar level of development when compared to the Project, but this alternative would include housing which would reduce overall vehicle miles traveled. As further discussed below in section n, Transportation and Traffic, the Mixed Use Alternative would increase the number of vehicle trips resulting from buildout of commercial, office and industrial uses within the Specific Plan Area, although to a lesser level than that of the Project. Vehicle trips would also increase due to the inclusion of 3,838 residential units within the Specific Plan Area. While some of the new residential trips would stay within the Project area, linking homes to jobs and retail destinations, the majority of the residential trips would travel external to the Project site. The net external trip generation for the Mixed Use Alternative is estimated at 14,045 AM peak hour / 15,358 PM peak hour trips. This would result in roughly an 8 percent reduction of emissions during the AM peak hour and a reduction of roughly 6 percent during the PM peak hour when compared to the proposed project. Reduced criteria air pollutants and toxic air contaminants would occur, and the significant and unavoidable cancer risk of the proposed Project would likely be avoided. However, the significant and unavoidable construction and operation impacts of the proposed Project would be reduced but not avoided because the overall area to be graded would not differ from the proposed Project. The inclusion of housing under this alternative would place a residential population proximate to major sources of toxic air contaminants, which may increase the health risk impact. Overall, the Mixed Use Alternative would have a similar level of impacts when compared to the Project.

d. Biological Resources

As described in Section 4.4, Biological Resources, implementation of the proposed Project could result in adverse effects on biological resources in the Specific Plan Area. While significant impacts to special-status animal species,

loss of bird nests, and modification of jurisdictional waters would be mitigated to less-than-significant levels, the impact to habitat species movement would be significant and unavoidable under the proposed Project. The Mixed Use Alternative would affect the same geographical area as the proposed Project and similar adverse effects to special-status species and waters would occur because the overall development footprint would remain the same, and would be graded and developed in the same manner as the proposed Project, and therefore would convert agricultural land to urban uses. Therefore, this alternative would result in a similar level of impacts as the proposed Project.

e. Cultural Resources

As described in Section 4.5, Cultural Resources, implementation of the Project could result in adverse impacts to cultural and paleontological resources if they are discovered during the construction period. The Mixed Use Alternative would include ground-disturbing construction activities within the same geographical area as the proposed Project and therefore could also adversely impact previously-unknown cultural and paleontological resources. As a result, the Mixed Use Alternative would not avoid or reduce the significant impacts of the proposed Project. Therefore, this alternative would result in a similar level of impacts as the proposed Project.

f. Geology, Soils and Seismicity

As described in Section 4.6, Geology, Soils, and Seismicity, implementation of the Project would not result in any significant impacts with respect to geology, soils and seismicity since the Project would be required to comply with the applicable laws and regulations in this regard, including, without limitation, relevant provisions in the Tracy Municipal Code, the California Building Code, and the Tracy General Plan. However, construction of the proposed Project would create new impervious areas, such as sidewalks, driveways, parking lots, and rooftops. Without imposition of controls and safeguards in RWQCB standards, NPDES permit requirements, the City of Tracy's Storm Drainage Master Plan and the City's Manual of Stormwater Quality Control Standards, as identified in Mitigation Measure GEO-1, the

Project's impacts associated with substantial soil erosion and loss of topsoil would be significant. The Mixed Use Alternative would include construction activities within the same geographical area and with the same overall development footprint as the proposed Project and therefore could also result in similar environmental effects due to an increase in impervious surfaces. As a result, the Mixed Use Alternative would not avoid or reduce the significant impacts of the proposed Project. Therefore, this alternative would result in a similar level of impacts as the proposed Project.

g. Greenhouse Gas Emissions

As described in Section 4.7, Greenhouse Gas Emissions, implementation of the proposed Project would result in an increase in GHG emissions resulting from the construction and operation of the proposed Project; despite the implementation of numerous Project sustainability features and the imposition of identified mitigation measures, the Project's generation of GHG emissions would remain significant and unavoidable. The Mixed Use Alternative would result in a similar level of development when compared to the Project, but this alternative would include housing which would reduce overall vehicle miles traveled. As discussed above in section c, Air Quality, the Mixed Use Alternative would result in an 8 percent reduction in AM peak hour trips and a 6 percent reduction in PM peak hour trips. The reductions in trips would have roughly the same reductions in GHG emissions. The combination of less employment within the Specific Plan Area and employees living within close proximity of the job sites would reduce GHG emissions. The emissions would be reduced but the alternative would not entirely avoid the significant and unavoidable impacts of the proposed Project. Therefore, the Mixed Use Alternative would result in less severe impacts than the proposed Project, although the significant impacts of the Project would not be eliminated.

h. Hazards and Hazardous Materials

As identified in Section 4.8, Hazards and Hazardous Materials, impacts associated with the Project may be significant given the location of existing pipelines that traverse the Specific Plan Area. However, these impacts would

be mitigated to a less than significant level with adherence to applicable laws and regulations. The Mixed Use Alternative would introduce approximately 12,318 residents in addition to the employee population of 33,028 employees, compared to the employee population of 36,708 employees under the proposed Project. Therefore, the Mixed Use Alternative would introduce more people and structures to a site traversed by natural gas and oil pipelines as compared to the proposed Project. However, like the proposed Project, impacts in this regard would be less than significant for the reasons above.

As described in Section 4.8, Hazards and Hazardous Materials, implementation of the Project would result in an increase in the use, storage, and transport of hazardous materials and activities associated with safety hazards and hazardous materials sites. These potential impacts related to hazards and hazardous materials would be reduced to a less-than-significant level through implementation of State and local regulations which are further required through the implementation of Mitigation Measures HAZ-1 and HAZ-2a through HAZ-2d. Similarly, the Mixed Use Alternative would include land uses that would involve the routine use, storage, and transport of hazardous materials, as well as the demolition of existing structures in the Specific Plan Area that could pose the risk of releasing hazardous materials. In addition, the Mixed Use Alternative would include a housing component which would place sensitive receptors closer to potential impacts from hazards and hazardous materials. As a result, the Mixed Use Alternative could result in more severe environmental impacts in this regard than the proposed Project.

i. Hydrology and Water Quality

As described in Section 4.9, Hydrology and Water Quality, construction and operation of the proposed Project could potentially degrade surface water quality, cause soil erosion, increase stormwater runoff, and introduce pollutants to stormwater runoff. However, these impacts would be reduced to a less-than-a-significant level through imposition of Mitigation Measures HYDRO-1a, HYDRO-1b, HYDRO-2a, HYDRO-2b, and HYDRO-2c. Similarly, the Mixed Use Alternative would also involve construction and

operation activities that could affect water quality, cause soil erosion, and increase stormwater runoff, would result in an increase of impervious surfaces within the Specific Plan Area, and would require mitigation measures to reduce the potential for impacts. As a result, the Mixed Use Alternative would have the same environmental effects as the proposed Project. Therefore, this alternative would result in a similar level of impacts as the proposed Project.

j. Land Use and Planning

As described in Section 4.10, Land Use and Planning, implementation of the Project would create office, commercial, and business park industrial uses but would not result in land use conflicts or exacerbate existing conflicts between land uses in the Specific Plan Area and on surrounding properties. In addition, Section 4.10 evaluates the proposed Project against relevant plans, programs, and policies, including those set forth by LAFCO and City of Tracy General Plan and Municipal Code, and concludes that the Project would be consistent with applicable land use policies and regulations, including guidelines for preferred uses and intensity in Urban Reserve 6. The Mixed Use Alternative would introduce the same land uses to the Specific Plan Area, as well as housing. The inclusion of housing in the Mixed Use Alternative would specifically address the policy direction relating to opportunities for housing set forth in the General Plan for Urban Reserve 6. Because the effects of the proposed Project relating to land use are expected to be less than significant, although the Mixed Use Alternative would be a slight improvement to the proposed Project due to its consistency with the General Plan, it would not reduce or avoid a significant environmental impact of the proposed Project. Overall, the Mixed Use Alternative would result in less severe impacts than the proposed Project.

k. Noise

As described in Section 4.11, Noise, implementation of the Project would increase noise and vibration levels due to construction activities and increased volumes of traffic. The noise impacts related to construction activities could be reduced to less-than-significant levels after mitigation for the Project. For

construction in the Mixed Use Alternative, since the general location of uses would remain the same as proposed under the Project, construction noise impacts from one parcel to the next may not change appreciably for this alternative. Thus, construction noise impacts and necessary mitigation measures would be comparable between the Project and this alternative.

In the Project assessment (Section 4.11, Noise), traffic-related noise impacts were shown to be significant and unavoidable. In comparison, the Mixed Use Alternative would result in similar noise impacts as the Project, particularly with respect to traffic-related noise impacts as the trip generation estimates for this alternative are only 6 percent below those for the proposed Project. This 6 percent reduction in trip generation rates (and the associated) traffic flows would nominally result in an inconsequential -0.3 dB change in traffic noise levels relative to the projected Project.² Thus, there would be no substantial change in the original determination of significant and unavoidable impacts with respect to traffic noise effects.

Of more concern, however, with the Mixed Use Alternative would be that housing and sensitive receptors would be now included in the Specific Plan Area. This introduction of sensitive land uses that may be located within close proximity to noise-generating non-residential uses would likely result in land use incompatibility issues with respect to noise levels at the sensitive receptors. Further, substantial traffic noise on roadways in and around the Specific Plan Area could result in additional impacts to the residential land uses (due to more restrictive noise level limits) that would not occur under the proposed Project. Therefore, the Mixed Use Alternative would result in more severe impacts than the proposed Project.

² It is assumed that the 6 percent reduction in trip generation estimates from the traffic consultant would result in a similar 6 percent reduction in ADT flows on the Project's area roadway segments. This also assumes all else is similarly held constant regarding flow distributions, alignment modifications, vehicle speeds, and fleet mixes.

l. Population, Housing and Employment

As described in Section 4.12, Population, Housing, and Employment, implementation of the Project would not directly induce population growth but would cause some indirect population growth through the creation of jobs. Nevertheless, the Project would not result in a significant impact because the Project would not cause a substantial population growth (either directly or indirectly), and development of the Specific Plan Area as proposed is consistent with the City's planned growth for this area. The Mixed Use Alternative would result in a reduced employee population of 33,028 employees, compared to 36,708 employees under the proposed Project, and would include 3,838 housing units, which would result in a population of approximately 12,318 persons.³ However, this alternative would have the potential to create a significant impact, because this level of residential growth in Urban Reserve 6 is not accounted for in the City's General Plan EIR or master infrastructure plans. The Mixed Use Alternative would result in more severe impacts than the proposed Project.

m. Public Services

As described in Section 4.13, Public Services, implementation of the Project would result in an indirect increase in population, a direct increase in service population, and therefore an increased demand for public services and recreation, although the Project would be providing a significant amount of park and recreational facilities and open space for Project users and the broader community. Project impacts associated with fire protection and law enforcement services would be potentially significant but would be mitigated to a less-than-significant level with the payment of development impact fees that would be used to systematically implement the improvements identified in the Citywide Public Facilities and Public Safety Master Plans. Impacts to schools would be significant but would be mitigated to a less-than-significant

³ Residential population is based on an average household size of 3.21 persons per household (3,838 units x 3.21 persons per household = 12,318 persons), which is the household size established in the Land Use Element of the City of Tracy General Plan.

level with the payment of school impact fees in accordance with SB 50. Impacts to libraries, parks, and recreation would be less than significant.

The Mixed Use Alternative would result in a service population of approximately 12,318 residents in addition to the employee population of 33,028 employees, compared to the service population of 36,708 employees under the proposed Project. As a result, the Mixed Use Alternative would result in increased demand for schools and library services, whereas the proposed Project would only have an indirect effect on these services. Using the City's parks service standard of 4 acres of parkland per 1,000 residents, the Mixed Use Alternative would require approximately 49 acres of parkland, which would be met by the 88.5 acres of parkland that would be provided under this alternative. Overall, the Mixed Use Alternative would not lessen or avoid the significant effects of the proposed Project and would have the potential to result in more severe impacts than the proposed Project, due to the increased overall service population and direct increase in residential population.

n. Transportation and Traffic

As described in Section 4.14, Transportation and Traffic, implementation of the Project would increase the number of vehicle trips in the Specific Plan Area and vicinity and would result in significant and unavoidable impacts related to over-capacity conditions on roadway and freeway systems, inadequate emergency access, and level of service (LOS) standards. The Mixed Use Alternative would also increase the number of vehicle trips resulting from buildout of commercial, office and industrial uses within the Specific Plan Area, although to a lesser level than that of the Project. Vehicle trips would also increase due to the inclusion of 3,838 residential units within the Specific Plan Area. While some of the new residential trips would stay within the Project area, linking homes to jobs and retail destinations, the majority of the residential trips would travel external to the Project site. The net external trip generation for the Mixed Use Alternative is estimated at 14,045 AM peak hour / 15,358 PM peak hour trips, which is about 7 percent lower than the Project's trip generation. . Thus, the Mixed Use Alternative

would result in less severe impacts than the proposed Project, but would not avoid the significant impacts of the proposed Project.

o. Utilities and Service Systems

As described in Section 4.15, Utilities and Service Systems, the proposed Project would increase demand for utilities and service systems, resulting in significant impacts associated with water supply, wastewater service, and stormwater drainage facilities. The Project's impacts to water supply service would be reduced to a less-than-significant level after mitigation, but the impacts to wastewater and stormwater drainage facilities would remain significant and unavoidable. Impacts to solid waste facilities would be less than significant.

The Mixed Use Alternative would result in an increased service population in comparison to the proposed project, with 12,318 residents in addition to the employee population of 33,028 employees, compared to the service population of 36,708 employees under the proposed Project. With respect to water, both the proposed Project and the Mixed Use Alternative would rely on the City's existing and future water portfolio and would require the extension of necessary infrastructure to serve the Specific Plan Area. The Mixed Use Alternative would require approximately 1,379.8 acre-feet per year (af/yr) for residential uses and approximately 1,707.2 af/yr industrial uses resulting in a demand of approximately 3,087 af/yr compared to the proposed Project. This represents an increase of approximately 1,149.5 af/yr when compared to the proposed Project. However, given the available capacity identified in the WSA, although impacts to water supply would be more severe when compared to the proposed Project, impacts under both the proposed Project and this alternative would be less than significant.

With respect to wastewater, the Mixed Use Alternative would result in the generation of approximately 1.97 million gallons per day (mgd) average dry weather flow rate of wastewater. This would be an increase of approximately 0.25 mgd when compared to the proposed Project due to the increased service population. Although impacts to wastewater would be more severe when

compared to the proposed Project, this alternative would still require new infrastructure to create the capacity and the distribution facilities to serve the Specific Plan Area as identified in the Citywide Water and Wastewater Master Plans, and following construction of those facilities, impacts would be less than significant.

Regarding stormwater treatment, impacts would remain significant and unavoidable under both the proposed Project and this alternative because both would require construction of new infrastructure resulting in significant construction-related impacts. Therefore, overall, the Mixed Use Intensity Alternative would result in similar or more severe impacts as compared to the proposed Project.

F. Reconfigured Specific Plan Boundary Alternative

1. Principal Characteristics

Under the Reconfigured Specific Plan Boundary Alternative, the boundary of the proposed Specific Plan Area would be modified to exclude the area south of New Schulte Road and west of the Westside Open Space. North of New Schulte Road and east of the Westside Open Space, the land use map would be the same as under the proposed Project. Like the proposed Project, this alternative would include approximately 591,980 square feet of General Commercial and 2,465,932 square feet of General Office space. This alternative would include 9,641,570 square feet of Business Park Industrial uses, compared to the 27,789,102 square feet of Business Park Industrial uses under the proposed Project. All of the Specific Plan policies would apply in this alternative.

2. Impact Discussion

a. Aesthetics

As explained in Section 4.1, Aesthetics, implementation of the proposed Project would result in changes to the visual character of the Specific Plan Area, and would have adverse effects on scenic vistas and public views, including views from Interstate 580, a State-designated scenic route. In

addition, the proposed Project would redevelop the Specific Plan Area with urban uses, which would substantially degrade the existing visual quality of the Specific Plan Area and create new sources of light and glare although the Project's light and glare impacts would be mitigated. Implementation of the Project and Reconfigured Specific Plan Boundary Alternative would include landscaping and gateway feature to enhance the visual character of the Specific Plan Area. The Reconfigured Specific Plan Boundary Alternative would result in less development than the proposed Project, and would affect a reduced geographical area than the proposed Project, but would still result in the conversion of open grassland to urban uses, including buildings visible from Interstate 580. The Reconfigured Specific Plan Boundary Alternative would not avoid the significant impacts of the proposed Project. Therefore, this alternative would result in similar levels of impacts as the proposed Project.

b. Agricultural Resources

As described in Section 4.2, Agricultural Resources, implementation of the proposed Project would convert approximately 1,700 acres of existing agricultural land within the Specific Plan area, including 100 acres of Prime Farmland and 1,600 acres of other Important Farmland, to urban uses, and would contribute to a cumulative loss of farmland; although the Project would pay an agricultural mitigation fee, these impacts would remain significant and unavoidable. In addition, the proposed Project could be incompatible with adjacent agricultural land uses, although this impact would be mitigated to a less-than-significant level as a result of buffers. The Reconfigured Specific Plan Boundary Alternative would involve the conversion of fewer acres to urban uses in comparison to the proposed Project. In addition, the reduced area of development would reduce the extent of new uses that would be incompatible with adjacent agricultural activities. However, the Reconfigured Specific Plan Boundary Alternative would still involve the conversion of Prime Farmland and other Important Farmland to urban uses. Therefore, the Reconfigured Specific Plan Boundary Alternative would result in less severe impacts than the proposed Project but

would not avoid the significant and unavoidable agricultural resource impacts of the proposed Project.

c. Air Quality

As discussed in Section 4.3, Air Quality, implementation of the proposed Project is expected to generate substantially more air emissions than existing activities in the Specific Plan Area and would exceed applicable SJVAPCD and other thresholds in several respects, due to the construction and operation of new business park industrial, office, and commercial uses in the Specific Plan Area. While the Project has been designed in a manner consistent with the City's long-term planning vision and the Specific Plan contains numerous policies and regulations designed to reduce the proposed Project's potential air quality effects, including a pedestrian-friendly central core, grid pattern of streets, and non-vehicular transportation options, these effects cannot be fully eliminated. Although certain of the Project's identified air quality impacts can be mitigated to less-than-significant levels through design features and Project-level mitigation plans, respectively, other impacts are expected to be significant and unavoidable. The Reconfigured Specific Plan Boundary Alternative would involve a smaller Specific Plan Area, and consequently would involve less construction truck traffic, fewer employees traveling to the site, and reduced emissions associated with ongoing operation of the Project. As further discussed below in section n., Transportation and Traffic, the Reconfigured Specific Plan Boundary Alternative would increase the number of vehicle trips resulting from buildout of commercial, office and industrial uses within the Specific Plan Area, although to a lesser level than that of the Project. The Reconfigured Specific Plan Boundary Alternative would increase the number of vehicle trips in the area, but to a level that would reduce the number. This would result in roughly a 38 percent reduction of emissions during the AM peak hour and a reduction of roughly 34 percent during the PM peak hour when compared to the proposed Project. Therefore, fewer air quality impacts would occur. Reduced criteria air pollutants and toxic air contaminants would be produced, and the significant and unavoidable cancer risk of the proposed Project would likely be avoided. However, the significant and unavoidable construction and operation impacts

of the proposed Project would be reduced due to the reduction on overall acres to be developed, but the impacts would not be avoided due to the intensity of construction activities occurring within the project site. As a result, the Reconfigured Specific Plan Boundary Alternative would have less severe impacts when compared to the Project, although not all impacts would be avoided.

d. Biological Resources

As described in Section 4.4, Biological Resources, implementation of the proposed Project could result in adverse effects on biological resources in the Specific Plan Area. While significant impacts to special-status animal species, possible loss of bird nests in active use, and modifications to jurisdictional waters would be mitigated to less-than-significant levels, the potential impacts of development on movement opportunities for native terrestrial wildlife would be significant and unavoidable under the proposed Project. The Reconfigured Specific Plan Boundary Alternative would directly affect a smaller area of grassland and agricultural habitat in comparison to the proposed Project and, therefore, would result in reduced effects on habitat for special-status species and jurisdictional waters. Modifications to potential seasonal wetlands and the lower reach of the central drainage would still occur under this alternative. An approximately two-acre potential seasonal wetland area in the northwestern corner of the Specific Plan Area would be largely avoided under this alternative.

Opportunities for terrestrial wildlife movement beyond the Specific Plan Area are currently limited by Interstate 205, the California Aqueduct, the Delta-Mendota Canal, and existing industrial and commercial development to the southwest. The California Aqueduct and Interstate 205 do currently have locations where wildlife can move under or over these barriers, and Interstate 205 is passable by wildlife late at night when traffic volumes are relatively low. Wildlife currently has only limited impediments for movement within the Specific Plan Area itself and to undeveloped lands to the east and southeast. Under the Reconfigured Specific Plan Boundary Alternative, new urban land uses would be introduced between Interstate 205 and New Schulte

Road, further limiting wildlife movement to the north and within the northern portion of the Specific Plan Area. The Reconfigured Specific Plan Boundary Alternative would leave the southern portion of the Specific Plan Area undeveloped, essentially creating an undeveloped island that would become largely surrounded by development over time. Lands south of New Schulte Road that would remain as grassland and agricultural habitat under this alternative would continue to provide for wildlife movement opportunities, but their value to sensitive wildlife species would be reduced because of the extent of new development to the north and existing development to the south. Therefore, this alternative would result in less severe impacts, including the avoidance of the approximately two-acre potential seasonal wetland in the northwest portion of the Specific Plan Area, but is not expected to fully avoid or substantially reduce the adverse environmental effects to biological resources that would occur under the proposed Project.

e. Cultural Resources

As described in Section 4.5, Cultural Resources, implementation of the Project could result in adverse impacts to cultural and paleontological resources if they are discovered during the construction period. The Reconfigured Specific Plan Boundary Alternative would include ground-disturbing construction activities within a reduced geographical area in comparison to the proposed Project. Although ground-disturbing activities would affect a reduced area, the potential for discovery of cultural and paleontological resources would remain under the Reconfigured Specific Plan Boundary Alternative. As a result, the Reconfigured Specific Plan Boundary Alternative would result in less severe impacts than the proposed Project but would not avoid the significant impacts of the proposed Project.

f. Geology, Soils and Seismicity

As described in Section 4.6, Geology, Soils, and Seismicity, implementation of the Project would not result in any significant impacts with respect to geology, soils and seismicity since the Project would be required to comply with the applicable laws and regulations in this regard, including, without

limitation, relevant provisions in the Tracy Municipal Code, the California Building Code, and the Tracy General Plan. However, construction of the proposed Project would create new impervious areas, such as sidewalks, driveways, parking lots, and rooftops. Without imposition of controls and safeguards in RWQCB standards, NPDES permit requirements, the City of Tracy's Storm Drainage Master Plan and the City's Manual of Stormwater Quality Control Standards, as identified in Mitigation Measure GEO-1, the Project's impacts associated with substantial soil erosion and loss of topsoil would be significant. Although a reduced area would be developed under the Reconfigured Specific Plan Boundary Alternative, the potential for erosion impacts as a result of new impervious surfaces would remain under this alternative. As a result, the Reconfigured Specific Plan Boundary Alternative would not avoid the significant impacts of the proposed Project and this alternative would have a similar level of impacts as the proposed Project.

g. Greenhouse Gas Emissions

As described in Section 4.7, Greenhouse Gas Emissions, implementation of the proposed Project would result in an increase in GHG emissions resulting from the construction and operation of the proposed Project; despite the implementation of numerous Project sustainability features and the imposition of identified mitigation measures, the Project's generation of GHG emissions would remain significant and unavoidable. The Reconfigured Specific Plan Boundary Alternative would result in less development, and therefore less GHG emissions associated with the development and operation of projects would occur. As discussed above in section c., Air Quality, the Reconfigured Specific Plan Boundary Alternative would result in a 38 percent reduction in AM peak hour trips and a 34 percent reduction in PM peak hour trips. The reductions in trips would have roughly the same reductions in GHG emissions. The emissions would be reduced but the alternative would not entirely avoid the significant and unavoidable impacts of the proposed Project. Therefore, the Reconfigured Specific Plan Boundary Density Alternative would result in less severe impacts than the proposed Project, although the significant impacts of the Project would not be eliminated.

h. Hazards and Hazardous Materials

As identified in Section 4.8, Hazards and Hazardous Materials, impacts associated with the Project may be significant given the location of existing pipelines that traverse the Specific Plan Area, and the potential risks of transmission line explosion or releases from oil lines. However, these impacts would be mitigated to a less than significant level with adherence to applicable laws and regulations. The Reconfigured Specific Plan Boundary Alternative would introduce fewer people (approximately 18,185 employees, compared to 36,708 employees under the proposed Project) and structures to a site traversed by natural gas and oil pipelines and would therefore be environmentally superior to the proposed Project in this regard; however, because the proposed Project impacts associated with the pipelines are less than significant, the Reconfigured Specific Plan Boundary Alternative would not reduce or avoid a significant effect of the Project.

As described in Section 4.8, Hazards and Hazardous Materials, implementation of the Project would result in an increase in the use, storage, and transport of hazardous materials and activities associated with safety hazards and hazardous materials sites. These potential impacts related to hazards and hazardous materials would be reduced to a less-than-significant level through implementation of State and local regulations which are further required through the implementation of Mitigation Measures HAZ-1 and HAZ-2a through HAZ-2d. Although the Reconfigured Specific Plan Boundary Alternative would involve a lesser amount of development, the alternative would include similar land uses that would involve the routine use, storage, and transport of hazardous materials, as well as the demolition of existing structures in the Specific Plan Area that could pose the risk of releasing hazardous materials. As a result, the Reconfigured Specific Plan Boundary Alternative would have a similar level of impacts as the proposed Project.

i. Hydrology and Water Quality

As described in Section 4.9, Hydrology and Water Quality, construction and operation of the proposed Project could potentially degrade surface water

quality, cause soil erosion, increase stormwater runoff, and introduce pollutants to stormwater runoff. However, these impacts would be reduced to a less than a significant level through imposition of Mitigation Measures HYDRO-1a, HYDRO-1b, HYDRO-2a, HYDRO-2b, and HYDRO-2c. The Reconfigured Specific Plan Boundary Alternative would affect a reduced geographical area and therefore a greater portion of the Specific Plan Area would remain undeveloped as pervious area. However, the alternative still involve construction and operation activities that could affect water quality, would result in an increase of impervious surfaces within the Specific Plan Area, and would require mitigation measures to reduce the potential for impacts. Mitigation measures would still be required to reduce potential impacts resulting from impervious surfaces and stormwater runoff. As a result, the Reconfigured Specific Plan Area Boundary Alternative would result in less severe impacts than the proposed Project but would not entirely avoid the significant impacts of the proposed Project.

j. Land Use and Planning

As described in Section 4.10, Land Use and Planning, implementation of the Project would create office, commercial, and business park industrial uses but would not result in land use conflicts or exacerbate existing conflicts between land uses in the Specific Plan Area and on surrounding properties. In addition, Section 4.10 evaluates the proposed Project against relevant plans, programs, and policies, including those set forth by LAFCO and City of Tracy General Plan and Municipal Code, and concludes that the Project would be consistent with applicable land use policies and regulations, including guidelines for preferred uses and intensity in Urban Reserve 6. The Reconfigured Specific Plan Boundary Alternative would introduce the same land uses to the Specific Plan Area, within a reduced geographical area. However, the General Plan requires a specific plan for the entire Urban Reserve 6 in order to ensure a comprehensive and cohesive plan for these lands, and efficient provision of infrastructure. Therefore, as a result of this inconsistency, the Reconfigured Specific Plan Boundary Alternative would have more severe impacts as compared to the proposed Project.

k. Noise

As described in Section 4.11, Noise, implementation of the Project would increase noise and vibration levels due to construction activities and increased volumes of traffic. The noise impacts related to construction activities could be reduced to less-than-significant levels after mitigation for the Project. For construction in the Reconfigured Specific Plan Boundary Alternative, since the general location of uses north of New Schulte Road would remain the same as proposed under the Project, construction noise impacts from one parcel to the next may not change appreciably for this alternative. Thus, construction noise impacts and necessary mitigation measures would be comparable between the Project and this alternative.

In the Project assessment (Section 4.11, Noise), traffic-related noise impacts were shown to be significant and unavoidable. In comparison, the Reconfigured Specific Plan Boundary Alternative would introduce less overall traffic, relative to the Project. However, if the Reconfigured Specific Plan Boundary Alternative produced 66 percent of the trip generation rates and the associated roadway segment traffic flows (as compared to the Project), then this would nominally result in a -1.8 dB change relative to the projected noise impacts for the Project.⁴ With such a -1.8 dB change relative to the Project noise results, there would be less individual roadway segments that would experience a significant impact with regard to traffic noise (as compared to the Project). Most segments, though, will remain being a significant and unavoidable impact as the -1.8 dB change is a relatively inconsequential improvement to the overall traffic noise impact situation. Thus, the Reconfigured Specific Plan Boundary Alternative would result in only a marginally improved traffic noise environment relative to the proposed Project and the changes would be on a roadway segment-by-segment basis. Therefore, the fundamental impact determination of

⁴ It is assumed that the 34 percent reduction (100 percent minus 66 percent) in trip generation estimates from the traffic consultant would result in a similar 34 percent reduction in ADT flows on the Project's area roadway segments. This also assumes all else is similarly held constant regarding flow distributions, alignment modifications, vehicle speeds, and fleet mixes.

significant and unavoidable for traffic noise will be the same for this alternative as for the Project.

l. Population, Housing and Employment

As described in Section 4.12, Population, Housing, and Employment, implementation of the Project would not directly induce population growth but would cause some indirect population growth through the creation of jobs. Nevertheless, the Project would not result in a significant impact because the Project would not cause a substantial population growth (either directly or indirectly), beyond that which has already been planned for by the City. The Reconfigured Specific Plan Boundary Alternative would result in a reduced employee population of 18,223 employees, compared to 36,708 employees under the proposed Project. Similar to the proposed Project, the Reconfigured Specific Plan Boundary Alternative could result in indirect population growth or housing demand, but the impact would be less than significant. Therefore, because neither the proposed Project nor the Reconfigured Specific Plan Boundary Alternative would result in a significant impact, the Reconfigured Specific Plan Boundary Alternative would result in a similar level of impacts as the proposed Project.

m. Public Services

As described in Section 4.13, Public Services, implementation of the Project would result in an indirect increase in population, a direct increase in service population, and therefore an increased demand for public services and recreation, although the Project would be providing a significant amount of park and recreational facilities and open space for Project users and the broader community. Project impacts associated with fire protection and law enforcement services would be potentially significant but would be mitigated to a less-than-significant level with the payment of development impact fees that would be used to systematically implement the improvements identified in the Citywide Public Facilities and Public Safety Master Plans. Impacts to schools would be significant but would be mitigated to a less-than-significant level with the payment of school impact fees in accordance with SB 50. Impacts to libraries, parks, and recreation would be less than significant.

The Reconfigured Specific Plan Boundary Alternative would bring less service population than the proposed Project, and therefore less demand for public services and recreation would occur. Therefore, the Reconfigured Specific Plan Boundary Alternative would result in less severe impacts than the proposed Project.

n. Transportation and Traffic

As described in Section 4.14, Transportation and Traffic, implementation of the Project would increase the number of vehicle trips in the Specific Plan Area and vicinity and result in significant and unavoidable impacts related to over-capacity conditions on roadway and freeway systems, inadequate emergency access, and level of service (LOS) standards. The Reconfigured Specific Plan Boundary Alternative would also increase the number of vehicle trips in the area, but to a level that is about 64 percent of the Project's trip generation, due to the reduced geographical area and amount of development that would occur under this alternative. The Reconfigured Specific Plan Boundary Alternative is estimated to generate 9,450 AM peak hour / 10,774 PM peak hour trips, as compared to 15,215 AM peak hour trips / 16,415 PM peak hour trips with the Project. Based on the comparative trip generation and reduced roadway network connections serving the reconfigured site, the Reconfigured Specific Plan Boundary Alternative would result in less severe impacts than the proposed Project, but would not entirely avoid the significant impacts of the proposed Project.

o. Utilities and Service Systems

As described in Section 4.15, Utilities and Service Systems, the proposed Project would increase demand for utilities and service systems, resulting in significant impacts associated with water supply, wastewater service, and stormwater drainage facilities. The Project's impacts to water supply service would be reduced to a less-than-significant level after mitigation, but the impacts to wastewater and stormwater drainage facilities would remain significant and unavoidable. Impacts to solid waste facilities would be less than significant.

The Reconfigured Specific Plan Boundary Alternative would result in a decreased service population in comparison to the proposed Project. With respect to water, both the proposed Project and the Reconfigured Specific Plan Boundary Alternative would rely on the City's existing and future water portfolio and would require the extension of necessary infrastructure to serve the Specific Plan Area; while the Reconfigured Specific Plan Boundary Alternative would require less water because of the reduced service population, impacts under both the proposed Project and this alternative would be less than significant. With respect to wastewater, the Reconfigured Specific Plan Boundary Alternative would result in a decreased service population; however, it would still require new infrastructure to create the capacity and the distribution facilities to serve the Specific Plan Area as identified in the Citywide Water and Wastewater Master Plans. Regarding stormwater treatment, impacts would remain significant and unavoidable under both the proposed Project and this alternative because both would require construction of new infrastructure resulting in significant construction-related impacts.

G. Ability to Meet Project Objectives

This section describes how each alternative would meet the Project objectives, described in Chapter 3 of this Draft EIR, and repeated below for reference:

The following objectives have been identified for the Project:

- “ Implement the City of Tracy General Plan land use vision for the Specific Plan Area (designated as Urban Reserve 6 by the General Plan).
- “ Facilitate the implementation of the City's various infrastructure, utility, public services, and public safety master plans.
- “ Facilitate the City's goal to master plan large parcels, in order to provide land use flexibility and encourage the efficient provision of utilities and associated infrastructure.

- “ Accommodate a variety of land uses including highway and retail commercial; office and business industrial (including office/warehouse; light industrial; warehouse and distribution facilities) to foster the growth of research and development and manufacturing uses.
- “ To create a state-of-the art commerce and business park within an economically viable and flexible planning context, which will accommodate a wide range of land uses including general commercial, general office, and business park industrial uses.
- “ Capitalize on the existing transportation corridors of Interstate 580 and Interstate 205 and increased demand for manufacturing and distribution space from the Bay Area, and attract a wide range of high-quality businesses, including emerging growth industries.
- “ To contribute to an economically vibrant employment sector by generating a significant number of temporary and permanent employment opportunities for Tracy residents (both “head-of-household” and entry level positions), and improving the City’s jobs/housing balance.
- “ Create a thematic gateway to the City of Tracy, introducing the City’s character with enhanced landscape treatments and sculptural monument signage along the Interstate 205 freeway edge.
- “ Provide a range of sustainability measures aimed at conserving resources, decreasing energy and water consumption, and reducing air and water pollutants.
- “ Allow property owners within the Specific Plan Area to realize a reasonable return on their investments to provide incentives for private development.
- “ Encourage and secure private participation in the provision and funding of community benefits.
- “ To foster economic vitality for the City of Tracy by generating substantial amounts of revenue in the form of taxes and fees, which will help fund vital improvements to City infrastructure, services, and

amenities and provide improved infrastructure systems for the benefit of the broader community.

- “ To create a development that has an identity of its own with a commitment to sustainability, flexible planning, high-quality architecture and site design, and the provision of attractive on-site amenities, including open space, public spaces, recreational facilities, trail network, and enhanced landscaping design.
- “ To preserve and enhance the City’s unique character by developing business and commerce park uses within a context of passive and active park and recreational facilities, including significant open space components and an extensive trail network, which will benefit Project users and the broader community.
- “ To build a comprehensive and integrated trail network, which will create substantial pedestrian and bicycle amenities, enhance connectivity within the Specific Plan Area, and provide alternatives to automobile use.
- “ To incorporate a range of sustainability measures into the Project’s design, which will help to conserve resources by reducing energy and potable water consumption, decrease contributions to GHG emissions by promoting high levels of connectivity and reliance on multi-modal transportation modes, reduce air and water pollutants, and enhance on-site biological resources.

a. No Project Alternative

Under the No Project Alternative, the Project would not be implemented, and therefore this alternative does not meet any of the objectives.

b. Reduced Intensity Alternative

Under this alternative, less development and fewer jobs than under the Project would occur. A less dense development would fail to meet the objective of creating a state-of-the-art commerce and business center because it would impose a development pattern that hinders the creation of a concentrated office district and reduces the City’s ability to implement pedestrian and bicycle connectivity given the spacing of the buildings on site.

In addition, this alternative would constrain the City's ability to efficiently deliver services, resources, and infrastructure to the Specific Plan Area and to users and employment-generating activities. A less dense development would not as effectively make use of scarce land resources, which would not as effectively meet the objective of conserving resources. This alternative would allow far fewer businesses to locate near critical major transportation corridors and would invite far fewer employees to the business park, thereby straining the City's ability to reverse commute patterns. Further, reducing the Project's uses by 50 percent under this alternative would pose an issue in terms of economic viability and the ability of the Project to provide a reasonable rate of return to the developers. The lands not developed with business park industrial, commercial, and offices uses within the Specific Plan Area would likely instead be developed as parking, thereby intensifying the local heat island effect. Lastly, this alternative would be less flexible from a land use regulations perspective, limiting the nature and size of businesses that could relocate to Tracy.

Based on the foregoing, this alternative would not meet most of the objectives.

c. Mixed Use Alternative

This alternative would provide less development of commercial, office, and industrial uses, but would include residential development. As explained in the application materials for the Proposed Project, the proposed General Plan Amendment to remove the reference to residential uses in Urban Reserve 6 reflects the City's further refinement to its vision for this area. Residential development in the Specific Plan Area would be inconsistent with the planning vision of Urban Reserve 6 as well as the parameters for residential development established in the General Plan, as described below.

The General Plan calls for industrial and residential uses to be separated to the extent feasible. This alternative would introduce sensitive receptors into an area with elevated emissions, contrary to City policy. The residential strategy established in the General Plan is to further enhance neighborhood

connectivity, with new housing being developed near existing schools, resident-serving services, community amenities, and existing residential neighborhoods. Under this alternative, access to services would be significantly constrained. This alternative would create a new residential neighborhood more than a mile away from existing neighborhoods, thus isolating this area. Housing in the Specific Plan Area would be substantially surrounded by business park uses, as opposed to consumer services, other residential uses, and school infrastructure. Children in these households would be separated from other community amenities in the city. Walkability would also be constrained under this alternative, because the neighborhood street pattern would not connect to other resident-serving uses and amenities. The existing environment in the Specific Plan Area vicinity includes a great amount of truck traffic from the Patterson Pass Business Park, which would raise a potential land use compatibility issue.

The City's growth management strategy has been developed and refined over a number of years, with significant community involvement and input, and has been updated in 2005, 2009, and 2012 in concert with the State of California Department of Housing and Community Development to identify available sites for residential development. These processes have concluded with residential growth being identified in the General Plan to continue to be located to proximate to existing Tracy residential neighborhoods, with very specific, numerical limits on building permits for residential uses beyond the geographies identified in the Growth Management Ordinance Guidelines.

Additionally, reducing the amount of business park industrial uses would hinder, to a certain extent, the ability of the Specific Plan Area to accommodate a variety of businesses, including emerging growth industries.

Based on the foregoing, this alternative would not meet most of the objectives.

d. Reconfigured Specific Plan Boundary Alternative

This alternative would provide less development of commercial, office, and industrial uses by reconfiguring the boundaries of the Specific Plan, thereby reducing the overall area that would be developed. A reduced amount of development would constrain the City's ability to efficiently deliver services, resources, and infrastructure to the Specific Plan Area and to users and employment-generating activities. This alternative would allow far fewer businesses to locate near critical major transportation corridors and would invite far fewer employees to the business park, thereby straining the City's ability to reverse commute patterns. Further, reducing the Project's uses under this alternative would pose an issue in terms of economic viability and the ability of the Project to provide a reasonable rate of return to the developers. This alternative would be less flexible from a land use regulations perspective, limiting the nature and size of businesses that could relocate to Tracy. This alternative would create an island of undeveloped property that would be substantially surrounded by other industrial areas, and would not facilitate the extension of transportation corridors to connect the business park to City infrastructure. This alternative would not effectively implement the General Plan because it would not capitalize as effectively on the two major transportation corridors near the Specific Plan Area. Lastly, this alternative would increase the cost per acre to extend infrastructure to the Project, thereby inhibiting the City's implementation of its master planned infrastructure and precluding the participating property owners from realizing a reasonable return on their investment. Therefore, this alternative would not meet most of the objectives.

H. Environmentally Superior Alternative

In addition to the discussion and comparison of impacts of the Project and the alternatives, Section 15126.6 of the State CEQA Guidelines requires that an "environmentally superior" alternative be selected and the reasons for such a selection be disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least environmental impact. Identification of the environmentally superior alternative is an

informational procedure and the alternative selected may not be the alternative that best meets Project objectives.

As shown in Table 5-1, the No Project Alternative would have the fewest environmental impacts as compared to the other three alternatives, and would therefore be considered the environmentally superior alternative. However, in accordance with State CEQA Guidelines Section 15126.6(e)(2), if the Environmentally Superior Alternative is the “No Project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Accordingly, the Reconfigured Specific Plan Boundary Alternative would be the Environmentally Superior Alternative.

CITY OF TRACY
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ALTERNATIVES TO THE PROPOSED PROJECT