# **ALTERNATIVES**

## 4.1 CEQA REQUIREMENTS

CEQA Guidelines Section 15126.6(a) requires that an EIR include a reasonable range of project alternatives sufficient to permit informed decision-making and public participation. The alternatives discussed in the EIR should represent scenarios that could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the project's significant effects. An EIR must discuss alternatives even if all of the project's significant environmental impacts will be avoided or reduced by mitigation measures. CEQA also requires an evaluation of the comparative merits of the alternatives.

In identifying suitable alternatives, potential alternatives must be reviewed to determine whether they:

- Can avoid or substantially reduce significant environmental effects;
- Can attain most of the basic project objectives;
- Are potentially feasible; and
- Are reasonable and realistic.

CEQA provides the following additional guidance for discussing project alternatives:

- An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives.
- An EIR is not required to consider alternatives that are infeasible. The term "feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological and legal factors.

- The EIR must focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project.
- The alternatives discussed should be ones that offer substantial environmental advantages over the proposed project.
- The EIR should briefly describe the rationale for selecting the alternatives to be discussed, as well as alternatives that the lead agency considered but rejected.
- The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project.
- The alternatives analysis discussed must be reasonable, and selected to foster informed decision-making and public participation. An EIR need not consider an alternative where the effect cannot reasonably be ascertained or where the implementation is remote or speculative, because unrealistic alternatives do not contribute to a useful analysis.

# Relationship to Project Objectives

The following is a summary of the basic objectives of the project based on information provided by the applicant. The objectives provide an important benchmark in conducting the comparative alternatives analysis. As discussed previously, an alternative is only meaningful for consideration if it can meet most of the project's basic objectives.

- Implement the intention of the San Benito County Board of Supervisors when they designated this site for higher density development by designating the site an Area of Special Study.
- Create a mutually supportive relationship between the residential community and the adjoining future community Gavilan Campus site that integrates connections and facilitates shared infrastructure.
- Provide for housing opportunities in proximity to existing utilities and infrastructure improvements.
- Provide for housing opportunities close to employment opportunities, public transportation, public facilities, and goods and services.
- Provide a range of potentially mixed residential housing opportunities that will meet the needs of a variety of households with lot sizes ranging from 4,000 square feet to five acres with a range of housing types and square footages.

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- Provide convenient pedestrian connections and recreational opportunities through the provision of pocket parks, open space areas, corridors and connections with the adjacent future Gavilan College campus site.
- Minimize the noise and speed of traffic to ensure the safety of residents through the design of cul-de-sacs and curvilinear streets.
- Provide employment opportunities in connection with the construction of the project's required infrastructure improvements and residential construction.

## 4.2 ALTERNATIVES ANALYSIS

As identified in Chapter 3.0, most of the potential environmental impacts of the Fairview Corners project can be mitigated to a level of insignificance, with the exception of significant and unavoidable impacts related to noise and area traffic and circulation patterns. The discussion in this chapter identifies and examines a reasonable range of potentially feasible alternatives to the proposed project, as follows:

- <u>Alternative 1</u>: No Project No Build Alternative
- Alternative 2: No Project Development Consistent with the Rural General Plan Land Use Designation
- Alternative 3: Reduced Maximum Residential Units/Increased Open Space
- Alternative 4: Alternative Location: Northeast of San Benito Street/Union Road

Environmental impacts associated with each of the alternatives are compared with impacts resulting from the proposed project. Table 46, Project Alternative Summary, at the end of this section provides a summary of this analysis. This section also includes identification of the "environmentally superior" alternative, as required under CEQA.

Each of these alternatives is described below, followed by an analysis of how each alternative may reduce significant impacts associated with the proposed project.

# Alternative 1: No Project-No Build

The "No Project-No Build" alternative assumes that if the project is not approved, no further development of the project site would occur. This alternative would result in the continued use of all areas of the project site as described in the environmental setting of Section 2.0, which consists of the cultivation of barley and the periodic grazing of cattle. Since no development

would occur, this alternative also assumes that other key features of the project, such as the collaborative potential infrastructure sharing with the adjoining Gavilan College San Benito Campus; implementation of numerous sustainable design, siting and building features; and the development of parks and recreational facilities, as well as roadway trails, landscaped parkways, naturally designed retention basins, and a pedestrian and bicycle roadway network that connects the project with the substantial open space facilities planned for the adjoining college campus, would not occur.

### **Comparative Analysis**

This alternative would avoid each of the impacts identified in this Draft EIR, which are listed in the Impact Summary Table. However, none of the project objectives would be achieved.

# Alternative 2: No Project-Development Consistent with the General Plan Land Use Designation

The "No Project-Development Consistent with General Plan Land Use Designation" alternative assumes that development would proceed consistent with the project site's existing "Rural" General Plan land use designation and "Rural Residential" zoning designation. To that end, this alternative assumes the project site would be developed with estate homes on minimum five-acre lots. For the 60-acre project site, the maximum gross density allowed by this designation would be 12 units. This represents a 95 percent reduction in total unit count under the project's maximum buildout scenario.

These lots would not be comprehensively planned in accordance with a specific plan and may be sold individually, with each buyer contracting separately to build custom homes. This alternative also assumes that other key components of the project, including the provision of a range of housing opportunities to meet community needs, the collaborative potential infrastructure sharing with the adjoining Gavilan College San Benito Campus; implementation of numerous sustainable design, siting and building features; and the development of parks and recreational facilities, as well as roadway trails, landscaped parkways, naturally designed retention basins, and a pedestrian and bicycle roadway network that connects the project with the substantial open space facilities planned for the adjacent college campus, would not occur. The potential impacts of this alternative are discussed below, relative to the impacts associated with the proposed project.

#### **Comparative Analysis**

#### Aesthetics/Visual Quality

This alternative would result in a very low profile of development on the project site. The visual character of the site would be altered by development under this alternative; however, much of the site would be developed with five-acre "ranchettes," which would likely be perceived as rural in character. Significantly less outdoor lighting would be required, thereby reducing the potential for light and glare impacts. While it is anticipated that frontage improvements would be built along Fairview Road in accordance with applicable County regulations, it is assumed these improvements may not be as cohesive or extensive as those proposed by the project given that the project site would not be comprehensively planned under an adopted specific plan. This alternative could result in the development of residential uses that lack a cohesive design, since the project site would not be developed as part of a comprehensive specific plan and because the County currently does not typically impose design review requirements on residential projects. In summary, the impacts to aesthetics and visual quality under this alternative would be reduced compared to those of the proposed project.

#### **Agricultural Resources**

Similar to the proposed project, this alternative would result in the conversion of approximately 60 acres of agricultural land to residential uses. However, because this land is not prime farmland, unique farmland, or farmland of statewide importance, the impacts of this conversion would be less than significant, similar to the proposed project. By subdividing the project site into five-acre ranchettes without comprehensive planning for the site's development through the adoption of a specific plan, this could result in more intense development of agricultural lands being directed elsewhere in the County, in order to accommodate future anticipated growth. Accordingly, this alternative's impact on agricultural resources could potentially be more significant than those of the project. In summary, the agricultural resources impacts of this alternative are similar to or greater than those of the proposed project.

#### **Air Quality**

This alternative assumes that only 12 homes would be built, which is a 95 percent reduction in unit count as compared to the units proposed to be developed under the maximum project buildout scenario. Therefore, the criteria pollutant air quality impacts identified in Table 9, Daily Project Emissions (Refer to Section 3.3), would be reduced by approximately 95 percent.

In summary, the air quality impacts of this alternative would be less significant than those of the proposed project.

#### **Biological Resources**

This alternative would not prevent grading and development of the project site associated with development of five-acre "ranchettes" and therefore may result in impacts to special-status species including the California tiger salamander (CTS), San Joaquin kit fox, American badger, burrowing owl, western spadefoot toad, nesting raptors, and migratory birds. The impacts to these species would be similar to those that would occur as part of the project. There may be an increase in some marginal foraging habitat as compared to the project because development of the site would be less intense, particularly if home sites were precluded from constructing perimeter fences and allowed to revert to annual grassland. However, impacts to the habitat of these species would still occur. Therefore, the impacts of this alternative on biological resources would be similar to or less than those of the proposed project.

#### Climate Change

This alternative assumes that only 12 homes would be built, which is a 95 percent reduction in unit count as compared to the units being proposed to be developed under the maximum project buildout scenario. This would equate to a significant decrease in vehicle trips, which would result in a corresponding decrease in GHG emissions. However, since this alternative could be viewed as a relatively inefficient land use pattern, given its low density and lack of clustering, and because numerous sustainable design, siting and building features would not likely be built given the lack of a comprehensive specific plan, this alternative could be viewed as not furthering stated objectives and goals to reduce GHG emissions contributing to climate change. In summary, the impact related to GHG emissions and climate change would be less significant in certain respects.

#### **Cultural Resources**

This alternative would develop the project site with rural residential uses, albeit on a smaller scale. Because there would be fewer ground-disturbing activities, there would be fewer opportunities to potentially damage or destroy cultural or paleontological resources, although some risk remains. In summary, impacts to cultural and paleontological resources under this alternative would be similar to or less significant than those of the proposed project.

#### **Geology and Soils**

Under this alternative, the project site would be subject to similar seismic hazards as the proposed project. The project site would still be developed with residential uses, which would involve ground-disturbing activities, albeit on a smaller scale. However, because of the reduced unit count, the population exposed to these hazards would be much smaller as compared to the population potentially exposed following development of the project. Further, potential soil erosion and sedimentation impacts associated with this alternative would be similar in kind to

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the proposed project, although they would be less significant overall, given the reduced amount of ground disturbance that would occur under this alternative. In summary, the geology and soils impacts under this alternative would be similar to or less significant than those of the proposed project.

#### Hazards and Hazardous Materials

Under this alternative and the proposed project, there is some risk of exposure to hazardous and potentially hazardous materials as a result of the pesticides used to cultivate the barley. While the potential for exposure would be reduced under this alternative, as a result of the lower numbers of population overall, impacts are less than significant under either circumstance given the low levels of contamination in the soils. Under this alternative, it is assumed that potential exposure to hazardous materials as a result of off-site surrounding uses would be similar in type but lower overall as a result of a significantly lower level of development and thus lower population figures; although impacts would be less than significant in any event. Therefore, the impacts associated with hazards and hazardous materials under this alternative would be similar to or less significant than those of the proposed project.

#### Hydrology and Water Quality

The amount of impervious surfaces and rates and volumes of peak runoff associated with the proposed project would be significantly reduced under this alternative. Correspondingly, the site would generate less stormwater runoff that could impact the capacity of existing or planned stormwater drainage systems and nearby tributaries. As with the proposed project, development of this alternative would be subject to compliance with applicable requirements of the County and the Regional Water Quality Control Board (RWQCB) to ensure there are adequate drainage facilities and that all performance standards are satisfied; water quality issues would also need to be adequately addressed. It is assumed that existing drainage facilities could accommodate the relatively minor amount of runoff that would result under this alternative. Therefore, no drainage facilities would need to be expanded or constructed, and no impacts associated therewith would occur under this alternative.

Additionally, the magnitude of construction-related impacts to water quality as a result of soil erosion and sedimentation would be significantly reduced since there would be less soil disturbance associated with site preparation, grading, and construction activities. This alternative would also generate fewer urban non-point source pollutants in stormwater runoff, given the significant decrease in total unit count, including lower volumes of on-site traffic and less area required for parking. However, very low density residential development under the alternative would likely incorporate fewer biofiltration measures, such as vegetated, grassy or street swales. Under this alternative, it is anticipated that the homes would be served by individual septic systems, rather than the City of Hollister's DWTP. These septic systems would be required to

adhere to applicable requirements of the County and the RWQCB to ensure there would be no significant, unmitigated impacts on water quality.

Flood hazards under this alternative and the proposed project would be similar (less than significant), given that no portion of the project site is subject to flooding during the 100-year event. In summary, the hydrology and water quality impacts under this alternative would be similar to or less significant than those of the proposed project.

#### Land Use and Planning

Under this alternative, only very low density residential development would be permitted. This could be viewed as potentially inconsistent with the project site's Area of Special Study designation, which is intended to allow higher levels of development as a means of directing anticipated growth to certain areas in the County that have been determined appropriate and able to provide adequate facilities and infrastructure to serve the increased growth. Dividing the project site into five-acre parcels for development of individual estate homes also could be viewed as potentially inconsistent with the Area of Special Study designation, which envisions comprehensive planning for the project site. In terms of other land use and planning impacts, this alternative would have similar impacts to those of the proposed project, since it would not disrupt or divide an established community; would not conflict with any adopted habitat conservation plan or natural community conservation plan; and would not result in incompatible development with surrounding uses. Therefore, land use and planning impacts under this alternative would be similar to or greater than those of the proposed project.

#### Noise

Under this alternative, the total unit count would be substantially reduced, with a corresponding reduction in noise impacts, including a reduction in the number of new sensitive receptors that could be exposed to traffic noise from Fairview Road and noise from athletic events at the planned adjoining Gavilan College San Benito Campus, as well as a reduction in traffic-related noise impacts on existing sensitive receptors. Noise impacts due to construction activities also would be reduced in intensity and duration given the significant reduction in overall unit count. This alternative would result in some new development, which would introduce new sources of noise to the site. However, these sources would be consistent with other nearby rural residential uses, and would not include multifamily dwellings or public parks and recreational facilities. With respect to exposure to groundborne vibration, it is assumed that short-term, construction-related vibration impacts would be less than significant under this alternative, similar to the proposed project. Long-term, operational vibration impacts would also be less than significant, similar to the proposed project, since neither scenario would involve the use of any equipment or processes that would result in potentially significant levels of groundborne vibration. Therefore, the noise impacts of this alternative would be less significant than those of the proposed project.

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#### **Public and Governmental Services**

The demand for fire, police, emergency response, and solid waste services would be substantially reduced under this alternative given the substantial reduction in the number of units that would be developed, and thus the number of households that would be generated. In addition, the projected number of school-age children would be significantly lower under this alternative for the same reason, and therefore, the associated impact on existing school facilities would be reduced as compared to the proposed project. Solid waste impacts would be lower under this alternative, due to the significantly reduced population and the related solid waste disposal needs. In summary, the impact on public services under this alternative would be less significant than those of the proposed project.

#### Parks and Recreation

The impact on existing park and recreational facilities would be substantially decreased under this alternative given the substantial reduction in the total number of units to be constructed. Under this alternative, it is assumed the development would not need to build any additional parks or recreational facilities given the relatively small amount of additional population that would be generated. Therefore, associated water supply impacts as a result of irrigation, and potential noise and air quality impacts that could occur as a result of construction, grading, and operation of such park and recreational facilities would not occur under this alternative. In summary, the impact of park and recreational facilities under this alternative would be less significant than those of the proposed project.

#### Traffic and Circulation

This alternative's transportation impacts would be less significant due to the substantial reduction in the total number of units to be constructed. This alternative would generate approximately 115 vehicle trips per day, which equates to an approximate 95 percent reduction as compared to the estimated daily trip generation of 2,105 for the proposed project. With this significant decrease in daily trips, LOS and signal warrant impacts under this alternative would be less than significant. However, the alternative would add traffic to highway segments operating at LOS E, and would therefore result in the same significant and unavoidable impacts as the proposed project. In summary, the transportation impacts of this alternative would be less significant than those of the proposed project, though the significant and unavoidable impacts related to the TIF relative to timing of improvements would not be avoided.

#### Wet and Dry Utilities and Energy

Under this alternative, there would be a significant reduction in demand for potable water as a result of the significant decrease in the total unit count. Therefore, water supply impacts would be less significant as compared to the proposed project. With respect to wastewater impacts,

under this alternative, the homes likely would be served by individual septic systems. Therefore, it is assumed that the quality of the wastewater would be poorer than the treated effluent from the City of Hollister's Domestic Wastewater Treatment Plant (DWTP). For this reason, disposal via individual septic systems is less protective of the environment when compared with the City's DWTP option. On-site soil conditions, however, appear suitable for leach field disposal, and the overall quantity of wastewater would be much less than that generated by the proposed project. Furthermore, septic systems would need to be constructed and operated in accordance with the applicable requirements of the County and the RWQCB, similar to the proposed project. Regarding energy consumption, this alternative would generate significantly less overall energy usage due to the decreased total unit count. However, the alternative would not likely include the implementation of numerous sustainable design, siting, and building features proposed by the project that could reduce energy usage and enhance conservation efforts. In summary, impacts to water supply, wastewater service, and energy consumption under this alternative would be less significant than those of the proposed project.

#### **Summary of Comparative Analysis**

In summary, the impacts resulting from the No Project-Development Consistent with the General Plan Land Use Designation in most categories would be similar to or less significant than those of the proposed project as a result of the significant decrease in density and total unit count. Additionally, significant and unavoidable impacts to off-site uses related to construction noise would be eliminated. However, the significant and unavoidable traffic impacts from the timing of TIF improvements relative to TIF payments would not be avoided. Furthermore, impacts under land use and planning as well as agricultural resources could be greater than those associated with the proposed project.

Few, if any, of the basic project objectives would be achieved under this alternative. For example, a range of housing types and options, affordable to a variety of households, would not be constructed; a mutually supportive relationship with the adjoining Gavilan College San Benito Campus site with shared infrastructure would not likely occur; and a convenient pedestrian/bicycle network and related recreational facilities that connect to the adjoining campus would not be constructed. In addition, this alternative would not result in the comprehensive planning of the project site; may not be consistent with the intention of the Area of Special Study designation; and therefore may not provide a balanced approach to land use that accommodates future growth, while protecting community assets and the environment.

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# Alternative 3: Reduced Maximum Residential Units/ Increased Open Space

The Reduced Maximum Residential Units/Increased Open Space alternative was developed from Specific Plan Lotting Example C, which reduces the total unit count to 179 single-family homes, an approximate 19 percent reduction in unit count as compared to the units proposed under the proposed project which assumes a maximum buildout of 220 units. This number was developed by the project civil engineer in an effort to reduce on-site grading and provide an on-site mitigation area of about seven acres. This alternative assumes that the resource agencies (USFWS and CDFG) would require on-site mitigation for impacts to CTS in the form of an approximate 7-acre habitat preservation easement consisting of the former stock pond and a 100-meter "buffer zone." However, this alternative assumes that off-site mitigation would still be required. The maximum total land area available for development would be 53 acres and the corresponding gross density would be about 3.4 dwelling units per acre, slightly less than the maximum proposed by the Specific Plan, which is 3.6 units per acre.

This alternative assumes the following characteristics of the proposed project: the project site would be comprehensively planned in accordance with an adopted specific plan; the project would be served with potable water from the Sunnyslope County Water District (Sunnyslope); the project's wastewater would be collected and treated by the City's DWTP; sustainable design, siting and building features would be included; and the development of parks and recreational facilities, roadside trails, landscaped parkways, naturally designed retention basins, and a Class I trail and sidewalks within landscaped corridors along the collector streets and Cielo Vista Drive extension, would be constructed. This alternative also includes provisions for secondary emergency access either by utilizing the Gavilan College Airline Highway (State Route 25) EVA or an alternative on-site EVA, similar to the proposed project.

The impacts that would result from this alternative are discussed below, relative to the impacts associated with the proposed project.

## **Comparative Analysis**

#### Aesthetics/Visual Quality

This alternative would result in less infrastructure and fewer buildings overall, a somewhat lower profile of development, and would result in a less-dense appearing project, as viewed from Fairview Road. However, these differences would not substantially reduce the visual impact resulting from the change of the project site from rural to suburban in character. The additional open space provided by this alternative would likely be characterized as a significant project amenity. However, since this additional open space would be located in an area of the site that is

not visible from public vantage points, it would not affect the aesthetics impact conclusion. Potential light and glare impacts would also be similar, although somewhat lower given the reduction in overall development and the related decrease in size and scale of certain project features (e.g., park and recreational facilities). This alternative reduces the total unit count by 41 units and may result in larger lot sizes, but this increase would not substantially affect the impacts of development since it is not anticipated that the reduction in density and unit count would be generally perceptible to the viewer. With respect to landscaping, it is assumed that similar or slightly less landscaping would be provided under this alternative to soften the visual impacts of the development. It is also assumed that development of the proposed structures would be required to receive design review approval, similar to the proposed project, which would help ensure the overall positive aesthetic quality of development. In summary, the impacts to aesthetics and visual quality under this alternative would be similar to or less significant than those of the proposed project.

#### **Agricultural Resources**

The conversion of approximately 60 acres to suburban uses and preserved habitat would still occur under this alternative. Because this land is not prime farmland, unique farmland, or farmland of statewide importance, the impacts of this conversion would be less than significant, similar to the proposed project. However, because this alternative would involve the development of fewer homes, this could result in more intense development of agricultural lands being directed elsewhere in the County in order to accommodate future anticipated growth. In summary, the agricultural resources impacts under this alternative would be similar to or possibly greater than those of the proposed project.

#### **Air Quality**

Short-term construction-generated emissions would be reduced by approximately 19 percent under this alternative, as a result of the reduced total unit count. Long-term air quality operational impacts also would be reduced for the same reason by approximately 19 percent. Under both this alternative and the proposed project, there would not be an exceedance of established thresholds by the MBUAPCD for any criteria air pollutants. With respect to localized mobile-source emissions, these would be reduced by approximately 19 percent under this alternative, and would be less than significant, similar to the proposed project. Regarding long-term exposure of sensitive receptors to toxic air contaminants, this alternative would result in temporary emissions of diesel exhaust during construction similar to those of the proposed project, and therefore would have similar, although fewer, impacts due to the reduced size. In summary, the air quality impacts would be similar to or less significant than those of the proposed project.

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#### **Biological Resources**

Similar to the proposed project, this alternative would result in the grading and development of the project site, and therefore may result in impacts to biological resources, including impacts to special-status species including the San Joaquin kit fox, CTS, western spadefoot toad, American badger, the burrowing owl, nesting raptors, and migratory birds. The impacts to these species would be similar to those that would occur under the project. Development would still be subject to regulatory take permit requirements. However, this alternative involves the preservation of a defined habitat area for CTS on the site in and around the area of the former stock pond, whereas the proposed project proposes commensurate off-site mitigation of project impacts to the species by providing dedicated habitat at a 1:1 ratio preserved in perpetuity and contiguous with other habitat areas. This alternative requires habitat restoration and preservation on the site, which may reduce the magnitude of the impact of the proposed project but does not eliminate the impacts that would result from habitat loss on the remainder of the site. Therefore, the biological resource impacts under this alternative would be similar to or less significant than those identified for the proposed project.

#### **Climate Change**

The reduced number of units (approximately 19 percent) under this alternative would correspond to a reduction in total GHG emissions resulting from vehicle trips and energy use. Therefore, under this alternative, emissions generated by development that contribute to climate change would be less than those of the proposed project (less than significant).

#### **Cultural Resources**

This alternative would result in the development of the project site, which would involve ground-disturbing activities, and, despite the increase in open space area, this alternative also requires restoration that may involve ground disturbance in and around the former stock pond. Undiscovered cultural and paleontological resources could still potentially be damaged or destroyed as a result of ground-disturbing activities on the entire site. In summary, impacts to cultural and paleontological resources under this alternative would be similar to those of the proposed project.

#### Geology and Soils

This alternative would be subject to the same seismic hazards as the proposed project, given that development of this alternative would result in the development of the project site, except that the population exposed would be somewhat smaller. The potential geology and soils impacts associated with this alternative would be similar to those of the proposed project as well. While the total unit count would be reduced under this alternative, it would still require substantial earthmoving activities to construct the stormwater retention basin, roadways and other

infrastructure needed to serve the development. In summary, geology and soils impacts under this alternative would be similar (less than significant) to those of the proposed project.

#### Hazards and Hazardous Materials

Under this alternative, similar to the project, there is some risk of exposure to hazardous and potentially hazardous materials as a result of any residual pesticides used in connection with the agricultural uses on the project site. While potential exposure to residual pesticides would be lower under this alternative, given the somewhat lower numbers of population overall, impacts would be less than significant under either circumstance, due to the low levels of contamination in the soils. Under this alternative, it is assumed that potential exposure to hazardous materials as a result of off-site surrounding uses would be similar in type but somewhat lower overall as a result of the reduced level of development. In summary, impacts associated with hazards and hazardous materials under this alternative would be similar to or somewhat less significant than those of the proposed project.

#### Hydrology and Water Quality

The amount of impervious surfaces and rates and volumes of peak runoff associated with the proposed project would be somewhat reduced under this alternative given the decrease in total unit count and increase in open space. Correspondingly, the site would generate less stormwater runoff that could impact the capacity of existing or planned stormwater drainage systems and nearby tributaries. It is assumed that stormwater retention facilities would still need to be constructed under this alternative, albeit on a somewhat smaller scale. Similar to the proposed project, development of this alternative would be subject to compliance with applicable requirements of the County and the RWQCB to provide adequate drainage facilities, to ensure there would be no increase as compared to existing runoff quantities in accordance with County standards, and to adequately address water quality impacts.

Additionally, the magnitude of construction-related impacts to water quality as a result of soil erosion and sedimentation would be reduced since there would be somewhat less soil disturbance associated with site preparation, grading, and construction activities. This alternative would also generate fewer urban non-point source pollutants in stormwater runoff, given the decrease in total unit count, including lower volumes of on-site traffic and less area required for parking, thereby reducing impacts to water quality.

Flood hazards under this alternative and the proposed project would be similar, given that no portion of the project site is subject to flooding during the 100-year event. In summary, the hydrology and water quality impacts under this alternative would be similar to or somewhat less significant than those of the proposed project.

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#### Land Use and Planning

Under this alternative, the total unit count would be reduced by 41 units (excluding secondary units), or approximately 19 percent, as compared to the units proposed to be developed under the proposed project, but would otherwise be similar to the project in terms of consistency with land use and planning policies. Similar to the proposed project, this alternative would not disrupt or divide an established community, and it would not conflict with any adopted habitat conservation plan or natural community conservation plan. In terms of compatibility of development with surrounding uses, this alternative could be characterized as consistent with existing single-family development across Fairview Road, similar to the proposed project, for the reasons set forth in the impact discussion in Section 3.10, Land Use and Planning. However, the reduction in total unit count would also reduce the opportunities available to provide a variety of housing types and lot sizes to meet community needs, including affordable housing and the housing needs of students, faculty and their families for the adjoining Gavilan College San Benito Campus. In summary, land use and planning impacts under this alternative would be similar to or greater than those of the proposed project.

#### Noise

Under this alternative, the total unit count would be reduced by approximately 19 percent, which may result in a reduction in the duration of construction-related noise on the project site. However, implementation phasing would likely be similar to that of the proposed project, with construction occurring on the site for more than 12 months at a time over a period of several years. Further, the reduced unit count would correspond with a reduction in exposure of sensitive receptors to traffic noise, and would result in a reduction of the number of sensitive receptors exposed to such noise. However, these reductions are not anticipated to be perceived as substantially less significant as compared to the proposed project, because this alternative would still be of substantial scale, and would not eliminate significant and unavoidable impacts to off-site sensitive receptors. With respect to exposure to groundborne vibration, it is assumed that short-term, construction-related vibration impacts would be somewhat less significant under this alternative, given the reduced scale of development and duration of construction, and that long-term, operational impacts would be similar to those of the proposed project, since neither scenario would involve the use of any equipment or processes that would result in potentially significant levels of groundborne vibration. Overall, the noise impacts under this alternative would expose fewer receptors to unacceptable noise levels, and the impacts would be similar to or somewhat less significant than those of the proposed project. Impacts resulting from construction activities (as more fully described in Section 3.11, Noise) would remain significant and unavoidable.

#### **Public and Governmental Services**

The demand for fire, police, emergency response, and solid waste services would be somewhat reduced under this alternative, given the reduced total unit count. Further, the projected increase in the number of school-aged children would be somewhat lower under this alternative for the same reasons, and therefore, the associated demand on existing school facilities would be less significant. Solid waste impacts would be somewhat lower under this alternative for the same reasons. In summary, the public services impacts under this alternative would be less significant than those of the proposed project.

#### Parks and Recreation

While this alternative would have fewer units than the proposed project, it is assumed that additional park and recreational facilities would still be constructed in order to meet the needs of the project's residents and to satisfy the County's park and open space requirements. As with the proposed project, impacts to existing park and recreational facilities would not be anticipated to occur. However, since new facilities would be constructed, this alternative would also have the associated water supply impacts as a result of irrigation, and potential noise and air quality impacts as a result of construction, grading and operation of these other park facilities, similar to those of the project. Under this alternative, fewer park facilities would be required, which, given the reduced acreage for development, may also reduce opportunities for park and pedestrian connectivity between the project site and the adjoining campus, which would not further stated objectives. In summary, the impact on parks and recreational facilities under this alternative would be similar to or greater than those of the proposed project.

#### **Traffic and Circulation**

Due to the approximate 19 percent reduction in total unit count, this alternative would result in reducing project traffic to approximately 1,713 daily trips, as compared to the estimated daily trip generation of 2,105 for the proposed project. The volume of traffic generated under this alternative would still negatively affect the level of service at the intersection of Fairview Road/Cielo Vista Drive extension and contribute to an unacceptable level of service at the intersection of Memorial Drive/Hillcrest Road under cumulative conditions. Similar to the proposed project, traffic generated by this alternative would also contribute to impacts to State Route 156 and State Route 25. While the developer would be required to mitigate these impacts to the extent feasible, it is assumed that the timely construction of needed improvements could not be assured under this alternative, similar to the proposed project, and therefore it is not likely that this alternative would eliminate all of the significant and unavoidable traffic impacts (as more fully described in Section 3.14, Traffic and Circulation). In summary, the transportation impacts under this alternative would be less significant than those of the proposed project, but the significant and unavoidable impacts would remain.

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#### Wet and Dry Utilities and Energy

Under this alternative, the demand for water would be reduced as a result of the decrease in total unit count. Therefore, impacts to water supply would be less significant than those of the proposed project. With respect to wastewater impacts, under this alternative, it is assumed that the homes would be served by the City of Hollister's DWTP, similar to the proposed project, and therefore similar impacts would occur in that regard. The impacts of constructing connections to existing City of Hollister wastewater mains would remain relatively the same as the proposed project, although there would be approximately 19 percent fewer connections. Regarding energy consumption, this alternative would generate somewhat less overall energy usage due to the decreased total unit count, although the project would still be required to incorporate specified design features. In summary, impacts to water supply, wastewater service, and energy consumption under this alternative would be less significant than those of the proposed project.

#### **Summary of Comparative Analysis**

In summary, the impacts resulting from this alternative in most categories would be similar to or less significant than the impacts associated with the proposed project as a result of the approximate 19 percent decrease in total unit count. However, the reductions in impacts are relatively marginal and are not substantial enough to eliminate the significant and unavoidable impacts to traffic and circulation infrastructure and from construction noise. Further, impacts to agricultural resources, land use and planning policies, and parks and recreation would be similar to or possibly greater than those associated with the project.

While a number of the basic project objectives would be achieved under this alternative, the reduced total unit count would result in less density overall and may also result in fewer employment opportunities from construction activity and for service workers from operational maintenance activities. Under this alternative, variations in housing options that serve a broad range of community needs, including students, faculty and their families from the adjoining campus, would be reduced. A reduced total unit count combined with a smaller developable land area may also reduce opportunities for park and pedestrian connectivity between the project site and the adjoining campus. On balance, this alternative does not offer significant environmental advantages over the proposed project and would not satisfy most of the project objectives to the same extent as the proposed project.

# Alternative 4: Alternative Location: Northeast of San Benito Street/Union Road

The "Alternative Location: Northeast of San Benito Street/Union Road" alternative examines placing the proposed development in an alternative location. The 51.5-acre alternative site, presented in Figure 37, Alternative Location, is immediately south of the City limits, within the City's Planning Area and is partially within the City's sphere-of-influence. Vacant lands that could be evaluated as an alternative location within the County's Area of Special Study were not considered as suitable alternatives because their development would be expected to result in the same impacts as the proposed project and would not eliminate or substantially reduce significant impacts. Lands south of Airline Highway were also reviewed as suitable alternative locations, but these sites are designated as Prime Farmland, are also within critical habitat areas, and further from existing water and wastewater infrastructure, and also would not eliminate significant impacts of the proposed project. The Alternative Location Northeast of San Benito Street/Union Road was chosen because of its proximity to existing services and infrastructure and location outside the critical habitat for CTS.

The alternative site is relatively flat and is currently used as agricultural (orchard and row crop), and is designated as Prime Agricultural land in the City of Hollister General Plan. The site is bounded by Union Road to the south, San Benito Street to the west, vacant land and residential uses to the north and east. The Ladd Lane Elementary School is also located to the east, and a church and children's center are present to the west across San Benito Street. The alternative site is not located within designated critical habitat for CTS. Additionally, the presence of special-status species on this alternative site is considered unlikely given its current use for agricultural crop production and because there are no recorded observations of other special-status species on or near the site (refer to Figure 29 in Section 3.4). Also, the site also is not located on a government-identified hazardous material site or within a FEMA 100-year flood zone. Additionally, there are no known earthquake faults on the site.

The County's General Plan land use designation for this alternative site is "Rural Residential," which allows 2 dwelling units per acre; it is not designated as an Area of Special Study. Therefore, if developed in the County, this site would allow under the current zoning a maximum of 103 dwelling units. The City's General Plan land use designation for this site is Low Density Residential, allowing 8 dwelling units per net acre, which would be sufficient to accommodate 220 residential units. The 51.5-acre site is located within Phase 1 of the City's General Plan phasing strategy for annexations (page 2.21). The City's General Plan also identifies the site as being located in a "Specific Plan Overlay" area (pp 2.12-2.13), which "promotes a mix of land uses that remain flexible enough to adjust to changing market

# Source: Google Earth 2009, City of Hollister 2010, San Benito County 2010 Figure 37









Union Rd.















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demands", and requires the preparation of a specific plan to guide development. Additionally, the City's General Plan also designates those portions of the site within the City's sphere of influence as a "Priority Infill" area (page 2.19). According to information received from the City of Hollister, the vacant property immediately north of this alternative site has been granted a growth allocation of 100 affordable units and 75 market rate units (Mary Paxton, pers. com., November 18, 2010).

If this site were to be developed under the City's jurisdiction, it is assumed that approval of a specific plan, a sphere of influence amendment, and annexation to the City would be required. For the purposes of this analysis, it is assumed that this alternative site would be developed within the City, and that a specific plan would be prepared for the development of 220 residential housing units on the 51.5 acre site. Under the City's low density residential land use designation (eight dwelling units per acre), over 400 single-family residential units could be developed on this site, consistent with the City's existing land use designation. However, this site could also support development with a range of residential housing types provided a specific plan is prepared and adopted as the comprehensive planning document (City of Hollister 2005).

#### **Comparative Analysis**

#### Aesthetics/Visual Quality

The alternative location is not in an area identified as a scenic resource in the City's General Plan. The visual and scenic characteristics of this alternative location are of somewhat lesser quality than the project site due to its location contiguous to existing urban uses within the City limit. The impacts to visual characteristics of this site would be most evident when viewed from Union Road and San Benito Street. From these public roadways, views of the site are framed by existing urban development to the north and east of the site. Development under this alternative would place new development in an area contiguous with existing and/or planned urban residential uses to the north and east, and would contribute to the conversion of rural to urban uses anticipated by buildout of the City's General Plan. Given the limited availability of public views of the site, public perception of impacts to scenic quality related to this alternative would be less compared to the same impacts of the proposed project. Under this alternative, development would generate light and glare impacts, similar to the proposed project, it would also be subject to City and County "Dark Sky" ordinances and other applicable lighting regulations.

Subject to compliance with these applicable County regulations, the impacts of light and glare would be similar to the proposed project. Therefore, the impacts to aesthetic resources and visual quality of the site and its surroundings, as well as lighting impacts to the night sky would be similar to or less significant than those of the proposed project.

#### **Agricultural Resources**

The City's General Plan identifies this alternative site as prime agricultural land (page 6.3); therefore, development of the project in this location would result in a loss of 51.5 acres of prime farmland. The conversion of prime farmland to urban uses is considered a significant, adverse impact under CEQA. In contrast, the proposed project site is designated as "grazing land." Therefore, the impact of this alternative to agricultural resources would be greater than those of the proposed project.

#### **Air Quality**

Short-term construction-generated emissions would be generally similar to the proposed project since the overall unit count would remain the same. Due to its location adjacent to the City limits and existing infrastructure, this alternative would not require construction of utility infrastructure to the extent required by the proposed project. Additionally, construction emissions could be somewhat less significant during site preparation due to the smaller size of the site (51.5 acres vs. 60 acres) and a potentially shorter duration of construction. However, construction of this alternative has the potential to expose a greater number of nearby receptors to construction emissions, due to the proximity of the site to existing homes, the Ladd Lane Elementary School to the east, and a church and children's center to the west across San Benito Street. Accordingly, construction-related impacts would be greater than that of the proposed project in this regard.

Long-term air quality operational impacts would be similar to the proposed project since the overall unit count would remain the same. This alternative would not exceed MBUAPCD established thresholds for all pollutants, similar to the proposed project. With respect to localized mobile-source emissions, these would be similar to the proposed project since the number of vehicle trips would be similar under this alternative and the proposed project, although perhaps somewhat less due to the close proximity of the site to existing schools, transit stops and bicycle facilities. Regarding long-term exposure of sensitive receptors to toxic air contaminants, this alternative would also result in temporary emissions of diesel exhaust during construction, although these would be less than significant similar to the proposed project. In summary, the air quality impacts would be similar to or somewhat greater than the proposed project.

#### **Biological Resources**

Under this alternative, development can be assumed to result in some impacts to biological resources. The site may provide nesting habitat for migratory birds and raptors, and its development may affect these species, similar to the proposed project. However, unlike the project site, this alternative site is not located within designated critical habitat for CTS. Additionally, the presence of special-status species on this alternative site is considered unlikely

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given its current use for agricultural crop production and because there are no recorded observations of other special-status species on or near the site (refer to Figure 29 in Section 3.4). Under this alternative, the impacts associated with habitat loss for special-status species would be reduced. Therefore, the impacts to biological resources, in particular the potential loss of CTS critical habitat, would be reduced compared to those of the proposed project.

#### **Climate Change**

As the total number of dwelling units under this alternative would be the same as the proposed project, the total GHG emissions resulting from vehicle trips and energy use in the dwelling units under this alternative would be similar to the emissions under the proposed project, although perhaps somewhat reduced due to the close proximity of the site to existing schools, transit stops and bicycle facilities. Emissions from the development and energy use associated with water and wastewater conveyance would be reduced somewhat due to the alternative site's proximity to existing water and wastewater infrastructure. Therefore, under this alternative, emissions generated by development that contribute to climate change would be somewhat less significant than the proposed project.

#### **Cultural Resources**

This alternative would result in the development of the alternative site, which would involve ground-disturbing activities, similar to the proposed project. Although the total area that would be disturbed would be somewhat reduced compared to the proposed project, as with the proposed project, undiscovered cultural and paleontological resources could still potentially be damaged or destroyed as a result of ground-disturbing activities. In summary, impacts to cultural and paleontological resources under this alternative would be similar (less than significant) to those of the proposed project.

#### Geology and Soils

This alternative would be subject to similar seismic hazards as the proposed project given that development of this alternative would result in the development of the alternative site with suburban uses. As with the proposed project, this alternative would still be required to address stormwater runoff from development and substantial earthmoving activities would still be necessary to construct stormwater retention basin, roadways and other infrastructure needed to serve the development. This site is located in a seismically active area; however, no known earthquake faults are present on the. As a result, development of this site would be expected to have lower risks of exposure to damage or harm from seismic faulting. In summary, geology and soils impacts under this alternative would be reduced as compared to those of the proposed project.

#### Hazards and Hazardous Materials

Under this alternative, similar to the project, there is some risk of exposure to hazardous and potentially hazardous materials as a result of any residual pesticides used in connection with the agricultural uses on the alternative site. A portion of this alternative site is under orchard production, which typically requires more irrigation and pest control, but less ground disturbance than annual grain crops. As a result, there may be a greater potential for soils being contaminated with pesticide residues on the alternative site. The extent of historic pesticide use on this site is unknown. However, it is assumed that exposures, at minimum, would be similar to those of the project (dry-farmed barley), but could be potentially greater due to the presence of the orchards. Under this alternative, it is assumed that potential exposure to hazardous materials as a result of off-site surrounding uses would be similar to the proposed project. In summary, impacts associated with hazards and hazardous materials under this alternative would be similar to or somewhat greater than those of the proposed project.

#### **Hydrology and Water Quality**

Impervious surfaces and rates and volumes of peak runoff associated with the proposed project would be reduced under this alternative due to the reduced land area (51.5 acres vs. 60 acres). Correspondingly, the site would generate less stormwater runoff that could impact the capacity of existing or planned stormwater drainage systems and nearby surface waters. It is assumed that stormwater retention facilities would still need to be constructed under this alternative. However, given the lack of adjacency with the Gavilan College San Benito campus facility, there would be no opportunities to share drainage infrastructure. For this alternative, the site would connect to the City's existing network of stormwater collection and storm drains and would be subject to the City's General Plan and City Municipal Code requirements for the design and construction of stormdrain infrastructure improvements. The environmental impacts associated with storm drainage would be similar to those of the proposed project. Development of this alternative would be required to comply with applicable standards of the City and the RWQCB for the design and control of stormwater flow and drainage to provide adequate drainage facilities, to ensure that there would be no increase as compared to existing runoff quantities, and to adequately address water quality impacts.

Further, the magnitude of construction-related impacts to water quality as a result of soil erosion and sedimentation would be reduced somewhat since there would be less soil disturbance associated with site preparation, grading, and construction activities. However, this alternative would generate similar amounts of urban non-point-source pollutants in stormwater runoff as compared to the proposed project given that the same number of units would be constructed. Septic systems would not be allowed on this alternative site.

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Flood hazards under this alternative and the proposed project would be similar, given that no portion of the alternative site is subject to flooding during the 100-year event (FEMA 2009). In summary, the hydrology and water quality impacts under this alternative would be similar to or less significant than those of the proposed project.

#### Land Use and Planning

Under this alternative, the total number of units – 220 – would remain the same although density of the development would be increased due to the overall reduction in developable land area (51.5 acres vs. 60 acres). In terms of other land use and planning impacts, this alternative would have similar impacts to those of the proposed project (less than significant), assuming it would be developed under the City's jurisdiction, since the alternative site is within the City's sphere of influence and the City's General Plan has designated it as a "Priority Infill" site. However, if the alternative were developed under the County's jurisdiction, it could be characterized as having significant land use impacts as a result of inconsistency with numerous County General Plan policies addressing the protection of prime agricultural resources and directing growth towards land that has been designated as an Area of Special Study.

In other respects, the alternative would have similar (less than significant) impacts to the proposed project since it would not disrupt or divide an established community; and it would not conflict with any adopted habitat conservation plan or natural community conservation plan. If the site were to remain in the County, the development of multi-family residential uses in proximity to existing low-density single-family uses on land that is not located within a designated Area of Special Study, would conflict with maximum allowed density of the County General Plan "Rural Residential" land use designation. However, if the site were to be entitled under the City's jurisdiction, then it could be considered consistent with the City's General Plan land use designation and Specific Plan Overlay policies, which permits development to include a range of single- and multi-family uses provided that a specific plan is prepared and adopted by the City. In terms of compatibility of development with surrounding uses, this alternative could be characterized as consistent with the existing, adjacent single-family development within the City limits, although neither this alternative nor the proposed project would be considered incompatible in this regard, for the reasons set forth in the Impact discussion in Section 3.10, Land Use and Planning. In summary, the impacts to land use and planning that would result under this alternative would be similar to or greater than those of the proposed project.

#### Noise

Under this alternative, the land area available for development of the 220 residential units would be reduced, and the density per acre would be increased. The impacts of prolonged noise exposure from construction-related noise on the alternative site may be reduced as compared to the proposed project, since the duration of construction may be reduced. However, despite the

smaller size of the site and proximity to existing infrastructure, the duration of construction would likely remain longer than 12 months, which would still be a significant and unavoidable impact, similar to the proposed project. Additionally, noise generation from construction of this alternative has the potential to expose a greater number of nearby receptors (within 700 feet of construction activity) to construction noise, due to the proximity of the site to existing homes, the Ladd Lane Elementary School to the east, and a church and children's center to the west across San Benito Street.

Also, substantial development would still occur on the alternative site, with related exposure of noise-sensitive receptors to noise resulting from the operation of the project, including noise impacts related to traffic. However, this alternative may result in somewhat fewer vehicle trips due to the proximity of schools and community services, although any such decrease is not anticipated to be noticeable to the sensitive receptors given the overall scale of development. Additionally, the western and southern sides of the alternative site would be exposed to traffic noise from San Benito Street and Union Road. Depending upon site design, sound walls would likely be required on the site to protect receptors from excessive traffic noise on these roadways. With respect to exposure to groundborne vibration, it is assumed that short-term, constructionrelated vibration impacts would be similar to the proposed project, given the similar unit count, and that long-term, operational impacts would be similar to those of the proposed project, since neither scenario would involve the use of any equipment or processes that would result in potentially significant levels of ground vibration. Overall, the noise impacts under this alternative would be similar to those of the proposed project, although certain construction- and operational-related noise impacts may be greater as compared to the proposed project. Additionally, impacts related to construction noise would remain significant and unavoidable.

#### **Public Services**

The demand for fire, police, emergency response, and solid waste services would be similar to the proposed project given that the total unit count would be the same, resulting in the same number of households. Further, the projected number of school-aged children associated with the proposed project would be similar under this alternative for the same reasons, and therefore, the associated demand on existing school facilities would be similar as well. Solid waste impacts would be similar under this alternative, due to the fact that the same number of units would be built under either scenario. In summary, the public services impacts under this alternative would be similar to those of the proposed project.

#### Parks and Recreation

While this alternative would be more dense than the proposed project, the same number of people would be added to the general area and the alternative would also be required to construct sufficient park and recreational facilities in order to meet the needs of the residents and

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to satisfy the City's applicable standards. Therefore, as with the proposed project, impacts to existing park and recreational facilities would not be anticipated to occur. However, since new park facilities would be constructed, this alternative would also have the associated water supply impacts as a result of irrigation, and potential noise and air quality impacts as a result of construction, grading and operation of these other park facilities, similar to the proposed project. In summary, the impact on parks and recreational facilities under this alternative would be similar to those of the proposed project.

#### **Traffic and Circulation**

This alternative would generate the same number of daily and peak hour trips as the proposed project. Primary access to the alternative site would be available from either San Benito Street or Union Road, with secondary access provided through existing residential subdivisions to the north and/or by connecting interior circulation routes to Ladd Lane to the east. Traffic volume would be similar to or somewhat less than the proposed project under this alternative given that the same number of units would be constructed, and would have the same effect to SR 25 and SR 152 traffic volume. However, some traffic impacts of the alternative would likely occur in different locations, being most evident on nearby intersections and roadways along San Benito Street, Union Road and on City of Hollister neighborhood streets in the immediate vicinity of the site. The County Board of Supervisors has noted concern with traffic congestion in this area of the City in proximity to the high school. Traffic-related congestion and level-of-service impacts to city streets could be more severe with this alternative, due to the limited opportunities available to increase street capacity to serve new development at this location. In this regard, this alternative could result in greater impacts to area roadway capacity.

However, this alternative also may result in somewhat fewer vehicle trips due to the proximity of schools and community services. Transit stops are available to the north of this site on Nash Road and Tres Pinos Road within one mile of the project site. Class II bicycle lanes are present on San Benito Street adjacent to the alternative site. Additionally, the site is within walking distance of Ladd Lane Elementary School and San Benito High School. In summary, this project would be closer to existing schools, transit, and bicycle facilities, which could reduce vehicle miles traveled and affect traffic characteristics (volume and dispersal) generated by the development of the alternative.

While the developer would be required to mitigate identified traffic impacts to the extent feasible, it is assumed that the timely construction of needed improvements could not be assured under this alternative, similar to the proposed project, and therefore it is not likely that this alternative would eliminate all of the significant and unavoidable traffic impacts. In summary, the transportation impacts under this alternative would be similar to the proposed project, and the significant and unavoidable impacts would remain.

#### Wet and Dry Utilities and Energy

Under this alternative, the scale of development (220 dwelling units) would be the same as under the proposed project. Water service would be provided by the City of Hollister under this alternative. The demand for water would be unchanged, regardless of location, and the project would connect to the City's infrastructure, upon annexation to the City. Therefore, the environmental impacts associated with water supply and infrastructure would be similar to those of the proposed project.

With respect to wastewater impacts, under this alternative, it is assumed that the homes would be served by the City of Hollister's DWTP, similar to the proposed project. Wastewater generation would be similar to the proposed project given that the same number of units would be developed, and the alternative would connect to the City's wastewater collection infrastructure. Treatment would be provided through the City of Hollister DWTP. Under this alternative, the extension of sewer mains would be required to serve the site, although the alternative site is located near the City limit and is closer to existing infrastructure than the proposed project site. Construction-related impacts of constructing the necessary utility infrastructure to serve the project may be somewhat reduced since the alternative site is closer in proximity to existing City infrastructure. Overall, the impacts to wastewater service would be similar to the proposed project.

Regarding energy consumption, this alternative would generate similar energy usage since the same number of units would be built. In summary, impacts to water supply, wastewater service, and energy consumption under this alternative would be similar to those of the proposed project.

#### **Summary of Comparative Analysis**

In summary, the impacts resulting from this alternative in most categories would be similar to the impacts associated with the proposed project since the overall unit count remains the same. However, impacts to biological resources, given the assumed lack of special-status wildlife species on the alternative site and specifically, loss of CTS critical habitat, would be reduced and impacts to aesthetics and hydrology would be similar to or somewhat reduced. Air quality impacts would be similar or somewhat greater than those of the proposed project, given the greater number of sensitive receptors that would be exposed to emissions during construction. Impacts to agricultural resources would be significantly greater given that development of this alternative would occur on prime agricultural land, which would result in the conversion of prime farmland to non-agricultural use. Impacts related to exposures to hazardous materials associated with agricultural production and residual pesticides would be similar to or perhaps greater than those of the proposed project, as would impacts related to consistency with land use and planning policies. Certain construction- and operational-related noise impacts would be

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similar to or perhaps greater than those of the proposed project, given the increased number of sensitive receptors that may be exposed. Development under this alternative would generate the same number of vehicle trips, but has the potential to reduce traffic volumes on local streets in proximity to the site; however, any local increase in traffic volume that occurs in areas with fewer opportunities to improve roadway capacity, may result in greater impact to traffic conditions on neighborhood streets. Additionally, the timely construction of needed improvements could not be assured under this alternative, similar to the proposed project, and the significant and unavoidable impacts related to TIF collection and the construction of improvements would remain. Therefore, traffic-related impacts to area roadways may be more severe than those associated with the proposed project, and the alternative would not eliminate significant and unavoidable impacts.

Finally, key project objectives would not be achieved with implementation of this alternative given its lack of adjacency to the Gavilan College San Benito Campus. Specifically, this alternative would not create a mutually supportive relationship between the residential community and the adjacent future community college campus site that integrates connections and facilitates shared infrastructure. In addition, under this alternative, there would be no ability to provide convenient pedestrian connections and recreational opportunities through the provision of pocket parks, open space areas, corridors and connections with the adjacent future Gavilan College San Benito Campus site. Finally, implementation of this alternative would not be consistent with the County's objective to direct greater densities to the Area of Special Study.

# 4.3 COMPARISON OF ALTERNATIVES

The comparison of the alternatives are summarized and compared in a matrix format in Table 46, Project Alternative Summary.

# Alternative 1: No Project-No Development

The "No Project-No Development Alternative" would result in the least environmental impact, since it would not involve any new development. This alternative would avoid each of the impacts identified in this EIR, which are listed within the Impact Summary Table. However, none of the project objectives would be achieved.

# Alternative 2: No Project-Development Consistent with Rural General Plan Land Use Designation

The "No Project-Development Consistent with General Plan Land Use Designation" alternative assumes the project site would be developed with estate homes on five-acre lots for a total of 12 units. This represents a 95 percent reduction in total unit count under the proposed project's maximum buildout scenario. In summary, the impacts resulting from the No Project-Development Consistent with the General Plan Land Use Designation in most categories would be similar to or less significant than those of the proposed project as a result of the significant decrease in density and total unit count; however, the significant and unavoidable traffic impacts under the proposed project would not be avoided. Additionally, the impacts under land use and planning as well as agricultural resources could be greater than those associated with the proposed project. Few, if any, of the basic project objectives would be achieved under this alternative.

# Alternative 3: Reduced Maximum Residential Units/ Increased Open Space

The "Reduced Maximum Residential Lots/Increased Open Space" alternative was developed from Specific Plan Lotting Example C, which reduces the total unit count to 179 single-family homes, an approximate 19 percent reduction in unit count as compared to the units proposed under the maximum buildout scenario.

In summary, the impacts resulting from this alternative in most categories would be similar to or somewhat less significant than the impacts associated with the proposed project as a result of the approximate 19 percent decrease in total unit count. However, the reductions in impacts are relatively marginal and are not substantial enough to reduce identified significant impacts to a less than significant level. This alternative also would not eliminate significant and unavoidable impacts to traffic and circulation, or those impacts from construction noise. Further, impacts related to agricultural resources, land use and planning, and parks and recreation would be similar to or possibly greater than those associated with the project.

While a number of the basic project objectives would be achieved under this alternative, the reduced total unit count would result in fewer opportunities for housing, such as less variation in housing options to serve a broad range of community needs, including those for students, faculty, and their families, from the adjoining Gavilan College San Benito Campus. Development under this alternative would also result in fewer employment opportunities from construction activity and over the long term from operational maintenance activities. A reduced total unit count combined with a smaller developable land area may also reduce opportunities

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for park and pedestrian connectivity between the project site and the adjacent campus. Accordingly, on balance, this alternative does not offer significant environmental advantages over the proposed project and would not satisfy most of the project objectives to the same extent as the proposed project.

# Alternative 4: Alternative Location: Northeast of San Benito Street/Union Road

The "Alternative Location: Northeast of San Benito Street/Union Road" alternative examines placing the proposed development in an alternative location. In summary, the impacts resulting from this alternative in most categories would be similar to the impacts associated with the proposed project since the overall unit count remains the same. However, impacts to biological resources would be substantially reduced, since the site is not designated as CTS critical habitat, and impacts to aesthetics, hydrology, and wet and dry utilities may be somewhat reduced. Air quality impacts would be increased due to the greater number of sensitive receptors that would be exposed to emissions during construction. Impacts to agricultural resources would be significantly greater given that development of this alternative would occur on prime agricultural land, which would create a new significant and unavoidable impact resulting from the conversion of prime farmland to non-agricultural use. Impacts related to exposures to hazardous materials associated with agricultural production and residual pesticides could be greater than those of the proposed project, as would impacts related to consistency with land use and planning policies. Certain construction- and operational-related noise impacts may be greater than those of the proposed project. Development under this alternative would generate the same number of vehicle trips, but has the potential to reduce traffic volumes on local streets in proximity to the site; however, any local increase in traffic volume that occurs in areas with fewer opportunities to improve roadway capacity, may result in greater impact to traffic conditions on neighborhood streets. Additionally, the alternative would add traffic to highway segments operating at LOS E.the timely construction of needed improvements could not be assured under this alternative, similar to the proposed project, and the significant and unavoidable impacts related to TIF collection and the construction of improvements would not be eliminated. As a result, traffic-related impacts to area roadways in proximity to the alternative site could be more severe than those associated with the proposed project, and the alternative would not eliminate significant and unavoidable impacts.

Finally, key project objectives would not be achieved with implementation of this alternative given its lack of adjacency to the Gavilan College San Benito Campus. Specifically, this alternative would not create a mutually supportive relationship between the residential community and the adjacent future Gavilan College San Benito Campus site that would integrate connections and facilitate shared infrastructure. In addition, under this alternative,

there would be no ability to provide convenient pedestrian connections and recreational opportunities through the provision of pocket parks, open space areas, corridors and connections with the adjacent future Gavilan College San Benito Campus site. Finally, implementation of this alternative would not be consistent with the County's objective to direct greater densities to the Area of Special Study.

# **Environmentally Superior Project Alternative**

CEQA Guidelines Section 15126.6(e)(2) requires that the environmentally superior alternative be identified. If the environmentally superior alternative is the "No Project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. In this case, the "No Project-No Build" alternative represents the environmentally superior alternative because all of the impacts would be avoided relative to the project. However, the "No Project-No Build" alternative does not meet any of the project objectives and is inconsistent with the County's designation of the site as an Area of Special Study. Similarly, the "No Project-Consistent with Rural General Plan Land Use Designation" alternative could be viewed as an environmentally superior alternative as compared to the other alternatives because most of the impacts would be reduced or avoided relative to the proposed project (although certain impacts would be similar to or greater than those of the proposed project). However, this alternative does not meet most of the project objectives and also is inconsistent with the County's designation of the site as an Area of Special Study. In addition, both of the above-referenced alternatives are "No Project" alternatives and therefore, another environmentally superior alternative among the remaining alternatives must be identified.

Of the two remaining alternatives, the "Reduced Maximum Residential Units/Increased Open Space Alternative" alternative would be the environmentally superior alternative, since there would be some reduction in impacts as a result of the decrease in unit count and increase in open space, as well as the fact that the alternative location would result in the development of prime agricultural land. For additional comparative analysis, see above discussion. Nevertheless, despite being the environmentally preferred alternative, the reductions in impacts are relatively marginal and are not substantial enough to affect the impact conclusions or eliminate significant and unavoidable impacts to traffic and circulation infrastructure and those resulting from prolonged exposure to construction noise. Further, impacts to agricultural resources and land use and planning would be similar to or possibly greater than those associated with the project.

While a number of the basic project objectives would be achieved under this alternative, the reduced total unit count would result in fewer opportunities for housing, such as less variation in housing options to serve a broad range of community needs, including those of students, faculty, and their families, from the adjoining Gavilan College San Benito Campus. Development under this alternative would also result in fewer employment opportunities from construction activity

and over the long term from operational maintenance activities. A reduced total unit count combined with a smaller developable land area may also reduce opportunities for park and pedestrian connectivity between the project site and the adjacent campus. Accordingly, on balance, this alternative does not offer significant environmental advantages over the proposed project and would not satisfy most of the project objectives to the same extent as the proposed project.

A summary matrix is provided below, which compares in relative terms, each considered alternative with the proposed project.

Table 46 Project Alternative Summary

Environmental Topic	Alternative 1 No Project-No Build	Alternative 2 No Project- Development Consistent with General Plan Land Use Designation	Alternative 3  Reduced  Maximum  Residential  Units	Alternative 4 Alternative Location
Aesthetics	Less	Less significant	Similar or less	Similar or less
Agricultural Resources	Less	Similar or more	Similar or more	More (new significant impact)
Air Quality	Less	Less significant	Similar or less	Similar or somewhat less
Biological Resources	Less	Similar or less	Similar or less	Less
Climate Change	Less	Less/more	Less	Less
Cultural Resources	Less	Similar or less	Similar	Similar
Geology and Soils	Less	Similar or less	Similar	Similar or less
Hazards and Hazardous Materials	Less	Similar or less	Similar or somewhat less	Similar or somewhat more

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Hydrology and Water Quality	Less	Similar or less	Similar or somewhat less	Similar or less significant
Land Use and Planning	Less	Similar or more	Similar or more	Similar or more
Noise	Less	Less	Similar or somewhat less (still significant and unavoidable)	Similar or more (still significant and unavoidable)
Public Services	Less	Less	Less	Similar
Parks and Recreation	Less	Less	Similar	Similar
Transportation	Less	Less (still significant and unavoidable)	Less (still significant and unavoidable)	Similar (still significant and unavoidable)
Wet and Dry Utilities and Energy	Less	Less	Less	Similar

**Source:** EMC Planning Group

*Note:* Table compares each alternative to the proposed project.

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