
16. ALTERNATIVES ANALYSIS

16.1 INTRODUCTION

Section 15126.6(a) of the CEQA Guidelines requires that the Lead Agency,

“...describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.”

Section 15126.6(b) of the Guidelines further states that,

“...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.”

An EIR must describe a range of “reasonable” alternatives to the proposed project that could feasibly attain most of the basic objectives of the project. The feasibility of an alternative may be determined based on a variety of factors, including but not limited to, economic viability and availability of infrastructure. In addition, by mandating the inclusion of a “no project” alternative, the resulting analysis is intended to provide a baseline against which project-related and alternative impacts can be evaluated. Since a comparative analysis of each alternative is required, this section provides the City’s decision makers and the general public with the means to compare and select between different ways of accomplishing the project’s stated objectives.

16.2 GENERAL PLAN OBJECTIVES

CEQA Guidelines, Section 15124(b), requires a statement of the objectives sought by the proposed project. The primary objective of the General Plan 2023 is to provide specific direction for the future growth and development of the City of Manteca and future annexation areas.

California law requires each city to adopt a comprehensive, long-term general plan for the physical development of the city. The general plan must be an integrated, internally consistent, and compatible statement of policies for the city. It serves as a framework for public and private development, and establishes requirements for additional planning studies where greater specificity is needed.

The general plan is the constitution for a city's development, and governs all land use regulations, including zoning.

The General Plan 2023 Introduction states the following purposes:

- To identify the community's land use, transportation, environmental, economic and social goals and policies as they relate to land use, conservation and development.

While agriculture still plays an important role in Manteca's economy, the City's economic base has become more diversified with the development of industries and the influx of Bay Area workers seeking affordable housing. This objective encompasses a jobs/housing balance, particularly the provision of jobs for the high percentage of interregional commuters who are attracted by Manteca's quality of life and relatively affordable housing. This skilled workforce, presently commuting long distances, is a resource for economic development. Due in part to the skills of the commuter workforce, Manteca will become increasingly competitive for the location of manufacturing and office uses.

- To enable the City Council and the Planning Commission to establish long-range conservation and development policies.

This objective includes the City's awareness of its quality of life value. The City's interest in conserving its natural resources, including preservation of open space and recreation areas, and the protection of natural resources, is reflected in this objective.

- To provide a basis for judging whether specific private development proposals and public projects are in harmony with these policies.

This objective includes the City's intent to equitably balance urban development and economic development with quality of life issues and the conservation of natural resources.

- To inform citizens, developers, decision makers, and other jurisdictions of the policies that will guide development and conservation within the City of Manteca.

This reflects the City's objective of developing a long range land use plan for the community.

In addition, the plan the General Plan reflects community vision and values, and the conditions that influence development of the community. These statements, along with the purposes stated above, can be viewed as the project objectives of the General Plan.

16.2.1 Logical Growth of the City

Manteca has generally grown in a compact pattern around the historic center of the City at the crossroads of Yosemite Avenue and Main Street. Residential neighborhoods have developed within boundaries established by the major streets spaced one mile apart. This General Plan directs land use to continue the historic pattern of compact urbanization. The developed portion of the City should retain its distinct, compact form with clear, well-defined edges.

16.2.2 Community Form, Scale and Identity

The community identity is established by important visual characteristics that provide cues for travelers, as well as residents.

The existing commercial core area should be retained and reinforced as the functional and social center of the City for residents. Urbanization should generally extend outward from this center.

16.2.3 Attractive, Sustainable Neighborhoods

Neighborhoods are the fundamental organizing concept for residential land use. The neighborhoods are typically not more than one mile in any dimension to provide a reasonable walking distance from any part of the neighborhood to the schools, parks, and commercial centers.

16.2.4 Support of Public Transit and Bicycle and Pedestrian Circulation

High activity areas should be located to facilitate the use of public transit.

16.2.5 Housing Opportunity

The General Plan responds to the need for diversity in housing opportunity and changes in market demand for housing types in two primary ways.

16.2.6 Employment and Economic Development

During the twenty-year horizon of this General Plan, Manteca will experience economic development that will add to and diversify the local economy. This will consist of additional growth in warehousing and distribution, but should also include significant new components, such as office and service sectors, research and development, and manufacturing.

16.2.7 Live/Work Housing

It is anticipated that the percentage of individuals working at home will increase over the next twenty years. At home workers may include telecommuters, professional services, small service businesses, mail order, and any number of other entrepreneurial endeavors. It is the intent of this General Plan to support such activities.

16.2.8 Public Services and Fiscal Stability

Growth will provide additional revenue sources, but will also place additional service burdens on the City of Manteca.

16.2.9 Access to Open Space

In the absence of natural features that could define an open space network, the General Plan encourages the creation of a network of open spaces in the storm drainage channels, and naturalized landscaping along major thoroughfares and bike paths.

16.2.10 Agricultural Productivity

The General Plan supports the existing level of agricultural production by directing development in a compact, concentric form in order to reduce the demand for new development areas.

16.3 PROJECT ALTERNATIVES

In fulfillment of the City's CEQA obligations, the City has identified a range of reasonable alternatives that accomplish the project's stated objectives, serve to satisfy specific analytical requirements (i.e. "no project" alternative), and seek to avoid or reduce the significant or potentially significant effects of the proposed project. Each of these alternatives is separately examined below.

Other alternatives identified by the City but deemed to be either infeasible or determined to be unlikely to produce a substantial reduction in any of the significant or potentially significant environmental effects identified in this EIR are specified below.

16.4 ALTERNATIVES CONSIDERED BUT SUBSEQUENTLY REJECTED

A number of project alternatives were considered and subsequently rejected by the City. The following alternatives were rejected either because these options were deemed to be infeasible, or lacked a reasonable likelihood of resulting in the avoidance or substantial reduction of the project's significant or potential significant environmental effects.

16.4.1 Alternative Site

For some projects, impacts can be avoided or reduced merely by relocating the project site (e.g., moving the project out of a sensitive resource area). In recognition of this possible impact avoidance strategy, the Guidelines contain provisions for the consideration of alternative project sites and acknowledge that in some cases there may be no feasible alternative location (Section 15126.6(f)(2)). Since the project constitutes an update to the City's 1988 General Plan, other than an alternative configuration of the Study Area, the project is required to address those areas located within both the corporate boundaries of the City and its Sphere of Influence. Although the City could formulate plans for other areas, those plans would not be binding upon those areas affected, and would not serve to further sound planning decisions for those areas under the City's current or future jurisdiction.

16.4.2 Down-Zoning Alternative

Not all properties within the City are currently developed to the maximum intensity authorized under the 1988 General Plan. As a result, one of the alternatives potentially available to the City is to “freeze” the City as it now exists and to redesignate each parcel to reflect the current land uses located thereupon. This action would reduce or eliminate the introduction of new, or the exacerbation of existing, environmental impacts associated with site intensification.

This action would, however, penalize those property owners who have not developed their properties to the intensities authorized under existing land use policies, and result in no or only limited economic use for those vacant properties within the City. Similarly, this action would not allow individual property owners to respond to existing and future market demands for new residential and non-residential uses. By creating a disincentive to private investment, the City may be establishing blighting influences within the community.

16.4.3 Modification of the Study Area

The area addressed in the General Plan 2023 includes the City’s adopted corporate boundaries and immediately adjacent unincorporated areas. It has been determined that the property within this defined Study Area is impacted, positively or negatively, by actions taken by the City of Manteca.

The City could limit its planning program to only those areas within the City’s existing corporate boundaries, relegating land use planning in adjoining unincorporated areas to San Joaquin County. However, the elimination of areas within the City’s Sphere of Influence would constitute a regressive response to local agency planning. Although jurisdictional boundaries are easily definable, environmental impacts typically extend beyond those often-arbitrary limits. Since both existing and future land uses within the City’s Sphere of Influence will continue to impact the community, sound planning necessitates the inclusion of those areas as part of this General Plan Update.

16.4.4 Market-Driven Alternative

Section 653029(a) of the California Government Code (CGC), states that a general plan shall include a land use element that “designates the proposed general distribution and general location and extent of the uses of the land for housing, business, industry, open space, including agriculture, natural resources, recreation, and enjoyment of scenic beauty, education, public buildings and grounds, solid and liquid waste disposal facilities, and other categories of public and private uses of land.” The City is required to specify the location and intensity of land uses within the community.

Under a purely market-driven approach, the City would not be proactive (neither delineating the geographic areas for land use categories nor establishing standards for those areas), but would be reactive (the City would merely respond to what individual owners determine to be the appropriate land use for each parcel). It is, therefore, the marketplace rather than the City that determines how the City ultimately develops. This approach has the potential to result in the introduction of adjoining uses of different types and intensities and, therefore, create land use conflicts that could otherwise be avoided through effective planning.

16.5 ALTERNATIVES UNDER CONSIDERATION

This analysis includes three primary alternatives to the proposed project:

(1) No Project Alternatives

- No Development
- Build-Out of the 1988 General Plan

(2) Higher Density Alternative

(3) Reduced Development Alternative

16.5.1 No Project Alternatives

Two different scenarios exist under the “no project” alternative. These alternatives are described separately below:

No Project Alternative No. 1: No Development

Under this scenario, no additional dwelling units are constructed and no additional square footage of non-residential uses is added to the City. Other than maintenance, rehabilitation, and renovation activities (which are not generally defined as “projects” under CEQA), the existing status quo is maintained within the City’s corporate boundaries. Since no annexation of unincorporated areas would occur, development within the Sphere of Influence would remain under the jurisdiction of San Joaquin County. It is assumed that development would continue to occur both in County areas, and within those areas located outside the corporate boundaries of the City.

This alternative is specifically mandated under the Guidelines and is posited for the sole purpose of providing a baseline against which other alternatives are considered and the comparative impacts of those alternatives can be evaluated. It is, however, unreasonable to assume that conditions within the City will be retained as the currently exist. As a result, this alternative should be considered infeasible.

No Project Alternative No. 2: Build-Out of 1988 General Plan

Under this second “no project” alternative, build-out of the Study Area would occur in accordance with those land use policies contained in the 1988 General Plan. In drawing comparisons between this alternative and other alternatives presented herein, it should be noted that the Study Area addressed in the 1988 General Plan is comparable to the Study Area now under consideration. The Study Area boundary differs primarily along the south edge.

Additional development within the Study Area, including the Sphere of Influence, can occur under the authorization of the 1988 General Plan. Based on the policies presented therein, reasonable foreseeable future growth within the community can occur in the absence of the General Plan update.

Since the retention of the existing land use policies, as presented in the 1988 General Plan, will result in incrementally less development than now proposed under the General Plan 2023, the potential project-related effects of that action will also be incrementally less than those associated with the proposed project.

It is reasonable to assume that any reduction in the number of future dwelling units or any decrease in the square footages of future non-residential uses constructed within the City will, however, translate into a corresponding increase in the number of units and square footages of other non-residential uses within the remainder of the region (i.e., if it is not built within City Limits, it will be built in surrounding County area). As a result, although development in the project planning area may be incrementally less, the cumulative impacts of this alternative are assumed to be comparable to those associated with the proposed project. In other words, the development will occur if there is a market demand. It is critical to plan for this development rather than simply allow it to occur.

16.5.2 Higher Density Alternative

This alternative allows the same population projection as the proposed project, but allocates less land area to residential land use. This alternative would result in higher density residential development.

The higher density alternative assumes that the same number of dwelling units projected in the General Plan 2023 Land Use would be developed on 20 percent less land area. For purposes of examining the effects of this alternative, Table 16-1 provides a summary of the land use and the number of dwelling units that would be allocated to each residential land use category.

Table 16-1**Calculation of High Density Alternative**

A	B	C	D	E	F
Assumed Residential Density	Proposed GP 2023		Dwellings	Reduced Land Use	Revised Density
Dwellings/acre	Land Use	Acres		Acres	Dwellings/acre
20	High Density Residential	251	5,020	200.8	25
8	Medium Density Residential	359	2,872	287.2	10
5	Low Density Residential	3685	18,425	2948	6.25
1	Very Low Density Residential	248	248	198.4	1.25
		4,543	26,565	3,795	

Source: Wade Associates May 2003

In this alternative the total land area allocated to residential use has been reduced by 20 percent compared to the General Plan 2023 Land Use Map, but the total number of dwelling units remains constant. If the land area is reduced and the dwelling units remain constant, then the density must increase. In this example the land area is reduced from 4,543 acres to 3,795 acres, and the dwelling unit total remains 26,565. The residential densities increase to those shown in Column F in Table 16-1. These densities are within the range established by the General Plan 2023 Land Use Element. The densities are on the high end of the normal range for home builders in the Central Valley. However the intent behind increasing the allowable density in each range is to allow more flexibility for home builders and thereby enhance the diversity of housing types and prices available in Manteca.

The average residential density of the new residential areas in the General Plan 2023 is 5.8 dwellings per acre. The average density of the alternative land use plan is 7.0 dwelling units per acre. This density is in the range that begins to support efficient public transit. It is notable that this alternative is within the range can be achieved in the General Plan 2023 policies. The success of housing types at these densities will depend on the market acceptance.

16.5.3 Reduced Development Area Alternative

This alternative allocates the land use types and policies in the General Plan 2023 to the land area defined as the Primary Urban Service Area in the 1988 General Plan. Application of the new policies and land use in the 1988 service boundary would result in reduced development area, and less potential development than the proposed General Plan 2023.

The 1988 Primary Urban Service boundary and the proposed General Plan 2023 Primary Urban Service boundary cover similar areas, however, the 1998 Service area did not include land in the Southwest Plan Area, (west of Airport Way and south of SR 120).

Table 16-2 shows the land use that would occur under this alternative in the 1988 Primary Urban Service boundary compared to the General Plan 2023 Land Use.

Table 16-2

Alternative Land Use Within 1988 Primary Urban Service Boundary

	Total 2023 Land Use	GP2023 in 1988 Service Boundary
LAND USE	Acres	Acres
AG	3960.0	6.9
GC	672.0	599.43
NCC	491.8	396.3
CR	0.0	0
PEC	0.0	0
CMU	255.0	211.6
HI	909.9	197.2
LI	1024.1	384.5
BIP	258.0	14.8
BP	133.0	137.5
HDR (15.1 to 25 du/ac)	442.0	343.4
MDR (8.1to 15 du/ac)	546.6	379.6
LDR (2.1 to 8 du/ac)	6427.6	4307.5
VLDR (0.5 to 2 du/ac)	357.8	182.2
P/QP/Schools/Utilities	1105.9	1037.6
OS	543.0	33.6
P	518.1	456.8
Subtotal	17644.8	8688.9
Urban Uses	12623.7	8191.6

Source : Wade Associates, May 2003

The proposed General Plan 2023 Primary Urban Service boundary encompasses 13,414 acres, but this includes 1,908 in the Southwest Plan Area, as well as the Manteca Water Quality Control Facility. Therefore, the proposed Service boundary would encompass 11,506 acres compared to the 1988 Primary Urban Service boundary that encompasses 11,551 acres. If the proposed General Plan 2023 land use plan and policies were applied only to the area defined by the 1988 Primary Urban Service Boundary, the development land area would be restricted.

Under this alternative the urban land uses would be reduced from 12,623.7 acres to 8191.6 acres, a thirty-five percent (35%) reduction in the total land area allocated in the General Plan.

16.6 COMPARISON OF ALTERNATIVE PLANS

Table 16-3 provides a comparison of the land uses allocated in each alternative. The “No Growth-No Development” alternative is not included in the table because it would provide no land development at all and is not feasible.

Table 16-3
Summary of Land Use Alternatives

	Total 2023 Land Use	1988 GP	High Density	GP2023 in 1988 Service Boundary
LAND USE	Acres	Acres	Acres	Acres
AG	3960.0	1,572.3	3,960.0	6.9
GC	672.0	827.9	672.0	599.43
NCC	491.8		491.8	396.3
CR	0.0	656.3	0.0	0
PEC	0.0	1,063.0	0.0	0
CMU	255.0		255.0	211.6
HI	909.9	335.9	909.9	197.2
LI	1024.1	777.6	1,024.1	384.5
BIP	258.0		258.0	14.8
BP	133.0		133.0	137.5
HDR (15.1 to 25 du/ac)	442.0	266.9	391.0	343.4
MDR (8.1 to 15 du/ac)	546.6	170.3	474.8	379.6
LDR (2.1 to 8 du/ac)	6427.6	5,481.7	5,689.7	4307.5
VLDR (0.5 to 2 du/ac)	357.8	280.0	308.2	182.2
P/QP/Schools/Utilities	1105.9	856.0	1,105.9	1037.6
OS	543.0	24.8	543.0	33.6
P	518.1	324.3	518.1	456.8
Subtotal	17644.8	12,637.6	16734.5	8688.9
Urban Uses	12623.7	10,716.2	11713.4	8191.6

Source: Wade Associates, May 2003

Table 16-3 indicates a broad range of alternatives for evaluation. Table 16-4 considers the effects of each of these alternatives in the context of the project purposes and objectives identified above.

Table 16-4
Summary of Alternatives Analysis

Criteria	Logical Growth of the City		
GP 2023 Land Use	1988 General Plan	2023 Land Use in 1988 Service Boundary	High Density
Good	Good	Good	Good
The Plan directs growth around the historic core.	The Plan directs growth around the historic core.	The Plan directs growth around the historic core.	The Plan directs growth around the historic core. This alternative would also restrict the geographic area.
Criteria	Community Form, Scale and Identity		
GP 2023 Land Use	1988 General Plan	2023 Land Use in 1988 Service Boundary	High Density
Good	Poor	Good	Good
the Plan provides direction for establishing the neighborhood scale.	The plan emphasizes single family residential with poor identity.	The plan enhances the 1988 plan by providing higher intensity land use in the core.	The plan would provide sufficient density to establish small neighborhood centers.

Criteria	Attractive, Sustainable Neighborhoods That Support of Public Transit and Bicycle and Pedestrian Circulation		
GP 2023 Land Use	1988 General Plan	2023 Land Use in 1988 Service Boundary	High Density
Good	Poor	Good	Excellent
Residential density can support of public transit by clustering higher density.	Relatively low density and poor pedestrian systems.	Higher intensity use concentrated around the core area.	Density would support public transit and pedestrian system.
Criteria	Housing Opportunity		
GP 2023 Land Use	1988 General Plan	2023 Land Use in 1988 Service Boundary	High Density
Good	Poor	Good	Excellent
Higher density and broader zoning designations allow for flexible development.	Detached single family is the dominant residential type.	Housing variety centered around the historic core area.	Density range provides opportunity for affordable housing types.
Criteria	Employment and Economic Development		
GP 2023 Land Use	1988 General Plan	2023 Land Use in 1988 Service Boundary	High Density
Good	Fair	Good	Good
Land use plan includes a mix of employment land uses.	The plan establishes the Planned Employment Center, but provided no implementation. Premature designation.	Provides same employment base as GP 2023.	Provides same employment base as GP 2023. Housing density may support more employees.

Criteria	Live/Work Housing		
GP 2023 Land Use	1988 General Plan	2023 Land Use in 1988 Service Boundary	High Density
Excellent	Poor	Excellent	Excellent
The plan provides policies and land use designations to support live/work housing.	Live/work housing was not anticipated in the 1988 plan.	The plan would provide the same land uses and policies as the GP 2023 plan.	The plan would provide the same land uses and policies as the GP 2023 plan. Higher density may create conflicts with some live/work situations.
Criteria	Access to Open Space		
GP 2023 Land Use	1988 General Plan	2023 Land Use in 1988 Service Boundary	High Density
Good	Poor	Good	Not Applicable
The plan provides policies for protecting open space and including open space corridors in urban areas.	The plan does not provide specific policies and has produced very poor access to open space.	The plan would provide the same land uses and policies as the GP 2023 plan.	The high density concept is not location specific. Higher density may include more common area open space than other land use densities.
Criteria	Agricultural Productivity		
GP 2023 Land Use	1988 General Plan	2023 Land Use in 1988 Service Boundary	High Density
Good/Fair	Fair	Good	Good
The plan provides a land use pattern that generally, but not always, directs growth away from the Prime Farmland.	The plan does not provide clear direction on avoidance of farmland.	Concentration of urban uses will reduce the land area required to accommodate the projected population.	Concentration of urban uses will reduce the land area required to accommodate the projected population.

16.7 ENVIRONMENTALLY PREFERRED ALTERNATIVE

Based on the above evaluation of the comparative merits of each alternative, and the environmental analysis of implementation of the General Plan 2023, the environmentally-superior alternative is the “High Density Alternative.” This conclusion is based on the beneficial effect gained by using less land to accommodate the planned growth General Plan 2023. However, it should be noted that the density ranges described in the High Density Alternative are approximately twenty percent higher than conventional market driven housing. The General Plan 2023 encourages the use of higher densities, but the market for such housing has not been tested in the Manteca area.

The Higher Density Alternative is one of a range of possible development scenarios under the proposed General Plan 2023.