

Chapter VIII

Alternatives Analysis

A. PURPOSE & RATIONALE

This Master EIR examines the potential environmental impacts arising from the proposed amendment to the *City of Modesto Urban Area General Plan* (General Plan). The proposed project, the General Plan amendment, is focused on the land use and circulation elements – although other portions of the General Plan would be amended for consistency and to correct deficiencies. The project includes changes to land use designations and street classifications, in addition to new goal / policy language. No changes to the General Plan or Sphere-of-Influence boundaries would occur.

Public Resources Code (PRC) Section 21100(b) requires that the master environmental impact report (Master EIR) discuss a reasonable range of feasible alternatives to the proposed project, which meet most or all of its objectives. Alternatives must be capable of avoiding or substantially lessening one or more of the significant effects of the project. Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines further provides that an EIR must evaluate the comparative merits of the alternatives. Alternatives need not be examined at the same level of detail as the project.

The City of Modesto (City) is responsible for selecting a reasonable range of feasible alternatives to the project. The Master EIR must describe the rationale for selecting the range of alternatives to be discussed and identify any other alternatives that were considered by the City but were rejected as infeasible. Reasons underlying the City’s determinations regarding alternatives must be explained (State CEQA Guidelines Section 15126.6[c]). The range of alternatives must include the “No-Project Alternative.” The purpose of analyzing this alternative is to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving it. (CEQA Guidelines Section 15126.6[e]. This section describes the process used to select the alternatives that are analyzed or otherwise addressed in this Master EIR.

The proposed project and the alternatives addressed in this Master EIR are based on the presentations and discussions that occurred during the extensive 2013 public workshop series for the project. Citizen and other stakeholder input were essential to the process. The alternatives addressed within the Master EIR were selected based on General Plan land use and transportation concepts, and the project objectives described in Chapter III, which were reviewed during the 2013 public workshops.

B. ALTERNATIVES CONSIDERED AND REJECTED

Based on the 2013 public workshops described above, in addition to subsequent Council meetings where the project was discussed, City staff settled on a reasonable set of alternatives to be included herein. The following alternatives were determined not to be feasible for continued evaluation because they are inconsistent with some of the most important project objectives described in Chapter III, such as reduced VMT, reduced sprawl, protection of agricultural land resources, and maintaining the existing general plan and sphere-of-influence boundaries, and in part, would not result in reduced environmental impacts as compared to the proposed General Plan amendment Project.

1. Expanded General Plan Boundary to the West

The City considered revising the General Plan boundary to include future growth areas west of the current General Plan boundary, southwest of Salida. Several variations regarding a possible new boundary location were considered, including increasing the General Plan “footprint” by fifty percent or more and other options that were less expansive. However, due to the high-quality agricultural soils that exist throughout this area of the northern San Joaquin Valley, combined with public opposition to Modesto’s westward growth, the City determined not to pursue this alternative.

This alternative would result in high infrastructure costs, increased VMT, air quality impacts, urban sprawl and premature conversion of prime agricultural land – each of which is inconsistent with the project objectives. Furthermore, westward expansion of the planning area would not result in reduced environmental impacts as compared to the proposed project, and it would actually result in greater impacts related to agricultural land conversion, air quality and other topics of analysis.

2. Expanded General Plan Boundary to the East

The City considered revising the General Plan boundary to add future growth areas east of the Burlington-Northern Santa Fe railroad, southeast of Riverbank. The lesser-quality soils in this area result in a perception that growth eastward would resolve the conflict between new growth and development versus the consumption of higher-value, limited-supply agricultural resources as the price to be paid for new development.

Similar to the ‘western expansion’ alternative described above, eastward growth and development would result in high infrastructure costs, increased VMT, air quality impacts, urban sprawl and premature conversion of agricultural lands – each of which is inconsistent with the project objectives. Furthermore, eastward expansion of the planning area would not result in reduced environmental impacts as compared to the proposed project, and it would actually result in greater impacts related to air quality and perhaps other study topics.

3. Modified Western Boundaries

The City considered an alternative that would result in a modified General Plan boundary, and Sphere-of-Influence boundary, along the west side of the General Plan area. The boundary changes contemplated would have resulted in a net reduction in the “footprint” of the General Plan boundary, although limited boundary expansion along the west side of the planning area would have been featured. However, because one of the primary project objectives is to maintain the existing General Plan and Sphere-of-Influence boundaries, and due to public opposition to *any* expansion of Modesto to the west, this alternative concept was dismissed.

C. SELECTED ALTERNATIVES TO BE ANALYZED

1. Alternative 1: No Project Alternative

The No Project Alternative is the continuation of the existing adopted General Plan into the future. Thus, the impacts of the proposed General Plan amendment would be compared with the impacts that would occur with buildout of Modesto as envisioned in the existing adopted General Plan. The

No Project Alternative would not include any of the new policies being added to the General Plan with the proposed project. The impacts of the existing adopted General Plan are described in the 2008 Master EIR prepared for that plan.

Alternative 1 Impacts

Alternative 1 would not meet the land use- and transportation-related objectives for future development, as the proposed policies and changes to the transportation network would not be adopted. However, some of the potential impacts associated with Alternative 1 are similar to those of the proposed Project. Potential impacts associated with Alternative 1 are described below.

Traffic: According to the traffic analysis in the 2008 Master EIR, future growth would cause the service levels on 90 defined roadway segments of the City's traffic network to operate at worse than level of service (LOS) D. This is a significant and unavoidable impact. Alternative 1 would result in slightly increased traffic, and therefore increased traffic-related impacts, as compared to the proposed Project.

Air Quality / Climate Change: Growth under the No Project alternative would result in the generation of ozone precursors and dust during construction and a net increase in emissions of ambient carbon monoxide (CO), ozone precursors, and particulate matter ten (10) microns or smaller in diameter (PM₁₀, PM_{2.5}) from area and mobile sources. Cumulative air quality-related impacts would be significant and unavoidable. Alternative 1 would result in relatively more Air Quality and related impacts as compared to the proposed Project.

Future development pursuant to the No Project alternative would result in a significant contribution to the greenhouse gas emissions that result in the cumulative impact of global climate change. The existing adopted General Plan has a number of energy conservation policies in Section VII-I.1 that would make a marginal reduction in greenhouse gas emissions. However, these do not mitigate the potential impacts to a less than significant level. These impacts would be somewhat greater than those associated with the proposed Project, due to the mixed-use development and multi-modal transportation system scenarios planned therein.

Generation of Noise: Growth, including new development and planned roadway expansions under the No Project alternative, would cause increased noise levels in the vicinity of construction sites along the existing and proposed road network, localized impacts from new stationary noise sources, and the introduction of land uses into a high-noise environment. Projected growth under the existing adopted General Plan would result in increased noise in portions of Modesto. This would be particularly noticeable as the Planned Urbanizing Area develops. These impacts would be considered significant and unavoidable. Noise impacts associated with Alternative 1 would be similar to those resulting from the proposed Project.

Loss of Productive Agricultural Lands: Growth under the No Project alternative would result in the conversion of agricultural land within the sphere of influence to urban uses. Major portions of the Planned Urbanizing Area identified in the existing adopted General Plan would convert from farm and grazing lands to urban development within the CPDs. The resulting impacts would be significant and unavoidable, and essentially identical to those associated with the proposed Project.

Increased Demand for Long-Term Water Supplies: Additional distribution and storage facilities would be needed to meet anticipated demand under the No Project alternative. Planned development would not exceed the potable water supply. However, as discussed in the 2008 Master EIR, Modesto's demands would contribute to the demand resulting from regional development. This regional demand may result in overdraft of the underlying aquifer. Significant, unavoidable, cumulative impacts would result. These impacts under Alternative 1 would be similar to those associated with the proposed Project.

Increased Demand for Sanitary Sewer Services: New development associated with the No Project alternative would demand additional infrastructure system capacity. However, additional sewage treatment plant capacity, sanitary sewer pipelines, pump stations and treatment plant capacity would be provided pursuant to the Wastewater Collection System master plan, so any resulting impact(s) would be less than significant. These impacts under Alternative 1 would be very similar to those associated with the proposed Project – also less than significant.

Loss of Sensitive Wildlife and Plant Habitat: Growth under the No Project alternative, particularly in the Planned Urbanizing Area, would contribute to the significant and unavoidable cumulative loss of habitat that is occurring within the region. These impacts under Alternative 1 would be very similar to those associated with the proposed Project.

Disturbance of Archaeological or Historical Sites: Prehistoric resources may be uncovered during excavation for construction. Construction activities resulting from the growth envisioned under the No Project alternative may adversely affect historical structures and resources. These may include historical structures removed as a result of road widening or new construction, as well as unknown archaeological resources that may be discovered during development. With the exception of potential significant and unavoidable impacts related to demolition of historic structures, these impacts would be less than significant after mitigation – as would be the case with the proposed Project.

Increased Demand for Storm Drainage: Future development under the No Project alternative would add impervious surfaces that create additional runoff requiring new and expanded storm drainage systems. Resulting impacts would be largely avoided by existing General Plan policies and Low Impact Development techniques; thus, these impacts associated with the No Project Alternative would be less than significant, with the exception of the scenario where a large storm event(s) prevents discharge of stormwater to drainage channels (significant and unavoidable), similar to the proposed Project scenario.

Flooding and Water Quality: Under the No Project alternative, future development within the flood zone largely would be avoided. Increased runoff and siltation resulting from new construction, as well as urban runoff pollution, would be controlled by existing City regulations and the required best management practices. Conversion of agricultural lands to urban development may affect groundwater recharge adversely absent a cooperative effort between the City and the irrigation districts. These impacts largely would be avoided by General Plan policies and the regional groundwater management efforts going on outside the general plan process. Therefore, the majority of these impacts would be less than significant for Alternative 1, and very similar in scope and magnitude to those associated with the proposed Project. However, cumulative water quality impacts could occur from development activities and affect the existing water quality impairments in the local water bodies.

Increased Demand for Parks and Open Space: The No Project alternative envisions new growth and development that would provide the requisite number and size of new park facilities to serve it. Any resulting impact(s) under this category would be less than significant for both Alternative 1 and the proposed Project.

Increased Demand for Schools: The No Project alternative envisions new growth and development outside of the existing City limits. Collection of school fees in combination with school districts' facility planning and funding will facilitate new school facilities being constructed. Any resulting impacts under this category would be less than significant for both Alternative 1 and the proposed Project.

Increased Demand for Police Services: The No Project alternative envisions future growth outside of the existing City limits. The City of Modesto will continue to provide police services City-wide, regardless of future growth. Any resulting impacts under this category would be less than significant for both Alternative 1 and the proposed Project.

Increased Demand for Fire Services: The No Project alternative contemplates future development of the same land areas as the proposed Project. Any construction of new fire station(s) and/or other fire-related facilities or structures would be subject to the same rules, regulations and General Plan policies as all other new development; this framework would prevent significant impacts from occurring. Any impacts under this category for Alternative 1 and the proposed Project would be less than significant.

Generation of Solid Waste: Future development under the No Project alternative would generate substantial amounts of solid waste that would require additional landfill capacity. Adequate future capacity is reasonably foreseeable based on projections generated by the Counties of Stanislaus and San Joaquin (where the landfills that receive Modesto's solid waste are located). Any related potential impacts associated with the Alternative 1 would be less than significant and similar to those that would occur under the proposed Project scenario.

Generation of Hazardous Materials: Future development under the No Project alternative would not generate substantial amounts of hazardous materials. Any related potential impacts associated with the No Project alternative would be less than significant and similar to those that would occur under the proposed Project scenario.

Geology, Soils and Mineral Resources: Future development under the No Project alternative would not be expected to result in adverse impacts to the underlying earth. Any related potential impacts associated with Alternative 1 would be less than significant and similar to those that would occur under the proposed Project scenario.

Energy: Future development under the No Project scenario would not necessarily result in wasteful or inefficient use of energy resources. Based on the analysis conducted for the proposed Project – which has the same general plan boundary as the No Project alternative – any impacts would be less than significant. These impacts would likely be somewhat greater than those associated with the proposed Project, due to the mixed-use development and multi-modal transportation system scenarios planned therein.

Effects on Visual Resources: Future development in the Planned Urbanizing Area would introduce new sources of light and glare where lands that are currently in agricultural use are

converted to urban use. However, due to application of the City’s design guidelines and the California Building Code, any resulting impact(s) would be less than significant. These impacts under Alternative 1 would be very similar to those associated with the proposed Project.

Land Use and Planning: The General Plan is the City’s “Blueprint” for land use and planning. Any potential impacts under this category, associated with future development under the No Project scenario, would be less than significant. The proposed project would result in very similar impacts (if any) to Land Use and Planning.

2. Alternative 2: Increased Density Along Mixed-Use Corridors and at Major Intersections / Nodes

Under Alternative 2, the UAGP land use diagram would reflect higher density / intensity “nodes” of mixed-use, transit-oriented development, at major intersections (arterial-arterial or higher). Revisions to land use designations along major transportation corridors, to accommodate mixed-use development between major intersections, would also occur. The growth and development contemplated under this alternative would – much more so in the near term, less so as the City’s boundary expands over time due to annexations and new development – largely occur within the most urbanized parts of the existing city. Other features and assumptions associated with Alternative 2 would be the same as the proposed Project.

Alternative 2 Impacts

Alternative 2 would generally meet both the land use- and transportation-related objectives for future development, as proposed policies and changes to the roadway network and land use diagram would remain. The potential impacts associated with Alternative 2, described below, would be similar to those of the proposed project, and they are described below.

Traffic: Alternative 2 would include similar transportation system improvements as compared to the proposed project. Traffic impacts would most likely be significant and unavoidable under both the proposed Project and Alternative 2 scenarios, although per-capita VMT could be slightly reduced under the Alternative 2 scenario, due to increased transit use and opportunities for pedestrian and bicycle activity.

Air Quality / Climate Change: Alternative 2 would incorporate policies intended to reduce air emissions and reduce energy use that results in air emissions. These are the policies contained in Sections VII-H (air quality) and VII-I (noise) of the proposed General Plan amendment Project. Largely because Alternative 2 proposes more development as compared to the proposed Project, the potential impacts associated with Air Quality would likely be somewhat increased. Nonetheless, increased traffic and VMT – and therefore air quality impacts – associated with growth would result in significant and unavoidable air quality impacts under Alternative 2.

Future development under Alternative 2 would result in a significant contribution to the cumulative impact of global climate change, albeit at a somewhat reduced level as compared to the proposed Project. The proposed energy conservation policies in Section VII-I and climate change policies in Section VII-H would help reduce greenhouse gas emissions.

However, these would not eliminate the contribution, and the impact(s) would be significant and unavoidable.

Generation of Noise: Growth under Alternative 2 would cause increased noise levels, similar to the proposed project, in the vicinity of construction sites along the existing and proposed street network, localized impacts from new stationary noise sources, and the introduction of land uses into a high-noise environment. Alternative 2 would include the same mitigating policies found in the proposed General Plan amendment in Section VII-G. However, it would result in noise impacts considered to be significant and unavoidable – just like the proposed Project.

Loss of Productive Agricultural Lands: Growth under Alternative 2 would result in the same conversion of agricultural land to urban uses as the proposed Project. This impact would remain significant and unavoidable under both scenarios.

Increased Demand for Long-Term Water Supplies: Additional distribution and storage facilities would be needed to meet anticipated demand under the Alternative 2 scenario. Water demand associated with Alternative 2 development would not exceed the potable water supply. However, as discussed in the 2008 Master EIR, Modesto’s demands would contribute to the demand resulting from regional development. This regional demand is expected to exceed the supply within the underlying aquifer. Significant, unavoidable, cumulative impacts would result, very similar to the proposed Project.

Increased Demand for Sanitary Sewer Services: New development associated with Alternative 2 would demand additional infrastructure system capacity. However, because additional sewage treatment plant capacity, sanitary sewer pipelines, pump stations and treatment plant capacity would be provided pursuant to the Wastewater Collection System master plan, any resulting impact(s) would be less than significant – similar to those associated with the proposed Project.

Loss of Sensitive Wildlife and Plant Habitat: Growth under Alternative 2, particularly in the Planned Urbanizing Area, would contribute to the significant and unavoidable cumulative loss of habitat that is occurring within the region. These impacts under Alternative 2 would be very similar to those associated with the proposed Project.

Disturbance of Archaeological or Historical Sites: Prehistoric resources may be uncovered during excavation for construction. Construction activities may affect historical structures and resources adversely. Based on the proposed policies, Alternative 2 would avoid significant effects, except where a historically significant building may be demolished. This particular circumstance would result in a significant, unavoidable impact. These impacts under Alternative 2 would be the same as those associated with the proposed Project.

Increased Demand for Storm Drainage: Future development under the No Project Alternative would add impervious surfaces that create additional runoff requiring new and expanded storm drainage systems. Resulting impacts would be largely avoided by existing General Plan policies and Low Impact Development techniques; thus, these impacts associated with the No Project Alternative would be less than significant, with the exception of the scenario where a large storm event(s) prevents discharge of stormwater to drainage channels (significant and unavoidable), similar to the proposed Project scenario.

Flooding and Water Quality: Under the Alternative 2 scenario, future development within the flood zone largely would be avoided. Increased runoff and siltation resulting from new construction, as well as urban runoff pollution, would be controlled by existing City regulations and the required best management practices. Conversion of agricultural lands to urban development may affect groundwater recharge adversely absent a cooperative effort between the City and the irrigation districts. These impacts largely would be avoided by General Plan policies and the regional groundwater management efforts going on outside the general plan process. Therefore, the majority of these impacts would be less than significant under Alternative 2, and very similar in scope and magnitude to those associated with the proposed Project. However, cumulative water quality impacts could occur from development activities and affect the existing water quality impairments in the local water bodies.

Increased Demand for Parks and Open Space: Alternative 2 envisions new growth and development that would provide the requisite number and size of new park facilities to serve it. Any resulting impact(s) under this category would be less than significant for both Alternative 2 and the proposed Project.

Increased Demand for Schools: Alternative 2 envisions new growth and development outside of the existing City limits. Collection of school fees in combination with school districts' facility planning and funding will facilitate new school facilities being constructed. Any resulting impacts under this category would be less than significant for Alternative 2 and for the proposed Project.

Increased Demand for Police Services: Under Alternative 2, future growth and development would occur outside of the existing City limits. The City of Modesto would continue to provide police services City-wide, regardless of future growth. Any resulting impacts under this category would be less than significant for both Alternative 2 and the proposed Project.

Increased Demand for Fire Services: The No Project alternative contemplates future development of the same land areas as the proposed Project. Any construction of new fire station(s) and/or other fire-related facilities or structures would be subject to the same rules, regulations and General Plan policies as all other new development; this framework would prevent significant impacts from occurring. Any impacts under this category for Alternative 1 and the proposed Project would be less than significant.

Generation of Solid Waste: Future development under the No Project alternative would generate substantial amounts of solid waste that would require additional landfill capacity. Adequate future capacity is reasonably foreseeable based on projections generated by the Counties of Stanislaus and San Joaquin (where the landfills that receive Modesto's solid waste are located). Any related potential impacts associated with Alternative 2 would be less than significant and similar to those that would occur under the proposed Project scenario.

Generation of Hazardous Materials: Future development under the Alternative 2 would not generate substantial amounts of hazardous materials. Any related potential impacts associated with the Alternative 2 would be less than significant and similar to those that would occur under the proposed Project scenario.

Geology, Soils and Mineral Resources: Future development under Alternative 2 would not be expected to result in adverse impacts to the underlying earth. Any potential impacts associated with Alternative 2 under this study topic would be less than significant, same as the proposed Project.

Energy: Future development under the Alternative 2 scenario would not be expected to result in wasteful or inefficient use of energy resources. Based on the analysis conducted for the proposed Project – which has the same general plan boundary as Alternative 2 – any impacts would be less than significant.

Effects on Visual Resources: Future development in the Planned Urbanizing Area would introduce new sources of light and glare where lands that are currently in agricultural use are converted to urban use. However, due to application of the City’s design guidelines and the California Building Code, any resulting impact(s) would be less than significant. These impacts under Alternative 2 would be very similar to those associated with the proposed Project.

Land Use and Planning: Because the General Plan is the City’s “Blueprint” for land use and planning, any potential impacts under this category associated with future development under Alternative 2 would be less than significant. Such impacts would also be the same as those associated with the proposed Project.

3. Alternative 3: Reduced Density Alternative

Under Alternative 3, development in the Downtown area would feature *reduced* density / intensity as compared to the proposed Project, essentially maintaining the status quo. Residential densities and non-residential intensities (e.g. Floor Area Ratio) would be reduced within the Planned Urbanizing Area, and the proposed “BCR” land use designation would not be proposed. Under this scenario, the City would expand at the expense of more Farmland on a unit-per-acre basis than the proposed Project, resulting in a less-efficient use of resources. Similarities between Alternative 3 and the proposed Project include the maintenance and enhancement of existing neighborhoods, and the transportation network design / layout.

Alternative 3 Impacts

Alternative 3 would accomplish most of the project objectives, although it would not meet the objectives related to providing adequate land for economic development and providing a better mix of land uses. Potential impacts associated with Alternative 3 would be similar to those of the proposed project, although certain traffic and air quality impacts would likely be reduced. The following discussion describes potential impacts associated with Alternative 3, as compared to the proposed Project.

Traffic: Alternative 3 would include the majority of the proposed project’s policies and changes to the transportation system and land use diagram. It could be expected that overall traffic volumes might be reduced somewhat as compared to the proposed project, although per-capita VMT may be slightly increased. Traffic impacts in general would be very similar, though perhaps slightly reduced, to those of the proposed Project.

Air Quality / Climate Change: Alternative 3 would incorporate the same policies as the proposed project that are intended to reduce air emissions and energy use that results in air emissions. These are the policies contained in Sections VII-H (air quality) and VII-I (energy conservation) of the proposed General Plan amendment. Nonetheless, increased traffic and VMT associated with all development under Alternative 3 would result in significant and unavoidable air quality impacts, although they would be slightly less severe than those associated with the proposed Project.

Future development under Alternative 3 would result in a significant contribution to the cumulative impact of global climate change. The proposed energy conservation policies in Section VII-I and climate change policies in Section VII-H would help reduce greenhouse gas emissions. However, these policies would not eliminate the contribution, and the impacts would be significant and unavoidable, although perhaps somewhat reduced as compared to the proposed Project.

Generation of Noise: Growth under Alternative 3 would cause increased noise levels in the vicinity of construction sites along the existing and proposed transportation network, localized impacts from new stationary noise sources, and the introduction of land uses into a high-noise environment. Alternative 3 would include similar mitigating policies found in the proposed General Plan amendment in Section VII-G. However, it nonetheless would result in significant, unavoidable noise-related impacts. These impacts would be similar, although perhaps slightly reduced, to those associated with the proposed Project.

Loss of Productive Agricultural Lands: Growth under Alternative 3 would result in the conversion of agricultural land to urban uses. These impacts would be significant and unavoidable, same as the proposed Project.

Increased Demand for Long-Term Water Supplies: Additional distribution and storage facilities would be needed to meet anticipated demand under the Alternative 3 scenario. Planned development would not exceed the potable water supply. However, as discussed in the 2008 Master EIR, Modesto's demands would contribute to the demand resulting from regional development. This regional demand is expected to exceed the supply within the underlying aquifer. Significant, unavoidable, cumulative impacts would result, although they would be perhaps slightly less severe as compared to the proposed Project.

Increased Demand for Sanitary Sewer Services: New development associated with Alternative 3 would demand additional infrastructure system capacity, albeit less than the proposed Project. However, additional sewage treatment plant capacity, sanitary sewer pipelines, pump stations and treatment plant capacity would be provided pursuant to the Wastewater Collection System master plan, so any resulting impact(s) would be less than significant.

Loss of Sensitive Wildlife and Plant Habitat: Growth under Alternative 3, particularly in the Planned Urbanizing Area, would contribute to the significant and unavoidable cumulative loss of habitat that is occurring within the region. Policies and mitigation measures enacted under Alternative 3 would avoid direct significant effects on habitat, and they would be the same as those included in the proposed Project.

Disturbance of Archaeological or Historical Sites: Prehistoric resources may be uncovered during excavation for construction. Construction activities may affect historical structures and resources adversely. Based on the proposed policies, Alternative 3 would avoid significant effects, except where a historically significant building may be demolished. This particular circumstance would be a significant, unavoidable impact. Alternative 3 impacts under this category would be very similar to those of the proposed Project.

Increased Demand for Storm Drainage: Future development would add impervious surfaces that create additional runoff requiring new and expanded storm drainage systems. The policies and mitigation measures associated with Alternative 3 would avoid a significant effect in the Planned Urbanizing Area. This would be a significant, unavoidable impact in the Baseline Developed Area where drainage capacity is limited. These impacts under Alternative 3 would be the same as those for the proposed Project.

Flooding and Water Quality: Under the Alternative 3 scenario, future development within the flood zone largely would be avoided. Increased runoff and siltation resulting from new construction, as well as urban runoff pollution, would be controlled by existing City regulations and the required best management practices. Conversion of agricultural lands to urban development may affect groundwater recharge adversely absent a cooperative effort between the City and the irrigation districts. These impacts largely would be avoided by General Plan policies and the regional groundwater management efforts going on outside the general plan process. Therefore, the majority of these impacts would be less than significant for Alternative 3, and very similar in scope and magnitude to those associated with the proposed Project. However, cumulative water quality impacts could occur from development activities and affect the existing water quality impairments in the local water bodies.

Increased Demand for Parks and Open Space: The Alternative 3 envisions new growth and development that would provide the requisite number and size of new park facilities to serve it. Any resulting impact(s) under this category would be less than significant for both Alternative 3 and the proposed Project.

Increased Demand for Schools: Alternative 3 envisions new growth and development outside of the existing City limits. Collection of school fees in combination with school districts' facility planning and funding will facilitate new school facilities being constructed. Any resulting impact(s) under this category would be less than significant for both Alternative 3 and the proposed Project.

Increased Demand for Police Services: Alternative 3 envisions future growth outside of the existing City limits. The City of Modesto will continue to provide police services City-wide, regardless of future growth. Any resulting impacts under this category for Alternative 3 would be less than significant, and very similar as compared to the proposed Project.

Increased Demand for Fire Services: The No Project alternative contemplates future development of the same land areas as the proposed Project. Any construction of new fire station(s) and/or other fire-related facilities or structures would be subject to the same rules, regulations and General Plan policies as all other new development; this framework would prevent significant impacts from occurring. Any impacts under this category for Alternative 1 and the proposed Project would be less than significant.

Generation of Hazardous Materials: Future development under Alternative 3 would not generate substantial amounts of hazardous materials. Any related potential impacts associated with Alternative 3 would be less than significant and similar to those that would occur under the proposed Project scenario.

Generation of Hazardous Materials: Future development under Alternative 3 would not generate substantial amounts of hazardous materials. Any related potential impacts associated with Alternative 3 under this study topic would be less than significant (same as those associated with the proposed Project).

Geology, Soils and Mineral Resources: Future development under Alternative 3 would not be expected to result in adverse impacts to the underlying earth. Any potential impacts associated with Alternative 3 under this study topic would be less than significant (same as those associated with the proposed Project).

Energy: Future development under the Alternative 3 scenario would not necessarily result in wasteful or inefficient use of energy resources. Based on the analysis conducted for the proposed Project – which would have the same general plan boundary as the proposed Project – any impacts would be less than significant. These impacts could be somewhat greater than those associated with the proposed Project, however, due to the reduced density / intensity of development associated with Alternative 3 – and the resulting inefficiencies in energy transmission and usage.

Effects on Visual Resources: Future development in the Planned Urbanizing Area would introduce new sources of light and glare where agricultural land would be converted to urban use. However, due to application of the City’s design guidelines and the California Building Code, any resulting impact(s) would be less than significant. These impacts under Alternative 3 would be very similar to those associated with the proposed Project.

Land Use and Planning: Because the General Plan is the City’s “Blueprint” for land use and planning, any potential impacts under this category associated with future development under Alternative 3 would be less than significant (same as the proposed Project scenario).

D. COMPARISON AMONG THE PROPOSED PROJECT AND ALTERNATIVES

As required per State CEQA Guidelines Section 15126.6(e), the impacts of the alternatives are compared with the impacts of the proposed General Plan amendment. Table VIII-1, below, identifies the common impacts and their level of significance under each of the alternatives. The table summarizes the impacts of the proposed project and the alternatives and does not differentiate between direct and cumulative impacts. The anticipated level of environmental impact for the proposed project, by study topic or category of analysis, is shown. The code for comparison to the proposed project, for each alternative, is shown to indicate one of three conditions: “+” means greater impact; “-” means lesser impact; and, “o” means a similar or same level of impact.

TABLE VIII-1 **Impacts Comparison among the Proposed Project and Alternatives**

Analysis Topic	Proposed Project 2040 GP	Alternative 1 No Project	Alternative 2 Increased Density	Alternative 3 Decreased Density
Traffic & Circulation	Significant and Unavoidable	o	o	o
Air Quality / GHG emissions	Significant and Unavoidable	o	-	+
Noise	Significant and Unavoidable	o	+	-
Agricultural Lands	Significant and Unavoidable	o	-	+
Water Demand	Significant and Unavoidable	o	+	-
Sewer Demand	Less than significant	o	o	o
Biology	Significant and Unavoidable	o	-	+
Archaeological & Historical	Significant and Unavoidable	o	o	o
Storm Drainage	Less than significant	o	o	o
Flooding & Water Quality	Less than significant	o	o	o
Parks & Open Space	Less than significant	o	o	o
Schools	Less than significant	o	o	o
Police Services	Less than significant	o	o	o
Fire Services	Less than significant	o	o	o
Solid Waste	Less than significant	o	o	o
Hazardous Materials	Less than significant	o	o	o

Geology, Soils & Minerals	Less than significant	o	o	o
Energy	Less than significant	o	-	+
Visual Resources	Less than significant	o	o	o
Land Use & Planning	Less than significant	o	o	o

Alternative 1 would not meet the land use- and transportation-related objectives for future development, as the proposed policies and land use changes would not be adopted. However, the potential impacts associated with Alternative 1 would be similar to those of the proposed project, due to similarities in the level of planned urbanization, and the fact that the ultimate boundary configuration would remain the same.

Alternative 2 would generally meet both the land use- and transportation-related objectives for future development, as all the proposed policies and changes to the network would remain. The potential impacts associated with Alternative 2 are very similar in scope and magnitude as compared to those of the proposed Project.

Alternative 3 would not meet the stated project objectives of providing adequate land for economic development. Otherwise, the Alternative 3 impacts would also be similar to those of the proposed Project, although inefficiencies associated with lower-density sprawl-type development would result in somewhat increased adverse environmental impacts related to air quality, agricultural land conversion, biological resources and energy.

E. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines Section 15126 requires the “environmentally superior” alternative to be identified in the Master EIR. Where the No-Project Alternative is environmentally superior, the environmentally superior alternative is to be identified from among the other alternatives.

On this basis, Alternative 2 (Increased Density) appears to be the environmentally superior alternative among the alternatives described above. Its increased efficiencies with regard to transportation, utilities systems, and energy usage could perhaps result in fewer and/or slightly less-severe impacts. However, the General Plan amendment contemplated under Alternative 2 would be less consistent (as compared with the proposed Project) with the overall community vision for the General Plan amendment that was formulated during the 2013 public workshop series lead by the Planning Commission and at subsequent City Council meetings where the proposed General Plan amendment project description was further defined.