7 ALTERNATIVES TO THE PROJECT

State CEQA Guidelines Section 15126.6(a) requires an evaluation of "a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic project objectives but would avoid or substantially lessen any of the significant effects, and evaluate the comparative merits of the alternatives." The project objectives are stated in Section 3.2, "Project Objectives," of this Draft EIR. Alternatives are used to determine whether or not a variation of the project would reduce, or eliminate, significant project impacts, within the basic framework of the objectives. State CEQA Guidelines Section 15126.6(f) specifies that the range of alternatives is governed by the "rule of reason," requiring evaluation of only those alternatives "necessary to permit a reasoned choice." Further, an EIR "need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative" (State CEQA Guidelines Section 15126.6[f][3]).

State CEQA Guidelines Section 15126.6(e) requires that, among other alternatives, a "no-project" alternative be evaluated in comparison to the proposed project. State CEQA Guidelines Section 15126.6(e) requires that the no-project analysis "discuss the 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 the available infrastructure and community services." Accordingly, a No Project Alternative that assumes continuation of the existing land uses is analyzed in this Draft EIR.

Other alternatives considered and evaluated in detail include a Mitigated Design Alternative and an Off-site Alternative. Descriptions of project alternatives are provided below. The advantages and disadvantages of each, compared to the project, are presented and an evaluation of each alternative's ability to meet most of the project's basic objectives is included. Any significant environmental impacts created exclusively by an alternative are also identified. Finally, a summary of the impacts for each resource area, as compared to the project, is provided at the end of each discussion (i.e., less, greater, or similar).

A more detailed description of the baseline conditions, evaluation methodology, and results are included in Chapter 4 of this Draft EIR and in technical reports prepared as part of the evaluation.

7.1 SUMMARY OF ENVIRONMENTAL CONSTRAINTS

The purpose of this section is to summarize the site-specific environmental constraints, as identified and discussed in Chapter 4, "Affected Environment, Environmental Consequences, and Mitigation Measures," of this Draft EIR. These site-specific environmental constraints, if not avoided through either project design or mitigation, could result in significant or potentially significant environmental impacts.

Potential site-specific environmental constraints include impacts to the visual character of the site, light and glare impacts, air quality impacts, noise impacts, impacts to sensitive biological species, conversion of important farmland, traffic impacts, and potential impacts to cultural resources. These constraints and their effects on the range of alternatives were considered in the analysis of alternatives.

The project would result in the following significant and unavoidable impacts.

Visual Resources. The project would convert an existing fallow agricultural site into a commercial development that would substantially change the local visual character of the project site and would contribute to the urban visual transition of the project area from agricultural to urban land uses (project and cumulative impacts) (discussed in Section 4.2, "Visual Resources").

Air Quality. Operation-related activities would generate long-term regional air quality emissions of criteria air pollutants and ozone precursors that exceed SJVAPCD standards (project and cumulative impacts)(discussed in Section 4.3, "Air Quality").

Agricultural Resources. The project would result in the conversion of 16 acres of important farmland to commercial uses (project and cumulative impacts).(see Section 4.8, "Agricultural Resources").

Transportation and Circulation. The project would increase project traffic volumes at several project area intersections and SR 120 ramp junctions (Impact 4.11-1), exacerbate existing adverse operating conditions along freeway mainline segments of SR 120 (Impact 4.11-3), increase project and cumulative traffic volumes at a number of project area roadways, intersections, and SR 120 ramp junctions and mainline segments (Impact 4.11-4), and generate the need for public bus transportation services (Impact 4.11-9).

The potential for the alternatives to avoid or reduce the project's significant impacts was considered in the analysis of alternatives.

7.2 NO PROJECT ALTERNATIVE–NO DEVELOPMENT

The No-Project Alternative—No Development assumes that existing conditions on the project site would remain. The project site would continue to support existing agricultural land uses and no new facilities would be constructed. Although the City general plan foresees development in this area, this analysis uses existing conditions as the "no-project" scenario, consistent with the requirements of the CEQA Guidelines Section 15126.6. Although this alternative is evaluated herein, it is an unlikely long-term alternative for the project area because of the urban land use designations in the City general plan. Given the City general plan designations for urban development, future development interest in the site is extremely likely. Further, because the City's adopted land uses for this site are similar to land uses proposed for the project, development that would be expected to occur in absence of the project would likely be substantially similar to development proposed by the project. Therefore, to allow meaningful consideration of a range of alternatives, this No-Project Alternative evaluates the continuation of existing agricultural uses at the site in comparison to the project's proposed developed land uses.

Consistent with CEQA requirements, the No-Project Alternative is evaluated in this Draft EIR. The No-Project Alternative would not meet any of the objectives of the project because development of commercial land uses would not occur. In addition, the No-Project Alternative would not be consistent with the intent of the City's general plan, which calls for development of residential and commercial land uses.

7.2.1 ENVIRONMENTAL ANALYSIS

LAND USE

Under the No Project Alternative, land uses at the project site would remain unchanged and existing communities would remain intact. The project would not result in the division of an established community and its land use impacts would be less than significant. Therefore, this alternative would not reduce or avoid any significant land use impacts and overall impacts would be similar. *[Similar]*

VISUAL RESOURCES

Under this alternative, no new development would occur. Thus, there would be no alteration in the visual character of the project site, views of the project site from surrounding areas would be unchanged, and no new sources of light and glare would be created. By comparison, the project would substantially alter the visual character of the project site through the conversion of the site to urban land uses. This project and cumulative impact is considered significant and unavoidable and would not occur under the No Project Alternative. *[Less]*

AIR QUALITY

The No Project Alternative would not include any new development, and thus would not generate new construction or operation-related emissions. The project would result in significant impacts related to construction-related emissions and significant and unavoidable impacts related to long-term operation-related regional emissions. Implementation of the No Project Alternative would not result in this significant and unavoidable impact. Although this alternative could generate dust (PM_{10}) through cultivation of on-site areas, these emissions would be substantially less that emissions generated by the project; therefore, overall air quality impacts would be less. *[Less]*

NOISE

Under the No Project Alternative, no new construction would occur, no new noise-generating land uses would be developed, and no additional traffic would be generated. Therefore, there would be no increase in potential noise conflicts under this alternative. By comparison, the project would result in significant impacts related to short-term construction noise and stationary-source noise at adjacent land uses. Implementation of the No Project Alternative would not result in these significant impacts; therefore, this alternative would result in less noise impacts than the project. *[Less]*

BIOLOGICAL RESOURCES

The No-Project Alternative would not include any development in the project area, and would thus not disturb any existing on-site or nearby species or habitats. The project site would be retained in its existing agricultural state and would continue to provide the same type, extent, and quality of habitat. By comparison, the proposed project would develop the site with urban uses, resulting in potentially significant impacts on sensitive and special-status wildlife species. Although these impacts would be reduced to less-than-significant levels after mitigation, this alternative would not result in the substantial disturbance or removal of on-site habitat. *[Less]*

HAZARDS AND HAZARDOUS MATERIALS

Under the No Project Alternative no new development would occur; therefore, no new facilities that use hazardous materials would be located on the project site and no new workers or visitors would have the potential to be exposed to existing or new sources of hazardous materials on the site. The use of hazardous substances (e.g., herbicides and pesticides) by the existing agricultural operations would continue; however, it is assumed that during the use of these materials, existing application, storage, and disposal regulations would continue to be followed. By comparison, the project would result in increased storage, use, and transport of hazardous materials during construction and operation of project facilities. There would be increased potential for construction workers and residents to be exposed to hazardous materials at existing and new contaminated areas on the project site. However, all these effects are considered less than significant either before or after mitigation through adherence to applicable regulations and appropriate testing and clean-up of potentially contaminated sites and materials. Because no significant impacts related to hazardous materials and public health were identified for the project after mitigation, the No Project Alternative would not reduce or avoid any significant impacts related to this issue area and similar impacts would occur. *[Similar]*

GEOLOGY, SOILS, AND SEISMICITY

The No Project Alternative would not include any new construction activities and existing facilities would remain in their current state on the project site. Therefore, there would be no construction-related erosion potential and no potential increase in risk of exposure to injury or property damage because of a seismic event.

By comparison, the project would result in potentially significant impacts related to seismic ground shaking and soil erosion. However, all impacts would be reduced to less-than-significant levels after mitigation. Because the

project would not result in any significant impacts related to geology and soils after mitigation, the No Project Alternative would not reduce or avoid any significant impacts related to this issue area and similar impacts would occur. *[Similar]*

AGRICULTURAL RESOURCES

This alternative would eliminate the project's significant and unavoidable impact related to conversion of important farmland. Therefore, this alternative would result in substantially less agricultural resource impacts compared to the project. *[Less]*

HYDROLOGY AND WATER QUALITY

Under the No Project Alternative, no new construction would occur; therefore, there would be no potential construction related releases of sediment and contaminants into surface waters and groundwater. Mitigation is proposed in this Draft EIR to reduce these impacts to a less-than-significant level. Because the project site would not be developed under this alternative, existing drainage from agriculture would occur during storm events. As discussed in Section 4.9, "Hydrology and Water Quality," existing stormwater runoff from the site could result in transport of a variety of pollutants associated with agricultural practices to the San Joaquin River. Under the project, various stormwater pollution prevention devices/best management practices would be implemented, which would result in substantially better overall water quality during storm events than under No Project Alternative conditions. These impacts are mitigated to less-than-significant levels under the project. Thus, local waterway (i.e., San Joaquin River) water quality would be improved under the project, in comparison to existing conditions and the No Project Alternative.

Because the project would not result in any significant impacts related to hydrology and water quality after mitigation, and because beneficial impacts associated with the project would not occur under the No Project Alternative (i.e., agricultural pollutants would continue to be carried to downstream water bodies), this alternative is considered to have greater impacts than the project. *[Greater]*

PUBLIC SERVICES AND UTILITIES

The No Project Alternative would not include any new development. Therefore, this alternative would not generate increased demand for fire, police, solid waste disposal services, or utilities (i.e., gas, electric, and water). By comparison, the project would include new commercial land uses on 16 acres. This would create increased demands for fire, police, and water. All public service and utilities impacts associated with the project would be less-than significant. Because the project would not result in significant public services and utilities impacts, the No Project Alternative would not avoid significant impacts related to the provision of adequate public services and utilities. However, the project would create an incremental increase in service demand that would not occur under the No Project Alternative. Therefore, this alternative would result in less public services and utilities impacts compared to the project. *[Less]*

TRANSPORTATION AND CIRCULATION

The No Project Alternative would not include any new development and thus would not generate any new traffic-related impacts. By comparison, the project is estimated to generate 8,164 daily trips and would significantly affect several intersections, roadways, and mainline freeway segments. After mitigation, significant and unavoidable impacts would still occur at some intersections and freeway segments and some intersections that currently operate unacceptably would improve. Regardless, implementation of the No Project Alternative would avoid the project's contribution to adverse operational conditions at these intersections, although cumulative development in the project area would result in many of these impacts even without implementation of the project. *[Less]*

CULTURAL RESOURCES

The No Project Alternative would not involve any construction activities, thereby avoiding impacts related to the disturbance, destruction, and physical or visual alteration of any previously undiscovered/unrecorded cultural resource sites. Under the project, ground disturbance and development of new structures would occur, resulting in potentially significant impacts related to the potential disturbance of undiscovered/unrecorded subsurface archaeological sites and human remains. These impacts would be reduced to less-than-significant levels after mitigation. However, because the No Project Alternative does not include any new development or ground disturbance, it has a lesser potential to result in the disturbance of previously undiscovered subsurface archaeological resources and/or human remains. Therefore, cultural resources impacts would be slightly less under this alternative. *[Less]*

7.2.2 SUMMARY

The No Project Alternative would result in greater impacts than the project in one issue area, lesser impacts in eight, and similar impacts in three. Significant unavoidable impacts related to agricultural resources, visual resources, air quality, and traffic associated with the project would not occur under this alternative.

7.3 NO PROJECT ALTERNATIVE – CURRENT ENTITLEMENT

The No Project Alternative – Current Entitlement assumes that the project would be developed with land uses that are consistent with the existing land use and zoning designations. As described in Chapter 3, "Project Description," the City general plan designates the entire site for commercial mixed-use (CMU) land uses. As defined by the City general plan (2003), the CMU designation would accommodate a variety of purposes including residential, employment centers, retail, and commercial and professional offices. The mixed-use concept would integrate a mix of compatible uses on a single site that include sales, services, and activities that residents may need on a daily basis. The project does not include development of any residential uses required by the CMU land use designation; therefore, the project would require a general plan amendment to change the land use designation of the project site to general commercial (GC).

The purpose of this alternative is to provide decision makers with information regarding the development and associated environmental impacts that would occur if the project did not move forward and the site was developed consistent with existing land use and zoning designations. As described above, the project's proposed commercial uses would be consistent with the commercial land uses allowed by the CMU designation; however, the project does not include any residential development required by that designation. As such, if development that was consistent with the CMU designation on the project were to occur, this development would consist of commercial land uses similar to land uses proposed by the project and a portion of the site would contain residential land uses likely of higher density (e.g., apartments) to be compatible with adjacent commercial activities.

The entire project site would be developed similar to the project (i.e., grading of entire site); therefore, site-specific impacts related to biological resources; cultural resources; visual resources; agricultural resources; land use; hydrology and water quality; geology, soils, seismicity; paleontological resources; and hazards and hazardous materials would be the same. Further, the development intensity of the site (e.g., square footage of commercial uses, number of buildings constructed) would be substantially similar to the intensity of development that would occur under the project. While some of the on-site land uses under this alternative would be residential, these land uses result in similar amounts (e.g., length of time, number of buildings) of construction activities and would generate traffic trips (in combination with on-site commercial development) that are similar to the proposed project. Therefore, impacts related to construction- and operational-related air quality, noise, transportation and circulation, public services and utilities, and population, employment, and housing would be similar to the project.

The No Project Alternative – Current Entitlement would result in environmental impacts that would not substantially differ from those evaluated throughout this Draft EIR, and the analysis presented in the Draft EIR is

representative of the impacts that would occur under this alternative. Therefore, no further discussion of the environmental impacts of this alternative is needed. Please refer to Chapter 4 of the Draft EIR.

7.4 MITIGATED DESIGN ALTERNATIVE

The Mitigated Design Alternative is designed to avoid or reduce several of the environmental impacts identified for the project, including minimizing impacts to farmland, noise compatibility, air quality, traffic, sensitive habitats and species, and cultural resources. With this alternative, a reduced density development would be implemented on a smaller portion of the project site.

This alternative would avoid development of approximately 6 acres in the eastern portion of the site. Elimination of this area from the project site would avoid removal of Farmland of Statewide Importance (6 acres) contained within the project site and would provide a buffer for adjacent residential land uses to the north and east of the project site. In addition, truck delivery areas would be situated in the southwestern portion of the project site, away from residences.

In consideration the project's air quality impacts, it was determined that based on San Joaquin Valley Air Pollution Control District (SJVAPCD) thresholds, the intensity of development on the project site would need to be reduced to approximately 56% of the proposed development to produce emissions that are below significance thresholds (in 2010). A development of this size would meet few if any of the project's objectives because a project of the type proposed could not be constructed (it relies on the mix and type of uses proposed) and the revenue sources associated with a large development would be substantially reduced such that it would prevent the funding of other necessary facilities and services on the project site (e.g., roadway infrastructure, utility infrastructure).

In consideration of the project's transportation impacts, it was determined that a development of any size would still result in significant and unavoidable project and cumulative traffic impacts because several existing intersections and freeway segments are currently operating at unacceptable levels (see Section 4.11, "Transportation and Circulation"), and mitigation is not available or feasible within the timeframe of proposed development. Therefore, even the contribution of only few trips would further exacerbate existing unacceptable operating conditions and would contribute to the significant and unavoidable project and cumulative traffic impacts.

Therefore, the purpose of this analysis is to develop an alternative that would substantially reduce the operational air quality, light and glare, noise, and traffic impacts of the project while providing a development that is of reasonable scale and would meet some of the project objectives. The Mitigated Design Alternative assumes that development on the project site would be reduced by 6 acres or approximately 38% (76,984 square feet). At this level of development, it is anticipated that long-term criteria air pollutants and operational traffic impacts would be substantially reduced compared to the project.

Proposed infrastructure and facilities that would serve the development (i.e., roadways, drainage, utilities, parking spaces, etc.) would be similarly reduced. All existing site agricultural irrigation-related structures in the area where construction would occur would be demolished and removed from the site. Site landscaping and setbacks would be in accordance with applicable City guidelines.

The Mitigated Design Alternative would partially meet project objectives by providing a development that is consistent with land use patterns envisioned by the City's general plan on a portion of the site and at a reduced scale. However, the Mitigated Design Alternative might not be consistent with some project objectives because it may be economically infeasible to develop a project of this size and the ability to provide certain amenities essential to this type of project may be curtailed. Further, the applicant has indicated that a development of this size would not be feasible based on current market conditions: it would reduce the market base of the project reducing the revenue that would be generated to fund infrastructure improvement; many of the infrastructure

improvements (e.g., interchanges, freeway widenings) are needed without implementation of the project and reduction of the project at any scale would reduce the revenue available to fund those large-scale improvements; and, a reduced project site limits the number, type, and quality of tenants that would occupy the project site and could constrain the applicant's ability to provide a high-quality, aesthetically pleasing, yet functional development.

7.4.1 ENVIRONMENTAL ANALYSIS

LAND USE

As described in Section 4.1, "Land Use," the project would not result in the division of an established community and this impact would be less than significant. This alternative would result in the same development patterns on-site but at a reduced scale. As such, this alternative would result in similar land use impacts as the project. *[Similar]*

VISUAL RESOURCES

Under the Mitigated Design Alternative, there would be the same alteration of the views of the project site from surrounding lands, but at a reduced scale. Views from SR 120 and local roadways would change from agricultural and open space uses to an urban setting. Similar to the project, this alternative would also contribute to the visual transition of the project area to an urban environment. This impact was identified as significant and unavoidable for the project. With this alternative, the impact would also be considered significant and unavoidable because the viewshed would be substantially changed from existing conditions, similar to what would occur with the project. Lighting would be slightly less under this alternative, but lighting and glare impacts were identified as a significant project impact. Overall aesthetic resources impacts would be the same under this alternative for the reasons described above. *[Similar]*

AIR QUALITY

Both the Mitigated Design Alternative and the project would result in development of the project site and the generation of associated construction- and operations-related air emissions. This alternative would produce approximately 4,059 daily vehicle trips, approximately 62% of the number of trips generated by the project. Overall air emissions would be less under the Mitigated Design Alternative because of the reduced development and vehicle trips.

Impacts associated with construction emissions are considered significant under the project, and long-term regional emissions are considered significant and unavoidable under the project, although mitigation measures would substantially lessen these impacts. Construction emissions for this alternative would be substantially reduced because of the reduction of grading and development that would occur at the site; however, because development is not eliminated or reduced to less than 56% of the proposed development, this alternative would continue to result in significant and unavoidable operation-related air quality impacts. Although long-term regional emissions would be reduced, this alternative would still develop land uses that would result in emissions that are above SJVAPCD thresholds. Therefore, this alternative would not eliminate the project's significant unavoidable long-term regional emissions impacts. Overall emissions would be less than under the project, though this alternative would not eliminate the project's significant and unavoidable impacts to air quality. *[Less]*

NOISE

Both the Mitigated Design Alternative and the project would result in temporary noise generated by construction activities; development of various noise generating land uses; increases in traffic noise; and sensitive receptors (e.g., nearby residences) that would be exposed to project generated noise. Given the relative level of traffic (62% of the proposed project), traffic noise would be slightly reduced. After mitigation, under both scenarios,

residual significant noise impacts would remain related to incompatibility between some project land uses and projected on-site exterior noise levels. However, this impact would be less under the Mitigated Design Alternative because the intensity of on-site land use would be reduced. Although the Mitigated Design Alternative does not avoid this significant impact, it does reduce the effects relative to the project. *[Less]*

BIOLOGICAL RESOURCES

Both the project and the Mitigated Design Alternative would develop a large portion of the project site, resulting in potentially significant impacts to special-status birds and common raptors. However, these impacts would be reduced under this alternative through the retention of 6 acres (38% of the project site) of undeveloped land.

Potentially significant biological resources impacts for both the project and the Mitigated Design Alternative would be reduced to less-than-significant levels through preconstruction surveys and participation in the SJMSCP. However, overall biological resources impacts would be reduced under this alternative for the reason described above. *[Less]*

HAZARDS AND HAZARDOUS MATERIALS

The project would result in impacts related to the use of hazardous materials during project construction and operation; and the potential exposure of construction workers and users of the site to existing sources of hazardous materials during project construction and operation. All these impacts are considered less than significant, or less than significant after mitigation. These same impacts would occur under the Mitigated Design Alternative. *[Similar]*

GEOLOGY, SOILS AND SEISMICITY

Under the Mitigated Design Alternative, there would be a reduction in project development footprint; therefore impacts related to construction erosion and risks from seismic and soil hazards would be reduced. This alternative would include the same mitigation measures as the project; therefore, post mitigation impacts would not change (i.e., would remain less than significant).

All impacts related to geology and soils are considered less than significant, or less than significant after mitigation under the project and this alternative. *[Similar]*

AGRICULTURAL RESOURCES

This alternative would reduce the acreage of important farmland (10 acres versus 16 acres) that would be developed on-site, and would reduce the project's impacts to Farmland of Statewide Importance (i.e., 6 acres of Farmland of Statewide Importance would remain on-site). Mitigation would be provided through participation in the City of Manteca Agricultural Mitigation Fee Program, which would result in agricultural land being preserved elsewhere in the County. However, this mitigation measure would not be sufficient to reduce the impact to a less-than-significant level. Therefore, although this alternative would substantially reduce agricultural impacts, the impact is still considered significant and unavoidable.

This alternative would reduce the amount of Farmland of Statewide Importance developed on-site by 6 acres, and 10 acres of important farmland would be used for nonagricultural purposes. Mitigation is not available to reduce this impact to a less-than-significant level. Although 6 acres of important farmland would remain undeveloped and available for continued agricultural use, it may not be financially practical to continue to use this land for agricultural purposes and farming may not occur. However, some important farmland would remain available for this purpose under the Mitigated Design Alternative.

Although this alternative would result in a significant and unavoidable impact related to conversion of farmland, impacts would be less than the project because of the reduced acreages that would be converted. *[Less]*

HYDROLOGY AND WATER QUALITY

Approximately 38% of the site would not be developed under this alternative, so total runoff would be less than under the proposed project. The stormwater drainage system designed for development under this alternative would also be required to detain storm water generated by a 48-hour, 100-year flood event on-site, consistent with City standards, while limiting discharge rates and to meet both drainage and discharge criteria and on-site flooding criteria established by the City. These detention facilities would be appropriately sized for the level of development under this alternative; therefore, on- and off-site impacts (i.e., San Joaquin River downstream) would potentially occur similar to the impacts identified for the proposed project but to a lesser degree. The portion of the site not developed with urban uses would continue to support existing agricultural operations, and could transport to the San Joaquin River a variety of pollutants associated with agricultural practices. By comparison, the proposed project would improve stormwater quality across the entire site, with implementation of mitigation, which requires implementation of stormwater BMPs that would minimize agricultural discharges to downstream water bodies. All hydrology and water quality impacts identified for the proposed project would be less than significant either before or after mitigation. Therefore, the Mitigated Design Alternative would not avoid any significant impacts. This alternative would result in greater discharges of agricultural pollutants to downstream water bodies; therefore, this alternative would result in greater hydrology and water quality impacts than the project. *[Greater]*

PUBLIC SERVICES AND UTILITIES

With the Mitigated Design Alternative, public utilities demands would be less than the project. Impacts to police, wastewater conveyance, potable water demand, and demand for electricity and natural gas would be less than the project, but, like those of the project, would be less-than-significant. No significant public services or utilities impacts were identified for the project after mitigation, so this alternative would not reduce or avoid any significant public services or utilities impacts of the project. *[Similar]*

TRANSPORTATION AND CIRCULATION

The Mitigated Design Alternative would result in development of approximately 125,605 square feet of commercial uses, which is notably less (i.e., 38% reduction) than the amount of commercial uses proposed as part of the project. At buildout, the project would result in significant and unavoidable impacts to the operation of SR 120 (Impact 4.11-3). Further, because it cannot be guaranteed at this time that recommended fair-share improvements to widening of Airport Way and Union Road, and improvements to the SR 120 interchanges with Airport Way and Union Road (Impact 4.11-4) would occur, these impacts would remain significant and unavoidable. Buildout of the project would contribute a higher level of traffic in the project area. As identified in the traffic impact analysis, significant cumulative impacts to SR 120 ramp junctions and SR 120 mainline segments would continue to occur without development of the project. Roadway segments operating at unacceptable LOS F conditions under cumulative no project conditions would also continue to operate unacceptably under cumulative with project conditions. Development of this alternative would not eliminate these significant cumulative impacts but would reduce the overall impact to freeway operations.

This alternative would result in the development of a new mixed use commercial development that would create demands for public transit services (i.e., bus routes). Currently, no bus services are provided to the site and would not be provided under this alternative. The only feasible mitigation requires coordination of the project applicant with the City to ensure that bus transportation services are provided to the project in accordance with City standards, but it is uncertain whether services would be provided. Because the provision of bus transit services to the project site is dependent on actions taken by the City, there is no guarantee that such services would be provided in the future, and this would therefore be a significant and unavoidable impact of both the project and

the Mitigated Design Alternative. However, demands for bus services would likely be less under this alternative. The Mitigated Design Alternative would substantially decrease the traffic-related impacts of the project. *[Less]*

CULTURAL RESOURCES

Under the project, ground disturbance and development of new structures would occur, resulting in potentially significant impacts related to potential disturbance of undiscovered/unrecorded subsurface archaeological sites and human remains. These impacts would be reduced to less-than-significant levels after mitigation. Impacts to unknown archaeological resources would be potentially significant with this alternative and would be similar to those of the project. No significant cultural resource impacts were identified for the project after mitigation, so this alternative would not reduce or avoid any significant cultural resource impacts of the project. *[Similar]*

7.4.2 SUMMARY

The Mitigated Design Alternative would result in greater impacts than the project in one issue area, lesser impacts in five, and similar impacts in six issue areas. Significant unavoidable impacts related to traffic, agricultural resources, air quality, and aesthetic resources associated with the project would also occur under this alternative, but this alternative would contribute to these impacts to a lesser extent than the proposed project.

7.5 OFF-SITE ALTERNATIVE

An off-site alternative would require the location of another potentially feasible site for development of uses consistent with those of the project. As directed in the State CEQA Guidelines Section15126.6(f) (2) (A), "the key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location." Because certain significant effects of the project are site-specific (such as the conversion of important farmland and intersection impacts), it would be conceivable that an alternative location could avoid the significant effect. Therefore, it is valid to determine if feasible alternative locations may exist in the area.

The State CEQA Guidelines Section 15126.6(f) (2) (B) indicates that "if the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion." If feasible alternative locations do not exist, the EIR analysis need not continue to consider the issue of an off-site alternative.

The area in which it is reasonable to search for alternative sites would be the jurisdiction of the lead agency (i.e., the City of Manteca). A site that could feasibly attain the basic objectives of the project would need to be of comparable size, with adequate access to roadways and utilities to support commercial retail development, in a location where these uses would be consistent with the general plan designation and compatible with adjacent uses.

An examination of developable parcels in the City and a review of the *City of Manteca General Plan 2023 Land Use Element* led to the conclusion that one feasible alternative location for the project exists and is approximately 2 miles east of the project site in the City of Manteca. Currently, there is an approximately 95-acre area of undeveloped land east of South Main Street and south of SR 120 that is within the city limits and is of sufficient size to accommodate the 16-acre development. This site is designated for Commercial Mixed Use (CMU) by the City general plan. This land use designation is the same as the existing land use designation for the project site and would be compatible with development proposed for the project. The Off-site Alternative would result in similar land uses and land use patterns as the project.

The Off-site Alternative would meet all but one of the project objectives (because it would not be located near the Stadium Center I and II shopping centers, and would not be an important element of a new gateway development area in the southwestern portion of the City). However, the proposed location for the Off-site Alternative is not owned by the project applicant. Further, it is unknown whether the current land owners would be willing to sell

their property. This alternative would require substantial time and investment to research the feasibility of acquiring the site, which makes this alternative potentially infeasible from a development standpoint.

7.5.1 ENVIRONMENTAL ANALYSIS

LAND USE

Similar to the project, the Off-site Alternative would require a general plan amendment to change the land use designation for the project site from Commercial Mixed Use (CMU) to General Commercial (GC). After approval of this amendment, the project would be consistent with the City's land use designations. The Off-site Alternative location does not currently support an established community. As such, this alternative would result in less-than-significant impacts related to the division of an established community similar to the project. *[Similar]*

VISUAL

Under the Off-site Alternative, there would be the same type of land use alteration as the project because agricultural lands would be converted to urban land uses. Similar to the project, the impact to the visual character of the site would be identified as significant and unavoidable. In addition, lighting would be similarly changed under this alternative. Overall, aesthetic resources impacts would be the same under this alternative for the reasons described above. *[Similar]*

AIR QUALITY

Both the Off-site Alternative and the project would result in development of large areas of land with commercial land uses and the generation of associated construction- and operations-related air emissions. This alternative would produce the same vehicle trips as the project because the same number of commercial land uses would be developed. Overall air emissions would be the same under the Off-site Alternative because of the similar development and vehicle trips. Less-than-significant air quality impacts identified for the project related to odors and local mobile source carbon monoxide (CO) concentrations would be the same under this alternative.

Impacts associated with long-term regional emissions are considered significant and unavoidable under the project, although mitigation measures would substantially lessen these impacts, and would be the same with the Off-site Alternative. Therefore, this alternative would not eliminate the project's significant unavoidable air quality impacts and impacts would be similar to the project. *[Similar]*

NOISE

Both the Off-site Alternative and the project would result in temporary noise generated by construction activities and development of various noise generating land uses that could affect off-site sensitive receptors. After mitigation, under both scenarios, significant noise impacts would be reduced to less-than-significant levels. The Off-site Alternative would not avoid these significant impacts, and would result in similar impacts relative to the project. *[Similar]*

BIOLOGICAL RESOURCES

Both the project and the Off-site Alternative would develop undeveloped land. Biological impacts are generally site specific and depend on the type and quality of habitat that occurs on the site. The project site and the proposed location for the Off-site Alternative are approximately 2 miles apart, and are located in generally rural areas within the San Joaquin Valley. Similar habitat is expected to be present at both locations. Therefore, it is likely that the Off-site Alternative would result in similar potentially significant impacts on common raptors and special-status birds compared to the project.

Potentially significant biological resources impacts for both the project and the Off-site Alternative would likely be reduced to less-than-significant levels through participation in the SJMSCP. Although it is likely that this alternative would result in similar biological impacts, it is unknown at this time whether any residual significant biological impacts would occur because the site-specific environmental constraints are not known. No significant biological resource impacts were identified for the project after mitigation, so this alternative would not reduce or avoid any significant biological resource impacts of the project. *[Similar]*

HAZARDS AND HAZARDOUS MATERIALS

The project would result in impacts related to the use of hazardous materials during project construction and operation and the potential exposure of construction workers, workers, and visitors to existing sources of hazardous materials during project construction and operation. All these impacts are considered less than significant, or less than significant after mitigation under the project. Because a similar level of development at a site with similar existing land uses (i.e., agriculture) would occur, the Off-site Alternative would result in the same hazards and hazardous materials impacts. *[Similar]*

GEOLOGY, SOILS AND SEISMICITY

Under the Off-site Alternative, there would be a similar level of development. Therefore, impacts related to construction erosion and risks from seismic and soil hazards would be the same. This alternative would include the same mitigation measures as the project; therefore, post mitigation impacts would not change (less than significant).

All impacts related to geology and soils are considered less than significant, or less than significant after mitigation under the project. Although geology impacts are generally site specific and are dependant on the type of soils present on site, the proposed location for the Off-site Alternative is located approximately 2 miles from the project site, is within the same regional geologic setting, and would be anticipated to have similar geologic features (i.e., soils, soil erosion hazards) at the site compared to the project. Therefore, this alternative would result in similar less-than-significant geology, soils, and seismicity impacts as the project. *[Similar]*

AGRICULTURAL RESOURCES

This alternative would result in the same impacts associated with development of Important Farmland because this site consists of lands also designated by the Department of Conservation, Farmland Mapping and Monitoring Program as Farmland of Statewide Importance. Mitigation would be provided through participation in the City of Manteca Agricultural Mitigation Fee Program, which would result in agricultural land being preserved elsewhere in the County. However, these mitigation measures would not be sufficient to reduce the impacts to less-than-significant levels. Therefore, these impacts are considered significant and unavoidable, and this alternative would not avoid or reduce impacts of the project. *[Similar]*

HYDROLOGY AND WATER QUALITY

Under this alternative, a similar land area would be developed with urban uses and similar stormwater and detention facilities would be constructed. These facilities would be appropriately sized for the level of development proposed, so on-site and off-site impacts (San Joaquin River downstream) would be similar to those of the project, which results in a less-than-significant impact after mitigation. All hydrology and water quality impacts identified for the project are considered less than significant either before or after mitigation. Therefore, the Off-site Alternative would not avoid any significant impacts. This alternative would result in similar stormwater discharges of urban pollutants to downstream water bodies; therefore, this alternative would result in similar hydrology and water quality impacts to the project. *[Similar]*

PUBLIC SERVICES AND UTILITIES

With the Off-site Alternative, impacts to police, wastewater conveyance, and demand for electricity and natural gas would be the same as the project, but, like those of the project, would be less-than-significant. Therefore, this alternative would not reduce or avoid any significant public services or utilities impacts of the project. *[Similar]*

TRANSPORTATION AND CIRCULATION

The Off-site Alternative would result in development of the same acreage of commercial land uses and the same number of traffic trips would be generated. At buildout, the project would result in significant and unavoidable impacts to operation of SR 120 (Impact 4.11-3). Further, because it cannot be guaranteed at this time that recommended fair-share improvements to widening of Airport Way and Union Road and improvements to the SR 120 interchanges with Airport Way and Union Road (Impact 4.11-4) would occur, these impacts would remain significant and unavoidable. Buildout of the project would contribute a higher level of traffic in the project area. Because of the short distance of the Off-site Alternative from these roadways, it is likely that this alternative would adversely affect the operations of many of the same roadways as the project. It is also reasonable to expect that this alternative would have comparable impacts along other local roadways near the proposed Off-site Alternative location.

This alternative would result in the development of a new commercial development that would create demands for public transit services (i.e., bus routes). Demands for bus services would likely be similar to the project under this alternative. Currently, no bus services are provided to the site and would not be provided under this alternative. The only feasible mitigation requires coordination the project applicant to coordinate with the City to ensure that bus transportation services are provided to the project in accordance with City standards, but it is uncertain whether services would be provided. Because the provision of bus transit services to the project site is dependent on actions taken by the City, there is no guarantee that such services would be provided in the future, and this would therefore be a significant and unavoidable impact of both the project and the Off-site Alternative.

Under this alternative, impacts related to roadway congestion from construction traffic, vehicular circulation patterns and site access, impacts to alternative transportation, impacts to emergency vehicle access, and conformity with City parking requirements would likely be the same compared to the project. Overall, it is reasonable to expect that the Off-site Alternative would result in similar transportation impacts compared to the project; however, localized impacts could occur and would be specific to the location of development. *[Similar]*

CULTURAL RESOURCES

Under the project, ground disturbance and development of new structures would occur resulting in significant and potentially significant impacts related to potential disturbance of undiscovered/unrecorded subsurface archaeological sites and human remains. These impacts would be reduced to less-than-significant levels after mitigation. Impacts to unknown archaeological resources would be potentially significant with this alternative and would be similar to those of the project. It is unknown whether previously recorded cultural or archeological resources exist on the site or in the immediate vicinity. This alternative could result in potentially significant impacts related to previously undiscovered cultural resources. Given the age and history of structures in the City of Manteca in general, this alternative would likely require a historic resources evaluation. If structures were found to be eligible under National Register of Historic Places criteria, this would result in a significant impact. It is unknown whether feasible mitigation measures would be available to reduce historic structure impacts to a less-than-significant levels. No significant cultural resource impacts were identified for the project after mitigation, so this alternative would not reduce or avoid any significant cultural resource impacts of the project. *[Similar]*

7.5.2 SUMMARY

The Off-site Alternative would result in similar impacts in all 12 resource areas. Significant unavoidable impacts related to traffic, air quality, agricultural resources, and aesthetic resources associated with the project would also occur under this alternative.

7.6 ALTERNATIVES PREVIOUSLY CONSIDERED AND REJECTED

State CEQA Guidelines Section 15126.6(c) provides that an EIR "should also identify any alternatives that were considered by the lead agency but rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination."

The lead agency considered an alternative that would increase the density of the development on-site, resulting in increased commercial square footage. This alternative would achieve the project's objectives relating to provision of commercial, retail, and restaurant services to highway users and development of an attractive shopping environmental that provides for a rapidly growing community. However, implementation of this alternative would result in substantially greater traffic, air quality, and noise impacts, most of which are already significant and unavoidable under the project as proposed. Therefore, this alternative would not fulfill the intended purpose of an alternatives analysis, which is to reduce or substantially lessen the significant impacts of the project, and was rejected from further consideration in this Draft EIR.

No additional alternatives to the project were brought forth during the scoping process.

7.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The State CEQA Guidelines require identification of an environmentally superior alternative. If the No Project Alternative is environmentally superior, CEQA requires selection of the "environmentally superior alternative other than the no project alternative" from among the project and the alternatives evaluated.

Table 7-1 identifies whether each of the three alternatives would have "greater," "less," or "similar" impacts as the project for each of the 12 environmental issues evaluated in this Draft EIR. The No Project Alternative – No Development would have greater impacts than the project in 1 issue area, lesser impacts in 8, and similar impacts in 3. The Mitigated Design Alternative would have greater impacts than the project in 1 issue area, lesser impacts in 5, and similar impacts in 6. The No Project Alternative – Current Entitlement and Off-site Alternative would have similar impacts to the project in all issue areas.

Based on the listing of lesser and greater impacts as identified in Table 7-1, the No Project Alternative – No Development would appear to be the environmentally superior alternative. The project would result in significant and unavoidable impacts in 4 resource areas: agricultural resources, visual resources, air quality, and transportation. The No Project Alternative – No Development, by comparison would not result in any significant and unavoidable impacts. It would have greater impacts than the project with respect to water quality (associated with stormwater runoff from agricultural activities). Nevertheless, because it would not result in any significant and unavoidable impacts, it is the environmentally superior alternative and it is superior to all other alternatives considered.

By comparison, the Mitigated Design Alternative would reduce, but not to a less-than-significant level, most of the project's significant and unavoidable impacts related to agricultural resources, air quality, and transportation. While for most resource areas environmental impacts would be similar, this alternative would achieve the objective of substantially reducing the project's significant and unavoidable impacts. For these reasons, the Mitigated Design Alternative is environmentally superior to the project.

The environmental effects of the Off-Site Alternative would be comparable to the project, because it would result in the same level of development on a substantially similar site and the same levels of construction and operational impacts (i.e., air quality, noise, traffic, biological resources). This alternative would not reduce or eliminate the project's listed significant and unavoidable impacts. Overall, this alternative would be environmentally similar to the project.

Finally, for the reasons described above, the No Project Alternative – Current Entitlement would result in substantially similar environmental impacts as the project. This alternative would not reduce or eliminate the project's listed significant and unavoidable impacts. Overall, this alternative would be environmentally similar to the project.

Table 7-1
Comparison of the Impacts of the Project to Those of the Alternatives*

Environmental Issues	Alternatives			
	No Project – No Development	No Project – Current Entitlement	Mitigated Design	Off-site
Land Use	Similar	Similar	Similar	Similar
Visual Resources	Less	Similar	Similar	Similar
Air Quality	Less	Similar	Less	Similar
Noise	Less	Similar	Less	Similar
Biological Resources	Less	Similar	Less	Similar
Hazards and Hazardous Materials	Similar	Similar	Similar	Similar
Geology, Soils, and Seismicity	Similar	Similar	Similar	Similar
Agricultural Resources	Less	Similar	Less	Similar
Hydrology and Water Quality	Greater	Similar	Greater	Similar
Public Services and Utilities	Less	Similar	Similar	Similar
Transportation	Less	Similar	Less	Similar
Cultural Resources	Less	Similar	Similar	Similar
Totals				
Greater Impacts	1	0	1	0
Lesser Impacts	8	0	5	0

* For each environmental issue, the alternative is compared to the project based on the level of severity of impacts (greater, less, similar).
Source: EDAW 2007