CHAPTER 5: ALTERNATIVES TO THE PROPOSED PROJECT

5.1 - Introduction

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15126.6, this Draft Environmental Impact Report (Draft EIR) contains a comparative impact assessment of alternatives to the proposed project. The primary purpose of this section is to provide decision-makers and the general public with a reasonable number of feasible project alternatives that could attain most of the basic project objectives, while avoiding or reducing any of the project's significant adverse environmental effects. Important considerations for these alternatives analyses are noted below (as stated in CEQA Guidelines § 15126.6).

- An EIR need not consider every conceivable alternative to a project.
- An EIR should identify alternatives that were considered by the lead agency, but rejected as infeasible during the scoping process.
- Reasons for rejecting an alternative include:
  - Failure to meet most of the basic project objectives;
  - Infeasibility; or
  - Inability to avoid significant environmental effects.

5.1.1 - Significant Unavoidable Impacts

The proposed project would result in the following significant unavoidable impacts:

- **Consistency With Air Quality Management Plan:** The proposed project would result in exceedances of regional emissions thresholds and, therefore, be inconsistent with the Bay Area Air Quality Management District (BAAQMD) regional air quality planning assumptions. Mitigation is proposed requiring the implementation of feasible emissions reduction measures; however, these measures would not reconcile this inconsistency. Therefore, the significance after mitigation is significant and unavoidable.
- **Cumulative Criteria Pollutant Emissions Impacts:** The project would result in a cumulatively considerable net increase of criteria pollutants for which the project region is nonattainment under an applicable federal or state ambient air quality standard. Mitigation is proposed requiring the implementation of air emissions reduction measures, but it would not fully reduce this impact to a level of less than significant. Therefore, the significance after mitigation is significant and unavoidable.

5.1.2 - Alternatives to the Proposed Project

The three alternatives to the proposed project analyzed in this section are as follows:

- **No Project/No Development Alternative:** The project site would remain undeveloped for the foreseeable future and no development would occur.

- **No Project/Existing General Plan Alternative:** A 2.4-million-square-foot food and beverage processing facility would be developed on the project site.
- **Reduced Density Alternative:** A 1.6-million-square-foot logistics center would be developed on the project site, which represents a 25 percent reduction in square footage relative to the proposed project. The layout and project boundaries would remain the same as the proposed project.
- **Phase 1 Only Alternative:** Phase 1 of the proposed project would be developed, which consists of approximately 1.1 million square feet of high-cube warehouse on 95 acres. Phase 2 would not be developed, and the remaining 113 acres would remain undeveloped.

Three alternatives to the proposed project are analyzed below. These analyses compare the proposed project and each individual project alternative. In several cases, the description of the impact may be the same under each alternative when compared with the CEQA Thresholds of Significance (i.e., both the project and the alternative would result in a less than significant impact). The actual degree of impact may be slightly different between the proposed project and each alternative, and this relative difference is the basis for a conclusion of greater or lesser impacts.

5.2 - Project Objectives and Underlying Purpose

The underlying purpose of the proposed project is to develop industrially-zoned undeveloped land within the American Canyon city limits to its highest and best use.

As stated in Section 2, Project Description, the objectives of the proposed project are to:

1. Promote economic growth in American Canyon by attracting new industries.
2. Promote development that that generates net positive tax revenues for the City by generating more in new tax revenues than are consumed by City expenditures on services provided to the development.
3. Create new employment opportunities for residents of Napa County and the surrounding region.
4. Develop compatible land uses near the Napa County Airport in the interests of avoiding interference with aviation operations.
5. Improve American Canyon's jobs-housing ratio by adding new employment opportunities.
6. Continue the orderly development of the Devlin Road corridor with a well-designed project.
7. Further the goals and policies of the City of American Canyon General Plan by developing land contemplated to support urban development to its highest and best use.
8. Preserve the most biologically sensitive portions of the project site as open space.

9. Install circulation improvements along Green Island Road and Devlin Road that provide efficient ingress and egress to the proposed project while also ensuring these facilities operate at acceptable levels.
10. Promote public safety by incorporating security measures into the project design.
11. Mitigate impacts on the environment through implementation of feasible mitigation measures.

5.3 - Alternative 1—No Project/No Development Alternative

CEQA Guidelines Section 15126.6(e) requires that an EIR evaluate a "No Project Alternative," which is intended to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. In cases where the project constitutes a land development project, the No Project Alternative is the "circumstance under which the project does not proceed." For many projects, the No Project Alternative represents a "No Development" scenario, in which the project site remains in its existing condition and no development occurs for the foreseeable future. However, CEQA Guidelines Section 15126.6(e)(3)(B) establishes that "If disapproval of the project under consideration would result in predictable actions by others such as the proposal of some other project, this 'no project' consequence should be discussed." In the interests of informed decision-making, this EIR shall consider both a No Project/No Development Alternative and a No Project/Existing General Plan Alternative.

Under the No Project/No Development Alternative, the project site would remain undeveloped for the foreseeable future.

5.3.1 - Impact Analysis

The project site would remain undeveloped for the foreseeable future. Accordingly, this alternative would avoid all of the proposed project's significant impacts (including significant and unavoidable impacts), as well as the need to implement any mitigation measures.

5.3.2 - Conclusion

The No Project/No Development Alternative would avoid the proposed project's significant and unavoidable impacts and would avoid any potential impacts related to all environmental topical areas. However, this alternative would not advance any of the project objectives, including those related to facilitating the development of land planned for business park/industrial uses to its highest and best use; positively contributing to the local economy; providing the City of American Canyon with a high-quality, employment-generating industrial development; and serving local and regional demand for manufacturing, logistics warehouse, and other industrial uses. Finally, it should be noted that the project site is zoned for industrial use, has been the subject of previous industrial development proposals, and is currently served with infrastructure suitable for this type of development. Thus, should the proposed project not advance, it would be expected that another industrial development proposal would be submitted.

5.4 - Alternative 2–No Project/Existing General Plan Alternative

Under the No Project/Existing General Plan Alternative, the project site would be developed as 2.4 million square feet of food and beverage processing uses. This alternative would have the same development footprint as the proposed project, albeit with single buildings on either side of Devlin Road. The end user would be a large-scale manufacturer of locally sourced food and beverage products such fruits, vegetables, sauces, oils, specialty items, wine, and beer.

Table 5-1: No Project/Existing General Plan Alternative

Scenario	Total Acres	Developed Acres	End Use	Square Feet
No Project/Existing General Plan Alternative	208	163	Food and beverage processing	2,400,000
Proposed Project	208	163	High-Cube Warehouse	2,400,000
Difference	–	–	–	–
Source: FirstCarbon Solutions (FCS) 2021.				

5.4.1 - Impact Analysis

Aesthetics, Light, and Glare

The No Project/Existing General Plan Alternative consists of developing 2.4 million square feet of food and beverage processing uses and associated infrastructure on the project site. Similar exterior light fixtures would be installed, and Mitigation Measure (MM) AES-3 would be implemented. The buildings developed under this alternative would be industrial in appearance similar to other structures in the Green Island Road Business Park. Therefore, the No Project/Existing General Plan Alternative would have similar aesthetics, light, and glare impacts as the proposed project.

Air Quality

The No Project/Existing General Plan Alternative would result in an equivalent amount of construction activity and 5,544 more daily vehicle trips (refer to Table 5-2), which have an approximately 240 percent increase in operational criteria pollutant and toxic air contaminant (TAC) emissions, assuming an equal fleet proportion of passenger vehicles versus trucks as that considered in the proposed project. Additionally, this alternative would attract more truck trips beyond what was considered under the proposed project and, thus, increase the severity of the significant unavoidable sensitive receptor impact. MM AIR-2a, MM AIR-2b, MM AIR-2c, and MM AIR-2d would be implemented under this alternative. This alternative would increase the severity of the proposed project's significant unavoidable air quality impacts by emitting more pollutants from operational activities. Therefore, this alternative would have greater impact on air quality than the proposed project.

Biological Resources

Similar ground-disturbing activities would occur within the same development footprint as the proposed project, and MM BIO-1a, MM BIO-1b, MM BIO-1c, MM BIO-1d, MM BIO-1e, MM BIO-3a, MM BIO-3b, MM BIO-3c, and MM BIO-4 would be implemented. Therefore, the No Project/Existing General Plan Alternative would have similar biological resources impacts as the proposed project.

Cultural and Tribal Cultural Resources

Similar ground-disturbing activities would occur within the same development footprint as the proposed project, and MM CUL-1a, MM CUL-1b, MM CUL-2, and MM CUL-3 would be implemented. Therefore, the No Project/Existing General Plan Alternative would have similar cultural resources impacts as the proposed project.

Geology, Soils, and Seismicity

Similar development activities would occur within the same development footprint, and MM GEO-1a and MM GEO-1b would be implemented. Therefore, the No Project/Existing General Plan Alternative would have similar geology, soils, and seismicity resources impacts as the proposed project.

Greenhouse Gas Emissions and Energy

The No Project/Existing General Plan Alternative would result in an equivalent amount of construction activity and 5,544 more daily vehicle trips (refer to Table 5-2), which have an approximately 240 percent increase in operational greenhouse gas (GHG) emissions, assuming an equal fleet proportion of passenger vehicles versus trucks as that considered in the proposed project. MM GHG-1a and MM GHG-1b would be implemented under this alternative. This alternative would increase the severity of the proposed project's significant unavoidable GHG impacts by emitting more pollutants from operational activities. Therefore, this alternative would have greater impact on GHG emissions than the proposed project.

Hazards and Hazardous Materials

As with the proposed project, no hazardous conditions exist on-site, and, therefore, impacts would be less than significant. This alternative would develop a 2.4-million-square-foot food and beverage processing facility, which would not involve the routine use of hazardous materials. Therefore, this alternative would have similar hazards and hazardous materials impacts as the proposed project.

Hydrology and Water Quality

Similar ground-disturbing activities would occur within the same development footprint, and MM HYD-1a and MM HYD-1b would be implemented. This alternative would develop an equivalent amount if impervious surface coverage as the proposed project and, thus, have equivalent drainage impacts. Therefore, the No Project/Existing General Plan Alternative would have similar hydrology and water quality impacts as the proposed project.

Land Use

This alternative would develop a 2.4-million-square-foot food and beverage processing facility, which is allowable under the existing General Plan and Zoning designations for the project site. Therefore, it would yield similar conclusions in terms of consistency with the City of American Canyon General Plan and the American Canyon Zoning Ordinance. Food and beverage processing would emit sources of steam, which have the potential to conflict with the provisions of the Napa County Airport Land Use Compatibility Plan. Therefore, the No Project/Existing General Plan Alternative would have greater land use impacts than the proposed project.

Noise

The No Project/Existing General Plan Alternative would result in equivalent construction activity and 5,544 more daily vehicle trips (refer to Table 5-2), which would have corresponding increases in the severity of operational noise impacts. MM NOI-1 would be implemented under this alternative. Although this alternative would implement mitigation measures similar to the proposed project, the increase in vehicle trips would increase the severity of noise impacts. Therefore, this alternative would have greater impact on noise than the proposed project.

Public Services

End uses would be similar to the proposed project. Although the proposed project's public services impacts were found to be less than significant and did not require mitigation, this alternative would result in less demand for fire protection and police protection through the 600,000-square-foot reduction in development potential. Accordingly, no new or expanded fire or police facilities would be required. Therefore, the No Project/Existing General Plan Alternative would have less impact on public services than the proposed project.

Transportation

Table 5-2 summarizes the daily and peak-hour trip generation associated with the No Project/Existing General Plan Alternative. As shown in the table, this alternative would yield an increase of 5,544 daily vehicle trips, 1,248 AM peak-hour vehicle trips, and 1,344 PM peak-hour vehicle trips. Although the proposed project's transportation impacts were found to be less than significant and did not require mitigation, the substantial increase in Vehicle Miles Traveled (VMT) by the No Project/Existing General Plan Alternative would be considered detrimental from a transportation perspective. The No Project/Existing General Plan Alternative would have greater transportation impacts than the proposed project.

Table 5-2: No Project/Existing General Plan Alternative Trip Generation Comparison

Scenario	Daily	AM Peak-hour	PM Peak-hour
No Project/Existing General Plan Alternative	9,432	1,488	1,608
Proposed Project	3,888	240	264
Difference	**5,544**	**1,248**	**1,344**

Notes:
Source: W-Trans, 2021; FirstCarbon Solutions (FCS) 2021.

Utilities and Service Systems

The No Project/Existing General Plan Alternative end uses would consist of food and beverage processing, which would demand more water and generate more effluent and solid waste by an estimated 240 percent. The proposed project's utilities and service system impacts were found to be less than significant and did not require mitigation. Because this alternative would result in an approximately 240 percent increase in demand for water and an approximately 240 percent increase in generation of wastewater and solid waste, it would have more severe impacts on utilities and service systems. Therefore, the No Project/Existing General Plan Alternative would have less impact on utilities and service systems than the proposed project.

5.4.2 - Conclusion

The No Project/Existing General Plan Alternative would not avoid the significant and unavoidable air quality and GHG emissions impacts associated with the proposed project and in fact would increase the severity of these impacts. The No Project/Existing General Plan Alternative would increase the severity of impacts associated with land use, noise, public services, transportation, and utilities. Additionally, the No Project/Existing General Plan Alternative would have similar impacts on aesthetics, biological resources, cultural resources, geology, hazards, and hydrology and water quality.

The No Project/Existing General Plan Alternative would advance most of the project objectives including those related to facilitating the development of land planned for business park/industrial uses to its highest and best use; positively contributing to the local economy; providing the City of American Canyon with a high-quality, employment-generating industrial development. However, the change of the end use would not advance the project objective concerning serving local and regional demand for logistics warehouse uses.

5.5 - Alternative 3—Reduced Density Alternative

Under the Reduced Density Alternative, a 1.6 million square-foot logistics center would be developed on the project site, which represents a 25 percent reduction in the proposed project's square footage. This would yield a 600,000-square-foot reduction in buildout potential, which would be applied proportionately to all project buildings. The reduction in building square footage would allow for 10 additional acres of the site to be preserved in its natural state.

The project boundaries, layout, (including disturbance area) and high-cube warehouse end uses would remain the same. Vehicular access points would remain at the same locations. The Napa Valley Vine Trail would be constructed along the project's frontages with Devlin Road and Green Island Road.

Table 5-3 summarizes the Reduced Density Alternative. The purpose of this alternative is to evaluate a smaller project with end uses identical to the proposed project that may avoid or substantially lessen the severity of significant project impacts.

Table 5-3: Reduced Density Alternative

Scenario	Total Acres	Developed Acres	End Use	Square Feet
Reduced Density Alternative	208	153	High-Cube Warehouse	1,800,000
Proposed Project	208	163	High-Cube Warehouse	2,400,000
Difference	**–**	**(10)**	**–**	**(600,000)**
Source: FirstCarbon Solutions (FCS) 2021.				

5.5.1 - Impact Analysis

Aesthetics, Light, and Glare

The Reduced Density Alternative consists of developing 1.8 million square feet of high-cube warehouse uses and associated infrastructure on the project site. Similar exterior light fixtures would be installed, and MM AES-3 would be implemented. The buildings developed under this alternative would retain a similar appearance to the proposed project's structures; however, 600,000-square-foot reduction in warehouses would reduce the amount of development on the project site and add 10 acres to the open, natural area of the site. Therefore, the Reduced Density Alternative would have less impact on aesthetics, light, and glare than the proposed project.

Air Quality

The Reduced Density Alternative would result in less construction activity and 972 fewer daily vehicle trips (refer to Table 5-4), which have an approximately 25 percent reduction in construction and operational criteria pollutant and TAC emissions. Additionally, this alternative would attract approximately 25 percent fewer truck trips and passenger vehicle trips and, thus, lessen the severity of the significant unavoidable sensitive receptor impact. MM AIR-2a, MM AIR-2b, MM AIR-2c, and MM AIR-2d would be implemented under this alternative. Although this alternative would not avoid the proposed project's significant unavoidable air quality impacts, it would lessen the severity by emitting fewer pollutants from operational activities. Therefore, this alternative would have less impact on air quality than the proposed project.

Biological Resources

Similar ground-disturbing activities would occur within the same development footprint as the proposed project, and MM BIO-1a, MM BIO-1b, MM BIO-1c, MM BIO-1d, MMBIO-1e, MM BIO-3a, MM BIO-3b, MM BIO-3c, and MM BIO-4 would be implemented. Therefore, the Reduced Density Alternative would have similar biological resources impacts as the proposed project.

Cultural and Tribal Cultural Resources

Similar ground-disturbing activities would occur within the same development footprint as the proposed project, and MM CUL-1a, MM CUL-1b, MM CUL-2, and MM CUL-3 would be implemented. Therefore, the Reduced Density Alternative would have similar cultural resources impacts as the proposed project.

Geology, Soils, and Seismicity

Similar development activities would occur within the same development footprint, and MM GEO-1a and MM GEO-1b would be implemented. Therefore, the Reduced Density Alternative would have similar geology, soils, and seismicity resources impacts as the proposed project.

Greenhouse Gas Emissions and Energy

The Reduced Density Alternative would result in less construction activity and 972 fewer daily vehicle trips (refer to Table 5-4), which have corresponding reductions in the severity of construction and operational greenhouse gas emissions. MM GHG-1a and MM GHG-1b would be implemented under this alternative. Although this alternative would not avoid the proposed project's significant unavoidable greenhouse gas impacts, it would lessen the severity by emitting fewer emissions from operational activities. Therefore, this alternative would have less impact on GHGs than the proposed project.

Hazards and Hazardous Materials

As with the proposed project, no hazardous conditions exist on-site, and, therefore, impacts would be less than significant. This alternative would result in a 600,000-square-foot reduction in high-cube warehouse development potential and, thus, would reduce the potential for hazardous material releases during construction and operations. Therefore, this alternative would have less impact on hazards and hazardous materials than the proposed project.

Hydrology and Water Quality

Similar ground-disturbing activities would occur within the same development footprint, and MM HYD-1a and MM HYD-1b would be implemented. This alternative would reduce the project's less than significant (after mitigation) hydrology and water quality impacts because there would be less impervious surface coverage. Therefore, the Reduced Density Alternative would have less impact on hydrology and water quality than the proposed project.

Land Use

This alternative would develop similar uses to the proposed project, and, therefore, would yield similar conclusions in terms of consistency with the City of American Canyon General Plan, American Canyon Zoning Ordinance, and the Napa County Airport Land Use Compatibility Plan. Thus, MM LU-3 would be implemented to reduce wildlife hazards associated with aviation to a level of less than significant. Therefore, the Reduced Density Alternative would have land use impacts similar to the proposed project.

Noise

The Reduced Density Alternative would result in less construction activity and 972 fewer daily vehicle trips (refer to Table 5-4), which would have corresponding reductions in the severity of construction and operational noise impacts. MM NOI-1 would be implemented under this alternative. Although this alternative would implement mitigation measures similar to the proposed project, the reduction in development potential and vehicle trips would reduce the severity of noise impacts. Therefore, this alternative would have less impact on noise than the proposed project.

Public Services

End uses would be similar to the proposed project. Although the proposed project's public services impacts were found to be less than significant and did not require mitigation, this alternative would result in less demand for fire protection and police protection through the 600,000-square-foot reduction in development potential. Accordingly, no new or expanded fire or police facilities would be required. Therefore, the Reduced Density Alternative would have less impact on public services than the proposed project.

Transportation

Table 5-4 summarizes the daily and peak-hour trip generation associated with the Reduced Density Alternative. As shown in the table, this alternative would yield a reduction of 972 daily vehicle trips, 60 AM peak-hour vehicle trips, and 66 PM peak-hour vehicle trips. Although the proposed project's transportation impacts were found to be less than significant and did not require mitigation, the substantial reduction in VMT by the Reduced Density Alternative would be considered beneficial from a transportation perspective. The Reduced Density Alternative would have less transportation impacts than the proposed project.

Table 5-4: Reduced Density Alternative Trip Generation Comparison

Scenario	Daily	AM Peak-hour	PM Peak-hour
Reduced Density Alternative	2,916	180	198
Proposed Project	3,888	240	264
Difference	**(972)**	**(60)**	**(66)**

Notes:
Source: W-Trans, 2021; FirstCarbon Solutions (FCS) 2021.

Utilities and Service Systems

End uses would be similar to the proposed project. Although the proposed project's utilities and service system impacts were found to be less than significant and did not require mitigation, this alternative would result in an approximately 25 percent reduction in demand for water, and energy, and an approximately 25 percent reduction in generation of wastewater and solid waste through the 600,000-square-foot reduction in development potential. Therefore, the Reduced Density Alternative would have less impact on utilities and service systems than the proposed project.

5.5.2 - Conclusion

The Reduced Density Alternative would lessen the severity of, but would not avoid, the significant and unavoidable air quality and GHG emissions impacts associated with the proposed project. Additionally, the Reduced Density Alternative would lessen the severity of several of the significant impacts that can be reduced to a level of less than significant with mitigation (e.g., hydrology and water quality, and noise).

The Reduced Density Alternative would advance all of the project objectives, with several advanced to a lesser degree. However, the reduction in square footage would result in fewer positive economic benefits and, thus, would advance the project objectives to a lesser degree. (For example, this alternative would be expected to employ fewer workers than the proposed project.) This includes objectives related to facilitating the development of land planned for business park/industrial uses to its highest and best use; positively contributing to the local economy; providing the City of American Canyon with a high-quality, employment-generating industrial development; and serving local and regional demand for logistics warehouse uses.

5.6 - Alternative 3—Phase 1 Only Alternative

Phase 1 of the proposed project would be developed, which consists of 1.1 million square feet on 95 acres. Phase 2 would not be pursued, and the remaining 113 acres would remain undeveloped as a wetland preserve.

Phase 1 would have the same layout and boundaries as the proposed project. Two high-cube warehouses totaling 1.1 million square feet would be developed on 95 acres north of Green Island Road and west of Devlin Road. Vehicular access would be taken from both roadways. Phase 2 would remain undeveloped for the foreseeable future.

Table 5-5 summarizes the Phase 1 Only Alternative. The purpose of this alternative is to evaluate the phase of the project most likely to develop in the near-term and also reduce the development footprint and buildout potential to avoid or substantially lessen the severity of significant project impacts.

Table 5-5: Phase 1 Only Alternative

Scenario	Total Acres	Developed Acres	End Use	Square Feet
Phase 1 Only Alternative	95	72	High-Cube Warehouse	1,100,000
Proposed Project	208	163	High-Cube Warehouse	2,400,000
Difference	**(113)**	**(91)**	**–**	**(1,300,000)**
Source: FirstCarbon Solutions (FCS) 2021.				

5.6.1 - Impact Analysis

Aesthetics, Light, and Glare

The Phase 1 Only Alternative consists of developing 1.1 million square feet of high-cube warehouse uses and associated infrastructure on 95 acres. The remaining 113 acres would remain undeveloped for the foreseeable future. Similar exterior light fixtures would be installed, and MM AES-3 would be implemented. The buildings developed under this alternative would retain a similar appearance to the proposed project's structures; however, 1.3-million-square-foot reduction in warehouses would reduce the amount of development and add 113 acres to the open, natural area of the site.

Therefore, the Phase 1 Only Alternative would reduce the proposed project's less than significant impacts on aesthetics, light, and glare.

Air Quality

The Phase 1 Only Alternative would result in less construction activity and 2,106 fewer daily vehicle trips (refer to Table 5-6), which have an approximately 55 percent reduction in criteria pollutant and TAC emissions. Additionally, this alternative would attract fewer truck trips and, thus, lessen the severity of the significant unavoidable sensitive receptor impact. MM AIR-2, MM AIR-3a, and MM AIR-3b would be implemented under this alternative. Although this alternative would not avoid the proposed project's significant unavoidable air quality impacts, it would lessen the severity by emitting fewer pollutants from operational activities. Therefore, this alternative would have less impact on air quality than the proposed project.

Biological Resources

The Phase 1 Only Alternative consists of developing 1.1 million square feet of high-cube warehouse uses and associated infrastructure on 95 acres. The remaining 113 acres would remain undeveloped for the foreseeable future. Similar development activities would occur for Phase 1 and, therefore, MM BIO-1a, MM BIO-1b, MM BIO-1c, MM BIO-1d, MM BIO-1e, MM BIO-3a, MM BIO-3b, MM BIO-3c, and MM BIO-4 would be implemented. However, the elimination of Phase 2 would lessen the potential for impacts to biological resources. Therefore, the Phase 1 Only Alternative would less impact on biological resources impacts than the proposed project.

Cultural and Tribal Cultural Resources

The Phase 1 Only Alternative consists of developing 1.1 million square feet of high-cube warehouse uses and associated infrastructure on 95 acres. The remaining 113 acres would remain undeveloped for the foreseeable future. Similar development activities would occur for Phase 1 and, therefore, MM CUL-1a, MM CUL-1b, MM CUL-2, and MM CUL-3 would be implemented. However, the elimination of Phase 2 would lessen the potential for impacts to cultural resources. Therefore, the Phase 1 Only Alternative would less impact on cultural resources impacts than the proposed project.

Geology, Soils, and Seismicity

The Phase 1 Only Alternative consists of developing 1.1 million square feet of high-cube warehouse uses and associated infrastructure on 95 acres. The remaining 113 acres would remain undeveloped for the foreseeable future. Similar development activities would occur for Phase 1 and, therefore, MM GEO-1a and MM GEO-1b would be implemented. However, the elimination of Phase 2 would lessen the potential for impacts to geology, soils, and seismicity. Therefore, the Phase 1 Only Alternative would have less impact on geology, soils, and seismicity than the proposed project.

Greenhouse Gas Emissions and Energy

The Phase 1 Only Alternative would result in less construction activity and 2,106 fewer daily vehicle trips (refer to Table 5-6), which have an approximately 55 percent reduction in the severity of GHG emissions. MM GHG-1 and MM GHG-2 would be implemented under this alternative. Although this alternative would not avoid the proposed project's significant unavoidable GHG emission impacts, it

would lessen the severity by emitting fewer emissions from operational activities. Therefore, this alternative would have less impact on GHG emissions than the proposed project.

Hazards and Hazardous Materials

The Phase 1 Only Alternative consists of developing 1.1 million square feet of high-cube warehouse uses and associated infrastructure on 95 acres. The remaining 113 acres would remain undeveloped for the foreseeable future. As with the proposed project, no hazardous conditions exist on-site, and, therefore, impacts would be less than significant. This alternative would result in a 1.3-million-square-foot reduction in high-cube warehouse development potential and, thus, would reduce the potential for hazardous material releases during construction and operations. Therefore, this alternative would have less impact on hazards and hazardous materials than the proposed project.

Hydrology and Water Quality

The Phase 1 Only Alternative consists of developing 1.1 million square feet of high-cube warehouse uses and associated infrastructure on 95 acres. The remaining 113 acres would remain undeveloped for the foreseeable future. Similar development activities would occur for Phase 1 and, therefore, MM HYD-1a and MM HYD-1b would be implemented. However, the elimination of Phase 2 would lessen the potential for impacts to hydrology and water quality. Therefore, the Phase 1 Only Alternative would have less impact on hydrology and water quality than the proposed project.

Land Use

The Phase 1 Only Alternative consists of developing 1.1 million square feet of high-cube warehouse uses and associated infrastructure on 95 acres. The remaining 113 acres would remain undeveloped for the foreseeable future. This alternative would develop similar uses to the proposed project, and, therefore, would yield similar conclusions in terms of consistency with the City of American Canyon General Plan, American Canyon Zoning Ordinance, and the Napa County Airport Land Use Compatibility Plan. Thus, MM LU-3 would be implemented to reduce wildlife hazards associated with aviation to a level of less than significant. Therefore, the Phase 1 Only Alternative would have land use impacts similar to the proposed project.

Noise

The Phase 1 Only Alternative would result in less construction activity and 2,106 fewer daily vehicle trips (refer to Table 5-6), which would have corresponding reductions in the severity of construction and operational noise impacts. MM NOI-1 would be implemented under this alternative. Although this alternative would implement mitigation measures similar to the proposed project, the reduction in development potential and vehicle trips would reduce the severity of noise impacts. Therefore, this alternative would have less impact on noise than the proposed project.

Public Services

End uses would be similar to the proposed project. Although the proposed project's public services impacts were found to be less than significant and did not require mitigation, this alternative would result in less demand for fire protection and police protection through the 1.3-million-square-foot

reduction in development potential. Therefore, the Phase 1 Only Alternative would have less impact on public services than the proposed project.

Transportation

Table 5-6 summarizes the daily and peak-hour trip generation associated with the Phase 1 Only Alternative. As shown in the table, this alternative would yield a reduction of 2,106 daily vehicle trips, 130 AM peak-hour vehicle trips, and 143 PM peak-hour vehicle trips. Although the proposed project's transportation impacts were found to be less than significant and did not require mitigation, the substantial reduction in VMT by the Phase 1 Only Alternative would be considered beneficial from a transportation perspective. The Phase 1 Only Alternative would have less transportation impacts than the proposed project.

Table 5-6: Phase 1 Only Alternative Trip Generation Comparison

Scenario	Daily	AM Peak-hour	PM Peak-hour
Phase 1 Only Alternative	1,782	110	121
Proposed Project	3,888	240	264
Difference	**(2,106)**	**(130)**	**(143)**
Source: W-Trans, 2021; FirstCarbon Solutions (FCS) 2021.			

Utilities and Service Systems

End uses would be similar to the proposed project. Although the proposed project's utilities and service system impacts were found to be less than significant and did not require mitigation, this alternative would result in an approximately 55 percent reduction in demand for water, and energy, and an approximately 55 percent reduction in generation of wastewater and solid waste through the 1.3-million-square-foot reduction in development potential. Therefore, the Phase 1 Only Alternative would have less impact on utilities and service systems than the proposed project.

5.6.2 - Conclusion

The Phase 1 Only Alternative would lessen the severity of, but would not avoid, the significant and unavoidable air quality and GHG emissions impacts associated with the proposed project. Additionally, the Phase 1 Only Alternative would lessen the severity of several of the significant impacts that can be reduced to a level of less than significant with mitigation (e.g., biological resources, cultural resources, hydrology and water quality, and noise).

The Phase 1 Only Alternative would advance all of the project objectives, with several advanced to a lesser degree. However, the reduction in square footage would result in fewer positive economic benefits and, thus, would advance the project objectives to a lesser degree. (For example, this alternative would be expected to employ fewer workers than the proposed project.) This includes objectives related to facilitating the development of land planned for business park/industrial uses to its highest and best use; positively contributing to the local economy; providing the City of

American Canyon with a high-quality, employment-generating industrial development; and serving local and regional demand for logistics warehouse uses.

As a practical matter, the project applicant has a 100-year lease agreement with the property owner, and it would be unlikely that it forgo development on the Phase 2 portion of the project site. Moreover, the project site is the single largest undeveloped site in the City of American Canyon and is zoned for industrial use. Preserving 113 acres the site as a wetland preserve would not represent the highest and best use of the property, particularly since approximately 45 acres of the project site would be assigned for this use.

5.7 - Environmentally Superior Alternative

The qualitative environmental effects of each alternative in relation to the proposed project are summarized in Table 5-7.

Table 5-7: Summary of Alternatives

Environmental Topic Area	Issue(s)	No Project/No Development Alternative	No Project/Existing General Plan Alternative	Reduced Density Alternative	Phase 1 Only Alternative
Aesthetics, Light, and Glare	Scenic Vistas; Visual Character; Light and Glare	Less impact	Similar impact	Less impact	Less impact
Air Quality	Air Quality Plan, Criteria Pollutants, Toxic Air Contaminants	Less impact	Greater Impact	Less impact	Less impact
Biological Resources	Special-status species; Wetlands, Wildlife Movement	Less impact	Similar impact	Similar impact	Less impact
Cultural and Tribal Cultural Resources	Historic Resources, Archaeological Resources; Human Remains; Tribal Cultural Resources	Less impact	Similar impact	Similar impact	Less impact
Geology, Soils, and Seismicity	Seismic Hazards; Erosion; Unstable Geologic Units; Expansive Soils	Less impact	Similar impact	Similar impact	Less impact
Greenhouse Gas Emissions and Energy	Greenhouse Gas Reduction Plans; Energy	Less impact	Greater impact	Less impact	Less impact
Hazards and Hazardous Materials	Routine Use; Risk of Upset; Aviation Hazards; Emergency Response	Less impact	Similar impact	Less impact	Less impact

Environmental Topic Area	Issue(s)	No Project/No Development Alternative	No Project/Existing General Plan Alternative	Reduced Density Alternative	Phase 1 Only Alternative
Hydrology and Water Quality	Water Quality; Groundwater; Drainage	Less impact	Similar impact	Similar impact	Less impact
Land Use	General Plan; Zoning; Airport Land Use Plan Consistency	Less impact	Greater impact	Similar impact	Similar impact
Noise	Noise Level Standards; Vibration; Aviation Noise	Less impact	Greater impact	Less impact	Less impact
Public Services	Fire; Police	Less impact	Greater impact	Less impact	Less impact
Transportation	Circulation System; Vehicle Miles Traveled; Roadway Hazards; Emergency Access	Less impact	Greater impact	Less impact	Less impact
Utilities and Service Systems	Water; Wastewater; Solid Waste	Less impact	Greater impact	Less impact	Less impact
Source: FirstCarbon Solutions (FCS) 2021.					

CEQA Guidelines Section 15126(e)(2) requires an EIR to identify an environmentally superior alternative. If the No Project Alternative is the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives.

The No Project/No Development Alternative reduces impacts on all categories and, thus, would be the environmentally superior alternative. Of the three remaining alternatives, the Phase 1 Only Alternative achieves the greatest reduction in impacts both reducing buildout potential and disturbance areas. Therefore, the Phase 1 Only Alternative is the environmentally superior alternative.

5.8 - Alternatives Rejected From Further Consideration

The following alternatives were initially considered, but rejected from further consideration for the reasons described below.

5.8.1 - Phase 2 Only Alternative

A Phase 2 Only Alternative was initially considered as a project alternative. This alternatives analysis evaluated a Phase 1 Only Alternative because it has less acreage and development potential than Phase 2. In addition, development plans are available for Phase 1 whereas Phase 2 is conceptual. Furthermore, the applicant has indicated that Phase 1 would develop first followed by Phase 2.

Hence, evaluating a Phase 2 Only Alternative would be illogical and out-of-sequence and, thus, it was rejected from further consideration.

5.8.2 - Alternative Location

CEQA Guidelines Section 15126.6(f)(2) sets forth considerations to be used in evaluating an alternative location. The section states that the "key question" is whether any of the significant effects of the proposed project would be avoided or substantially lessened by relocating the proposed project. The CEQA Guidelines identify the following factors that may be taken into account when addressing the feasibility of an alternative location:

1. Site suitability
2. Economic viability
3. Availability of infrastructure
4. General Plan consistency
5. Other plans or regulatory limitations
6. Jurisdictional boundaries
7. Whether the project applicant can reasonably acquire, control, or otherwise have access to the alternative site

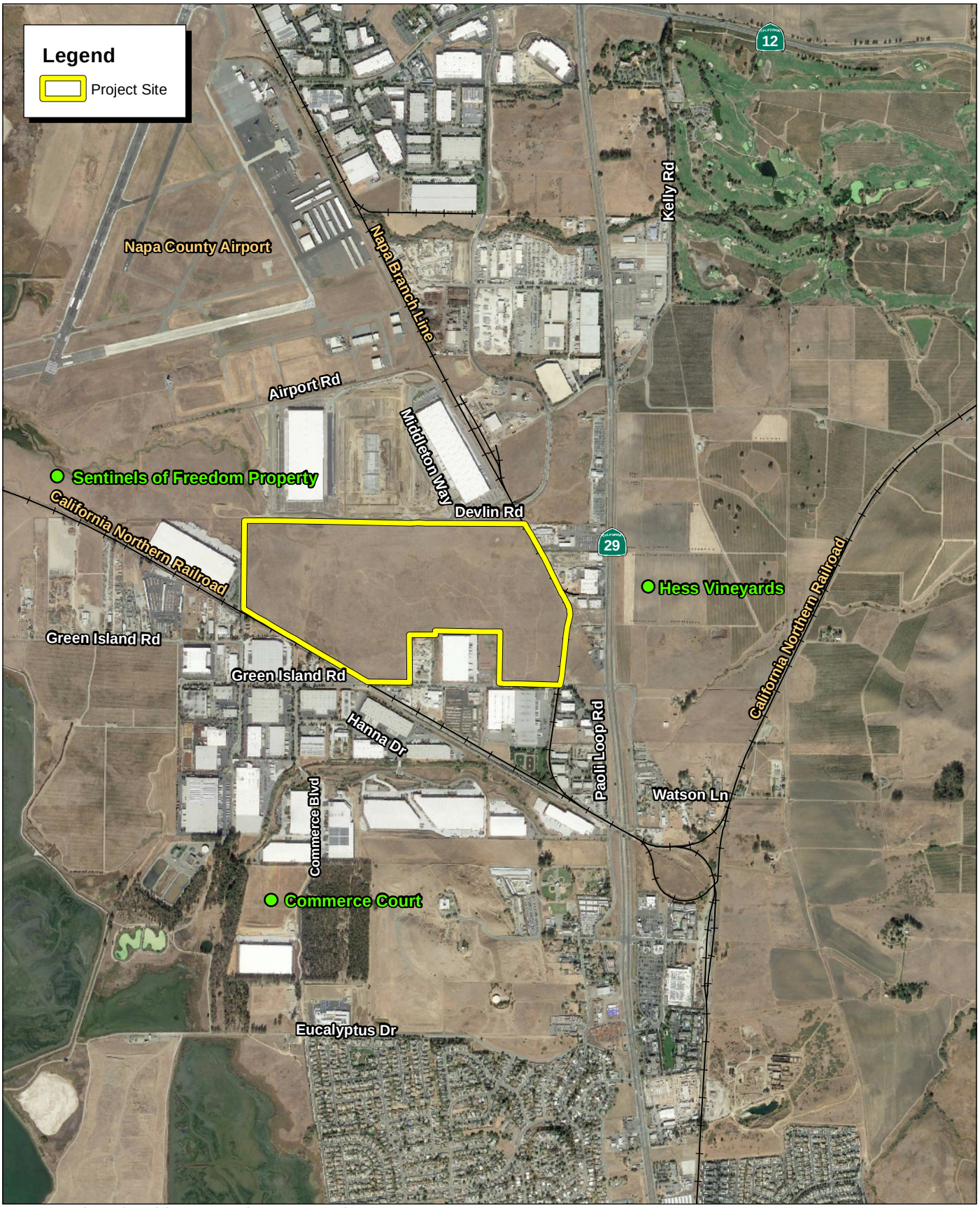
Here, "General Plan consistency" is an important factor. CEQA case law is clear that EIRs for proposed private projects consistent with governing General Plan designations generally need not address alternative sites, given that such existing General Plan designations embody policy decisions already made by governing city councils and boards of supervisors. "[T]he keystone of regional planning is consistency—between the general plan, its internal elements, subordinate ordinances, and all derivative land use decisions." (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 572.) "Case-by-case reconsideration of regional land use policies, in the context of a project-specific EIR, is the very antithesis of that goal." (*Id*. at p. 573.) "[A]n EIR is not ordinarily an occasion for the reconsideration or overhaul of fundamental land use policy." (*Ibid*.)

Table 5-8 evaluates the feasibility of three alternative locations located within 1 mile of the project site in either the City of American Canyon or unincorporated Napa County. The three locations are shown on Exhibit 5-1. As indicated in Table 5-8, none of the three sites would meet CEQA Guidelines criteria for a feasible alternative location.

Table 5-8: Alternative Location Feasibility Analysis

Name	Description	Feasibility Determination
Sentinels of Freedom Property	Approximately 25 acres located west of Napa Logistics Park and south of Napa County Airport in unincorporated Napa County and within the City of American Canyon Sphere of Influence. This site contains undeveloped land, is bisected by No Name Creek, and parts are within a 100-year flood hazard area. This site is designated "Industrial" by the Napa County General Plan and	**Not Feasible:** This site is controlled by the Sentinels of Freedom and is not owned, controlled, or otherwise accessible to the project applicant. The Sentinels of Freedom have conceptually proposed developing two warehouses on the property with vehicular access occurring from either Napa County Airport and the Napa Logistics Park. Additionally, the acreage of this site (25

Name	Description	Feasibility Determination
	zoned "Business/Industrial" by the Napa County Airport Industrial Area Specific Plan.	acres) is 12 percent of the acreage of the project site (208 acres) and, thus, is too small to accommodate the level of development contemplated by the proposed project.
Commerce Court	Approximately 21 acres located near the south end of Commerce Court in the City of American Canyon. The site is undeveloped. This site is designated "Commercial Recreation" by the City of American Canyon General Plan and zoned "Recreation" by the American Canyon Zoning Ordinance. This site is the subject of a development application for two distribution centers (224,000 and 217,000 square feet).	**Not Feasible:** This site is owned by a third party and is not owned, controlled, or otherwise accessible to the project applicant. Additionally, the acreage of this site (21 acres) is 10 percent of the acreage of the project site (208 acres) and, thus, is too small to accommodate the level of development contemplated by the proposed project. Moreover, this site is the subject of an active development application to develop a similar type use as the proposed project and, thus, is not available.
Hess Vineyards	Approximately 100 acres located east of SR-29/S. Kelly Road in unincorporated Napa County. This site contains cultivated agricultural land. This site is designated "Agricultural, Watershed, and Open Space" by the Napa County General Plan and zoned "Agricultural Watershed" by the Napa County Zoning Ordinance.	**Not Feasible:** This site is owned by a third party and is not owned, controlled, or otherwise accessible to the project applicant. Additionally, the acreage of this site (100 acres) is 52 percent of the acreage of the project site (208 acres) and, thus, is too small to accommodate the level of development contemplated by the proposed project. Finally, this property was re-designated from "Industrial" to "Agricultural, Watershed, and Open Space" in 2008, signifying the County's policy direction for this particular property.
Source: FirstCarbon Solutions (FCS) 2021.		



Source: Google Earth Aerial Imagery, 10/2020. County of Napa.

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2,000 1,000 0 2,000 Feet

Exhibit 5-1
Alternative Locations

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CITY OF AMERICAN CANYON
GIOVANNONI LOGISTICS CENTER PROJECT
ENVIRONMENTAL IMPACT REPORT

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