

6.0 ALTERNATIVES

In accordance with CEQA and the *State CEQA Guidelines* (Section 15126.6), an EIR must describe a reasonable range of alternatives to the project, or to the location of the project, that could attain most of the project’s basic objectives, while avoiding or substantially lessening any of the significantly adverse environmental effects of the project. An EIR does not need to consider every conceivable alternative to a project, rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation.

As an EIR identifies ways to mitigate or avoid significant effects that a project may have on the environment, the discussion of alternatives should focus on alternatives to the project or its location that are capable of avoiding or substantially lessening significant effects of the project. The EIR needs to include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project, the significant effects of the alternative should be discussed, but in less detail than the significant effects of the project. The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. *State CEQA Guidelines* note that an EIR should not consider alternatives “whose effect cannot be ascertained and whose implementation is remote and speculative.”

6.1 PROPOSED PROJECT AND ITS OBJECTIVES

As described in more detail in **Chapter 3.0: Project Description**, the proposed project includes the development of a four-story, approximately 204,144 square-foot apartment building with 185 rental units situated around a central clubhouse area. The four-story building would consist of three wings and would be up to 49 feet tall. The proposed apartment building would include 36 studio/1 bath units (approximately 482 to 582 square feet), 66 one-bedroom/1 bath units (approximately 670 to 696 square feet), 77 two-bedroom/2 bath units (approximately 1,006 to 1,199 square feet), and 6 three-bedroom/2 bath units (approximately 1,416 square feet). The average unit size would be approximately 864 square feet. The proposed project includes an internal circulation system that loops around the apartment building, surface parking areas, and a two-story parking garage. Based on an average household size of 2.75 persons, the proposed project would house 509 residents.^{1 2}

¹ 2.75 residents per multifamily unit x 185 units = 509 residents (rounded). Derived from City of Fairfield, Fairfield Guidelines for Project VMT Screening Transportation Analysis, December 22, 2020, American Community Survey 2012-2016 Five-Year Estimates.

² Based on a recent population assessment conducted by the project applicant for the Green Valley 1 Project, which consists of a multi-family residential development in Fairfield similar to the proposed project, there are 1.9 residents/unit. If this household size were to be used, the proposed project would generate about 350 residents. As such, 509 residents or 2.75 residents/unit for the proposed project reflects a conservative population assessment that has been used for this EIR analysis.

The proposed multi-family apartment complex would be a rental property that would be managed and maintained by an apartment management company. A total of five employees would be employed at the project site to operate the leasing office and maintain the property.

If approved, project construction is anticipated to commence in Summer 2023 and be completed in Spring 2025. Project occupancy is expected in Spring 2025. Discretionary actions and approvals by the City that would be necessary for development of the proposed project include environmental review, General Plan Land Use Amendment/Rezoning, and Development Review.

As stated in **Chapter 3.0**, the objectives of the proposed project are to:

- Create a development of a scale and character that complements and is supportive of the surrounding uses;
- Develop a well-designed, economically feasible residential community that consists of a variety of unit types and sizes;
- Develop a residential project that contains a high density of residences to help meet City, regional, and State housing goals; and
- Improve the availability of rental housing in the Green Valley/Cordelia area of western Fairfield.

6.2 SIGNIFICANT IMPACTS OF THE PROPOSED PROJECT

The potential environmental effects of implementing the proposed project are analyzed in **Chapter 4.0: Environmental Setting, Impacts, and Mitigation Measures**. As analyzed in more detail in **Chapters 4.0 and 5.0** of this EIR, the project's impacts under the resource topics of *Air Quality; Biological Resources; Cultural and Tribal Cultural Resources; Geology and Soils; Noise; and Transportation* would be significant but would be reduced to less than significant if the mitigation measures recommended in this EIR are implemented. There would be no impacts that are significant and unavoidable.

The project's environmental impacts under all of the remaining resource topics (*Aesthetics; Agricultural and Forest Resources; Energy; Greenhouse Gas Emissions; Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Mineral Resources; Population and Housing; Public Services and Recreation; Utilities and Service Systems; and Wildfire*) would be less than significant and would not require mitigation or an alternative that would reduce these impacts. Therefore, these resource topics are not discussed further in this chapter unless an alternative has the potential to result in a significant impact on a resource that would not be significantly affected by the proposed project. The project's significant impacts, which have been used to evaluate alternatives, are summarized below.

6.2.1 Air Quality

As analyzed in **Section 4.2: Air Quality**, construction of the proposed project would result in a cumulatively considerable net increase of a criteria pollutant (dust/particulate matter) for which the project region is non-attainment under an applicable federal or State ambient air quality standard

(**Impact AQ-2**). Emissions from project construction activities would exceed established thresholds for impacts due to toxic air contaminant emissions (TACs) (**Impact AQ-4**). Both impacts would be reduced to less than significant with the proposed mitigation measures. All other impacts on air quality would be less than significant.

6.2.2 Biological Resources

The analysis in **Section 4.3: Biological Resources** found that the proposed project would have a substantial adverse effect, either directly or through habitat modifications, on Swainson's hawks (**Impact BIO-1**); burrowing owls (**Impact BIO-2**); raptors, nesting birds, or other birds protected under the California Fish and Game Code and Migratory Bird Treaty Act (MBTA) (**Impact BIO-3**); monarch butterfly (**Impact BIO-4**); on riparian habitat from inadvertent disturbance during project construction (**Impact BIO-5**); on state or federally protected wetlands through direct removal and filling (**Impact BIO-6**); and conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (**Impact BIO-8**). All of these impacts would be reduced to less than significant with the proposed mitigation measures. All of the other biological resource impacts would be less than significant.

6.2.3 Cultural and Tribal Cultural Resources

As described in **Section 4.4: Cultural and Tribal Cultural Resources**, the proposed project could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 (**Impact CUL-2**). The proposed project could also disturb human remains, including those interred outside of formal cemeteries (**Impact CUL-3**) and potentially affect tribal cultural resources (**Impact TCR-2**). All three impacts would be reduced to less than significant with the proposed mitigation measures. All other impacts on cultural and tribal cultural resources would be less than significant.

6.2.4 Geology and Soils

The analysis in **Section 4.6: Geology and Soils** reflects that the proposed project could result in hazards due to differential settlement (**Impact GEO-3**) and expansive soils (**Impact GEO-4**) and affect a previously unknown unique paleontological resource or site (**Impact GEO-6**). These impacts would be reduced to less than significant with the proposed mitigation measures. All other impacts related to geology and soils would be less than significant.

6.2.5 Noise

As described in **Section 4.10: Noise**, project construction activities would generate a temporary increase in noise levels at the nearest sensitive receptors in excess of the FTA standard for construction noise (**Impact NOI-1**). However, the proposed mitigation measures would reduce the construction noise impact to less than significant. All of the other impacts related to noise and vibration would be less than significant.

6.2.6 Transportation

The analysis in **Section 4.12: Transportation** found that the proposed project would conflict or be inconsistent with *State CEQA Guidelines* Section 15064.3, subdivision (b) based on the fact the

vehicle miles traveled (VMT) it would generate per apartment unit would be greater than the baseline VMT threshold for multi-family units in Fairfield (**Impact TRA-2**). For the same reason, development of the proposed project, in combination with past, present, and reasonably foreseeable future developments, would conflict or be inconsistent with *State CEQA Guidelines* Section 15064.3, subdivision (b) and result in a significant cumulative impact (**Cumulative Impact C-TRA-2**). Both impacts would be reduced to less than significant with the proposed mitigation measure. All of the other impacts related to transportation would be less than significant.

6.3 ALTERNATIVES EVALUATED IN DETAIL

The following alternatives were identified for detailed evaluation and are designed to inform public participation and reasoned choice by decision-makers:

- **Alternative 1: No Project/No Development.** Under the No Project/No Development alternative, no grading or new construction would occur on the project site and the site would remain vacant.
- **Alternative 2: No Project/Development Consistent with Existing Zoning.** Under this alternative, consistent with the site’s existing zoning of Industrial Business Park – North Cordelia Overlay (IBP-NC), the project site would be developed with a business office complex with a maximum of about 250,000 square feet of office space.³
- **Alternative 3: Reduced Project.** Under this alternative, the project site would be developed with a three-story, approximately 147,200-square foot apartment building with 130 rental units.

Table 6.A: Key Attributes of Proposed Project and Alternatives summarizes the key characteristics of the proposed project and these three alternatives.

Table 6.A: Key Attributes of Proposed Project and Alternatives

Alternative	Building Space (n square feet)	Number of Buildings	Building Height	Number of Residential Units	On-site Population
Proposed Project	204,144	1	4 stories (49 feet)	185	509 residents; ¹ 5 employees
No Project/No Development	0	0	0	0	0
No Project/Development Consistent with Zoning	250,000	1 to 2	2 to 4 stories (up to 50 feet)	0	769 employees ²
Reduced Project	147,200	1	3 stories (37 feet)	130	358 residents; ¹ 5 employees

¹ Based on an average household size of 2.75 persons per apartment (taken from the City’s VMT Guidelines).

² Based on 325 square feet per employee of office space (taken from the City’s VMT Guidelines).

³ The City’s zoning ordinance permits a maximum 1.0 Floor Area Ratio (FAR) (i.e., maximum percent of net lot area) for the Industrial Business Park zoning designation. Therefore, as the project site is 5.78 acres or approximately 251,777 square feet in size, the maximum office space allowed under this zoning designation would be approximately 250,000 square feet.

These alternatives represent a reasonable range of potential alternatives to the proposed project in light of the objective of reducing or avoiding the significant or potentially significant impacts of the proposed project identified in this EIR. Other potential alternatives were also considered, as discussed later in this chapter, but were not selected for detailed analysis because none of those alternatives would substantially reduce or avoid the significant environmental impacts of the proposed project, meet most of the basic project objectives, or were found to infeasible for other reasons.

The analysis in this chapter provides both a quantitative and qualitative evaluation of the environmental impacts that could occur with each alternative and compares those potential impacts to the significant impacts identified for the proposed project as summarized above. The analysis also includes a determination of whether or not the alternative would reduce, eliminate, or create new significant environmental impacts and whether it would or would not meet the objectives of the proposed project.

6.3.1 No Project/No Development Alternative

6.3.1.1 Principal Characteristics

Section 15126.6(e)(1) of the *State CEQA Guidelines* states that “the purpose of describing and analyzing a no project alternative is to allow decisionmakers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.” Under the No Project/No Development alternative, no grading or new construction would occur on the project site and the site would remain undeveloped.

6.3.1.2 Analysis of the No Project/No Development Alternative

The potential impacts associated with the No Project/No Development alternative are described below.

Air Quality. Under the No Project/No Development alternative, no construction activities would occur and the site would remain vacant. Therefore, the proposed project’s construction-phase potentially significant impacts related to fugitive dust and TACs would be avoided under this alternative. The less than significant impacts from the emissions of criteria pollutants during operations would also be avoided.

Biological Resources. No construction or grading activities would occur on the project site. As a result, the proposed project’s potentially significant impacts on Swainson’s hawk, burrowing owls, nesting birds, monarch butterfly, wetlands, riparian habitat, and protected trees would be avoided under this alternative.

Cultural Resources and Tribal Cultural Resources. No construction or grading activities would occur on the project site. Therefore, the proposed project’s impacts that would result from construction at the project site, including potentially significant impacts related to disturbance of previously unknown archaeological resources, human remains, and tribal cultural resources, would be avoided under this alternative.

Geology and Soils. No construction or grading activities would occur on the project site. Therefore, the proposed project's impacts related to differential settlement, expansive soils, and disturbance of previously unknown paleontological resources would be avoided under this alternative.

Noise. Under the No Project/No Development alternative, no construction activities would occur and the site would remain vacant. There would be no noise associated with the construction and operation of the proposed project. The proposed project's potentially significant construction noise impact would be avoided under this alternative.

Transportation. Under the No Project/No Development alternative, no development would occur and the site would remain vacant. There would be no increase in traffic to the project site. The proposed project's significant impact associated with VMT would be avoided under this alternative. The project's other less than significant transportation impacts would also be avoided.

6.3.1.3 Summary Comparison to the Proposed Project

As discussed, the No Project/No Development alternative would avoid all of the significant impacts of the proposed project, and no mitigation measures would be required.

However, the No Project/No Development alternative would not achieve any of the objectives of the proposed project, including the development of a residential project that contains a high density of residences to help meet City, regional, and State housing goals.

6.3.2 No Project/Development Consistent with Existing Zoning Alternative

6.3.2.1 Principal Characteristics

Section 15126.6(e)(2) of the *State CEQA Guidelines* states that "the 'no project' analysis shall discuss the existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the project is not approved, based on current plans and consistency with available infrastructure and community services." Should the proposed project not be approved by the City, it would be reasonable to expect that the project site would be developed by another entity with a project that is consistent with the site's existing General Plan land use and zoning designations and available infrastructure.

The *City of Fairfield General Plan* designates the project site as Business and Industrial Park (IBP)⁴ while the City's Zoning Ordinance designates the project site as Industrial Business Park – North Cordelia Overlay (IBP-NC). The IBP designation is intended for administrative and professional offices, research and development parks, limited distribution, light manufacturing, and assembly operations. A floor to area ratio (FAR) of 1.0 is permitted under this zoning designation. Although the existing zoning allows for any of the above uses to be developed on this site, this alternative assumes that the project site would be developed with business office uses similar to the adjacent office use on Business Center Drive. Based on a FAR of 1.0 for this zoning designation and the size of the project site, up to 250,000 square feet of office space could be constructed on the project site.

⁴ City of Fairfield Community Development Department. 2015 General Plan Land Use Map. Website: <https://www.fairfield.ca.gov/home/showpublisheddocument/3170/637732653282470000> (accessed March 10, 2022).

Allowing for the required setbacks and parking needed to serve the office space, either one large four-story building or two smaller buildings between three and four stories in height would be developed on the project site under this alternative.

6.3.2.2 Analysis of the No Project/Development Consistent with Existing Zoning Alternative

The environmental impacts of No Project/Development Consistent with Existing Zoning alternative are described below.

Air Quality. Under this alternative, one to two office buildings with up to 250,000 square feet of building space would be constructed, which would be larger than the 204,144 square foot residential building that would be constructed under the proposed project. Construction-phase emissions of a project are generally proportional to the amount of building space that is built. As a result, the construction-phase emissions of this alternative would be about 18 percent greater than the criteria pollutant (reactive organic gases [ROG] and nitrogen oxides [NO_x]) emissions that would be generated by project construction activities. Although greater than the proposed project, the emissions would not result in the exceedance of the applicable thresholds, and similar to the proposed project, the alternative's construction-phase air quality impact related to ROG and NO_x would be less than significant.

Similar to the proposed project, this alternative would involve the clearance, excavation, and grading of almost the entire project site, and would result in a significant impact related to dust emissions, and the same mitigation measure (**Mitigation Measure AQ-1**) would be required. Finally, as a result of an approximately 18 percent increase in building construction on the project site, this alternative would increase the severity of the project's significant construction TAC impact. Thus, similar to the proposed project, construction activity associated with this alternative would still result in a construction-period health risk to off-site receptors and require the implementation of the same mitigation measure (**Mitigation Measure AQ-2**).

Due to the larger building size under this alternative and the associated population (about 769 employees compared to 509 residents and 5 employees under the proposed project), this alternative would result in greater operational emissions, including emissions due to a much larger number of daily vehicle trips (2,710 daily vehicle trips compared to 840 daily vehicle trips under the proposed project). However, it is expected that operational emissions associated with this alternative would not exceed the BAAQMD thresholds, and the operational impact would be less than significant. As with the proposed project, no mitigation would be required. All other air quality impacts would be comparable to those of the proposed project and would be less than significant.

In summary, this alternative would result in a greater but less than significant operational emissions impact, a comparable significant construction dust emissions impact, and a more severe construction-phase TAC impact and would require the same construction-phase mitigation measures as the proposed project.

Biological Resources. Similar to the proposed project, the No Project/Development Consistent with Existing Zoning alternative would require clearance and grading of the entire project site, and would have the potential to result in potentially significant impacts to special-status wildlife species,

nesting birds, an on-site seasonal wetland, riparian habitat, and protected trees. All mitigation measures (**Mitigation Measures BIO-1 through BIO-9**) identified for the proposed project would also be required for this alternative to reduce the impacts to less than significant. Like the proposed project, this alternative would not conflict with an adopted habitat conservation plan or adversely affect a wildlife movement corridor or native wildlife nursery site.

Cultural Resources and Tribal Cultural Resources. Similar to the proposed project, the No Project/Development Consistent with Existing Zoning alternative would also have the potential to disturb previously unknown archaeological resources, human remains, and tribal cultural resources during excavation and grading on the project site. The same mitigation measures (**Mitigation Measures CUL-1, CUL-2, and TCR-2**) identified for the proposed project would also be required for this alternative to reduce these impacts to less than significant. The same less than significant impacts on historic resources would also occur under this alternative.

Geology and Soils. Similar to the proposed project, ground disturbing and construction activities associated with the No Project/Development Consistent with Existing Zoning alternative would also have the potential to result in hazards due to differential settlement and expansive soils and disturb previously unknown paleontological resources during excavation on the project site. The same mitigation measures (**Mitigation Measures GEO-1 and GEO-2**) identified for the proposed project would also be required for this alternative to reduce these impacts to less than significant. The same less than significant impacts associated with geology and soils would also occur under this alternative.

Noise. Construction activities under this alternative would involve the use of generally the same types of construction equipment and vehicles as the proposed project. As noted above, one to two office buildings with up to 250,000 square feet of space would be constructed under this alternative, which would be larger than the 204,144 square foot residential building that would be constructed under the proposed project. Consequently, the duration of construction could be somewhat longer, and the numbers of large equipment used during construction could be greater. As a result, the construction-phase noise generated under this alternative would be comparable or longer in duration than under the proposed project. Therefore, this alternative would result in a potentially greater significant construction noise impact at the nearby sensitive receptors (residences and hotel) than the proposed project, and the same mitigation measures (**Mitigation Measures NOI-1 through NOI-5**) would be required.

Due to the larger building size under this alternative and the associated larger population, this alternative would result in 2,710 daily vehicle trips, about 1,870 more trips than the proposed project. However, the added vehicle trips would not substantially increase roadway noise levels to exceed the applicable threshold and the operational noise impact from vehicle trips would be less than significant. As with the proposed project, no mitigation would be required.

In summary, this alternative would result in a more severe construction noise impact and require the same mitigation measures as the proposed project. As with the proposed project, the construction noise impact of this alternative would be reduced to less than significant with mitigation.

Transportation. Due to the business office land use and trip making characteristics of this land use type, this alternative would generate 2,710 daily vehicle trips, about 1,870 more daily vehicle trips compared to the proposed project. The City of Fairfield has prepared VMT screening maps that illustrate how each Traffic Analysis Zone (TAZ) performs using a VMT/unit threshold based on land use. The City has one screening map for each major land use: office, single-family residential land use, and multi-family residential land use. If a TAZ is colored red, that indicates that the TAZ has a VMT/office per 1,000 square feet (KSF) that will exceed the Citywide threshold for the office land use. Based on the office land use VMT screening map from the City of Fairfield Travel Model, a business office use at the project site is expected to generate a VMT/office KSF greater than the City-wide threshold, and therefore this alternative would result in a significant VMT impact and mitigation would be required. All of the other transportation impacts of this alternative would be similar to those of the proposed project and would be less than significant.

Wildfire. As described in **Section 6.2** above, the project's environmental impacts related to wildlife were determined to be less than significant and no mitigation would be required to reduce potential impacts. However, due to the larger building size and population under this alternative, this alternative would involve a larger number of persons that would evacuate from the project area during a daytime evacuation, compared to the proposed project. During nighttime hours, however, the offices would not be occupied, and hence would not add to the number of persons evacuating from the area in a nighttime evacuation. Nonetheless, as a result of the anticipated increase in vehicle trips during a daytime evacuation, this alternative would have a greater impact related to wildfire evacuation compared to the proposed project.

6.3.2.3 Summary Comparison to the Proposed Project

The potential impacts associated with the No Project/Development Consistent with Existing Zoning alternative are described above. As discussed, this alternative would result in comparable impacts on biological resources, geology and soils, and cultural resources but would result in more severe impacts in the areas of air quality, noise, transportation, and wildfire. All of the mitigation measures required for the proposed project would also be required for this alternative.

Further, the No Project/Development Consistent with Existing Zoning alternative would not achieve three of the four objectives of the proposed project. It would not develop a well-designed, economically feasible residential community that consists of a variety of unit types and sizes; would not develop a residential project that contains a high density of residences to help meet City, regional, and State housing goals; and would not improve the availability of rental housing in the Green Valley/Cordelia area of western Fairfield.

6.3.3 Reduced Project Alternative

6.3.3.1 Principal Characteristics

The Reduced Project alternative would involve reducing the size of the proposed project by excluding the apartment units on the fourth level of the proposed apartment building. This would reduce the overall building space by approximately 56,000 square feet (i.e., an approximately 27 percent reduction compared to the proposed project) and the building height by approximately 12 feet. Under this alternative, a three-story, approximately 147,200-square foot apartment building

would be constructed with a total of 130 residential units. All of the other improvements would be comparable to the proposed project, including the recreational facilities, parking garage, landscaping, site access, and roadways and paths for internal circulation. As the alternative would comprise 130 units, it would include parking spaces that would be proportionally reduced (233 parking spaces compared to 332 parking spaces under the proposed project).

6.3.3.2 Analysis of the Reduced Project Alternative

The potential impacts associated with the Reduced Project alternative are described below.

Air Quality. Similar to the proposed project, this alternative would involve the clearance, excavation and grading of the project site, would result in a significant impact related to dust emissions, and the same mitigation measure (**Mitigation Measure AQ-1**) would be required. As the building space to be constructed under this alternative would be less than the proposed project, this alternative would result in reduced TAC emissions. However, the reduction in TAC emissions would not be enough to avoid a significant TAC impact and, similar to the proposed project, construction activity associated with this alternative would still result in a construction-period health risk impact to off-site receptors. Thus, this alternative would still require the implementation of the same mitigation measure (**Mitigation Measure AQ-2**) to reduce the impact to less than significant.

Due to the smaller building size under this alternative and the associated population (about 357 residents and 5 employees compared to 509 residents and 5 employees under the proposed project), this alternative would result in reduced operational emissions, including those due to vehicle trips, compared to those under the proposed project. Therefore, this alternative would further reduce the project's less than significant operational air quality impact. As with the proposed project, no mitigation would be required. All other air quality impacts would be comparable to those of the proposed project and would be less than significant.

In summary, this alternative would result in a reduced operational emissions impact, a comparable significant construction dust emissions impact, and a less severe construction-phase TAC impact. The construction-phase impacts would still be significant, and the alternative would still require the same construction-phase mitigation measures as the proposed project.

Biological Resources. Similar to the proposed project, the Reduced Project alternative would require site clearance and grading and would have the potential to result in potentially significant impacts to special-status wildlife species, nesting birds, an on-site seasonal wetland, riparian habitat, and protected trees. All mitigation measures (**Mitigation Measures BIO-1 through BIO-9**) identified for the proposed project would also apply to this alternative to reduce the impact to less than significant. Like the proposed project, this alternative would not conflict with an adopted habitat conservation plan or adversely affect a wildlife movement corridor or native wildlife nursery site.

Cultural Resources and Tribal Cultural Resources. Similar to the proposed project, the Reduced Project alternative would also have the potential to disturb previously unknown archaeological resources, human remains, and tribal cultural resources and result in significant impacts. The same mitigation measures (**Mitigation Measures CUL-1, CUL-2, and TCR-2**) identified for the proposed project would also be required for this alternative to reduce the impacts to less than significant. The

same less than significant impacts associated with historic resources would also occur under this alternative.

Geology and Soils. Similar to the proposed project, ground disturbing and construction activities associated with the Reduced Project alternative would also have the potential to result in hazards due to differential settlement and expansive soils and disturb previously unknown paleontological resources during excavation on the project site. The same mitigation measures (**Mitigation Measures GEO-1 and GEO-2**) identified for the proposed project would also be required for this alternative to reduce these impacts to less than significant. All of the same less than significant impacts associated with geology and soils would also occur under this alternative.

Noise. Construction activities under this alternative would involve the use of generally the same types of construction equipment and vehicles as the proposed project, and construction activities would occur at the same distances from the nearest receptors as under the proposed project. As a result, the daily construction noise levels generated under this alternative would be comparable to that generated by the construction of the proposed project, and this alternative would also result in a potentially significant construction noise impact at the nearby sensitive receptors (residences and hotel). The same mitigation measures (**Mitigation Measures NOI-1 through NOI-5**) would be required. However, because the residential building would be smaller (about 27 percent smaller than the proposed project), the duration of construction would be reduced by a small number of months, and the duration of exposure to noise impacts would be slightly shorter.

Due to the reduced building size under this alternative and the associated reduced population, this alternative would result in fewer vehicle trips than the proposed project. As with the proposed project, the operational noise impact from vehicle trips under this alternative would be less than significant and no mitigation would be required.

In summary, although the impacts would be slightly reduced, this alternative would also result in a significant construction noise impact and would require the same mitigation measures as the proposed project.

Transportation. Due to the reduced building size under this alternative and the associated reduction in population, this alternative would result in 250 fewer daily vehicle trips than the proposed project. This alternative would also result in a reduction in total VMT; however, the VMT/multi-family unit is estimated to remain about the same since the reduced unit count would result in a commensurate reduction in total VMT. Therefore, the Reduced Project alternative is estimated to result in a similar VMT/multi-family residential unit as the proposed project, thereby exceeding the City threshold for multi-family residential units and resulting in a significant VMT impact. The same mitigation measure (**Mitigation Measure TRA-1**) would be required. All of the other transportation impacts of this alternative would be similar to those of the proposed project and would be less than significant.

6.3.3.3 Summary Comparison to the Proposed Project

The potential impacts associated with the Reduced Project alternative are described above. As discussed, the Reduced Project alternative would result in comparable impacts on resource topics

such as biological resources, geology and soils, transportation, and cultural resources but would result in reduced impacts in the areas of air quality and noise. However, all of the mitigation measures required for the proposed project would be required for this alternative.

The Reduced Project alternative would achieve only two of the four objectives of the proposed project. It would create a development of a scale and character that complements and is supportive of the surrounding uses, and it would improve the availability of rental housing in the Green Valley/Cordelia area of western Fairfield, although by providing substantially fewer housing units, it would not satisfy this objective as effectively as the proposed project. Furthermore, due to the substantial reduction in the number of units, the Reduced Project alternative would not achieve other two objectives of the proposed project, which are to develop an economically feasible residential community and a high-density residential community that would help to meet City, regional, State housing goals.

6.4 ALTERNATIVES CONSIDERED BUT NOT SELECTED FOR DETAILED EVALUATION

State CEQA Guidelines Section 15126.6(c) requires an EIR to identify and briefly discuss any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process. The City considered certain alternatives during the preparation of this EIR and found them to be infeasible. Also during the scoping period for this EIR, the City received verbal and written suggestions for the identification and evaluation of alternatives to the proposed project.

The following provides a description of potential alternatives that were identified and considered by the City, and the reasons why they were ultimately not selected for further evaluation in this EIR. In dismissing these alternatives from detailed evaluation in this EIR, primary considerations were whether the alternatives would meet *most* of the project objectives, or whether the alternatives were *feasible*, or whether they would *reduce the significant impacts* of the proposed project.

6.4.1 No Project/Warehouse Project on the Project Site

As discussed above in **Section 6.3.2**, the *State CEQA Guidelines* note that the No Project analysis shall discuss what would be reasonably expected to occur in the foreseeable future if the project is not approved, based on current plans and consistency with available infrastructure and community services. The *City of Fairfield General Plan* designates the project site as IBP while the City's Zoning Ordinance designates the project site as IBP-NC. The IBP designation is intended for administrative and professional offices, research and development parks, limited distribution, light manufacturing, and assembly operations. A FAR of 1.0 is permitted under this zoning designation.

A No Project alternative that would develop the site with business office uses is fully evaluated in **Section 6.3.2** above. A No Project alternative that would develop a warehouse project on the project site was considered but dismissed from detailed evaluation for a number of reasons. While the zoning of the project site allows for limited distribution use—i.e., warehouses—it is not a use allowed by right, and a conditional use permit (CUP) would be required to build such a project on the project site. By comparison, the business office use that is analyzed in **Section 6.3.2** does not require a CUP. Development of a warehouse on the project site would require the clearance and grading of the entire site and would therefore not avoid any of the project's significant impacts on biological, cultural, paleontological, and other resources. Further, based on a FAR of 1.0 for this

zoning designation and the size of the project site, up to 250,000 square feet of warehouse space could be constructed on the project site. A warehouse of this size would generate a large number of truck trips to the project site, i.e., approximately 435 daily truck trips, which would generate diesel exhaust emissions in the vicinity of the nearby residential receptors, resulting in air quality impacts that would be greater than the operational air quality impacts of the proposed project which would not involve truck traffic at this scale. The warehouse activities, which would include truck idling, loading and unloading, would also have the potential to result in greater operational noise impacts than those associated with the proposed residential project. Finally, development of this alternative on the project site would not reduce or eliminate the project's significant construction noise impact because the construction of this alternative would also result in similar noise impacts. For all of these reasons, this variation of the No Project alternative was not carried forth for detailed evaluation.

6.4.2 Develop a Single-Family Residential Subdivision on the Project Site

An alternative that would develop a single-family residential subdivision on the project site was considered but dismissed from detailed evaluation because such an alternative would not achieve three of the four objectives of the proposed project. A single-family development on the project site would satisfy one objective, as it would be of a scale and character that complements and is supportive of the surrounding uses. However, it would not satisfy the project's other three objectives which are to (1) develop a well-designed, economically feasible residential community that consists of a variety of unit types and sizes; (2) develop a residential project that contains a high density of residences to help meet City, regional, and State housing goals; and (3) improve the availability of rental housing in the Green Valley/Cordelia area of western Fairfield. As this alternative would not satisfy most of the objectives of the project, it was deemed infeasible and was not carried forth for detailed evaluation.

6.4.3 Develop the Proposed Project at an Alternative Location

As noted above, the project's four objectives are to develop a well-designed, economically feasible residential community that consists of a variety of unit types and sizes; create a development of a scale and character that complements and is supportive of the surrounding uses; develop a residential project that contains a high density of residences to help meet City, regional, and State housing goals; and improve the availability of rental housing in the Green Valley/Cordelia area of western Fairfield. Based on these objectives, a search of the Green Valley/Cordelia area was conducted based on input from City Planning staff to identify parcels that would be suitable for the development of the proposed project. This search revealed that, with the exception of one parcel, there are no other suitable parcels (i.e., undeveloped and zoned for residential use) in the Green Valley/Cordelia area for the development of an apartment complex comparable to the proposed project. There is one undeveloped parcel (Assessor's Parcel Number [APN] 0027-350-110) that could potentially accommodate the project. The parcel is approximately 10 acres and is located on Business Center Drive about 1.75 miles northeast of the proposed project. The parcel is designated Mixed Use (MU) in the General Plan, which allows for business park and high-density residential uses, and it is zoned as Residential High Density (RH), which allows for 15 to 22 dwelling units per acre. Similar to the project site, the parcel is vacant and is routinely disced for fire fuel load reduction. A residential development is present adjacent to this parcel. Similar to the proposed

project, the development on this site would have the potential to result in significant impacts on biological, cultural, and paleontological resources and would require the same or comparable mitigation measures. Further, there would be similarly significant air quality, noise, and transportation impacts. Due to the presence of residential receptors to the west of this parcel, there would be potential for significant noise and TAC impacts during construction and the same mitigation measures would be required. In addition, based on a review of standard real estate sources, including LoopNet and Zillow, this property is not listed for sale.^{5 6} As this alternative would not reduce or avoid the project's significant impacts, and because the applicant does not own the site or can reasonably acquire it, this alternative was not carried forth for detailed evaluation.

Other off-site locations suggested by the public during project scoping were also considered but were found to be infeasible and were not carried forth for detailed evaluation. For example, one of the suggested locations was the Eastridge gated community on Green Valley Road north of the project site. However, this community is zoned Residential Low Density (RL). The allowable density range is 2.5 to 4.5 dwelling units per gross developable acre. Development of a high-density rental apartment complex in this area would not be consistent with the General Plan and would be unlikely to be approved by the City. Therefore, such an alternative would be considered infeasible.

Another off-site location suggested in scoping comments is on Vanden Road. This area is associated with the 3,000-acre Fairfield Train Station Specific Plan area, which is located in the northeastern part of the City centered on the new Capitol Corridor train station located at the southeast corner of Peabody Road and Vanden Road. This location for the proposed project would not satisfy the objective of the project of providing rental housing in the Green Valley/Cordelia area. Furthermore, based on a review of standard real estate sources, there are no suitable properties listed for sale in this area. Only one 1.5-acre property (APN 0174-010-280) zoned for commercial use (Neighborhood Commercial District [CN]) was listed for sale, which is incompatible with the proposed residential project. Thus, there are no suitable sites within this area that the applicant could reasonably acquire.

6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Based on the alternatives analysis in **Section 6.3** above, of the alternatives analyzed, the No Project/No Development alternative would have the fewest impacts and would be the environmentally superior alternative. Under CEQA, if the No Project alternative is the environmentally superior alternative, the EIR must identify an environmentally superior alternative from among the other alternatives (*CEQA Guidelines* Section 15126.6(e)(2)).

Of the other two alternatives that are analyzed in detail, the No Project/Development Consistent with Existing Zoning alternative would have significant impacts in most resource topics that would be comparable to the proposed project. The alternative would have potentially greater transportation, noise, and air quality impacts than the proposed project due to its larger size. The Reduced Project alternative would also have significant impacts in all resource topics that would be

⁵ LoopNet. 2022. LoopNet Online Real Estate Marketplace. Website: <https://www.loopnet.com>. Accessed May 19, 2022.

⁶ Zillow. 2022. Zillow Online Real Estate Search. Website: <https://www.zillow.com>. Accessed May 19, 2022.

comparable to those of the proposed project, but due to the reduced size of the apartment building and the reduced number of housing units, this alternative would result in somewhat reduced construction-phase air quality and noise impacts, and reduced operational-phase transportation and air quality impacts. Therefore, the Reduced Project alternative is considered the environmentally superior alternative.

Table 6.B: Summary Comparison of Project Alternatives¹

Project Impact	Proposed Project (Before/After Mitigation)	Alternative 1: No Project/No Development	Alternative 2: No Project/Development Consistent with Existing Zoning	Alternative 3: Reduced Project Alternative
Impact AQ-2: Construction of the proposed project would result in a cumulatively considerable net increase in criteria pollutants for which the project region is non-attainment under an applicable federal or State ambient air quality standard.	PS/LTS	Avoided	Similar	Similar
Impact AQ-4: Project operation would not expose sensitive receptors to substantial pollutant concentrations; however, emissions from project construction activities would exceed applicable thresholds.	PS/LTS	Avoided	Greater	Reduced
Impact BIO-1: The proposed project could have a substantial adverse effect, either directly or through habitat modifications, on Swainson’s hawks.	PS/LTS	Avoided	Similar	Similar
Impact BIO-2: The proposed project could have a substantial adverse effect, either directly or through habitat modifications, on burrowing owls.	PS/LTS	Avoided	Similar	Similar
Impact BIO-3: The proposed project could have a substantial effect, either directly or through habitat modifications, on raptors, nesting birds, or other birds protected under the California Fish and Game Code and MBTA.	PS/LTS	Avoided	Similar	Similar
Impact BIO-4: The proposed project could have a substantial adverse effect, either directly or through habitat modifications, on monarch butterfly.	PS/LTS	Avoided	Similar	Similar
Impact BIO-5: The project could result in a substantial adverse effect on riparian habitat from inadvertent disturbance during project construction.	PS/LTS	Avoided	Similar	Similar
Impact BIO-6: The project would have a substantial adverse effect on state or federally protected wetlands through direct removal and filling.	PS/LTS	Avoided	Similar	Similar

Table 6.B: Summary Comparison of Project Alternatives¹

Project Impact	Proposed Project (Before/After Mitigation)	Alternative 1: No Project/No Development	Alternative 2: No Project/Development Consistent with Existing Zoning	Alternative 3: Reduced Project Alternative
Impact BIO-8: The proposed project could conflict with local policies or ordinances adopted for the protection of biological resources, such as a tree preservation policy or ordinance.	PS/LTS	Avoided	Similar	Similar
Impact CUL-2: The proposed project could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.	PS/LTS	Avoided	Similar	Similar
Impact CUL-3: The proposed project could disturb any human remains, including those interred outside of formal cemeteries.	PS/LTS	Avoided	Similar	Similar
Impact TCR-2: The project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	PS/LTS	Avoided	Similar	Similar
Impact GEO-3: The project could be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.	PS/LTS	Avoided	Similar	Similar

Table 6.B: Summary Comparison of Project Alternatives¹

Project Impact	Proposed Project (Before/After Mitigation)	Alternative 1: No Project/No Development	Alternative 2: No Project/Development Consistent with Existing Zoning	Alternative 3: Reduced Project Alternative
Impact GEO-4: The proposed project would be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life and property.	PS/LTS	Avoided	Similar	Similar
Impact GEO-6: The project would not directly or indirectly affect a unique geologic feature but could inadvertently destroy a unique paleontological resource or site.	PS/LTS	Avoided	Similar	Similar
Impact NOI-1: Project construction activities would generate a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	S/LTS	Avoided	Greater	Reduced
Impact TRA-2: The proposed project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).	PS/LTS	Avoided	Greater	Similar
Cumulative Impact C-TRA-2: Development of the proposed project, in combination with past, present, and reasonably foreseeable future developments, would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).	PS/LTS	Avoided	Greater	Similar
Impact WFR-1: The proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan.	LTS	Avoided	Greater	Reduced

¹ This table lists only the significant or potentially significant environmental impacts of the proposed project.

S: Significant

PS: Potentially significant

LTS: Less than significant impact

Avoided: Proposed project's impact avoided

Similar: Impact similar to proposed project

Reduced: Impact less than proposed project

Greater: Impact greater than proposed project