CHAPTER FOUR

EVALUATION OF ALTERNATIVES

CHAPTER FOUR – EVALUATION OF ALTERNATIVES

4.1 Introduction

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) include a discussion of reasonable project alternatives that would "feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives" (CEQA Guidelines Section 15126.6). This chapter identifies potential alternatives to the proposed project and evaluates them, as required by CEQA.

Key provisions of the CEQA Guidelines on alternatives (Section 15126.6[a] through [f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in the EIR.

- "The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly" (15126.6[b]).

- "The specific alternative of 'no project' shall also be evaluated along with its impact"(15126.6[e][1]).

- "The no project analysis shall discuss the existing conditions at the time the Notice of Preparation (NOP) is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives" (15126.6[e][2]).

- "The range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project" (15126.6[f]).

- "Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)" (5126.6[f][1]).

- "For alternative locations, "only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR" (15126.6[f][2][A]).

- "An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative" (15126.6[f][3]).

For each development alternative, this analysis:

- Describes the alternative;
- Analyzes the impact of the alternative as compared to the proposed project;
- Identifies the impacts of the project that would be avoided or lessened by the alternative;
- Assesses whether the alternative would meet most of the basic project objects; and
- Evaluates the comparative merits of the alternative and the project.

Per the CEQA Guidelines Section 15126.6(d), additional significant effects of the alternatives are discussed in less detail than the significant effects of the project as proposed.

4.2 Project Objectives

Project objectives are identified as a means of aiding the Lead Agency in choosing an environmentally superior alternative to the proposed project. One the key factors in the consideration of alternatives is whether they can attain most of the project objectives. As described in Section 2.2, the objectives of the proposed project are to:

- Positively contribute to the local economy by creating new job opportunities for local residents.

- Promote increased economic growth and economic development that is consistent with the policies of the Stanislaus County General Plan.

- Combine all aspects of the operation - including growing, storage, packing, and shipping – at one location.

- Attain financial success by selecting a facility location that has reasonable land prices, site development costs, and operating costs.

- Minimize travel distance to Highway 99.

- Develop a packing, storage, and shipping facility located in an area served by adequate roads.

- Achieve an architectural and site design that are compatible with the surrounding agricultural areas.

- Provide a development that will result in a net fiscal benefit to the County by generating increased property tax revenue.

4.3 Significant Impacts of the Project

A primary consideration in selecting project alternatives is their potential to reduce or eliminate significant impacts compared to the proposed project beyond that which can be accomplished through mitigation measures. The project impact analysis, as detailed in Chapter Two of this Draft EIR, concluded that the following impacts would remain significant, after mitigation, for the proposed project:

Air Quality

Impact 3.3-1 – Conflict with or obstruct implementation of any applicable air quality plan.

Impact 3.3-3 – Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable national or State ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors).

Greenhouse Gases

Impact 3.7-1 – Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

Impact 3.7-2 – Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG.

Noise

Impact 3.11-1 – Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

4.4 Rationale for Alternatives Selection

As discussed above, CEQA provides that alternatives should:

1. Feasibly accomplish most of the basic objectives of the project; and
2. Avoid or substantially lessen one or more of the significant effects.

All alternatives selected for alternatives analysis met at least some of the project objectives and possessed some possibility of reduction or elimination of project-related significant impacts.

The comparative environmental ranking of the project alternatives is based on the alternative's relative and quantitative (where applicable) ability to reduce these identified significant impacts.

4.5 Alternatives Selected for Analysis

4.5.1 CEQA REQUIREMENTS

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (Guidelines Sec. 15126.6(f)(2)).

The following alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly or partially attain objectives of the project but avoid or substantially lessen any of the significant effects of the project. These alternatives are analyzed in detail in following sections:

1) **No Project** – This assumes that the Use Permit is not granted. Land use would be that which is permitted in this Agricultural zoning district without the use permit. In this case, it would not be conversion of the site to a vacant condition.

2) **WISP Alternative Site** – This alternative assumes that the warehouse operation as proposed is moved to a parcel within Turlock's Westside Industrial Park (WISP). This site in within the Turlock city limits and therefore not under the land use jurisdiction of Stanislaus County.

3) **Reduced Greenhouse Gas Emissions** – This alternative requires reductions in certain aspects of the proposed warehouse construction and operation in order to reduce GHG emissions below the threshold of significance.

After alternatives are summarized and compared with the proposed project, the chapter concludes with an analysis of the comparative environmental superiority of the various alternatives, as required by CEQA, and the identification of the environmentally superior alternative. The threshold criteria used in Chapter Three (Appendix G of the CEQA Guidelines) are used in this section to judge the significance of, and compare, the impact conclusions related to each criteria for the project for each alternative.

4.5.2 ANALYSIS GUIDELINES

CEQA, unlike NEPA, does not require alternatives analysis at the same detailed level as the analysis of the project; the analysis is simply required to "include sufficient information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project". [CEQA Guidelines 15126.6(d)] It is, further, required to provide decision-makers and the public with sufficient information to make decision makers' reasoning accessible to the public and for decision-makers to make an informed decision.

The Guidelines require that not only the significant environmental effects of each alternative be identified for comparison with those of the project but that any additional significant effects of each alternative be ascertained and discussed.

4.6 Impact Analysis

4.6.1 NO PROJECT ALTERNATIVE

CEQA Guidelines Section 15126.6(e) requires every EIR to include a "No Project Alternative." "The purpose of describing and analyzing a no project alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project." In general, this alternative should discuss "existing conditions…as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services."

The manner in which a No Project Alternative shall be composed depends on the nature of the project at issue. The No Project Alternative for this project is the land use that would likely result if the use permit application is denied, thereby allowing only the land uses and activities that are consistent with the A-2-40 General Agriculture zone. This definition is based on CEQA Guidelines Section 15126.6(e), which defines the No Project Alternative. Relevant excerpts follow (in italics, with emphasis added in bold).

> *(2) The "no project" analysis shall discuss the existing conditions at the time the notice of preparation is published,…* ***as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved****, based on current plans …*
>
> *(3) (B) If the project is other than a land use or regulatory plan, for example a development project on identifiable property, the "no project" alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental efforts of the property remaining in the existing state against environmental effects which would occur if the project is approved… However, where failure to proceed with the project will not result in preservation of existing conditions,* ***the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment****.*
>
> *(3)(C) … the lead agency should proceed to analyze the impact of the no project alternative* ***by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved****, based on current plans and consistent with available infrastructure and community services.*

In conclusion, CEQA does not direct that the "no project" condition be a return to previous conditions, but rather that it describe what is reasonably expected to occur if the proposed project is not approved. In this case, the project proponent has indicated that he would implement those uses and activities that are permitted in the A-2-40 General Agriculture zone.
Under this alternative, the existing site improvements and structures would remain and the current activities on the site would remain, in compliance with County regulations. Following are the key elements of the No Project Alternative:

1. Necessary permits will have been obtained for work that has been done at the site.

2. No warehouse would be constructed, so no sorting, storage, packing and shipping of produce would take place.

3. New buildings and building additions that were installed without a County building permit will have received permits and remains, as follows:

   - Office in the single family dwelling
   - Agricultural barn addition
   - New steel building roof
   - Milk barn

4. Site improvements that were completed without County permits will have received permits and remain, as follows:

   - Erosion control plan will have been implemented to the satisfaction of Stanislaus County.
   - Dust control plan will have been implemented to the satisfaction of San Joaquin Valley APCD.
   - Fulkerth Road driveway will have been removed and ground restored to previous condition.
   - Washington Road driveway will have received a permit and remains in place.

Aesthetics

Under this alternative, the existing buildings would be retained, after securing required permits from the County, but the 180,000 square foot warehouse would not be constructed. In addition, the proposed fencing and landscape screening described in Section 3.1 would not be installed along Washington Road. Therefore, the existing structures and equipment would remain in full view of motorists. There would be a ***greater*** aesthetics impact under the No Project alternative.

Agricultural Resources

Under this alternative, with the absence of the proposed 180,000 warehouse, the amount of land devoted to agricultural use would be greater than under the proposed project. Therefore, the potential impact to agricultural resources would be ***less*** under the No Project Alternative.

Air Quality

This alternative would result in less emissions associated with building construction, because no new buildings would be constructed. Similarly, vehicle-related emissions would be reduced because there would be no produce shipping conducted at the site. Overall, impacts on air quality would be ***less*** under this alternative.

Biological Resources

Under this alternative, the project site and any related biological resources would remain in their existing conditions, and potential impacts to special-status species listed as occurring in its general vicinity would be less under the No Project alternative because there would be a reduction in the developed area relative to the proposed project, and the activity level at the site would be less. Therefore, this alternative would have ***less*** potential impacts to biological resources.

Cultural Resources

Under this alternative, site disturbance would be reduced relative to that in the proposed project. As a result, potential impacts to cultural resources would be ***less***.

Geology and Soils

Grading and excavation of the site would not occur under the No Project Alternative, except to comply with County permit requirements for grading that was completed in advance of required permits. Moreover, no additional structures would be constructed and no additional employees would be added. Geologic impacts, therefore, would be ***less*** in comparison to the proposed project.

Greenhouse Gases

Under the No Project Alternative, the 180,000 square foot warehouse would not be constructed and associated truck deliveries would not occur. Consequently, this alternative would eliminate the significant unavoidable GHG impacts associated with the proposed project and would not generate as much mobile or stationary sources of GHG emissions. Overall, this alternative would have ***less*** construction and operational GHG emissions.

Hazards and Hazardous Materials

In comparison to the proposed project, the No Project Alternative would not have the potential to create greater hazardous materials impacts than those associated with the proposed project because County regulations would pertain in either case. As such impacts associated with hazards and hazardous materials would be the ***same*** as the No Project Alternative.

Hydrology/Water Quality

In this alternative, the amount of impervious surface on the site would be less than that of the proposed project. However, features contained in the proposed project description that are intended to improve water quality and improve onsite detention of stormwater would not be constructed under the No Project Alternative. Therefore, the No Project Alternative would likely have ***greater*** potential impacts to hydrology and water quality than the proposed project

Land Use and Planning

Under the No Project Alternative, land uses and activities currently occurring on the site would be made to conform to the A-2-40 General Agriculture zone, and the warehouse and uses that are not permitted in that zone would not occur. Since the proposed project would also be consistent with County land use regulations, the potential impacts would be the ***same***.

Noise

Because the No Project Alternative would eliminate construction activities, it would eliminate significant short-term construction noise impacts at nearby vibration-sensitive and noise-sensitive receptors. Similarly, long-term project traffic related noise impacts to residential dwellings adjacent to major access roads to the site would be reduced because the shipping activities associated with the warehouse under the proposed project would not exist. Under the No Project Alternative, vehicle trips or stationary noise would be similar to the existing condition, and would result in ***less*** vehicle noise impact on residential uses than the proposed project.

Public Services and Utilities

While impacts under the proposed project were less than significant, demand for services under No Project Alternative would be less. Accordingly, potential impact would be ***less*** than the proposed project.

Transportation and Traffic

Under this No Project alternative, there would be no additional traffic trips except those generated from continuing farming operations on the project site. This alternative would result in ***less*** traffic impacts associated with shipping, as well as employee traffic associated with warehouse employees.

Impact Summary

The No Project Alternative results in 9 less impacts than the proposed project, 2 greater impacts, and 2 impacts that are the same as the proposed project.

Ability to Achieve Project Objectives

The No Project Alternative would achieve one project objective listed in Section 4.1.2, which pertains to compatible architectural and site design with the surrounding agricultural uses. However, it would not achieve any of the other objectives.

4.6.2 WISP SITE ALTERNATIVE

Under this alternative, the project proponent would develop the proposed project on roughly 27-acre parcel within Turlock's Westside Industrial Specific Plan (WISP). A survey of vacant sites provided by the City indicates that there are currently multiple vacant sites that would be

available for development. Development of a site within the WISP would be limited to the sorting, storage, packing and shipping of produce within a new 180,000 square foot warehouse. No crops would be produced on the site.

Aesthetics

Under this alternative, the architectural and site design of the proposed 180,000 square foot warehouse would be subject to design guidelines contained in the WISP; whereas, the proposed project is only subject to WISP design guidelines for Washington Road frontage improvements. There are no similar County design guidelines that would apply. However, since, within mitigation, there were no aesthetic impacts resulting from the proposed project, there are no impacts that would be reduced under the WISP Site alternative. Therefore, the aesthetic impacts are the ***same***.

Agricultural Resources

While there were no identified potential impacts on agricultural resources under the proposed project, developing the project within the WISP will reduce the amount of agricultural land developed for the warehouse, thereby increasing the amount of land available for continued growing of crops. The potential impact will therefore be ***less*** under this alternative.

Air Quality

Under this alternative, air quality impacts are expected to be approximately the same as those of the proposed project. While a site in the WISP would be nominally closer to SR 99, the reduced travel distance would not be expected to measurably reduce vehicle emissions. Potential impacts on air quality associated with the WISP Site Alternative, therefore, is expected to be approximately the ***same*** as that of the proposed project.

Biological Resources

While potential impacts to biological resources were mitigated to less than significant under the proposed project, the potential impacts to biological resources will likely be even less at a site within the WISP, since it is in an area with a higher level of activity and fewer biological resources. The potential biological resources impact is ***less*** than that of the proposed project.

Cultural Resources

Potential impacts to cultural resources at the proposed project site are limited to heretofore potential resources that could be encountered during site grading and construction. Those same potential impacts would apply to the WISP site; therefore, potential impacts to cultural resources are the ***same*** for the WISP Site Alternative.

Geology and Soils

The site development and earth disturbance that would occur at the project site for the proposed warehouse would occur at the WISP site; therefore, potential impacts to geology and soils would be the ***same*** under the WISP Site Alternative.

Greenhouse Gases

With the same project site size and the same levels of development, the impacts of this alternative on greenhouse gases and global climate change will be essentially the ***same***.

Hazards and Hazardous Materials

While any hazardous materials that may be used in the warehouse would be the same at WISP site, there would be no existing materials or substances, as there are at the proposed project site. Since the WISP site is assumed to be free of the on-site hazardous substances (e.g., spilled materials) found at the proposed project site, development of the WISP site can be expected to have ***less*** potential impacts associated with hazards and hazardous materials.

Hydrology/Water Quality

Storm water runoff and water quality impacts, while mitigated to less-than-significant levels under the proposed project, are expected to the ***same*** at a site within the WISP.

Land Use and Planning

Under this alternative the project would be developed in full conformity with City of Turlock zoning requirements, including requirements that are specific to the WISP. Potential impacts would be the ***same*** as those of the proposed project.

Noise

Under this alternative the project would be developed in full conformity with City of Turlock zoning requirements, including any noise mitigation requirements that are specific to operations within the WISP. While the number of vehicle trips that create noise impacts on nearby sensitive uses would be the same under this alternative, the access point to the site would probably not be on Washington Road, thereby potentially reducing traffic noise on the segment of Washington Road where residents would be impacted by truck traffic noise under the proposed project. Accordingly, the potential noise impact would likely be ***less*** under the WISP Site Alternative.

Public Services and Utilities

As noted in Chapter Two Project Description, the project does not propose connection to water, sanitary sewer, and storm drainage systems. Under this alternative, no additional demand would be generated for area utilities and service systems, even though by being with the WISP, connection to utility systems would be easier to accomplish. Since the project would not require

connect to City utility systems, the impact of the WISP Site alternative would be the ***same*** as the proposed project.

Transportation and Traffic

Under the WISP Site Alternative, trips to and from the project site would likely use many of the same County and City streets as the proposed project, although Washington Road would likely not be used for site access. Accordingly, traffic impacts are expected to be essentially the ***same*** as those associated with the proposed project.

Impact Summary

The WISP Site Alternative results in 4 less impacts and 9 impacts that are the same as the proposed project.

Ability to Achieve Project Objectives

The WISP Site Alternative achieves all but three of the project objectives listed in Section 4.4.2, as follows: 1) It would not combine growing, storage, packing, and shipping at one location, because growing would not occur in the WISP, 2) The financial success of the project at this site would be challenged by higher land acquisition and site development costs associated with the WISP, and 3) The project would not generate property taxes for the County.

4.6.3 REDUCED GREENHOUSE GAS ALTERNATIVE

The Reduced Greenhouse Gas (GHG) alternative would apply mitigation measures to meet the 29% reduction target set in AB 32, as recommended by the San Joaquin Valley Air Pollution Control District (SJVAPCD) to reduce impacts on climate change. This alternative would also result in further reducing both the construction and operational criteria pollutants to well below the SJVAPCD's thresholds of significance (10 tons per year for NOx and ROG and 15 tons per year for PM10 and PM2.5).

This alternative would result in the following mitigation measures for construction: reduce speeds to 15 mph on unpaved surfaces, water unpaved areas 3 times per day, apply soil stabilizer for unpaved roads (also see Regulation VIII requirements), and utilize Tier 3 construction equipment. Construction assumptions would consist of: 3 construction phases lasting 4 months each (total 12 months), 31 pieces of construction equipment for each phase, and a 26.73-acre disturbance area.

Under this alternative, mitigation measures during operations would include the following: installing renewable energy (55%), high efficiency lighting, exceed Title 24 by 25%, reclaim 8.1% of indoor water use, planting 80 trees, employee offered vanpool/shutter, VOC paint and cleaning supplies, 3% plug in for electric landscaping equipment, and recycle 50% of solid waste. Operation assumptions would include the following: total trips per day equals 466.2 miles (10% hauling, 70% employees, and 20% consumers), 6 work days, workers and vendors

originate from Turlock, haul trips average 375 miles per day (both long haul and short haul), and total yearly water use of 690,805 gallons.

In Table 4.6-1, the Business As Usual (BAU) listed in column two is the baseline year of 2005 which does not include regulation. Column three lists the 2020 results that occur with regulation that is in place. The last column lists the 2020 regulation along with the mitigation measures applied from the discussion.

Table 4.6-1
Total GHG Operation Emissions

Source	Business as Usual (BAU) $MTCO_2e$	2020 (with Regulation) $MTCO_2e$	2020 (with Regulation and Standard Measures) $MTCO_2e$
Total	4687.28	4271.57	3305.82
Reduction		9.7%	29.5%
Significance Threshold		29.0%	29.0%
Are emissions significant after mitigation, project design features, and regulation?		Yes	No

Note: Results also based on CalEEMod defaults.
Source: Avila & Sons, 2013.

The results listed in 4.6-1 would result in meeting the SJVAPCD's suggested 29% target reduction set in AB 32.

Reduction in construction and operation criteria pollutants are listed in Table 4.6-2. Pursuant to Rule 9510, if ROG or PM10 is over 2 tons per year, then Rule 9510 is triggered.

Table 4.6-2
Total Construction and Operation Criteria Pollutant Emissions

Combined Emissions (2014, 2015, and 2016)	ROG	NOx	CO	PM10 Total	PM2.5 Total
		Construction tons/yr			
Total	1.7859	4.6803	3.072	0.4017	0.3201
		Operation tons/yr			
Total	5.6364	5.8656	14.5101	2.0694	0.6183

Note: Results also based on CalEEMod defaults.
Source: Avila & Sons, 2013.

As shown in Table 4.6-2, the total construction emissions combined are well under the SJVAPCD's thresholds for criteria pollutants (10 tons per year for NOx and ROG and 15 tons per year for PM10 and PM2.5). When the construction results are divided by three to coincide with each of the three construction phases, each phase also falls below Rule 9510 thresholds for triggering an Indirect Source Review (ISR). However, the operation phases combined would require the ISR.

It is uncertain at this time whether the Reduced Greenhouse Gas (GHG) Emissions alternative is more cost effective than the Proposed Project alternative, as the cost of mitigation is unknown (especially the 55% renewable energy). However, the cost for mitigating under the ISR is $9,350 per ton for NOx, and $9,011 per ton for PM10.

Aesthetics

It is unlikely that the project appearance would change noticeably different under this alternative as a result of incorporating one of more of the measures described above for reducing greenhouse gas emissions. Although, if additional trees were planted under this alternative, as described in the listing, there could be an improved appearance on the site. Therefore, the potential impact on aesthetics would ***less*** than that of the proposed project.

Agricultural Resources

It is unlikely that any of the greenhouse gas reduction measures described above would result in an impact on agricultural resources that is different than that of the proposed project. Therefore, this alternative can be expected to have the ***same*** impact on agricultural resources as the proposed project.

Air Quality

It is expected that incorporation of one or more of the greenhouse gas reduction measures described above would result in a reduction on air quality impacts. Accordingly, this alternative is ***less*** potential impact on air quality than the proposed project.

Biological Resources

It is unlikely that any of the greenhouse gas reduction measures described above would result in an impact on biological resources that is different than that of the proposed project. Therefore, this alternative can be expected to have the ***same*** impact on biological resources as the proposed project.

Cultural Resources

It is unlikely that any of the greenhouse gas reduction measures described above would result in an impact on cultural resources that is different than that of the proposed project. Therefore, this alternative can be expected to have the ***same*** impact on cultural resources as the proposed project.

Geology and Soils

It is unlikely that any of the greenhouse gas reduction measures described above would result in an impact on agricultural resources that is different than that of the proposed project. Therefore, this alternative can be expected to have the ***same*** impact on geology and soils as the proposed project.

Greenhouse Gases

This alternative is specifically intended to reduce GHG emissions by requiring implementation of a menu of GHG reduction methods in various aspects of the site and architectural design and in the daily operations of the proposed project. Accordingly, this alternative will result in ***less*** GHG emission impacts than the proposed project. Specifically, incorporation of the listed measures will reduce GHG emissions to below the thresholds described in Section 3.7 of this Draft EIR.

Hazards and Hazardous Materials

It is unlikely that any of the greenhouse gas reduction measures described above would result in any effect on impacts associated with hazards or hazardous materials that is different than that of the proposed project. Therefore, this alternative can be expected to have the ***same*** impact on hazards and hazardous materials as the proposed project.

Hydrology/Water Quality

It is unlikely that any of the greenhouse gas reduction measures described above would result in an impact on hydrology and water quality that is different than that of the proposed project. Therefore, this alternative can be expected to have the ***same*** impact on hydrology and water quality as the proposed project.

Land Use and Planning

Incorporation of the greenhouse gas reduction measures described above would not result in an impact on land use and planning that is different than that of the proposed project. Therefore, this alternative can be expected to have the ***same*** impact on land use and planning as the proposed project.

Noise

It is unlikely that any of the greenhouse gas reduction measures described above would result in a different operational noise impact than that of the proposed project. Also, the greenhouse gas reduction measures would not reduce vehicle traffic noise impacts. Therefore, this alternative can be expected to have the ***same*** impact on noise as the proposed project.

Public Services and Utilities

It is unlikely that impacts on public services and utilities would be any different as a result of the of the greenhouse gas reduction measures described above than that of the proposed project. Therefore, this alternative can be expected to have the ***same*** impact on public services and utilities as the proposed project.

Transportation and Traffic

Incorporation of the greenhouse gas reduction measures described above will not affect the volume, trip distribution, or mix of vehicles associated with operation of the project. As such potential traffic impacts under the Reduced GHG alternative would be the ***same*** as that for the proposed project.

Impact Summary

The Reduced GHG Alternative results in 3 less impacts and 10 impacts that are the same as the proposed project.

Ability to Achieve Project Objectives

The Reduced GHG Alternative would achieve all of the project objectives listed in Section 4.2, with the possible exception of achieving financial success. This is due to the higher cost of development and operation that may result from implementing GHG reduction measures.

4.7 Environmentally Superior Alternative

CEQA requires a lead agency to identify the "environmentally superior alternative" and, in cases where the "No Project" Alternative is environmentally superior to the proposed project, the environmentally superior development alternative must be identified. The relative impacts of each project alternative in comparison to the proposed project are summarized in Table 4.7-1.

Table 4.7-1
Proposed Project vs. Project Alternatives
Comparison of Environmental Impacts and Achievement of Project Objectives

Environmental Impact	Proposed Project	Project Alternatives		
		No Project Alternative	WISP Site Alternative	Reduced GHG Alternative
Aesthetics	LTS	Greater	Same	Less
Agricultural Resources	LTS	Less	Less	Same
Air Quality	SU	Less	Same	Less
Biological Resources	LTS	Less	Less	Same
Cultural Resources	LTS	Less	Same	Same
Geology and Soils	LTS	Less	Same	Same
Greenhouse Gases	SU	Less	Same	Less
Hazards and Hazardous Materials	LTS	Same	Less	Same
Hydrology/Water Quality	LTS	Greater	Same	Same
Land Use/Planning	LTS	Same	Same	Same

Environmental Impact	Proposed Project	Project Alternatives		
		No Project Alternative	WISP Site Alternative	Reduced GHG Alternative
Noise	SU	Less	Less	Same
Public Services/Utilities	LTS	Less	Same	Same
Transportation/Traffic	LTS	Less	Same	Same
Achievement of Objectives		1	5	7

LS Less than Significant
SU Significant and Unavoidable

The Table 4.7-1 summarizes the potential impacts of the alternatives analysis as follows:

- **No Project Alternative –** Results in 9 less impacts than the proposed project, 2 greater impacts, and 2 impacts that are the same as the proposed project.

- **WISP Site Alternative** – Results in 4 less impacts and 9 impacts that are the same as the proposed project.

- **Reduced GHG Alternative** – Results in 3 less impacts and 10 impacts that are the same as the proposed project.

Among the three alternatives, the No Project Alternative results in the greatest reduction in impacts, and could be considered superior from an environmental standpoint. However, it also results in 2 impacts that are greater than that of the proposed project. The Reduced GHG Alternative has impacts that are most similar to the Proposed Project and results in the fewest reductions in impacts. In conclusion, other than the No Project Alternative, the WISP Site Alternative is marginally superior in terms of environmental impact.

With regard to achievement of the 8 project objectives listed in Section 4-2, Table 4.7-1 shows that the No Project Alternatives meets only 1 of 8, the WISP Site Alternative meets 5 of 8, and the Reduced GHG Alternative meets 7 of 8.