

5 ALTERNATIVES TO THE PROPOSED PROJECT

5.1 INTRODUCTION

Section 15126.6(a) of the State CEQA Guidelines requires EIRs to describe "... a range of reasonable alternatives to the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not 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. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives.

There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. This section of CEQA also provides guidance regarding what the alternatives analysis should consider. Subsection (b) further states the purpose of the alternatives analysis as follows:

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

The State CEQA Guidelines further require that the alternatives be compared to the proposed project's environmental impacts and that the "no project" alternative be considered (CEQA Guidelines Section 15126.6(e)). In defining "feasibility" (e.g., "... feasibility attain most of the basic objectives of the project ..."). State CEQA Guidelines Section 15126.6(f)(1) states, in part:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.

In determining what alternatives should be considered in the EIR, it is important to acknowledge the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in CEQA Guidelines Section 15126.6(a).

For the purposes of this EIR, the "project," as described in the various CEQA guidance summarized above, is the proposed Riverbank General Plan update.

5.2 ALTERNATIVES EVALUATED IN THIS EIR

Project alternatives are intended to reduce or eliminate the potentially significant adverse environmental effects of the proposed General Plan update, while attempting to meet most of the project objectives. For this EIR, the "project objectives" are the Riverbank General Plan goals, which are presented throughout the draft policy document (under separate cover).

An EIR is required to contain a discussion of a reasonable range of alternatives to the project, or to the location of the project, that could feasibly attain the basic objectives of the project (State CEQA Guidelines Section

15126.6[a]). The comparative merits of the alternatives should also be presented. CEQA provides the following guidelines for considering alternatives to the project.

- ▶ The “no project” alternative shall be evaluated. If the environmentally superior alternative is the no project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives (State CEQA Guidelines Section 15126.6[e]).
- ▶ The discussion of alternatives shall focus on alternatives to the project or its location which are capable of eliminating significant adverse environmental effects or reducing them to a level of insignificance, even if these alternatives would partially impede the attainment of the proposed objectives, or would be more costly (State CEQA Guidelines Section 15126.6[b]).
- ▶ If an alternative would cause one or more significant environmental effects in addition to those that would be caused by the project, the significant effects of the alternatives shall be discussed, but in less detail than the significant effects of the project (State CEQA Guideline Section 15126.6[d]).
- ▶ The range of alternatives required by an EIR is governed by the “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The key issue is whether the selection and discussion of alternatives fosters informed decision-making and informed public participation. An EIR need not consider an alternative whose effect cannot be ascertained and whose implementation is remote and speculative (State CEQA Guidelines Section 15126.6[f]).

5.2.1 PREVIOUS GENERAL PLAN ALTERNATIVES

The City considered a wide range of land use and circulation alternatives during preparation of the draft General Plan update. Although the City initially set out to adopt a General Plan update in roughly 18 months, staff and decision makers elected, due to public interest, to spend more time in public workshops refining alternatives, and discussion the pros and cons of different land use and circulation approaches. This public discourse touched on many environmental issues, although social and economic issues were involved, also. The previous public discussion of Riverbank General Plan alternatives is distinct from the alternatives analysis presented in this EIR, although there may be overlap with certain concepts presented earlier.

Originally, there were three General Plan alternatives. Alternative 1 basically continued development patterns of the recent past, including:

- ▶ Primarily single-family detached residential community
- ▶ Apartment projects concentrated along a few arterials
- ▶ Fulfill affordable housing requirements mostly with infill
- ▶ Community is designed to accommodate automobile travel
- ▶ Major arterial streets carry the vast majority of traffic
- ▶ Development in large blocks creates enclosed developments separated from adjacent areas
- ▶ Land uses are not mixed in geographic proximity
- ▶ Future commercial development may contain more national chains and franchises, although this outcome is not guaranteed.
- ▶ Auto-oriented commercial areas are concentrated along major arterials

- ▶ Most residents commute to work outside the City
- ▶ Limited availability of public transit and little feasibility for public transit in the future

Alternative 2 was more compact than Alternative 1, and incorporates the strong community desire for a more pedestrian and bicycle friendly community:

- ▶ Variety, choice, and balance guide the distribution of land uses
- ▶ Housing types mixed throughout the City—single-family attached/detached, small apartments/townhouses, large apartment/townhouse/condo communities
- ▶ City would fulfill affordable housing requirements in new growth areas and through infill
- ▶ Destinations—stores, schools, parks, employment—are closer to one another to encourage walking and biking
- ▶ Small, neighborhood commercial centers scattered throughout the City
- ▶ Circulation and commerce not focused on arterial streets
- ▶ Greater emphasis on revitalization of downtown, re-shaping of Patterson Road into a pedestrian-friendly street and commercial area
- ▶ Same growth rate as in Alternative 1 but with clustered rural residential transition areas between city and surrounding agricultural areas
- ▶ Greater use and viability of public transit

Alternative 3 represented the lowest growth, most compact alternative among the original three:

- ▶ Similar themes as Alternative 2, except—
- ▶ More compact, higher average density of development
- ▶ Greatest emphasis among the three alternatives on downtown revitalization and infill development
- ▶ Tightly defined urban limit line and open space buffers separate the City from its neighbors
- ▶ Slower growth rate results in community with about 60 percent of the population on 50 percent of the land compared to Alternatives 1 and 2.
- ▶ Slower growth rate and smaller size may mean fewer retail and service opportunities compared to a larger city

At a public hearing on March 8th, 2006, the City presented another General Plan alternative, known as Alternative 4. This new alternative was developed in response to decision maker and public comments, and represented a hybrid of previous Alternatives 1 and 2. Alternative 4 also identified a high School site in the southwestern portion of the Planning Area, provided a distinct rural/urban edge in the west, showed a decreased industrial absorption during the Planning Period, and had a larger development footprint than Alternative 2 but emphasized neighborhood centers, among other elements.

City staff, in public consultation with decision makers and the general public continued to revise alternatives until a Preferred Alternative was selected in August of 2006. The Preferred Alternative contained components of many

of those originally discussed. The Preferred Alternative was refined as a part of the draft General Plan land use diagram. The Preferred Alternative is similar in many respects to Alternatives 2 and 4 of the earlier set. Alternative 3 of the original set of alternatives is similar to EIR Alternatives 2 and 3, described below.

For detailed information pertaining to the alternatives considered during the course of the draft General Plan update, please refer to the City’s web site and click on “Conceptual Alternatives: http://www.riverbank.org/departments/community_development/Gen_plan.html.” The alternatives report is also on file with the City’s Community Development Department.

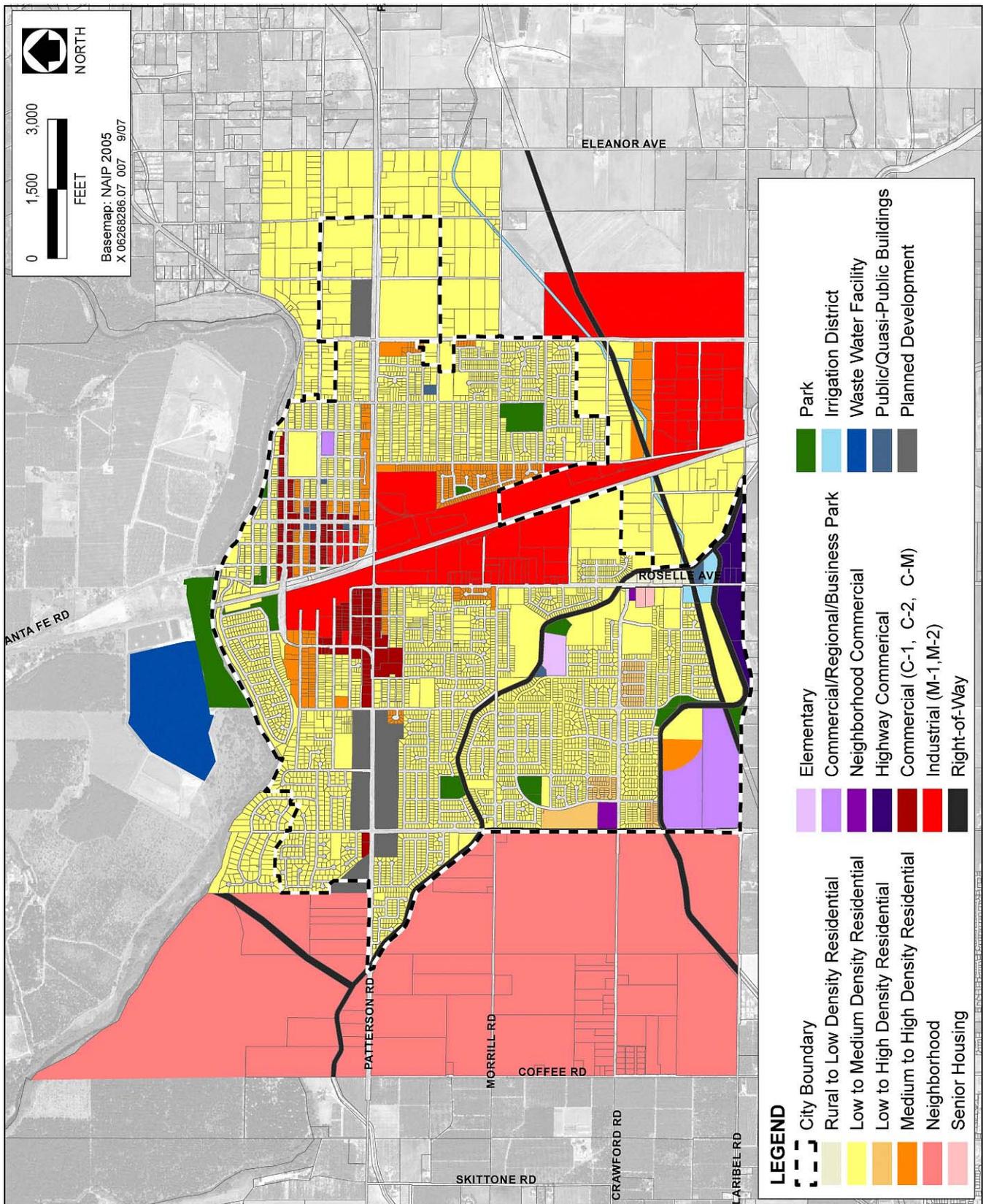
5.2.2 GENERAL PLAN EIR ALTERNATIVES

As mentioned, the previous General Plan alternatives discussion involved environmental and other issues. The focus for alternatives analysis in this EIR is distinct from the earlier General Plan alternatives process. For this EIR, the City elected to examine the impacts of three alternatives compared to the draft General Plan, including:

- ▶ **Alternative 1. No Project: Buildout of the Existing General Plan** – assumes that the Riverbank General Plan update would not be implemented and that the Planning Area would build out as indicated by the existing (pre-update) General Plan (see Exhibit 5-1).
- ▶ **Alternative 2. Reduced Footprint, Increased Density** – assumes that the overall urban development footprint would be reduced to avoid sensitive biological areas, avoid high-quality agricultural lands, reduce the amount of land subject to earth disturbance, make public infrastructure and service provision more efficient and less resource intensive, preserve the aesthetic value of more open land surrounding the city, avoid steep slopes and the river bluff areas northwest of the city, and place different land uses in proximity to one another with a compact design to facilitate other than automobile travel. At buildout, this alternative would have roughly the same level of development as with the proposed General Plan update on a smaller footprint (see Exhibit 5-2).
- ▶ **Alternative 3. Reduced Footprint, Similar Density** – assumes that the overall urban development footprint would be reduced to avoid sensitive biological areas, avoid high-quality agricultural lands, reduce the amount of land subject to earth disturbance, make public infrastructure and service provision more efficient and less resource intensive, preserve the aesthetic value of more open land surrounding the city, and avoid steep slopes and the river bluff areas northwest of the city (see Exhibit 5-3).

5.3 ALTERNATIVES REJECTED FOR FURTHER EVALUATION

The City considered approximately six different land use and circulation alternatives as a part of the General Plan update process, as previously mentioned. These alternatives had a larger and smaller overall development footprint, increased or decreased density compared to one another, as well as creating variation among other attributes. While there may be similarities between the previously considered alternatives and the array presented in this section, the alternatives were specifically reconstituted for the purposes of this EIR analysis. The City determined that a simple repeat of the earlier range of alternatives would not serve the decision makers or public as well as the present range. For example, alternatives previously considered in some instances had larger development footprints compared to the proposed General Plan update, with additional lower-density residential land on the outskirts of the Planning Area. This is not helpful for comparison in an EIR since the purpose of alternatives analysis here is to reduce environmental impacts for potentially significant impacts compared to the proposed project. The larger development footprint alternative with additional lower-density housing at the fringe would increase environmental impacts compared to the proposed General Plan update.



Source: Adapted by EDAW 2007

Alternative 1. No Project: Buildout of the Existing General Plan

Exhibit 5-1

5.4 ALTERNATIVE 1. NO PROJECT: BUILDOUT OF THE EXISTING GENERAL PLAN

This alternative assumes that the Riverbank General Plan update would not be implemented, and that the Planning Area would build out as indicated by the existing (pre-update) General Plan.

This no project alternative is not the same as the “no build” alternative, which is used in some CEQA alternatives analysis, and would involve no additional construction or development. The existing General Plan land use diagram provided by the City shows large, undeveloped areas with the designation “Neighborhood.” This is a flexible land use designation applied to lands west of the existing developed city. This designation, however, is not described in the narrative of the existing (pre-update) General Plan, and therefore it is unclear what types of land uses and what intensity of development might be anticipated.

The analysis that follows makes some generalized assumptions regarding the type and intensity of development that could have occurred, had the City taken action to define this land use designation and approve urban development over these lands.

5.4.1 TRAFFIC AND CIRCULATION

This alternative would involve the construction of primarily residences, but also accompanying land uses west of the existing City, as with the proposed General Plan update. This alternative would also develop lands in the northeastern portion of the Planning Area as low-density residential development. Buildout of the existing General Plan would involve industrial land uses along the railroad and in the southeastern portion of the city, as with the proposed General Plan update. However, areas southeast of this industrial area would not buildout with a mix of land uses, as anticipated with the proposed General Plan.

Traffic volumes on local roadways would change as a result of the implementation of this alternative compared to the existing conditions. This alternative would generate daily vehicle trips and would add peak-hour and daily trips to local roadways and intersections.

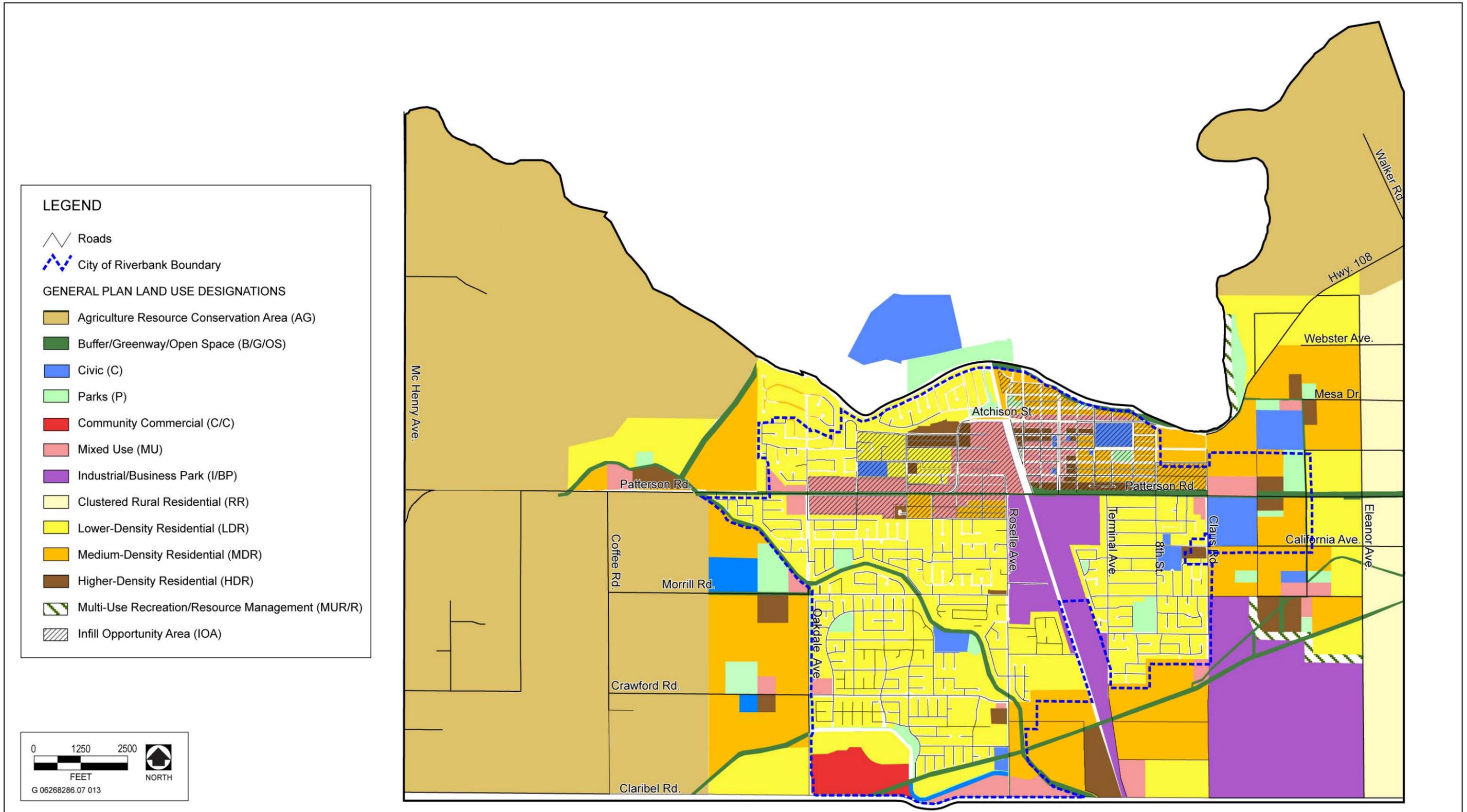
While traffic volumes would be reduced somewhat by buildout of the existing General Plan compared to the proposed General Plan update, it is anticipated that significance conclusions would be similar. LOS would still be unacceptable along the Claribel Road corridor, two-lane sections of SR 108 would have LOS deficiencies, Morrill Road may have LOS in exceedance of D, existing developed areas of Riverbank may experience congestion, the intersections requiring improvements to achieve LOS D would still require similar improvements, and additional traffic would be sent over the railroad tracks.

In summary, this alternative would reduce overall transportation impacts compared to the proposed General Plan update slightly, but significance characterizations would be expected to be the same. *[Less]*

5.4.2 AIR QUALITY

This alternative, like the proposed General Plan update would accommodate urban development that would in turn generate construction- and operations-related air pollutant emissions, including criteria pollutants, as well as greenhouse gases and other pollutants. This alternative would reduce slightly the number of daily vehicle trips compared to the proposed project. Overall, operational air quality impacts would be reduced slightly under this alternative compared to the project.

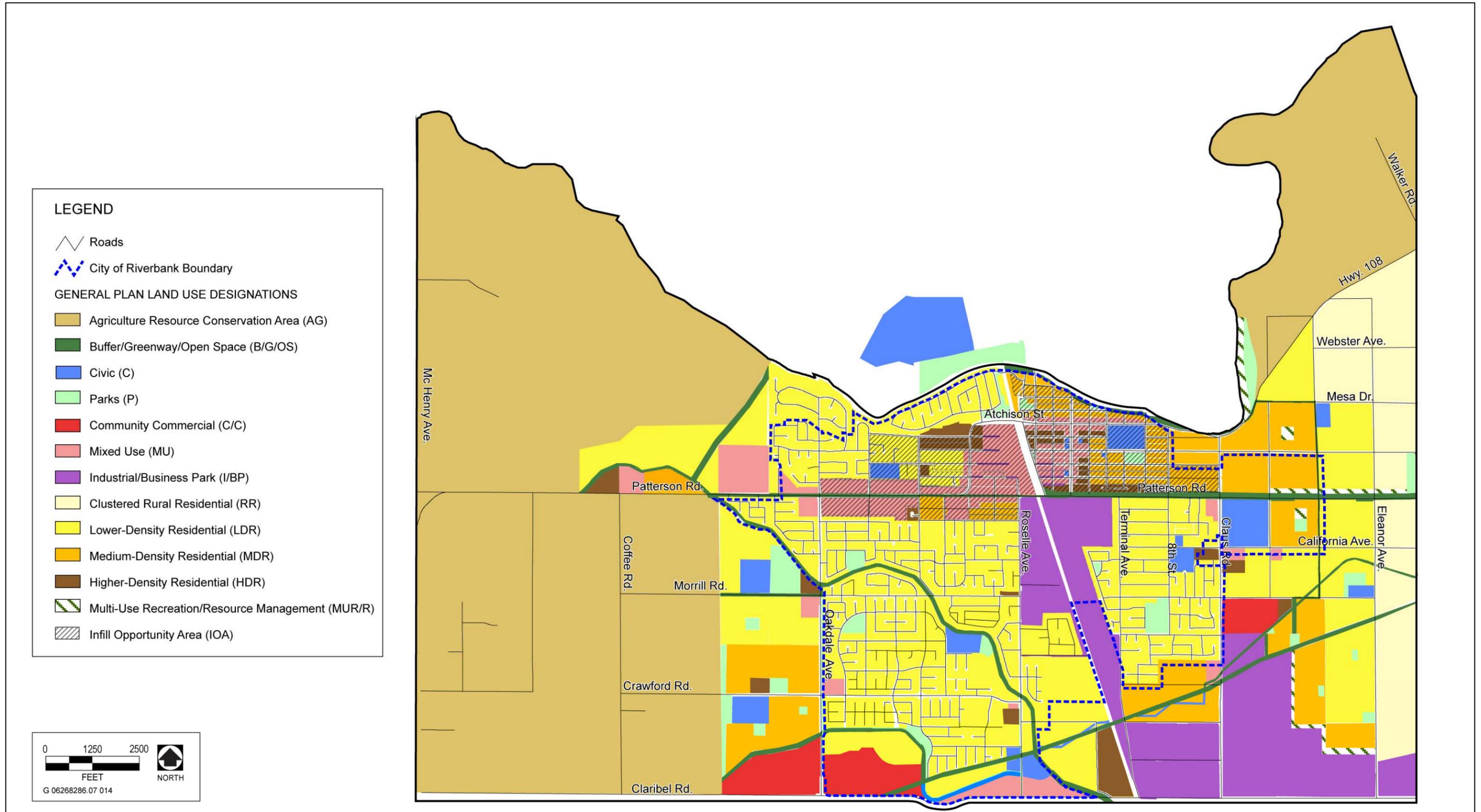
The proposed General Plan update has a variety of policies in the proposed Land Use, Circulation, Community Character and Design, and Conservation Element (expressed both as narrative and as a part of policy diagrams) that are intended to create a community where existing and future residents do not depend on their personal



Source: Adapted by EDAW 2007

Alternative 2. Reduced Footprint, Increased Density

Exhibit 5-2



Source: Adapted by EDAW 2007

Alternative 3. Reduced Footprint, Similar Density

Exhibit 5-3

vehicles for all daily travel needs. Although the existing (pre-update) General Plan attempts to address some of the same issues, the clarity of various policy requirements and the degree to which they are linked to policy diagrams is greatly enhanced in the proposed General Plan update.

Although this no project alternative would decrease somewhat the overall amount of development compared to the proposed General Plan, the proposed General Plan may accommodate a mode shift away from vehicles for some amount of daily travel needs. Without detailed analysis of the buildout of the existing General Plan, it is impossible to the exact quantified reductions that are available through the various land use and transportation strategies designed to reduce automobile dependence.

Impacts associated with construction activities could be somewhat reduced in this alternative compared with the proposed General Plan update since construction activities would occur in a smaller area. As a result, emissions of PM₁₀ would be reduced. In addition, emissions of ozone precursor emissions (ROG and NO_x) and CO would be reduced compared to the proposed General Plan update if the lower level of development led to reduced construction worker trips and reduced use of construction equipment, reduced application of architectural coatings, and reduced asphalt paving.

Implementation of this alternative would also expose sensitive receptors to substantial levels of toxic air contaminants (TACs). However, this alternative would not necessarily include the addition of large commercial development sites that could have substantial truck freight operations. Avoiding such land uses would reduce impacts compared to the proposed General Plan update.

Overall, this alternative could reduce short-term construction related emissions and exposure to substantial pollutant concentrations compared to the proposed General Plan update. Long-term operational emissions could be similar. Climate change impacts could be similar or perhaps increased compared to the proposed General Plan update (which includes extensive measures to ensure a more efficient land use pattern and transportation network). The impacts are similar. *[Similar]*

5.4.3 NOISE

Both the no project alternative and the proposed General Plan update would result in construction-generated temporary increases in ambient noise levels, increases in traffic-generated ambient noise levels, and development of sensitive land uses (i.e., residential) that could be exposed to excessive noise levels exceeding City standards. This alternative would reduce the overall development area. This could reduce somewhat the amount of construction at any given time. However, it is uncertain whether construction would occur in areas with noise sensitive land uses. This General Plan cannot provide assumptions as to the exact timing of the development of different areas and different land uses. Instead, the proposed General Plan has standards for short- and long-term noise exposure according to land use compatibility factors. The existing General Plan (pre-update) does not have the same approach to noise standards or mitigation requirements. The specific focus of the existing General Plan Noise Element is introduction of noise sensitive land uses into existing noise impacted areas and less on the noise impacts of new development. It is possible that despite having a slightly lower level of development, this alternative could actually, in effect, have greater noise impacts because the existing (pre-update) General Plan does not as adequately address noise impacts mitigation.

Traffic generation would be similar to the proposed General Plan update, and therefore off-site traffic related noise impacts would be similar. However, the updated General Plan for the most part avoids the use of noisy, large-volume roadways in favor of a more densely connected network of smaller roadways. This can reduce traffic noise problems. Significance characterizations are not anticipated to change for this alternative compared to the proposed project. *[Similar]*

5.4.4 POPULATION AND HOUSING

Although population growth and job growth may be somewhat lower for this alternative compared to the proposed project, there is no different in the significance conclusions. *[Similar]*

5.4.5 PUBLIC SERVICES AND UTILITIES

Under the no project alternative, utility and public service demand could be reduced slightly in proportion to the slight reduction of overall development in this alternative compared to the proposed General Plan update. The same facilities and services would be required for this alternative as with the proposed General Plan update (e.g., water and wastewater pipelines, electrical lines). Overall, this alternative would slightly reduce environmental impacts compared to the proposed General Plan update with a reduced amount of urban development (i.e., reduced population), thereby reducing overall demand for utilities and public services. However, the proposed General Plan update has various policies related to conservation and community design that would have benefits related to public infrastructure provision. Significance conclusions would not change. *[Similar]*

5.4.6 AESTHETICS

Under this alternative, there would be the same alteration of views as with the proposed General Plan update. Placing structures within existing expansive views and views of currently undeveloped open space would substantially change the view shed from existing conditions, despite having a slightly reduced overall amount of development. The aesthetic impacts related to alteration of views would be reduced on the eastern portion of the Planning Area since buildout of the existing General Plan would not affect these areas. Lighting would be slightly less under this alternative. Overall, the aesthetic impacts of this alternative are similar to that anticipated for the proposed General Plan, except for areas in the eastern and southeastern portion of the Planning Area. *[Less]*

5.4.7 PUBLIC HEALTH AND HAZARDS

Under this alternative, the reduced amount of construction (compared to the proposed General Plan) would expose fewer residents to any potential health or safety hazards. Less than significant public health and hazards impacts were identified for the proposed General Plan update, when considering the various policies drafted specifically to address such effects. It is assumed that buildout of the existing General Plan could involve the use of similar strategies to minimize and hazards impacts, even if applied as mitigation at the project level instead of as City policy at the General Plan level. Overall, the impact is similar. *[Similar]*

5.4.8 GEOLOGY AND SOILS

Under this alternative, development of urban land uses would occur, just as with the proposed General Plan update. Construction on steep slopes around the river bluff areas northwest of the existing city would occur under this alternative, just as with the proposed General Plan update. The areas not affected by development under this alternative compared to the proposed General Plan are not known to have substantial geologic or soils constraints. The overall level of development for this alternative would be somewhat reduced compared to the proposed General Plan update. However, as with most impact areas, the proposed General Plan includes extensive policies to address any geologic or soils related impacts of future development anticipated under the General Plan. Considering the inclusion of these policies, the impacts of this alternative related to geology, soils, and mineral resources are considered similar to those of the proposed General Plan. Impacts related to construction erosion and risks from seismic and soil hazards would occur in the same manner as anticipated for the proposed General Plan update since the same basic land area is involved with the same basic land uses (with the exception of areas southeast of the existing city, which would not be developed under this alternative). This alternative would involve construction of buildings or structures in the Planning Area and, as a result, potential hazards related to

soils (e.g., liquefaction, soil expansion) could still occur. This alternative would involve slightly reduced levels of construction, but in areas with the same geology and soils constraints, exposing slightly fewer residences to any potential geologic risk and soil limitations. Since a slightly smaller area is subject to grading under this alternative, the impacts are reduced slightly, even as significance characterizations would remain the same as with the proposed General Plan update. *[Less]*

5.4.9 HYDROLOGY AND WATER QUALITY

This alternative would involve slightly reduced levels of construction and within a slightly smaller overall development footprint, compared to the proposed General Plan update, but implementation of this alternative would still involve stormwater discharges. Urban land uses with impervious surfaces would occur. The proposed General Plan update includes many policies to avoid adverse effects to hydrology and water quality, including a no-net runoff policy and the use of natural drainage systems to ensure water filtration and ongoing water quality. Considering that measures that are a part of the proposed General Plan update could be included in this alternative, and considering that a slightly smaller area for urban development would be involved in this alternative, this alternative would result in similar hydrology and water quality impacts compared to the proposed project. *[Similar]*

5.4.10 AGRICULTURE

This alternative, like the proposed General Plan update, would involve conversion of important farmlands to urban use. Areas southeast of the city, where this alternative would not place future urban land uses, are designated as important farmlands. This alternative would reduce the level of impact compared to the proposed General Plan update, but the impact conclusions would be the same. *[Less]*

5.4.11 BIOLOGICAL RESOURCES

Both the proposed General Plan update and the no project alternative would develop open space with urban land uses, streets and other infrastructure, and other urban improvements. This alternative reduces the overall development footprint compared to the proposed General Plan, but the reductions are not placed in areas with sensitive biological resources. The impact is the same. *[Similar]*

5.4.12 CULTURAL RESOURCES

This alternative would result in a slightly reduced development footprint compared to the proposed General Plan update. Therefore, ground-disturbing activities would occur across the majority of the Planning Area. Ground disturbance would be slightly reduced as a result of this alternative, but the areas avoided are not those along the riverbank where archaeological resources might be more likely to occur. The land use changes anticipated in historic sections of the city that could involve historic resources would be similar for this alternative as with the proposed General Plan update. Although in the General Plan update the City encourages infill development and revitalization of existing developed areas of the city, the updated General Plan also includes various policies to avoid cultural resources impacts. Therefore, potential impacts are similar for this alternative as with the proposed General Plan update. *[Similar]*

5.5 ALTERNATIVE 2. REDUCED FOOTPRINT, INCREASED DENSITY

This alternative assumes that the overall urban development footprint would be reduced to address specific environmental resource areas. The footprint would be reduced to avoid sensitive biological areas, avoid high-quality agricultural lands, reduce the amount of land subject to earth disturbance, make public infrastructure and service provision more efficient and less resource intensive, preserve the aesthetic value of more open land surrounding the city, and avoid steep slopes and the river bluff areas northwest of the city. This alternative would

also use certain ideas that are also fundamental to the proposed General Plan update, such as placing different land uses in proximity to one another with a compact design to facilitate other than automobile travel. At buildout, this alternative would have roughly the same level of development compared with the proposed General Plan update, as measured in dwelling units and nonresidential building square footage.

5.5.1 TRAFFIC AND CIRCULATION

This alternative would involve a similar mix of land uses as anticipated as a part of the proposed General Plan update. Lot sizes for residential construction would be reduced slightly. Areas for surface parking would be reduced for commercial uses. More compact site plans, generally, would occur for residential and nonresidential development alike. This alternative anticipates a more efficient use of land to accommodate the City's future growth, when compared with the proposed General Plan update.

The level of development on the western half of the community, where most existing and anticipated future traffic congestion problems are focused, would be similar to the proposed General Plan update. However, much larger areas west of the existing city would be preserved in agricultural and resource conservation use.

This alternative would also preserve lands in the northeastern portion of the Planning Area as agricultural and resource conservation areas. This may alleviate some traffic impacts along the two-lane sections of SR 108 where congestion problems are identified but where roadway expansion is limited.

Like the proposed General Plan, this alternative anticipates business park / industrial land uses along the railroad and in the southeastern portion of the city. However, areas between Claus Road and Roselle Road south of the existing City would have a mix of land uses without industrial / business park land uses. These land uses would be focused exclusively east of Claus Road in this alternative.

Traffic volumes on local roadways would increase after implementation of this alternative, compared to baseline conditions. This alternative would generate daily vehicle trips and would add peak-hour and daily trips to local roadways and intersections.

Traffic volumes, based on current techniques for traffic generation and distribution analysis, would likely be slightly lower than that anticipated for the proposed General Plan update. The larger representation of more compact housing opportunities provided in this alternative would decrease the overall amount of vehicle trips. This is due to the fact that more compact housing opportunities (such as apartments) have lower per-unit trip generation characteristics than do low-density residential types. Trip generation is typically conducted on a per-unit basis. This alternative also does not propose large-scale commercial areas, as with the proposed General Plan update, uses which tend to have very high trip-generating characteristics.

Placing a variety of land uses in close proximity to one another with high degrees of transportation connectivity can also reduce vehicle trips by altering the anticipated mode share. (The "mode" is simply the means of travel; for example, travel modes include: automobile, public transit, walking, and bicycling). Both the proposed General Plan update and this alternative use this strategy to reduce automobile dependence, protect the public health, increase pedestrian and bicycle safety and convenience, and other objectives.

Even with these features, the significance conclusions would be similar for this alternative as compared with the proposed General Plan update. LOS would still be unacceptable along the Claribel Road corridor, two-lane sections of SR 108 would have LOS deficiencies, Morrill Road may have LOS in exceedance of D, existing developed areas of Riverbank may experience congestion, the intersections requiring improvements to achieve LOS D would still require similar improvements, and additional traffic would sent over the railroad tracks.

In summary, this alternative would reduce overall transportation impacts compared to the proposed General Plan update slightly, but significance characterizations would be expected to be the same. *[Less]*

5.5.2 AIR QUALITY

This alternative, like the proposed General Plan update, would accommodate urban development that would in turn generate construction- and operation-related air pollutant emissions. Construction emissions are from site development and operation of equipment, as well as worker trips. Operational emissions are from activities enabled or accommodated by the physical construction in the Planning Area, such as vehicle trips. The emission from this urban development would include criteria pollutants, as well as greenhouse gases and other pollutants. Please refer to the Air Quality section of this EIR for more background. This alternative would reduce slightly the number of daily vehicle trips compared to the proposed General Plan, as addressed above. And overall, operational air quality impacts would be reduced slightly under this alternative compared to the proposed General Plan update.

The proposed General Plan update has a variety of policies in the proposed Land Use, Circulation, Community Character and Design, and Conservation Element, expressed both as narrative and as a part of policy diagrams, which are intended to create a community where existing and future residents do not depend on their personal vehicles for all daily travel needs. With the reduced development footprint and slightly increased overall density, this alternative may be even better positioned to achieve certain City objectives related to air quality. This alternative may accommodate a mode shift away from vehicles for a considerable amount of daily travel needs. Without detailed analysis, it is impossible to the exact quantified reductions.

Impacts associated with construction activities would be reduced in this alternative compared with the proposed General Plan update since construction activities would occur in a smaller area. For certain pollutants, the key variable in determining emissions during construction is the overall area affected by grading or other earth movement. With the substantially smaller development footprint, emissions of PM₁₀ would be reduced. In addition, emissions of ozone precursor emissions (ROG and NO_x) and CO would be reduced compared to the proposed General Plan update due to a reduced use of construction equipment and reduced asphalt paving.

Implementation of this alternative could potentially expose sensitive receptors to substantial levels of toxic air contaminants (TACs). However, this alternative would not include the addition of large commercial development sites (as with the proposed General Plan update) that could have substantial truck freight operations. Avoiding such land uses would reduce potential impacts compared to the proposed General Plan update.

Overall, this alternative would reduce short-term construction related emissions and exposure to substantial pollutant concentrations compared to the proposed General Plan update. Long-term operational emissions could be reduced slightly. Climate change impacts could be similar or perhaps reduced compared to the proposed General Plan update. Impact conclusions would be similar. *[Less]*

5.5.3 NOISE

Both this alternative and the proposed General Plan update would result in construction-generated temporary increases in ambient noise levels, increases in traffic-generated ambient noise levels, and development of sensitive land uses (i.e., residential) that could be exposed to excessive noise levels exceeding City standards.

This alternative would reduce the extent of development. This could reduce somewhat the area affected by earth movement and site preparation at any given time. It is uncertain whether construction would occur in areas with noise sensitive land uses. The City cannot provide assumptions as to the exact timing of the development of different areas and different land uses as a part of the proposed General Plan update. Instead, the proposed General Plan has standards for short- and long-term noise exposure according to land use compatibility factors. It is assumed that this alternative could be developed using the same approach.

Vehicle trip generation would be slightly less as a result of this alternative, compared to the proposed General Plan update. Therefore, traffic related noise impacts would be slightly reduced. The updated General Plan for the

most part avoids the use of noisy, large-volume roadways in favor of a more densely connected network of smaller roadways. This can reduce traffic noise problems. It is assumed that this strategy, with the more compact footprint presented in this alternative, could also be employed.

Since distance between sources of noise and receptors decreases the noise level as experienced at the receptor, the more compact development pattern included as a part of this alternative may increase slightly noise exposure in general. Common sources of urban noise, such as stereos, car doors slamming, children playing outdoors, dogs barking, and other sources may tend to occur and closer distances to typical receptors of such noise.

Overall, significance characterizations are not anticipated to change for this alternative compared to the proposed project. *[Similar]*

5.5.4 POPULATION AND HOUSING

Although population growth and job growth may be somewhat lower for this alternative compared to the proposed project, there is no different in the significance conclusions. *[Similar]*

5.5.5 PUBLIC SERVICES AND UTILITIES

Under this alternative, utility and public service demand would be similar to that generated compared to the proposed General Plan update. The same facilities and services would be required for this alternative as with the proposed General Plan update (e.g., water and wastewater pipelines, electrical lines). This alternative may decrease very slightly the overall demand for public services if the greater representation of more compact housing choices leads to smaller overall household sizes than under the proposed General Plan. The extension of infrastructure lines could be reduced and efficiency of public service could be increased slightly through the more compact development pattern. This could slightly reduce environmental impacts compared to the proposed General Plan update. However, the proposed General Plan update has various policies related to conservation and community design that would have benefits related to public infrastructure provision. It is anticipated that this alternative could include the same type of provisions. Significance conclusions would not change. *[Less]*

5.5.6 AESTHETICS

Under this alternative, there would be the same basic alteration of views as with the proposed General Plan update. Placing structures within existing expansive views and views of currently undeveloped open space would substantially change the view shed from existing conditions.

However, with the substantially reduced development footprint provided under this alternative, the gross amount of visually open land converted to urban use under this alternative would be reduced compared to the proposed General Plan update. The aesthetic impacts related to alteration of views would be reduced on both the western the eastern portion of the Planning Area since buildout of this alternative would provide for agricultural and resource conservation lands in these areas.

Overall, the aesthetic impacts of this alternative are similar to that anticipated for the proposed General Plan, except for areas in the eastern and western portion of the Planning Area. *[Less]*

5.5.7 PUBLIC HEALTH AND HAZARDS

Under this alternative, the same level of development (compared to the proposed General Plan) would result in the same overall exposure of residents to any potential health or safety hazards. Less than significant public health and hazards impacts were identified for the proposed General Plan update, when considering the various policies drafted specifically to address such effects. It is assumed that this alternative could involve the use of similar strategies to minimize and hazards impacts. Overall, the impact is similar. *[Similar]*

5.5.8 GEOLOGY AND SOILS

Under this alternative, development of urban land uses would occur, just as with the proposed General Plan update. Construction on steep slopes around the river bluff areas northwest of the existing city would be avoided under this alternative. Impacts related to construction erosion and risks from seismic and soil hazards would occur in the same manner as anticipated for the proposed General Plan update. This alternative would involve construction of buildings or structures in the Planning Area and, as a result, potential hazards related to soils (e.g., liquefaction, soil expansion) could still occur.

But, the aerial extent of development for this alternative would be reduced compared to the proposed General Plan update. This would result in a reduced amount of earth disturbance and resultant potential soil erosion impacts.

Overall, the impacts are reduced slightly, even as significance characterizations would remain the same as with the proposed General Plan update. *[Less]*

5.5.9 HYDROLOGY AND WATER QUALITY

This alternative would involve a smaller overall development footprint, compared to the proposed General Plan update, but implementation of this alternative would still involve stormwater discharges. Urban land uses with impervious surfaces would occur. The proposed General Plan update includes many policies to avoid adverse effects to hydrology and water quality, including a no-net runoff policy and the use of natural drainage systems to ensure water filtration and ongoing water quality. It is assumed that similar policies could be applied to this alternative scenario.

Certain areas near the Stanislaus River (such as the northeastern and northwestern portions of the Planning Area) where groundwater recharge could occur are designated under this alternative for agricultural and resource conservation. Depending on the agricultural operations, this preservation could reduce potential impacts to groundwater quality.

Overall, impact conclusions for this alternative would be the same as for the proposed project, even as the level of impact is slightly reduced. *[Similar]*

5.5.10 AGRICULTURE

This alternative, like the proposed General Plan update, would involve conversion of Important Farmlands to urban use. However, this alternative includes large areas west and northeast of Riverbank, where Prime Farmland occurs, as agricultural and resource conservation land. Urban development is not anticipated in several key areas of high-quality farmland in the Planning Area. This would substantially reduce farmland conversion impacts compared to the proposed General Plan update. However, because technically a large amount of Important Farmland would still be lost, this alternative would not avoid significant impacts. This alternative would substantially reduce the level of impact compared to the proposed General Plan update, but the impact conclusions would be the same. *[Less]*

5.5.11 BIOLOGICAL RESOURCES

Both the proposed General Plan update and this alternative would develop open space with urban land uses, streets and other infrastructure, and other urban improvements. This alternative reduces the development footprint compared to the proposed General Plan substantially. Although the Riverbank Planning Area does not have large land areas characterized as sensitive habitat, this alternative avoids urban development of the areas, mostly northwest of the existing City, where sensitive habitats are concentrated. This alternative could adversely affect some wetlands, however, in the southeastern portion of the Planning Area. The proposed General Plan update shows urban land use designations that are designed to avoid sensitive resources in the northwestern portion of the

Planning Area, and includes policies to avoid such areas. With the extensive and specific policies included as a part of the proposed General Plan update, impacts to biological resources are considered less than significant. This alternative would substantially reduce impacts to biological resources through avoidance of these resources, as well. The impacts are reduced slightly compared to the proposed General Plan, but the significance conclusions would remain the same. *[Less]*

5.5.12 CULTURAL RESOURCES

This alternative would result in a reduced development footprint compared to the proposed General Plan update. Ground-disturbing activities would still occur throughout the Planning Area under this alternative scenario. Ground disturbance would be reduced as a result of this alternative, and some of the areas avoided are those along the riverbank where archaeological resources might be more likely to occur. The land uses changes anticipated in historic sections of the city that could involve historic resources would be the same for this alternative as with the proposed General Plan update. It is assumed that this alternative could include policies similar to those included in the proposed General Plan update to avoid cultural resources impacts. Therefore, impacts are slightly reduced for this alternative as compared with the proposed General Plan update but significance conclusions would be the same. *[Similar]*

5.6 ALTERNATIVE 3. REDUCED FOOTPRINT, SIMILAR DENSITY

This alternative assumes that the overall extent of urban development would be reduced substantially compared to the proposed General Plan update. Instead of proposing urban development for the majority of the Planning Area, areas in the western and northeastern portions would be designated for agricultural and resource conservation lands. Preservation would avoid sensitive biological areas, avoid conversion of high-quality agricultural lands, reduce the amount of land subject to earth disturbance, preserve the aesthetic value of more open land surrounding the city, and avoid steep slopes and the river bluff areas northwest of the city.

5.6.1 TRAFFIC AND CIRCULATION

This alternative would involve the same basic array of land uses as compared with the proposed General Plan update. The overall density of this alternative would be the same as for the General Plan update, also. However, because substantial amounts of land would be set aside for agriculture and/or resource conservation rather than urban development, this alternative would reduce substantially the amount of vehicle trips generated overall.

The level of development on the western half of the community, where most existing and anticipated future traffic congestion problems are focused, would be substantially reduced compared to the proposed General Plan update.

Traffic volumes on local roadways would increase after implementation of this alternative, compared to baseline conditions. This alternative would generate daily vehicle trips and would add peak-hour and daily trips to local roadways and intersections.

Traffic volumes, based on current techniques for traffic generation and distribution analysis, would be substantially lower than that anticipated for the proposed General Plan update.

Even with these features, some significance conclusions would be similar for this alternative as compared with the proposed General Plan update. LOS would still be unacceptable along the Claribel Road corridor, two-lane sections of SR 108 would likely have LOS deficiencies, existing developed areas of Riverbank may experience congestion, some of the intersections requiring improvements to achieve LOS D would require similar improvements as specified for the proposed General Plan update, and additional traffic would be sent over the railroad tracks.. Morrill Road would likely not have LOS in exceedance of D.

In summary, this alternative would reduce traffic congestion related impacts compared to the proposed General Plan update, but significance characterizations would be expected to be largely the same. *[Less]*

5.6.2 AIR QUALITY

This alternative, like the proposed General Plan update, would accommodate urban development that would in turn generate construction- and operation-related air pollutant emissions. Construction emissions are from site development and operation of equipment, as well as worker trips. Operational emissions are from activities enabled or accommodated by the physical construction in the Planning Area, such as vehicle trips. The emission from this urban development would include criteria pollutants, as well as greenhouse gases and other pollutants. Please refer to the Air Quality section of this EIR for more background. This alternative would reduce the number of daily vehicle trips compared to the proposed General Plan, as addressed above. And overall, operational air quality impacts would be reduced under this alternative compared to the proposed General Plan update.

The proposed General Plan update has a variety of policies in the proposed Land Use, Circulation, Community Character and Design, and Conservation Element, expressed both as narrative and as a part of policy diagrams, which are intended to create a community where existing and future residents do not depend on their personal vehicles for all daily travel needs. With the reduced development footprint but similar density, this alternative could also include City policies for mobility.

Impacts associated with construction activities would be reduced in this alternative compared with the proposed General Plan update since construction activities would occur in a smaller area. For certain pollutants, the key variable in determining emissions during construction is the overall area affected by grading or other earth movement. With the substantially smaller development footprint, emissions of PM₁₀ would be reduced. In addition, emissions of ozone precursor emissions (ROG and NO_x) and CO would be reduced compared to the proposed General Plan update due to a reduced use of construction equipment and reduced asphalt paving.

Implementation of this alternative could potentially expose sensitive receptors to substantial levels of toxic air contaminants (TACs). This alternative, like the proposed General Plan update includes the addition of large commercial development sites that could have substantial diesel truck freight operations.

This alternative, unlike the proposed General Plan update, does not include the use of wide buffers between areas of ongoing agricultural operations and the edge of the developed urban area. This could present issues associated with dust, odors, and spraying. If this alternative were to be pursued by the City, a wide buffer could be employed as mitigation.

Overall, this alternative would reduce short-term construction related emissions and exposure to substantial pollutant concentrations compared to the proposed General Plan update. Long-term operational emissions would be reduced. Climate change impacts would be similar. Impact conclusions would be similar. *[Less]*

5.6.3 NOISE

Both this alternative and the proposed General Plan update would result in construction-generated temporary increases in ambient noise levels, increases in traffic-generated ambient noise levels, and development of noise sensitive land uses (i.e., residential) that could be exposed to excessive noise levels exceeding City standards.

This alternative would reduce the aerial extent of development compared to the proposed General Plan update. This could reduce somewhat the area affected by earth movement and site preparation at any given time. It is uncertain whether construction would occur in areas with noise sensitive land uses. This General Plan cannot provide assumptions as to the exact timing of the development of different areas and different land uses. For example, it is impossible to know if certain homes would be occupied in a new growth area when construction on nearby commercial buildings starts. Instead, the proposed General Plan has standards for short- and long-term

noise exposure according to land use compatibility factors. It is assumed that this alternative could be developed using the same approach.

Vehicle trip generation would be reduced as a result of this alternative, compared to the proposed General Plan update. Therefore, it is anticipated that traffic related noise impacts would be reduced. The updated General Plan for the most part avoids the use of noisy, large-volume roadways in favor of a more densely connected network of smaller roadways. This can reduce traffic noise problems. It is assumed that this strategy could also be employed as a part of this alternative scenario.

This alternative, unlike the proposed General Plan update, does not include the use of wide buffers between areas of ongoing agricultural operations and the edge of the developed urban area. This could present issues associated with noise exposure. If this alternative were to be pursued by the City, a wide buffer could be employed as mitigation.

Overall, significance characterizations are not anticipated to change for this alternative compared to the proposed project. *[Similar]*

5.6.4 POPULATION AND HOUSING

Although population growth and job growth would be lower for this alternative compared to the proposed project, there is no different in the significance conclusions. *[Similar]*

5.6.5 PUBLIC SERVICES AND UTILITIES

Under this alternative, the types of public utilities and public services required would be similar to that needed to implement the proposed General Plan update. This alternative would decrease the overall demand for public services since the overall amount of development is reduced.

The proposed General Plan update has various policies related to conservation and community design that would have benefits related to public infrastructure provision. It is anticipated that this alternative could include the same type of provisions. Significance conclusions would not change. *[Less]*

5.6.6 AESTHETICS

Under this alternative, there would be the same basic alteration of views as with the proposed General Plan update. Placing structures within existing expansive views and views of currently undeveloped open space would substantially change the view shed from existing conditions.

However, with the substantially reduced development footprint provided under this alternative, the gross amount of visually open land converted to urban use under this alternative would be reduced compared to the proposed General Plan update. The aesthetic impacts related to alteration of views would be reduced on both the western the northeastern portion of the Planning Area since buildout of this alternative would provide for agricultural and resource conservation lands in these areas.

Overall, the aesthetic impacts of this alternative are similar to that anticipated for the proposed General Plan, except for areas in the northeastern and western portion of the Planning Area. *[Less]*

5.6.7 PUBLIC HEALTH AND HAZARDS

Under this alternative, the same level of development (compared to the proposed General Plan) would result in the same overall exposure of residents to any potential health or safety hazards. Less than significant public health and hazards impacts were identified for the proposed General Plan update, when considering the various policies

drafted specifically to address such effects. It is assumed that this alternative could involve the use of similar strategies to minimize and hazards impacts. Overall, the impact is similar. *[Similar]*

5.6.8 GEOLOGY AND SOILS

This alternative involves construction of the full array of urban uses on lands with potential geologic and soils limitations of varying degrees. Construction on steep slopes around the river bluff areas northwest of the existing city would be avoided under this alternative. But, impacts related to construction erosion and risks from seismic and soil hazards would occur in the same manner as anticipated for the proposed General Plan update.

Since the aerial extent of development for this alternative would be reduced compared to the proposed General Plan update, there would be a reduced amount of earth disturbance and resultant potential soil erosion impacts.

Since the overall level of development would be reduced compared to the proposed General Plan update, any geologic or soils limitations existing in the Planning Area would expose fewer residents to such limitations.

Overall, the impacts are reduced slightly, even as significance characterizations would remain the same as with the proposed General Plan update. *[Less]*

5.6.9 HYDROLOGY AND WATER QUALITY

This alternative would involve a smaller overall development footprint, compared to the proposed General Plan update, but implementation of this alternative would still involve stormwater discharges. Urban land uses with impervious surfaces would occur.

The proposed General Plan update includes many policies to avoid adverse effects to hydrology and water quality, including a no-net runoff policy and the use of natural drainage systems to ensure water filtration and ongoing water quality. It is assumed that similar policies could be applied to this alternative scenario.

Certain areas near the Stanislaus River (such as the northeastern and northwestern portions of the Planning Area) where groundwater recharge could occur are designated under this alternative for agricultural and resource conservation. Depending on the types and methods of agricultural operations, this preservation could reduce potential impacts to groundwater quality compared to the proposed General Plan update.

Overall, impact conclusions for this alternative would be the same as for the proposed General Plan update, even as the level of impact is slightly reduced. *[Similar]*

5.6.10 AGRICULTURE

This alternative, like the proposed General Plan update, would involve conversion of Important Farmlands to urban use. However, this alternative includes large areas west and northeast of Riverbank, where Prime Farmland occurs, as agricultural and resource conservation land. Urban development is not anticipated in several key areas of high-quality farmland in the Planning Area. This would substantially reduce farmland conversion impacts compared to the proposed General Plan update. However, because technically a large amount of Important Farmland would still be lost, this alternative would not avoid significant impacts.

Generally, this alternative would substantially reduce the level of impact compared to the proposed General Plan update, but the impact conclusions would be the same. *[Less]*

5.6.11 BIOLOGICAL RESOURCES

Both the proposed General Plan update and this alternative would develop open space with urban land uses, streets and other infrastructure, and other urban improvements. This alternative substantially reduces the development footprint compared to the proposed General Plan. Although the Riverbank Planning Area does not have large land areas characterized as sensitive habitat, this alternative avoids urban development of the areas, mostly northwest of the existing City, where sensitive habitats are concentrated. This alternative could adversely affect some wetlands, however, in the southeastern portion of the Planning Area.

The proposed General Plan update shows urban land use designations that are designed to avoid sensitive resources in the northwestern portion of the Planning Area, and includes policies to avoid such areas. With the extensive and specific policies included as a part of the proposed General Plan update, impacts to biological resources are considered less than significant. This alternative would substantially reduce impacts to biological resources through avoidance of these resources, as well. The impacts are reduced compared to the proposed General Plan, but the significance conclusions would remain the same. *[Less]*

5.6.12 CULTURAL RESOURCES

This alternative would result in a reduced development footprint compared to the proposed General Plan update. Ground-disturbing activities would still occur throughout the Planning Area under this alternative scenario. Ground disturbance would be reduced as a result of this alternative, and some of the areas avoided are those along the riverbank where archaeological resources might be more like to occur.

The land uses changes anticipated in historic sections of the city that could involve historic resources would be the same for this alternative as with the proposed General Plan update. It is assumed that this alternative could include policies similar to those included in the proposed General Plan update to avoid cultural resources impacts.

Therefore, impacts are slightly reduced for this alternative as compared with the proposed General Plan update but significance conclusions would be the same. *[Similar]*

5.7 SUMMARY OF COMPARATIVE EFFECTS OF THE ALTERNATIVES

Table 5-1 summarizes the environmental analysis provided above for the alternatives and the proposed General Plan update (the proposed project). The environmental impacts of the General Plan update are addressed in detail throughout this EIR.

Environmental Topic	No Project: Existing General Plan	Alternative 2. Reduced Footprint, Increase Density	Alternative 3. Reduced Footprint, Similar Density
Traffic & Circulation	Less	Less	Less
Air Quality	Similar	Less	Less
Noise	Similar	Similar	Similar
Population & Housing	Similar	Similar	Similar
Public Services and Utilities	Similar	Less	Less
Aesthetics	Less	Less	Less
Public Health & Hazards	Similar	Similar	Similar
Geology & Soils	Less	Less	Less
Hydrology & Water Quality	Similar	Similar	Similar
Agriculture	Less	Less	Less
Biological Resources	Similar	Less	Less
Cultural Resources	Similar	Similar	Similar

5.8 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of the alternatives to the proposed General Plan update, CEQA requires that an “environmentally superior” alternative among the alternatives considered be selected and the reasons for such selection disclosed. In general, the environmentally superior alternative is the alternative that would generate the fewest or least severe adverse impacts.

For the purposes of this EIR, Alternatives 2 and 3 are environmentally superior because these alternatives would reduce impacts in the most topic areas compared to the proposed General Plan update.

The Project Objectives, for the purposes of this EIR, are the goals articulated throughout the proposed General Plan update. It is assumed that any of the alternatives described in this section could be designed to achieve the majority of the community’s goals, as expressed throughout the General Plan.