

## SECTION 5: ALTERNATIVES TO THE PROPOSED PROJECT

### 5.1 - Introduction

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

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

#### 5.1.1 - Significant Unavoidable Impacts

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

- **Consistency with Air Quality Management Plan:** The proposed project would result in exceedances of regional emissions thresholds and, therefore, would be inconsistent with the Bay Area Air Quality Management District regional air quality planning assumptions. Mitigation is proposed requiring the implementation of feasible emissions reduction measures; however, these measures would not reconcile this inconsistency. Therefore, the significance after mitigation is significant and unavoidable.
- **Cumulative Criteria Pollutant Impacts:** The project would result in a cumulatively considerable net increase of criteria pollutants for which the project region is nonattainment under an applicable federal or state ambient air quality standard. Mitigation is proposed requiring the implementation of air emissions reduction measures, but it would not fully reduce this impact to a level of less than significant. Therefore, the significance after mitigation is significant and unavoidable.
- **Sensitive Receptors:** The proposed project would emit toxic air contaminants (TACs) during construction that could potentially expose sensitive receptors in the project vicinity to unhealthful levels of pollution and result in an increase in cancer risk above the BAAQMD cancer risk threshold. Potential actions to reduce the cancer risk are identified in the mitigation but require the agreement of the residents or property owners of the dwelling units. Since this cannot be assured, the impacts remain significant unavoidable.

- **Greenhouse Gas Emissions:** The proposed project would generate new sources of greenhouse gas emissions that would exceed Bay Area Air Quality Management District thresholds. Mitigation is proposed requiring the implementation of feasible emissions reduction measures; however, these measures would not reduce emissions to less than significant levels. Therefore, the significance after mitigation is significant and unavoidable.
- **Existing Plus Project Traffic:** The proposed project would generate new trips to intersections that would operate below the minimum acceptable standard under Existing Plus Project Traffic Conditions. Improvements are identified for each location; however, such improvements are uncertain and may not be feasible because they rely on the approval of third-party agencies or funding sources that are not secured at the time of this writing. As such, the significance after mitigation is significant and unavoidable.
- **Existing Plus Background Plus Project Traffic:** The proposed project would generate new trips to intersections that would operate below the minimum acceptable standard under Existing Plus Background Plus Project Traffic Conditions. Improvements are identified for each location; however, such improvements are uncertain and may not be feasible because they rely on the approval of third-party agencies or funding sources that are not secured at the time of this writing. As such, the significance after mitigation is significant and unavoidable.
- **Cumulative Traffic:** The proposed project would generate new trips to intersections that would operate below the minimum acceptable standard under Cumulative Traffic Conditions. Improvements are identified for each location; however, such improvements are uncertain and may not be feasible because they rely on the approval of third-party agencies or funding sources that are not secured at the time of this writing. As such, the significance after mitigation is significant and unavoidable.
- **Congestion Management Plan:** The proposed project would generate new trips to various Congestion Management Plan-designated roadway facilities. Certain facilities are projected to operate at unacceptable levels, and improvements such as road widening are not acceptable to jurisdictions in Napa County. Furthermore, certain facilities are outside of the jurisdictional control of the City of American Canyon; therefore, there is uncertainty as to whether feasible improvements could be implemented, if determined to be available. Therefore, the significance after mitigation is significant and unavoidable.

### 5.1.2 - Alternatives to the Proposed Project

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

- **No Project Alternative:** The previously entitled Building D would be pursued and the balance of the project site would remain undeveloped for the foreseeable future.
- **Reduced Density Alternative:** Building G (182,720 square feet) would be eliminated and Lot 6 would be developed as an 11.42-acre private outdoor recreation area. All other lots and buildings would be developed as contemplated by the proposed project. In total, either 389,088 square feet of warehouse uses (Option 1) would be developed, or 371,379 square

feet of warehouse/gas station/restaurant uses (Option 2) would be developed under this alternative.

- **Business Park Alternative:** A 550,000-square-foot business park would be developed on the project site. The gas station and restaurant uses would not be pursued under this alternative.

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

## 5.2 - Project Objectives

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

1. Facilitate the development of land contemplated for urban development to its highest and best use.
2. Positively contribute to the local economy via new capital investment, creation of new employment opportunities, and the expansion of the tax base.
3. Provide the City of American Canyon with a high-quality, employment-generating industrial development.
4. Serve local and regional demand for warehouse and wine warehouse uses, as well as providing the option of business-park serving commercial uses.
5. Locate a 24-7 industrial land use in a manner that allows for direct and safe access to the regional highway network while avoiding impacts to residential areas.
6. Facilitate the logical and orderly development of the Devlin Road corridor in accordance with the City of American Canyon General Plan and Napa County Airport Industrial Area Specific Plan.
7. Create a range of new employment opportunities for local residents.
8. Contribute to the long-term fiscal health of the City of American Canyon by generating new taxable sales, development impact fees, business license fees, and other sources of revenue.
9. Minimize potential truck and pedestrian conflicts through site planning that clearly separates truck and pedestrian access areas.
10. Minimize noise and land use compatibility impacts to the surrounding uses through site planning measures such as building orientation, screen walls, and landscaping.

## 5.3 - Alternative 1—No Project Alternative

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

As previously discussed in Section 2, Project Description, Building D was previously entitled through the County (although not yet constructed) and is not a part of the proposed project. Building D totals 90,799 square feet and occupies a parcel totaling 5.58 acres. Since construction of Building D could legally proceed at any time separately from the proposed project, the No Project Alternative will assume that Building D would be developed as planned, and the balance of the project site will remain undeveloped for the foreseeable future. Therefore, any environmental impacts arising from development of Building D are not accounted for in this analysis of the No Project scenario, since they would not be part of the project.

### 5.3.1 - Impact Analysis

The project site would remain undeveloped for the foreseeable future. Building D, which is currently entitled, would be developed as contemplated. Accordingly, no significant impacts (including significant and unavoidable impacts) would occur as a result of the proposed project, which does not include the development of Building D. Therefore, no mitigation measures would be required.

### 5.3.2 - Conclusion

The No Project Alternative would avoid the proposed project’s significant and unavoidable impacts and would avoid any potential impacts related to all environmental topical areas. However, this alternative would not advance any of the project objectives, including those related to facilitating the development of land planned for urban development to its highest and best use; positively contributing to the local economy; providing the City of American Canyon with a high-quality, employment-generating industrial development; and serving local and regional demand for warehouse and wine warehouse uses, as well as providing the option of business-park serving commercial uses. Finally, it should be noted that the project site is zoned for industrial use, and that the northern portion of the project site previously received entitlements from Napa County, and is currently served with infrastructure suitable for this type of development. Thus, should the proposed project not advance, it would be expected that another industrial development proposal would be submitted.

## 5.4 - Alternative 2—Reduced Density Alternative

Under the Reduced Density Alternative, Building G (182,720 square feet) would be eliminated and Lot 6 would be developed as an 11.42-acre private outdoor recreation area. All other lots and buildings would be developed as contemplated by the proposed project. In total, either 389,088 square feet of warehouse uses (Option 1) would be developed or 371,379 square feet of warehouse/gas station/restaurant uses (Option 2) would be developed under this alternative.

Lot 1 (Building A), Lot 2 (Building B), Lot 4 (Building H), and Lot 5 (Building E) would be developed as contemplated; however, Lot 6 (Building G) would not be developed. The elimination of Building G would reduce the development potential by 182,720 square feet. In place of Building G, the 11.42-acre Lot 6 would support an outdoor private recreational area consisting of a basketball court, sand volleyball court, walking paths, seating/picnic areas, and landscaping that would be intended for the exclusive use of project employees and their guests. The private recreation area would be contiguous to the proposed preserved wetland area and provide additional buffering in terms of a landscaped setback. All other aspects of the proposed project would be identical to the proposed project, including end users, design and appearance, vehicular access points, and discretionary approvals. The previously entitled Building D would also be developed under this alternative.

Table 5-1 summarizes the Reduced Density Alternative. The purpose of this alternative is to evaluate a smaller version of the proposed project.

**Table 5-1: Reduced Density Alternative**

Scenario	Uses	Characteristics
Reduced Density Alternative	Warehouse, Wine Warehouse	Four Warehouse Buildings/389,088 square feet (Option 1)
	Warehouse, Fuel Station, Restaurant	Three Warehouse Buildings/364,420 Two Gas Station and Restaurant Buildings/6,688 square feet 371,379 square feet (Option 2)
	Private Recreational Area	11.42 acres
	<i>Subtotal</i>	<i>371,379 to 389,088 square feet 11.42 acres (private recreational area)</i>
Proposed Project	Warehouse	Five Warehouse Buildings/571,808 square feet (Option 1)
	Warehouse, Fuel Station, Restaurant	Four Warehouse Buildings/547,140 square feet Two Gas Station and Restaurant Buildings/6,688 square feet Total: 554,099 square feet (Option 2)
	<i>Subtotal</i>	<i>554,099 square feet to 571,808 square feet</i>
<b>Difference</b>	—	<b>(182,720 square feet [Option 1]) (182,720 square feet [Option 2]) 11.42 acres private recreational area</b>

Source: FirstCarbon Solutions, 2015.

## 5.4.1 - Impact Analysis

### Aesthetics, Light, and Glare

The Reduced Density Alternative consists of developing 371,379 to 389,088 square feet of industrial uses/commercial uses and 11.42 acres of outdoor recreational amenities. Similar exterior light fixtures would be installed, and Mitigation Measure AES-3 would be implemented. The buildings developed under this alternative would retain a similar appearance to the proposed project's structures; however, 11.42 acres of outdoor recreational amenities would be provided in place of a 182,720-square-foot warehouse building. Therefore, the Reduced Density Alternative would somewhat reduce the project's less than significant impacts on aesthetics, light, and glare.

### Air Quality/Greenhouse Gas Emissions

The Reduced Density Alternative would result in less construction activity and 647 to 702 fewer daily vehicle trips (refer to Table 5-2), which have corresponding reductions in the severity of construction and operational air quality and greenhouse gas emissions. Additionally, this alternative would attract fewer truck trips and thus lessen the severity of the significant unavoidable sensitive receptor impact. Mitigation Measures AIR-2, AIR-3a, and AIR-3b would be implemented under this alternative. Although this alternative would not avoid the proposed project's significant unavoidable air quality impacts, it would lessen the severity by emitting fewer pollutants from operational activities. Therefore, this alternative would have less impact on air quality and greenhouse gas than the proposed project.

### Biological Resources

Ground-disturbing activities would occur under the Reduced Density Alternative similar to those proposed by the project, and Mitigation Measures BIO-1a, BIO-1b, BIO-2a, BIO-2b, BIO-2c, and BIO-4 would be implemented. This alternative would develop 11.42 acres of outdoor recreational amenities in place of a 182,720-square-foot warehouse building, which would reduce the impact on biological resources. Therefore, the Reduced Density Alternative would have less impact on biological resources than the proposed project.

### Cultural Resources

Ground-disturbing activities would occur under the Reduced Density Alternative similar to those proposed by the project, and Mitigation Measures CUL-1, CUL-3, and CUL-4 would be implemented. This alternative would develop 11.42 acres of outdoor recreational amenities in place of a 182,720-square-foot warehouse building, resulting in less site disturbance than the proposed project. Therefore, the Reduced Density Alternative would have less impact related to the potential to disturb previously undiscovered cultural resources than the proposed project.

### Geology, Soils, and Seismicity

Development activities would occur under the Reduced Density Alternative similar to those proposed by the project, and Mitigation Measure GEO-1 would be implemented. This alternative would develop 11.42 acres of outdoor recreational amenities in place of a 182,720-square-foot warehouse building, resulting in less site disturbance and less potential exposure to seismic hazards

than the proposed project. As such, this alternative would reduce the project's impacts related to geology, soils, and seismicity, which would be less than significant after mitigation.

### **Hazards and Hazardous Materials**

As with the proposed project, no hazardous conditions exist on-site, and, therefore, impacts would be less than significant. This alternative would develop 11.42 acres of outdoor recreational amenities in place of a 182,720-square-foot warehouse building and thus would reduce the potential for hazardous material releases during construction and operations. Therefore, the Reduced Density Alternative would have less impact related to hazards and hazardous materials than the proposed project.

### **Hydrology and Water Quality**

Ground-disturbing activities would occur under the Reduced Density Alternative similar to those proposed by the project, and Mitigation Measures HYD-1a and HYD-1b would be implemented. This alternative would develop 11.42 acres of outdoor recreational amenities in place of a 182,720-square-foot warehouse building and thus would reduce the project's less than significant (after mitigation) hydrology and water quality impacts because there would be less impervious surface coverage. Therefore, the Reduced Density Alternative would have less impact on hydrology and water quality than the proposed project.

### **Land Use**

This alternative would develop similar uses to the proposed project and, therefore, would yield similar conclusions in terms of consistency with the City of American Canyon General Plan, Napa County Airport Industrial Area Specific Plan, and Napa County Airport Land Use Compatibility Plan. Therefore, the Reduced Density Alternative would have land use impacts similar to the proposed project.

### **Noise**

The Reduced Density Alternative would result in less construction activity and 647 to 702 fewer daily vehicle trips (refer to Table 5-2), which would have corresponding reductions in the severity of construction and operational noise impacts. Mitigation Measure NOI-1 would be implemented under this alternative. Although this alternative would implement mitigation measures similar to the proposed project, the reduction in development potential and vehicle trips would further reduce the severity of noise impacts. Therefore, this alternative would have reduced noise impacts compared with the proposed project, which would be less than significant with mitigation.

### **Public Services and Utilities**

The Reduced Density Alternative would result in a 182,720-square-foot reduction in development potential, resulting in less demand for fire protection, police protection, water, and energy, and less generation of wastewater and solid waste. Although the proposed project's impacts on public services and utilities were found to be less than significant and did not require mitigation, the overall reduction in demand for services and generation of effluent would be considered more beneficial.

Therefore, the Reduced Density Alternative would have less impact on public services and utilities than the proposed project.

**Transportation**

Table 5-2 summarizes the daily and peak-hour trip generation associated with the Reduced Density Alternative. As shown in the table, this alternative would yield a reduction of 647 to 702 daily vehicle trips, 44 to 46 AM peak-hour vehicle trips, and 42 to 44 PM peak-hour vehicle trips. The trip reduction would contribute fewer vehicle trips to intersections that would operate at unacceptable levels, and Mitigation Measures TRANS-1a, TRANS-1b, TRANS-1c, TRANS-1d, and TRANS-2 would be implemented. Although this alternative would not avoid the project’s significant and unavoidable transportation impacts, it would lessen the severity of these impacts. As with the proposed project, this alternative would implement similar mitigation measures in the form of traffic improvements and impact fees. Overall, this alternative would have less transportation impacts than the proposed project.

**Table 5-2: Reduced Density Alternative Trip Generation Comparison**

Scenario	Daily Trips	AM Peak Hour Trips	PM Peak Hour Trips
Reduced Density Alternative—Option 1	1,510	169	138
Proposed Project—Option 1	2,212	215	182
<i>Difference</i>	<i>(702)</i>	<i>(46)</i>	<i>(44)</i>
Reduced Density Alternative—Option 2	4,262	400	356
Proposed Project—Option 2	4,909	444	398
<i>Difference</i>	<i>(647)</i>	<i>(44)</i>	<i>(42)</i>
Note: Refer to Table 3.11-7 in Section 3.11, Transportation for trip generation rates used in calculations. Source: FCS, 2015.			

**5.4.2 - Conclusion**

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

The Reduced Density Alternative would advance all of the project objectives, with several advanced to a lesser degree. However, the reduction in square footage would result in fewer positive economic benefits and, thus, would advance the project objectives to a lesser degree. For example, this alternative would be expected to reduce employment by 91 workers by eliminating Building G. This includes objectives related to facilitating the development of land planned for business park/industrial uses to its highest and best use; positively contributing to the local economy; providing the City of American Canyon with a high-quality, employment-generating industrial development; and serving local and regional demand for warehouse and wine warehouse uses.

## 5.5 - Alternative 3—Business Park Alternative

Under the Business Park Alternative, a 550,000-square-foot business park would be developed on the project site. The gas station, convenience market, and restaurant would not be developed under this alternative. This alternative would represent a net reduction of 21,808 square feet relative to Option 1 of the proposed project, and a net reduction of 5,499 square feet relative to the Option 2 of the proposed project.

The end users of the Business Park Alternative would be primarily light industrial. A total of eight buildings would be developed, ranging from 50,000 to 150,000 square feet in area. Certain buildings would be subdivided for multiple tenants (e.g., start-ups and small businesses), while others would be intended for larger single users. The buildings would provide at-grade loading docks (i.e., roll-up doors) and limited truck wells; they would not be intended for large-format distribution uses. Buildings would stand up to 35 feet above finished grade. Additionally, enclosed outdoor storage areas would also be accommodated by this alternative.

Vehicular access would be taken from driveways located on S. Kelly Road and Devlin Road. This alternative would require the same discretionary approvals as the proposed project (Option 1).

Table 5-3 summarizes the Business Park Alternative. The purpose of this alternative is to evaluate an alternative use for the proposed project that would be allowable under the City of American Canyon General Plan land use designation of “Industrial” and the Napa County Airport Industrial Area Specific Plan designation of “Business/Industrial Park.”

**Table 5-3: Business Park Alternative**

Scenario	Uses	Characteristics
Business Park Alternative	Light Industrial	Eight Buildings/550,000 square feet
Proposed Project	Warehouse	Five Buildings/571,808 square feet (Option 1)
	Warehouse, Fuel Station, Restaurant	Six Buildings/554,099 square feet (Option 2)
	<i>Subtotal</i>	<i>554,099 to 571,808 square feet</i>
<b>Difference</b>	—	<b>(21,808 square feet [Option 1]) (4,099 square feet [Option 2])</b>

Source: FirstCarbon Solutions, 2015.

### 5.5.1 - Impact Analysis

#### Aesthetics, Light, and Glare

The Business Park Alternative consists of developing 550,000 square feet of office, research and development, and light industrial uses on the project site. This alternative would have a different layout than the proposed project and would consist of eight buildings ranging from 50,000 to 150,000 square feet in area. Although the layout and number of buildings would be different, the

visual appearance would be similar to the proposed project and therefore would yield similar findings about aesthetic character. Similar exterior light fixtures would be installed and Mitigation Measure AES-3 would be implemented. Therefore, the Business Park Alternative would have aesthetics, light, and glare impacts similar to the proposed project.

### **Air Quality/Greenhouse Gas Emissions**

The Business Park Alternative would involve similar development activities as the proposed project and, therefore, yield similar conclusions regarding construction emissions. This alternative would generate as many as 1,677 additional daily vehicle trips relative to Option 1, but would reduce 1,020 daily trips relative to Option 2 (refer to Table 5-4), which have corresponding increases or decreases in the severity of operational air quality and greenhouse gas emissions. This alternative would attract the same amount of truck trips and, thus, yield a similar significant unavoidable sensitive receptor impact. Mitigation Measures AIR-2, AIR-3a, and AIR-3b would be implemented under this alternative. This alternative would not avoid the proposed project's significant unavoidable air quality impacts, and would increase the severity by emitting more pollutants from operational activities compared with Option 1. Relative to Option 2, this alternative would reduce operational emissions but probably would not avoid the significant unavoidable impacts, due to the overall net increase in pollutant emissions. Therefore, this alternative would have greater impact on air quality and greenhouse gas emissions than the proposed project.

### **Biological Resources**

This alternative would result in an amount of ground disturbance similar to the proposed project and therefore would yield similar findings regarding biological resource impacts. Similar development activities would occur, and Mitigation Measures BIO-1a, BIO-1b, BIO-2a, BIO-2b, BIO-2c, and BIO-4 would be implemented. Therefore, the Business Park Alternative would have biological resources impacts similar to the proposed project.

### **Cultural Resources**

This alternative would have an amount of ground disturbance similar to the proposed project and therefore would yield similar findings regarding cultural resource impacts. Similar development activities would occur, and Mitigation Measures CUL-1, CUL-3, and CUL-4 would be implemented. Therefore, the Business Park Alternative would have cultural resources impacts similar to the proposed project.

### **Geology, Soils, and Seismicity**

Similar development activities would occur, and Mitigation Measure GEO-1 would be implemented. This alternative would develop an amount of square footage roughly similar to the proposed project and would therefore yield similar findings regarding geology, soils, and seismicity. Therefore, the Business Park Alternative would have geology, soils, and seismicity impacts similar to the proposed project.

## **Hazards and Hazardous Material**

As with the proposed project, no hazardous conditions exist on-site, and, therefore, impacts would be less than significant. This alternative would have an identical layout and would develop an amount of square footage equivalent to the proposed project, thereby yielding similar findings regarding hazards and hazardous materials. Therefore, the Business Park Alternative would have hazards and hazardous materials impacts similar to the proposed project.

## **Hydrology and Water Quality**

Ground-disturbing activities similar to the proposed project would occur, and, therefore, Mitigation Measures HYD-1a and HYD-1b would be implemented. This alternative would have an identical layout and develop an amount of impervious surfaces equivalent to the proposed project, thereby yielding similar findings regarding hydrology and water quality. Therefore, the Business Park Alternative would have hydrology and water quality impacts similar to the proposed project.

## **Land Use**

This alternative would include an allowable use—light industrial—and therefore would yield similar conclusions in terms of consistency with the City of American Canyon General Plan, Napa County Airport Industrial Area Specific Plan, and the Napa County Airport Land Use Compatibility Plan. Therefore, the Business Park Alternative would have land use impacts similar to the proposed project.

## **Noise**

The Warehouse Alternative would have construction activities similar to the proposed and, therefore, would yield similar conclusions regarding construction noise. This alternative would generate as many as 1,677 additional daily vehicle trips relative to Option 1 but would reduce 1,020 daily trips relative to Option 2 (refer to Table 5-4). Mitigation Measure NOI-1 would be implemented under this alternative. Because all of the proposed project's noise impacts were found to be less than significant, it would be expected that this alternative would yield similar conclusions even after accounting for the changes in daily trips relative to Option 1 and Option 2. Therefore, this alternative would have noise impacts similar to the proposed project.

## **Public Services and Utilities**

The Business Park Alternative would develop 550,000 square feet of office, research and development, and light industrial uses on the project site. These uses would be expected to result in slightly less demand for fire protection, police protection, water, and energy, and slightly less generation of wastewater and solid waste due to the reduction in development potential. Although the proposed project's impacts on public services and utilities were found to be less than significant and did not require mitigation, the overall reduction in demand for services and generation of effluent would be considered more beneficial. Therefore, the Business Park Alternative would have less impact on public services and utilities than the proposed project.

## Transportation

Table 5-4 summarizes the daily and peak-hour trip generation associated with the Warehouse Alternative. As shown in the table, this alternative would generate 704 more AM peak-hour vehicle trips and 264 more PM peak-hour vehicle trips compared with Option 1. The additional trips would contribute more vehicle trips to intersections that would operate at unacceptable levels, and Mitigation Measures TRANS-1a, TRANS-1b, TRANS-1c, TRANS-1d, and TRANS-2 would be implemented. This alternative would not avoid the significant and unavoidable transportation impacts that would occur under Option 1 of the project, and would increase the severity of these impacts by generating a net increase in peak-hour trips. As with the proposed project, this alternative would implement similar mitigation measures in the form of traffic improvements. Overall, this alternative would have greater transportation impacts than the proposed project under the Option 1 development scenario.

**Table 5-4: Business Park Alternative Trip Generation Comparison**

Scenario	Daily Trips	AM Peak Hour Trips	PM Peak Hour Trips
Business Park Alternative	3,889	919	446
Proposed Project—Option 1	2,212	215	182
<i>Difference</i>	<i>1,677</i>	<i>704</i>	<i>264</i>
Business Park Alternative	3,889	919	446
Proposed Project—Option 2	4,909	444	398
<i>Difference</i>	<i>(1,020)</i>	<i>475</i>	<i>48</i>
Notes: Business Park Alternative uses ITE Light Industrial trip generation rate. Refer to Table 3.11-7 in Section 3.11, Transportation for trip generation rates used in calculations. Source: FCS, 2015.			

This alternative would generate 475 more AM peak-hour vehicle trips and 48 more PM peak-hour vehicle trips compared with Option 2. The additional trips would contribute more vehicle trips to intersections that would operate at unacceptable levels, and Mitigation Measures TRANS-1a, TRANS-1b, TRANS-1c, TRANS-1d, and TRANS-2 would be implemented. This alternative would not avoid the significant and unavoidable transportation impacts that would occur under Option 2 of the project, and would increase the severity of these impacts by generating a net increase in peak-hour trips. As with the proposed project, this alternative would implement similar mitigation measures in the form of traffic improvements. Overall, this alternative would have greater transportation impacts than the proposed project under the Option 2 development scenario.

### 5.5.2 - Conclusion

The Business Park Alternative would not avoid the significant and unavoidable air quality/greenhouse gas emissions and transportation impacts associated with the proposed project, and would increase the severity of these impacts by generating additional daily and peak-hour trips

compared with Option 1. Additionally, the Business Park Alternative would have the same impacts as the proposed project on all other topical areas.

The Business Park Alternative would not avoid the significant and unavoidable transportation impacts associated with the proposed project, and would increase the severity of these impacts by generating additional peak-hour trips compared with Option 2. However, this alternative would slightly lessen the severity of air quality and greenhouse gas emissions impacts by generating fewer daily trips compared with Option 2. Additionally, the Business Park Alternative would have the same impacts as the proposed project on all other topical areas.

The Business Park Alternative would advance all of the project objectives, either to an equivalent degree or a slightly lesser degree than the proposed project. Objectives advanced to an equivalent degree would include facilitating the development of land planned for business park/industrial uses to its highest and best use, and permanently protecting the most biologically viable wetlands within the project site. The objectives that would be achieved to a lesser degree include positively contributing to the local economy; providing the City of American Canyon with a high-quality, employment-generating industrial development; and serving local and regional demand for warehouse and wine warehouse uses, as well as providing the option of business-park serving commercial uses.

## 5.6 - Environmentally Superior Alternative

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

**Table 5-5: Summary of Alternatives**

Environmental Topic Area	Mitigation Measures	No Project Alternative	Reduced Density Alternative	Business Park Alternative
Aesthetics, Light, and Glare	AES-3	Less Impact	Similar Impact	Similar Impact
Air Quality/Greenhouse Gas Emissions	AIR-2a AIR-2b AIR-3	Less Impact	Less Impact	Greater Impact
Biological Resources	BIO-1a BIO-1b BIO-2a BIO-2b BIO-2c BIO-4	Less Impact	Similar Impact	Similar Impact
Cultural Resources	CUL-1 CUL-3 CUL4	Less Impact	Similar Impact	Similar Impact
Geology, Soils, and Seismicity	GEO-1	Less Impact	Similar Impact	Similar Impact
Hazards and Hazardous Materials	None	Less Impact	Similar Impact	Similar Impact

**Table 5-5 (cont.): Summary of Alternatives**

Environmental Topic Area	Mitigation Measures	No Project Alternative	Reduced Density Alternative	Business Park Alternative
Hydrology and Water Quality	HYD-1a HYD-1b	Less Impact	Similar Impact	Similar Impact
Land Use	LU-3	Less Impact	Similar Impact	Similar Impact
Noise	NOI-1	Less Impact	Less Impact	Similar Impact
Public Services and Utilities	None	Less Impact	Less Impact	Similar Impact
Transportation	TRANS-1a TRANS-1b TRANS-1c TRANS-1d TRANS-2	Less Impact	Less Impact	Greater Impact (Option 1)  Less Impact (Option 2)

Source: FCS, 2015.

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

Of the two remaining alternatives, the Reduced Density Alternative has the potential to yield the greatest reductions in the severity of the proposed significant and unavoidable impacts associated with air quality/greenhouse gas emissions and transportation relative to both Options 1 and 2. In comparison, the Business Park Alternative would only reduce daily trip generation relative to Option 1 but would increase it relative to Option 2, which would increase the severity of air quality and greenhouse gas emissions impacts. Therefore, the Reduced Density Alternative is the environmentally superior alternative.

## 5.7 - Alternatives Rejected From Further Consideration

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

### 5.7.1 - Alternative Location

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

- 1) Site suitability
- 2) Economic viability
- 3) Availability of infrastructure

- 4) General Plan consistency
- 5) Other plans or regulatory limitations
- 6) Jurisdictional boundaries
- 7) Whether the project applicant can reasonably acquire, control, or otherwise have access to the alternative site

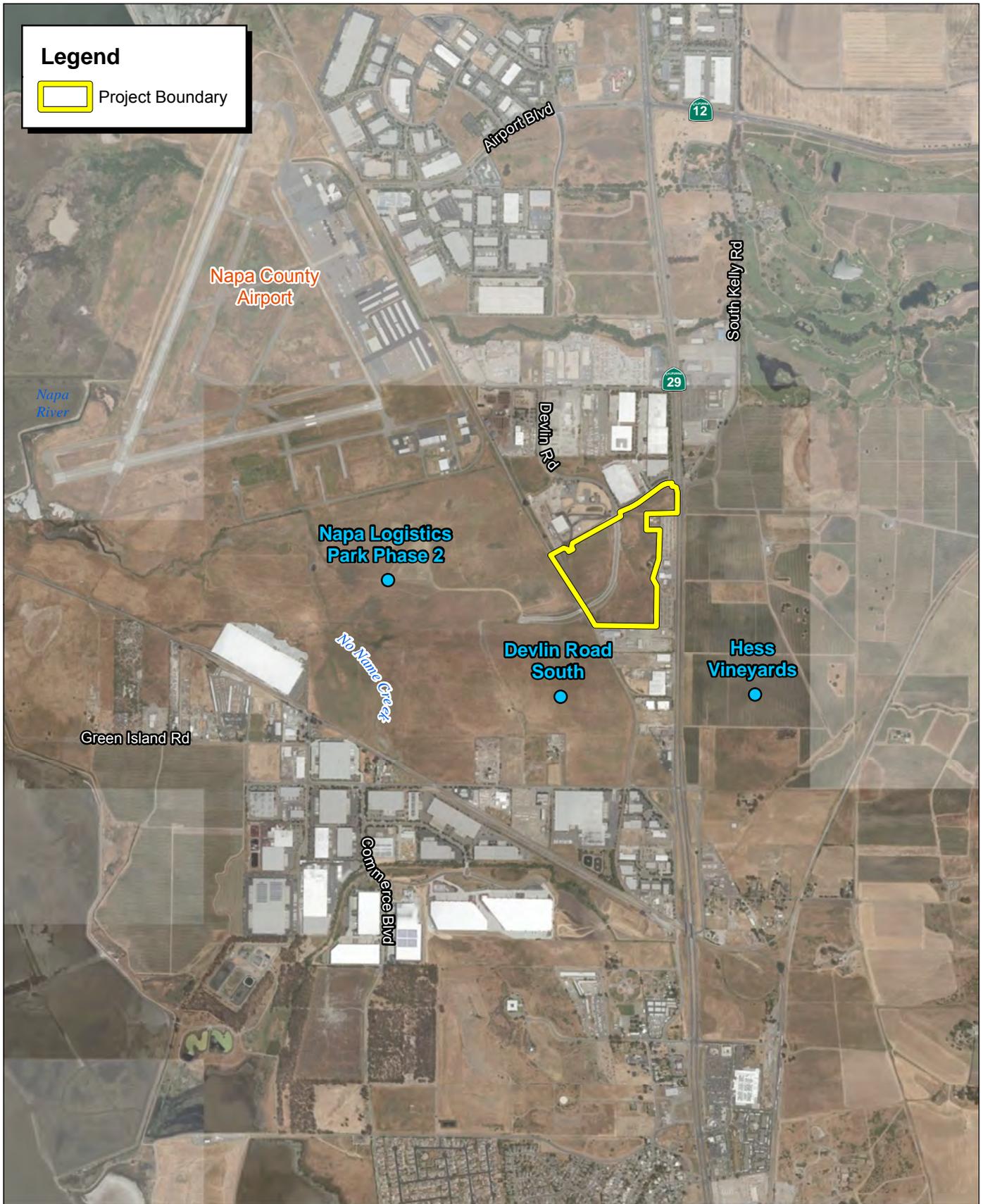
The CEQA Guidelines establish that only locations that would accomplish this objective should be considered as alternative locations for the proposed project.

Table 5-6 evaluates the feasibility of three alternative locations located within 0.5 mile of the project site in either the City of American Canyon or unincorporated Napa County. The three locations are shown on Exhibit 5-1. As indicated in Table 5-6, none of the three sites would meet CEQA Guidelines criteria for a feasible alternative location.

**Table 5-6: Alternative Location Feasibility Analysis**

Location	Description	Feasibility Determination
Napa Logistics Park Phase 2	Approximately 173 acres located at the end of Devlin Road in the City of American Canyon. The site contains undeveloped land. This site is designated “Industrial” by the City of American Canyon General Plan and zoned “Business/Industrial Park” by the Napa County Airport Industrial Area Specific Plan.	<b>Not Feasible:</b> This site is owned by a third party and is not owned, controlled, or otherwise accessible to the project applicant. Additionally, the site is entitled for 2.71 million square feet of industrial uses and the applicant is proceeding with developing the uses.
Hess Vineyards	Approximately 100 acres located east of SR-29/S. Kelly Road in unincorporated Napa County. This site contains cultivated agricultural land. This site is designated “Agricultural, Watershed, and Open Space” by the Napa County General Plan and zoned “Agricultural Watershed” by the Napa County Zoning Ordinance.	<b>Not Feasible:</b> This site is owned by a third party and is not owned, controlled, or otherwise accessible to the project applicant. This property was re-designated from “Industrial” to “Agricultural, Watershed, and Open Space” in 2008, signifying the County’s policy direction for this particular property.
Devlin Road South	Approximately 55 acres located south of Devlin Road and west of the Napa Branch Line railroad tracks in the City of American Canyon. This site contains undeveloped land. This site is designated “Industrial” by the City of American Canyon General Plan and zoned “Business/Industrial Park” by the Napa County Airport Industrial Area Specific Plan.	<b>Not Feasible:</b> This site is owned by a third party and is not owned, controlled, or otherwise accessible to the project applicant. Additionally, developing the project on this site would require the extension of roadways and infrastructure, which would increase the potential for impacts.
Source: FirstCarbon Solutions, 2015.		

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Source: ESRI Imagery



## Exhibit 5-1 Alternative Locations

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