

20 Alternatives

20.1 Introduction

The State CEQA Guidelines Section 15126.6 mandates that an EIR include a comparative evaluation of the proposed project with a range of reasonable alternatives to the project, which would feasibly attain most of the basic objectives of the project while simultaneously avoiding or substantially lessening any of the significant effects of the project. Pursuant to Section 15126.6 (f)(1) of the State CEQA Guidelines, “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, 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).” Although these factors do not present a strict limit on the scope of reasonable alternatives to be considered, they help establish the context in which “the rule of reason” is measured against when determining an appropriate range of alternatives sufficient to establish and foster meaningful public participation and informed decision-making.

As described in Chapter 3, the proposed project includes the development of two age-restricted housing communities on closed portions of the existing Deer Ridge Golf Club and the Shadow Lakes Golf Club, totaling approximately 32 acres (refer to Figure 3-1 in Chapter 3 for project site locations).

20.2 Project Objectives

The project applicant has identified the following project objectives:

Golf Course

- Redevelop underutilized and economically challenged golf courses
- Consolidate the existing courses creating a single, profitable, and sustainable course while maintaining golf in each community
- Reopen the driving range and update the existing Shadow Lakes clubhouse
- Improve ongoing maintenance of the golf course, buffer areas adjacent to homes, and course owned landscape along neighborhood streets

Residential Communities

- Maximize the amount of open space preserved by minimizing the development areas
- Create a walkable community with significant active and passive open space, trails, and neighborhood amenities on the repurposed golf holes, and a golf course
- Beautify the existing course owned landscape along the neighborhood streets

- Increase and protect Deer Ridge and Shadow Lakes property values
- Minimize the traffic, school, and environmental impacts on the local community

Senior Housing

- Fulfill a market demand for multi-family senior housing
- Increase the housing supply of age-restricted communities as stated in the General Plan
- Create a sustainable life-cycle housing community by locating the age-restricted community within the existing community, close to recreational amenities like golf courses and open space, and existing infrastructure
- Generate enough revenue to make the golf course viable by eliminating debt, combining the courses, performing deferred maintenance, constructing a golf cart bridge, reopening the driving range and improving the clubhouse, and constructing improvements on the repurposed holes

20.3 CEQA Requirements for Alternatives

CEQA requires that an EIR “...describe a reasonable range of alternatives to the project, or to the location of 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.” (CEQA Guidelines Section 15126.6(a))

To comply with this requirement, the City of Brentwood evaluated possible alternatives based on the following factors:

- Does the alternative accomplish most of the basic project objectives?
- Is the alternative potentially feasible (from economic, environmental, legal, social, technological standpoints)?
- Does the alternative avoid or substantially lessen any significant effects of the proposed project? Alternatives need be environmentally superior to the project in only some, not all, respects.
- Is the alternative reasonable and realistic? An EIR need not consider an alternative whose effect cannot reasonably be ascertained or whose implementation is remote and speculative, because unrealistic alternatives do not contribute to a useful analysis.

20.4 Significant and Unavoidable Impacts of the Project

As noted in Chapters 5 through 19 of this EIR, most of the potentially significant impacts identified can be mitigated to a less-than-significant level through implementation of feasible mitigation measures. However, significant and unavoidable impacts related to public services, traffic, and short-term construction noise would occur as a result of implementation of the project.

20.5 Selection of Alternatives

CEQA requires that an EIR analyze alternatives that are potentially feasible. Among the factors that may be taken into account when addressing the potential feasibility of alternatives include site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or other regulatory limitations, jurisdictional boundaries, and a proponent's control over alternative sites in determining the range of alternatives to be evaluated in the EIR (14 CCR 15126.6(f)(1)). The potential feasibility of alternatives considers the following factors:

- **Economic Feasibility.** Is the additional cost of the alternative or lost profits from the alternative sufficiently severe to render it impractical and not feasible? Alternatives that are capable of eliminating or reducing significant environmental effects even though they may be more costly must be considered (14 CCR 15126.6(b)). However, if the additional costs of implementing an alternative or lost profitability associated with an alternative are sufficiently severe, then these factors may render the alternative impractical or economically infeasible.
- **Legal Feasibility.** Are there legal constraints to implementing the alternative? For example, constructing the proposed project on an alternative site may not be legally feasible if the applicant does not own the site or applicable land use regulations or property restrictions prohibit the proposed project. For example, the proposed project may not be legally permissible in wilderness areas, wilderness study areas, restricted military bases, airports, and Indian reservations or on property that is not zoned to allow such a use. Any potential legal constraints affecting an alternative are identified based on a review of applicable local, State, and Federal laws, regulations, plans, and policies.
- **Social Feasibility.** Would the alternative cause significant damage to the socioeconomic structure of the community and be inconsistent with important community values and needs? Similar to the environmental feasibility addressed below, this subject is primarily considered in regard to significant environmental effects.
- **Technical Feasibility.** Is the alternative feasible from a technological perspective, considering available technology? Are there any construction, operation, or maintenance constraints that cannot be overcome?

20.5.1 No Project Alternative

In addition to studying a reasonable range of alternatives based on the criteria set forth above, CEQA requires the EIR to analyze a "no project" alternative. Consideration of the No Project

Alternative is required by Section 15126.6(e) of the CEQA Guidelines. The analysis of the No Project Alternative must discuss the existing conditions at the time the Notice of Preparation was published (August 4, 2017), as well as: “what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services” (CEQA Guidelines Section 15126.6 (e)(2)). The requirements also specify 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” (CEQA Guidelines Section 15126.6 (e)(3)(B)).

20.6 Summary of Alternatives

Based on the purpose of the alternatives analysis as described above, and as prescribed in Section 15126.6 of the State CEQA Guidelines, the following alternatives were selected by the City of Brentwood for evaluation in the EIR:

- Alternative 1: No Project Alternative
- Alternative 2: Reduced Density Alternative
- Alternative 3: Single-Family Homes Alternative

Section 15126.6(e) specifically requires that an EIR evaluate the impacts associated with the alternative of “no project” to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.

The analysis of alternatives takes into consideration the base assumption that all applicable mitigation measures associated with the project would be implemented with the appropriate alternatives. However, applicable mitigation measures may be scaled to reduce or avoid the potential impacts of the alternative under consideration, and may not precisely match those identified for the project. If a specific impact is not raised within the discussion of an alternative, it is because the effect is expected to be the same as that associated with the implementation of the project. Table 20-1 (Comparison of Alternative Project Impacts to the Project) presents a comparison of the alternative project impacts with those of the proposed project.

Resource Topic	Alternative 1 No Project Alternative	Alternative 2 Reduced Density Alternative	Alternative 3 Single-Family Homes Alternative
Aesthetics, Light, and Glare	Reduced Impacts	Reduced Impacts	Reduced Impacts
Air Quality	Reduced Impacts	Reduced Impacts	Reduced Impacts
Biological Resources	Reduced Impacts	No Change in Impacts	No Change in Impacts
Cultural Resources	Reduced Impacts	No Change in Impacts	No Change in Impacts
Energy Conservation	Reduced Impacts	Reduced Impacts	Reduced Impacts
Geological Resources	Reduced Impacts	No Change in Impacts	No Change in Impacts

Table 20-1: Comparison of Alternative Project Impacts to the Project

Resource Topic	Alternative 1 No Project Alternative	Alternative 2 Reduced Density Alternative	Alternative 3 Single-Family Homes Alternative
Greenhouse Gas Emissions	Reduced Impacts	Reduced Impacts	Reduced Impacts
Hazards and Hazardous Materials	Reduced Impacts	No Change in Impacts	No Change in Impacts
Hydrology and Water Quality	Reduced Impacts	No Change in Impacts	Greater Impacts
Land Use	Reduced Impacts	Reduced Impacts	Reduced Impacts
Noise	Reduced Impacts	No Change in Impacts	No Change in Impacts
Population and Housing	Reduced Impacts	Reduced Impacts	Reduced Impacts
Public Services and Utilities	Reduced Impacts	No Change in Impacts	Reduced Impacts
Transportation and Circulation	Reduced Impacts	Reduced Impacts	Reduced Impacts
No Change in Impacts=No change in impacts when compared to Project. Reduced Impacts=Reduced impacts when compared to Project. Greater Impacts=Greater impacts when compared to the Project.			

20.6.1 Alternative 1: No Project Alternative

Alternative 1 assumes that the existing conditions on the project site (as of August 2017) remain status quo. These conditions include the continued closure of the Shadow Lakes Golf Club and use of the course for open space, existing use of the Shadow Lakes clubhouse, and use of the Deer Ridge Golf Club and clubhouse for golf and open space. This alternative assumes that the existing land use and zoning designations on-site remain (Semi-Public Facility (SPF), and PD-18 and PD-20, respectively). Under the Alternative 1 scenario, no improvements to the existing golf courses and associated facilities would occur, nor would the two golf courses be consolidated or reconfigured into a single 18-hole golf course. This alternative would not require an amendment to the General Plan, a rezone, or any of the other actions associated with the proposed Deer Ridge and Shadow Lakes Community Improvement Plan.

Aesthetics, Light, and Glare

Under the Alternative 1 scenario, the existing land uses would continue and the aesthetic character of the site would not change. The project site would remain as golf courses and open space, the golf course reconfiguration and open space improvements proposed for the two existing golf courses would not occur, and existing viewsheds would remain unchanged. Because the Shadow Lakes Golf Club is currently closed, it is assumed that the course would remain closed (indefinitely) under this alternative and conditions would remain as status quo. Because Alternative 1 would not involve development of the project site, no new sources of lighting would be provided. Because potential impacts associated with the continued closure of the Shadow Lakes Golf Club are considered speculative, aesthetic impacts generated by the continued closure of Shadow Lakes would be considered less than significant. None of the improvements associated with consolidation of the two golf courses, including on-site landscape and/or open space

amenities, would occur under this alternative. Further, because no change would occur to the Deer Ridge Golf Club, impacts would be less than significant.

Air Quality

Because there would be no development under this alternative, no construction-related emissions would occur. Similar to the proposed project, there would be no emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation or result in a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment. Impacts would be less than significant.

Biological Resources

Because no development would occur under this alternative, no impacts to biological resources would result. Turf areas, trees, and other vegetation and water features on site that currently could be used for nesting by migratory birds protected under the Migratory Bird Treaty Act (MBTA) would remain because no existing vegetation would be removed. Impacts would be less than significant.

Cultural Resources

Under Alternative 1, the project site would remain in its current condition and would therefore prevent potential impacts to cultural resources. No construction or grading activities would occur. Therefore, the potential to discover and impact previously undisturbed cultural resources, including archaeological, paleontological, and tribal resources, would not occur. Impacts would be less than significant.

Energy

Under Alternative 1, there would be no construction activities or associated construction equipment operations or development of age-restricted housing communities, reconfigured golf course, and open space land uses. Therefore, there would be no short-term energy uses associated with construction activities or long-term energy consumption of electricity, natural gas, and water associated with operations of the land uses assumed as a part of the proposed project. Impacts would be less than significant.

Geology and Soils

No development would occur on the project site. Therefore, the potential to expose additional people or structures to potentially significant adverse effects of seismic ground shaking, ground failure, landslides, expansive soils, or other unstable geologic hazards would not occur. No soil erosion or loss of topsoil would occur since the project site would remain in its existing condition. Impacts would be less than significant.

Greenhouse Gas Emissions

Under Alternative 1, there would be no construction activities or associated construction equipment operations or development of age-restricted housing communities, reconfigured golf

course, or open space land uses. Therefore, there would be no short-term greenhouse gas (GHG) emissions from construction activities or long-term GHG emissions from vehicles or the consumption of electricity, natural gas, and water associated with operation of the land uses assumed as a part of the proposed project. This alternative would not generate additional GHG emissions, and impacts would be less than significant. It should be noted that the project's impact on GHG would also be less-than-significant based on the significance criteria set forth in this EIR.

Hazards and Hazardous Materials

The project site consists of two existing golf courses, clubhouses, and open space, and therefore does not generate or transport large amounts of hazardous materials. Under Alternative 1, current uses on the project site would continue to generate, store, use, distribute, and dispose of hazardous materials such as household chemicals, oils, solvents, paints, pesticides, and fertilizers. This alternative would not develop the age-restricted housing communities and; therefore, no hazards associated with the accidental disturbance of buried oil and natural gas pipelines would occur. Impacts would be less than significant.

Hydrology, Drainage, and Water Quality

Alternative 1 assumes no development would occur on the project site. Because there would be no subsurface excavation, the existing on-site drainage pattern and runoff quantities would remain the same. As with the proposed project, this alternative would not deplete groundwater supplies or interfere with groundwater recharge. Additionally, the project site is not within a 100-year flood hazard area or near a levee or a dam; therefore, people and structures are not exposed to flooding risks.

No changes in the amount of pervious and impervious areas would occur under the Alternative 1 scenario. With the proposed project, the impervious surface area would increase by approximately nine acres because of the replacement of some of the existing golf course areas with age-restricted housing communities, parking areas, sidewalks, and landscaping. Under Alternative 1, the additional stormwater bioretention areas identified for mitigating the reduction in pervious surfaces under the proposed project would not be constructed. However, retention of the site as two golf courses would not exacerbate any existing drainage issues and would continue to allow for infiltration of stormwater surface flows. Therefore, hydrology and water quality effects would be similar when compared to the proposed project, and are; therefore, less than significant.

Land Use

Under Alternative 1, the project site would remain in its present condition. As with the proposed project, this alternative would not physically divide an established community through the introduction of either physical or community barriers. Under this alternative, the proposed age-restricted housing communities would not be developed, but could potentially be developed in a different location within the City's Planning Area without any General Plan amendments or

discretionary approvals. In comparison to the proposed project, impacts under this alternative are less than significant.

Noise

With Alternative 1, there would be no construction activities or associated construction equipment operations or development. Therefore, there would be no construction noise impacts. There would be no substantial temporary increase in noise levels or exposure of persons to or generation of noise levels in excess of standards. Therefore, Alternative 1 would avoid the project's significant and unavoidable construction noise impact. Impacts would be less than significant.

Population and Housing

Alternative 1 would not create any new jobs; involve the development of additional housing; or cause increases in the resident population of the city. As a result, there would be no impact associated with inducing substantial population growth. As with the proposed project, no significant impact would occur. This alternative would maintain the site in its existing condition and would not provide age-restricted housing communities within the project site. Impacts would be less than significant.

Public Services and Recreation

The public services evaluated in this EIR are fire protection, police protection, schools, libraries, and parks. Because Alternative 1 would not involve new development, no impacts to public services would occur and no payment of development impact fees would occur. Under Alternative 1, the project would not contribute to the need for additional equipment and staffing for emergency medical services and fire protection as would be required for the proposed project. Continued use of the site for golf course and open space uses would not preclude the City from providing equipment and staffing. Impacts would be less than significant.

Under this alternative, there would be no increase in demand for recreational facilities or services because there would be no increase in the residential population. However, this alternative would not provide for the development of additional open space and other recreational amenities which are included in the other project alternatives. Because no development would occur on the project site, there would be no physical impacts associated with construction of recreational and open space facilities. Impacts would be less than significant.

Transportation and Circulation

This alternative would maintain the site in its existing condition and would not generate any new vehicle trips, compared to the estimated 1,841 daily trips that would be generated by the proposed project. This alternative would not generate any additional traffic when compared to the proposed project, which based on the significance criteria set forth in this EIR, traffic generated by the proposed project would be less-than-significant with mitigation measures

incorporated. Because no development would occur on the project site, no traffic improvements would occur. Impacts would be less than significant.

Utilities and Service Systems

The EIR evaluates potential impacts on the following: wastewater facilities, water supply, stormwater facilities, and solid waste. Because Alternative 1 would not involve the generation of any new residents or associated land uses, there would be no additional demands on these services and the existing infrastructure capacity would be preserved. Since this alternative would not provide new facilities or infrastructure, there would be no physical impacts associated with the construction and operation of these facilities. Impacts would be less than significant.

20.6.2 Alternative 2: Reduced Density Alternative

Under the Reduced Density Alternative, the General Plan designation would still be amended to change the project site from its existing Semi-Public Facility (SPF) designation to Residential Medium-Density (R-MD), rather than the Residential High-Density proposed by the project applicant. According to the City's General Plan, the R-MD designation accommodates a variety of housing product types, including duplexes, triplexes, apartments, townhouses, and small lot single family detached. The permitted density range is 5.1 to 11.0 units per gross acre, with a mid-range of 8.0 units per gross acre. It should be noted the General Plan currently caps new development at the mid-range of the various density ranges.

While the proposed project would not require a substantial amount of new infrastructure, it would introduce a higher residential density than currently exists within the immediate project vicinity. As a result, the focus of this Reduced Density Alternative is on the analysis of a development alternative that would be reasonably feasible and meets most of the project objectives, while also serving to minimize potentially significant impacts that would occur with implementation of the proposed project related to aesthetics, land use, noise, public services, and traffic. This alternative also strives to achieve the majority of the project objectives as required by the Section 15126.6 of the State CEQA Guidelines.

Under this alternative, the proposed project would be developed under a similar land use plan as the proposed project, but with approximately 30 percent fewer age-restricted housing units (110 units in Deer Ridge and 146 units in Shadow Lakes, for a total of 256 units). This reduction in units would enable a land plan that demonstrates greater consistency and conformity with the surrounding single-family residential development. Because the same types of construction would be required for this alternative, short-term noise impacts associated with construction would likely remain significant and unavoidable.

Project Component	Existing Density Range	Proposed Unit Count	Reduced Density Unit Count	Proposed Density
Deer Ridge (Proposed Village One)	11.1 – 20 du/ac	250	110	8 du/ac
Shadow Lakes (Proposed Village Two)	11.1 – 20 du/ac	310	146	8 du/ac
Totals		560	256	

Under this alternative, reconfiguration of the golf courses would occur, as would the construction of the proposed golf cart bridge. In addition, a General Plan amendment, rezone, tentative parcel maps, and design review would also occur. This alternative would fulfill the following proposed project objectives:

Golf Course

- Redevelop underutilized and economically challenged golf courses
- Consolidate the existing courses creating a single, profitable, and sustainable course while maintaining golf in each community
- Reopen the driving range and update the existing Shadow Lakes clubhouse
- Improve ongoing maintenance of the golf course, buffer areas adjacent to homes, and course owned landscape along neighborhood street

Residential Communities

- Maximize the amount of open space preserved by minimizing the development areas
- Create a walkable community with significant active and passive open space, trails, and neighborhood amenities on the repurposed golf holes, and a golf course
- Beautify the existing course owned landscape along the neighborhood streets
- Minimize traffic, school, and environmental impacts on the local community

Senior Housing

- Fulfill a market demand for multi-family senior housing
- Increase the housing supply of age-restricted communities as stated in the General Plan
- Create a sustainable life-cycle housing community by locating the age-restricted community within the existing community, close to recreational amenities like golf courses and open space, and existing infrastructure
- Generate enough revenue to make the golf course viable by eliminating debt, combining the courses, performing deferred maintenance, constructing a golf cart bridge, reopening the driving range and improving the clubhouse, and constructing improvements on the repurposed holes

Aesthetics, Light, and Glare

Under Alternative 2, land uses would include multi-family residential at a reduced density as compared to the proposed project, which could better complement the aesthetic character of the surrounding project area. Similar to the proposed project, this alternative would include reconfiguration of the golf courses and the creation of open space and other amenities such as walking trails, picnic areas, community gardens, or vineyards. However, similar to the proposed project, this alternative would affect scenic vistas with the introduction of higher density residential housing (than exists in the surrounding community) in areas with existing golf courses and open space. Under this alternative, future development plans would be required to go through the City's design review process to ensure that they are complementary with surrounding land uses and that they comply with the City's zoning ordinance, which include limiting building heights to no greater than the maximum roofline of adjacent single-family homes, this to demonstrate consistency and conformity with surrounding single-family neighborhoods.

As with the proposed project, Alternative 2 would generate additional sources of light and glare via additional vehicle trips, lighting from residential uses, security lighting, and street lights. Areas outside of the city limits, near the fringes of the Planning Area, are characterized primarily by agricultural uses and scattered low intensity residential development, and generally have lower levels of ambient nighttime lighting and daytime glare. If approved, future development under this alternative could introduce potentially significant impacts to surrounding land uses based on light and glare, resulting in potentially significant impacts. As with the proposed project, mitigation would be required to reduce impacts to a less-than-significant level.

Mitigation measures identified in Chapter 5 of this Draft EIR would reduce potential impacts associated with aesthetics, as well as new light and glare for both Alternative 2 and the project to a less-than-significant level.

Air Quality

Under Alternative 2, AM and PM peak hour trips would decrease by approximately 50 percent compared to the proposed project. Reducing trips would result in a reduction of mobile source emissions, which accounts for the majority of the air pollutant emissions associated with the project. Reducing the amount of development would also result in fewer area source and energy source emissions, and this alternative would result in an approximate 50 percent reduction in generalized emissions, this due to the lower unit count. Construction-related emissions associated with this alternative would be similar to those of the proposed project, which are not anticipated to exceed the Bay Area Air Quality Management District (BAAQMD) thresholds. Impacts would be less than significant.

Biological Resources

Implementation of the project under Alternative 2 could potentially disturb biological resources that have the potential to occur on the project site since the disturbance footprint for this

alternative would be similar to that of the proposed project. However, similar to the proposed project, this alternative would be implemented in accordance with the East Contra Costa County Habitat Conservation Plan and Natural Community Conservation Plan's (HCP/NCCP) conditions. Through payment of HCP/NCCP fees or equivalent mitigation, the proposed project would contribute to the HCP/NCCP's conservation strategy, thereby benefiting all CEQA species addressed in the CEQA Species Assessment. Impacts would be less than significant.

Cultural Resources

Both Alternative 2 and the proposed project would include varying levels of ground disturbance within the same proposed footprint, and therefore each has the potential to impact previously discovered and undiscovered cultural resources through site preparation (e.g., vegetation removal, grading and filling), development of utility infrastructure, or subsurface construction associated with any of the proposed elements. Mitigation measures identified in Chapter 8 of this Draft EIR would reduce potential cultural resources impacts associated with both Alternative 2 and the project to a less-than-significant level.

Energy

Under Alternative 2, development would decrease by approximately 30 percent compared to the proposed project. This decrease in intensity would result in decreased short-term energy uses associated with construction activities and long-term energy consumption of electricity, natural gas, and water associated with operations of the land uses assumed under this alternative. Similar to the proposed project, impacts would be less than significant.

Geology and Soils

Alternative 2 would reduce the density proposed by the project which would reduce the amount of people and buildings that would be exposed to potential adverse impacts from seismic events compared to the proposed project. No significant geologic hazards are anticipated to occur on-site with the exception of potentially expansive soils, which are present in the project vicinity. As previously discussed in Chapter 9 of this Draft EIR, implementation of mitigation measures would reduce expansive soils potential to a less-than-significant level. Therefore, implementation of both Alternative 2 and the proposed project would result in similar geologic resource impacts.

Greenhouse Gas Emissions

The BAAQMD requires that projects limit their GHG emissions to a level of 4.6 MTCO₂eq or lower, per service population per year. Compared to the project's estimated GHG emissions of 3.1 MTCO₂eq per service population per year, the reduction in density that would occur under Alternative 2 would reduce the overall GHG emissions associated with mobile source, area source, energy consumption, water demand, and waste generation by approximately 30 percent. Therefore, implementation of Alternative 2 and the proposed project would result in GHG emissions that are less than significant.

Hazards and Hazardous Materials

As previously stated, both Alternative 2 and the proposed project would be developed within the same project footprint and would be developed with similar land uses, although Alternative 2 would be developed at a reduced density and intensity of development. Therefore, implementation of both Alternative 2 and the proposed project would be subject to the same existing potential environmental hazards located on-site, including underground natural gas and oil pipelines. Similar to the proposed project, this alternative would not impair or physically interfere with an adopted emergency response or evacuation plan and no revisions to the City's adopted Emergency Operations Plan (EOP) would be required.

Additionally, because both Alternative 2 and the project would include the development of similar uses (residential communities, golf course, and open space), it is anticipated that similar hazardous materials would be utilized during both construction and operation of both alternatives (e.g., household cleaners, paints, pesticides, petroleum, oil, lubricants, thinners, fertilizers, and solvents). As identified in Chapter 11 of this Draft EIR, with the implementation of mitigation measures, impacts associated with hazards and hazardous materials would be less than significant.

Hydrology, Drainage, and Water Quality

While Alternative 2 would result in development of the project site at a reduced scale, density, and intensity than that of the proposed project, the amount of impervious surfaces on the site would be similar to that of the proposed project since Alternative 2 would result in similar land coverages. However, both Alternative 2 and the proposed project would install additional stormwater bioretention areas to mitigate for the reduction in pervious surfaces and similar mitigation would be required to reduce potential water quality impacts associated with construction to a level considered less than significant.

Similar to the proposed project, areas of the existing golf courses support various sized drainage and flood control facilities, some of which are managed by the Contra Costa County Flood Control and Water Conservation District. To avoid potential impacts to existing drainage areas, all cut soils associated with development of this alternative would be placed away from existing drainage areas and easements, so as not to interfere with existing drainage and flood control functions. With implementation of the mitigation measures identified in Chapter 12, impacts associated with both Alternative 2 and the proposed project would be less than significant.

Land Use

Implementation of both Alternative 2 and the project would require a General Plan amendment and rezone to reflect the changes identified in Figure 13-1 of this Draft EIR. Similar to the proposed project, the General Plan amendment would re-designate a portion of the project site from its current SPF designation to Residential-Medium Density (R-MD) to allow for the age-restricted housing communities, and the new designation would allow for the senior units within a density range of 8 dwelling units per acre. Similar to the proposed project, this alternative

would repurpose the vacated holes into some form of open space or other amenities, such as, but not limited to walking trails, vineyards, community gardens, play areas, picnic areas, wildlife habitat areas, and other open space area. As with the proposed project, Alternative 2 would be required to adhere to the City's adopted Residential Design Guidelines, included as Mitigation Measure AES-1 of Chapter 5, which would reduce impacts to a level of less-than-significant by ensuring that this alternative is more compatible with height, bulk and mass of surrounding single-family residential land uses.

Under Alternative 2, this new R-MD designation would provide for multi-family development and other requirements for higher density living. Similar to the proposed project, building heights would be limited under this alternative to no greater than the maximum roofline of adjacent single-family homes to demonstrate consistency and conformity with surrounding single-family neighborhoods. Under the R-MD designation and per the Brentwood Municipal Code (17.140.006), building coverage would be limited to 40 percent of the lot area, and the maximum building height would be limited to approximately 30 feet. Similar to the proposed project, the remainder of the project site would continue to be designated SPF to allow for golf course and open space uses. Under Alternative 2, Village One (Deer Ridge) would consist of approximately 13.77 acres and 110 units, for a corresponding density of 8 dwelling units per acre. Village Two (Shadow Lakes) would consist of approximately 18.26 acres and 146 units, for a corresponding density of 8 dwelling units per acre.

As with the proposed project, this alternative would not physically divide an established community through the introduction of either physical or community barriers. With implementation of the mitigation measures identified in Chapter 5, impacts associated with the City's design review process and existing zoning polices under Alternative 2 would be less than significant.

Noise

Alternative 2 would result in a shorter construction duration due to the reduction in the mass and scale of proposed structures. However, construction-related activities and methods under this alternative would be similar to those of the project, thereby resulting in similar, significant and unavoidable short-term impacts related to construction noise. Operational noise impacts under Alternative 2 would be similar to those with the project and would be less than significant.

Population and Housing

With Alternative 2, it is estimated that an additional 384 people would be added to the project site, based on 1.5 persons per household. This household size estimate is based on the Water Supply Assessment prepared for the proposed project by Coleman Engineering, which determined in consultation with the City of Brentwood that 1.5 persons/unit would be an appropriate average household size for a senior housing facility. Similar to the proposed project, these new residents would represent a small percentage of the General Plan's full population

buildout within the City's Planning Area and would not trigger a substantial population increase. Similar to the project, impacts would be less than significant.

Public Services and Recreation

Alternative 2 proposes a reduced intensity of development, thus decreasing the need for public services compared to the proposed project. Similar to the project, Alternative 2 would involve new development, and would; therefore, increase the demand for fire protection, police protection, schools, libraries, and parks. However, similar to the proposed project, this alternative would be required to comply with the City's General Plan policies aimed at maintaining service standards for police protection, schools, libraries, and parks, and would be required to pay development fees that support the City's infrastructure needs identified in the City's General Plan. Impacts on these services would be less than significant.

However, according to the East Contra Costa Fire Protection District (ECCFPD), existing underfunding and understaffing currently limits its ability to provide service and response times that meet generally accepted standards (ECCFPD, 2017). The City of Brentwood has existing funding from development fees programmed for the construction of a new fire station on Shady Willow Lane; however, this fire station would require staffing and equipment. A specific timeframe for construction of the new station has not been identified, nor programmed. The anticipated increase in medical emergency service calls, in the absence of the additional facilities and personnel would result in a potentially significant impact.

Under this alternative and similar to the proposed project, the applicant would be required to pay the City's development impact fee pursuant to the Schedule of City Fees in effect at the time of project approval. The development impact fees are intended to finance public facilities necessary to mitigate the impacts generated by new development in the City of Brentwood and to ensure that new development pays its fair share of associated with the costs of mitigating its impact. This fee includes a Fire Fee to fund fire facilities and apparatus necessary for the safety of new development. While payment of this fee is intended to serve as full mitigation for impacts related to fire service (including facilities, response time and response to medical emergencies), the level of funding and timing for implementation of said improvements had not been determined. As such, impacts associated with increased medical emergency services would be significant and unavoidable until such time as the new station is constructed and/or sufficient facilities and equipment are identified, available and implemented resulting in the ECCFPD's ability to meet standards for industry best practices. With implementation of mitigation measures identified in Chapter 16, impacts associated with all other emergency fire protection, including wildfire risk would be reduced to a less than-significant-level.

Transportation and Circulation

Implementation of Alternative 2 would result in approximately 920 daily trips, a 50 percent reduction in overall trips generated by the proposed project. However, existing delays would continue to occur at: West Country Club Drive/American Avenue at Balfour Road; John Muir

Parkway at Eagle Rock Way; SR 4 between Sand Creek Road and Balfour Road; and SR 4 between Balfour Road and Marsh Creek Road. Increased travel times would continue to occur along Balfour Road between American Avenue/West Country Club Drive and SR 4. As a result, these roadway facilities would continue to operate at unacceptable levels of service (LOS) and roadway segments would continue to experience increased travel times. Thus, the same mitigation measures required for the proposed project would also be required for this alternative.

Under Alternative 2, construction-related transportation impacts would be slightly less than the project, since the construction timeline would be shorter due to this alternative's reduced density. As identified in Chapter 17 of this Draft EIR, mitigation would be required for those intersections that currently operate at unacceptable LOS and along roadway segments where increased travel times would occur. However, similar to the project, the proposed mitigations would reduce potentially significant impacts for Alternative 2 to a less-than-significant level. Therefore, impacts would be less than significant.

Utilities and Service Systems

Alternative 2 proposes a reduced intensity of project development, thus decreasing the capacity demands on the City's existing utilities and service systems infrastructure. However, portions of the City's water supply and sewer systems are in need of expansion and or upgrades to support future buildout under the City's General Plan. Because the Deer Ridge and Shadow Lakes project area was not included in the current General Plan buildout scenarios, any additional development associated with this alternative and the proposed project could cause these systems to become deficient. With implementation of the mitigation measures identified in Chapter 18 of this Draft EIR, impacts associated with water supply, sewer, and wastewater treatment facilities under Alternative 2 and the proposed project would be reduced to a less than-significant-level.

20.6.3 Alternative 3: Single-Family Homes Alternative

Under the Single-Family Homes Alternative, the General Plan designation would be amended to change the project site from its existing Semi-Public Facility (SPF) designation to Residential-Low Density (R-LD). According to the City's General Plan, the R-LD designation is designed predominantly for single-family detached homes, although higher density developments could be accommodated if offset with sufficient open space or other amenities in order to maintain the gross density within the indicated range. As specified in the General Plan, the permitted density range for the R-LD designation is 1.1 to 5.0 units per gross acre, with a mid-range of 3.0 units per gross acre. This alternative assumes three units per gross acre.

Table 20-3: Single-Family Homes Alternative

Project Component	Existing Density Range	Proposed Project Unit Count	Single Family Homes Dwelling Unit Count	Proposed Density
Deer Ridge (Proposed Village One)	11.1 – 20 du/ac	250	41	3 du/ac
Shadow Lakes (Proposed Village Two)	11.1 – 20 du/ac	310	55	3 du/ac
Totals		560	96	

Alternative 3 would reduce some of the potentially significant and unavoidable impacts associated with the proposed project as they relate to aesthetics. Because similar construction methods would be required for this alternative, short-term noise impacts associated with construction would likely remain significant and unavoidable.

Traffic impacts would be reduced under this alternative by an approximate 50 percent reduction in daily trips, compared to the proposed project. The 50 percent reduction in daily trips would be the result of a reduced population associated with this alternative and the fact that this alternative would not have trips associated with age-restricted facility staffing and commercial vehicle deliveries. In addition, the proposed project’s trip generation is based on conservative population and residential unit estimates, which resulted in a higher number of vehicle trips.

The Single-Family Homes Alternative would result in building heights that are consistent with and conform to the existing nearby single-family homes. Potential impacts associated with building bulk and massing would be minimized since this alternative would implement architectural and design techniques that are similar to those of nearby residences. Potential impacts associated with conflicting rooflines, uniform wall planes, and lack of decorative features would also be avoided with this alternative.

This alternative would utilize the same acreage as the proposed project and would include the reconfiguration of the two existing golf courses and construction of the golf cart bridge. As a result, the amount of open space with this alternative would be the same as the proposed project. In addition, the proposed General Plan amendment, rezone, tentative parcel maps (these would become full-scale subdivision maps under Alternative 3), and design review would be the same as under the proposed project. This alternative would fulfill the following proposed project objectives:

Golf Course

- Redevelop underutilized and economically challenged golf courses
- Consolidate the existing courses creating a single, profitable, and sustainable course while maintaining golf in each community

- Reopen the driving range and update the existing Shadow Lakes clubhouse
- Improve ongoing maintenance of the golf course, buffer areas adjacent to homes, and course owned landscape along neighborhood street

Residential Communities

- Maximize the amount of open space preserved by minimizing the development areas
- Create a walkable community with significant active and passive open space, trails, and neighborhood amenities on the repurposed golf holes, and a golf course
- Beautify the existing course owned landscape along the neighborhood streets
- Minimize traffic, school, and environmental impacts on the local community

Senior Housing

- Increase the housing supply of age-restricted communities as stated in the General Plan
- Create a sustainable life-cycle housing community by locating the age-restricted community within the existing community, close to recreational amenities like golf courses and open space, and existing infrastructure

Aesthetics, Light, and Glare

Under Alternative 3, land uses would include single-family homes that would be compatible with the aesthetic character of the surrounding project area. Similar to the proposed project, this alternative would include reconfiguration of the golf courses and the creation of open space and other amenities such as walking trails, picnic areas, community gardens, or vineyards. However, as with the proposed project, this alternative could affect scenic vistas with the introduction of residential housing in areas with existing golf courses and open space. Like the proposed project, development plans for this alternative would be required to go through the City's design review process to ensure that they are complementary with surrounding land uses and that they comply with the City's zoning ordinance, which include limiting building heights to no greater than the maximum roofline of adjacent single-family homes, this to demonstrate consistency and conformity with surrounding single-family neighborhoods.

As with the proposed project, Alternative 3 would generate additional sources of light and glare via additional vehicle trips, lighting from residential uses, security lighting, and street lights. Areas outside of the city limits, near the fringes of the Planning Area, are characterized primarily by agricultural uses and scattered low intensity residential development, and generally have lower levels of ambient nighttime lighting and daytime glare. If approved, future development under this alternative could introduce potentially significant impacts to surrounding land uses based on light and glare, resulting in potentially significant impacts. As with the proposed project, mitigation would be required to reduce impacts to a less-than-significant level.

Mitigation measures identified in Chapter 5 of this Draft EIR would reduce potential impacts associated with aesthetics, as well as new light and glare for both Alternative 3 and the project to a less-than-significant level.

Air Quality

Compared to the project, AM and PM peak hour trips under Alternative 3 would decrease by approximately 50 percent because of a reduced population and no trips associated with facility staffing and commercial vehicle deliveries. Reducing vehicle trips would result in a reduction of mobile source emissions, which accounts for the majority of the air pollutant emissions associated with the project. Construction-related emissions associated with this alternative would be similar to those of the project, which are not anticipated to exceed the Bay Area Air Quality Management District (BAAQMD) thresholds. Impacts would be less than significant.

Biological Resources

Implementation of the project under Alternative 3 could potentially disturb biological resources that have the potential to occur on the project site since the disturbance footprint for this alternative would be similar to that of the proposed project. However, similar to the proposed project, this alternative would be implemented in accordance with the East Contra Costa County Habitat Conservation Plan and Natural Community Conservation Plan's (HCP/NCCP) conditions. Through payment of HCP/NCCP fees or equivalent mitigation, the proposed project would contribute to the HCP/NCCP's conservation strategy, thereby benefiting all CEQA species addressed in the CEQA Species Assessment. Impacts would be less than significant.

Cultural Resources

Both Alternative 3 and the proposed project would include varying levels of ground disturbance within approximately the same proposed footprint, and therefore each has the potential to impact previously discovered and undiscovered cultural resources through site preparation (e.g., vegetation removal, grading, and filling), development of utility infrastructure, or subsurface construction associated with any of the proposed elements. Mitigation measures identified in Chapter 8 of this Draft EIR would reduce potential cultural resources impacts associated with both Alternative 3 and the project to a less-than-significant level.

Energy

Under Alternative 3, development intensity based on population would decrease by approximately 50 percent compared to the proposed project. This decrease in development intensity and population would result in decreased short-term energy uses associated with construction activities, and long-term energy consumption of electricity, natural gas, and water associated with operations of the single-family land uses assumed under this alternative. Similar to the project, impacts would be less than significant.

Geology and Soils

Alternative 3 would result in an overall reduction in building density compared to the proposed project and would reduce the amount of people and buildings that would be exposed to potential adverse impacts from seismic events compared to the project. Similar to the project, no significant geologic hazards are anticipated to occur on-site with the exception of expansive soils. As previously discussed in Chapter 9 of this Draft EIR, implementation of mitigation measures would reduce expansive soil potential to a less-than-significant level. Therefore, implementation of both Alternative 3 and the project would result in similar geologic resource impacts.

Greenhouse Gas Emissions

The BAAQMD requires that projects limit their GHG emissions to a level of 4.6 MTCO₂eq or lower, per service population per year. Compared to the project's estimated GHG emissions of 3.1 MTCO₂eq per service population per year, the reduction in density that would occur under Alternative 3 would reduce the overall GHG emissions associated with mobile sources, area sources, energy consumption, water demand, and waste generation by approximately 50 percent. Therefore, implementation of both Alternative 3 and the project would result in GHG emissions that are less than significant.

Hazards and Hazardous Materials

Both Alternative 3 and the project would be developed within approximately the same project footprint and would be developed with similar residential land uses, although this alternative would be developed at a reduced density and intensity of development. Therefore, implementation of both Alternative 3 and the project would be subject to the same existing potential environmental hazards located on site, including underground natural gas and oil pipelines. Similar to the proposed project, this alternative would not impair or physically interfere with an adopted emergency response or evacuation plan and no revisions to the City's adopted Emergency Operations Plan (EOP) would be required. Additionally, because both Alternative 3 and the project would include the development of similar uses (residential communities, golf course, and open space), it is anticipated that similar hazardous materials would be utilized during both construction and operation of both alternatives (e.g., household cleaners, paints, pesticides, petroleum, oil, lubricants, thinners, fertilizers, and solvents). As identified in Chapter 11 of this Draft EIR, with the implementation of mitigation measures, impacts associated with hazards and hazardous materials would be less than significant.

Hydrology, Drainage, and Water Quality

While Alternative 3 would develop the project site at a reduced scale, density, and intensity than that of the proposed project, the amount of impervious surfaces on the site would be expected to be greater than the proposed project. The increased impervious surfaces under Alternative 3 would be the result of impervious land coverages typically associated with single-family homes, including residential structures, parking areas, driveways, sidewalks, patios, etc. However, both Alternative 3 and the proposed project would install additional stormwater bioretention areas to mitigate for the reduction in pervious surfaces. Similar mitigation would also be required for

Alternative 3 and the project, to reduce potential water quality impacts associated with construction to a level that is less than significant.

Similar to the proposed project, areas of the existing golf courses support various sized drainage and flood control facilities, some of which are managed by the Contra Costa County Flood Control and Water Conservation District. To avoid potential impacts to existing drainage areas, all cut soils associated with development of this alternative would be placed away from existing drainage areas and easements, so as not to interfere with existing drainage and flood control functions. With implementation of the mitigation measures identified in Chapter 12, impacts associated with both Alternative 3 and the proposed project would be less than significant.

Land Use

Implementation of both Alternative 3 and the project would require a General Plan amendment and rezone to reflect the changes identified in Figure 13-1 of this Draft EIR. Specifically, this alternative would re-designate a portion of the project site from its current SPF designation to Residential-Low Density (R-LD) to allow for the single-family homes and the General Plan amendment would allow for the proposed development within a density range of up to three (3) dwelling units per acre. Similar to the proposed project, this alternative would repurpose the vacated holes into some form of open space or other amenities, such as, but not limited to walking trails, vineyards, community gardens, play areas, picnic areas, wildlife habitat areas, and other open space area. As with the proposed project, Alternative 3 would be required to adhere to the City's adopted Residential Design Guidelines, identified in Mitigation Measure AES-1 of Chapter 5, which would reduce impacts to a level of less-than-significant by ensuring that this alternative is more compatible with the surrounding single-family residential land uses.

Under Alternative 3, this new R-LD designation would provide for a single-family home development, with off-street parking and other requirements for low-density residential living. Similar to the proposed project, building heights under this alternative would be limited to no greater than the maximum roofline of adjacent single-family homes, this to demonstrate consistency and conformity with surrounding single-family neighborhoods. The remainder of the project site would continue to be designated SPF to allow for a golf course and open space and other amenities such as walking trails, picnic areas, community gardens, or vineyards. Under Alternative 3, Village One (Deer Ridge) would consist of approximately 13.77 acres and 41 units, for a corresponding density of 3 dwelling units per acre. Village Two (Shadow Lakes) would consist of approximately 18.26 acres and 55 units, for a corresponding density of 3 dwelling units per acre. As with the proposed project, this alternative would not physically divide an established community through the introduction of either physical or community barriers. With implementation of the mitigation measures identified in Chapter 5, impacts associated with Alternative 3 would be less than significant.

Noise

Under Alternative 3, it is assumed that the construction duration would be similar to that of the proposed project, since the individual dwellings would be constructed separately as opposed to the clustered development under the project. Similarly, construction-related activities and methods under this alternative would be similar to those of the project, thereby resulting in a similar, significant, and unavoidable short-term impact related to construction noise. Operational noise impacts under Alternative 3 would be less than under the proposed project, since single-family residential uses would not require support staffing, large commercial kitchen facilities, or frequent commercial vehicle deliveries. Operational impacts for Alternative 3 and the project would be less than significant.

Population and Housing

With Alternative 3, it is estimated that an additional 305 people would be added to the project site. This population estimate is based on the City's average persons per household, which for single-family homes is 3.18 persons per household, multiplied by 96 dwelling units proposed under this alternative. According to the City's 2015 Housing Element, the City's "household size has remained relatively constant over the past 10 years with the California Department of Finance E-5 January 2014 estimate, indicating 17,171 households with an average household size of 3.18 persons." Similar to the project, these new residents would represent a small percentage of the General Plan's full population buildout within the City's Planning Area and would not trigger a substantial population increase. Similar to the project, impacts would be less than significant.

Public Services and Recreation

Alternative 3 proposes a reduced intensity of development, thus decreasing the need for public services compared to the proposed project. Similar to the project, Alternative 3 would involve new development and would; therefore, increase the demand for fire protection, police protection, schools, libraries, and parks. However, similar to the proposed project, this alternative would be required to comply with the City's General Plan policies aimed at maintaining service standards for police protection, schools, libraries, and parks, and would be required to pay development fees that support the City's infrastructure needs identified in the City's General Plan. Impacts on these services would be less than significant.

However, according to the East Contra Costa Fire Protection District (ECCFPD), existing underfunding and understaffing currently limit its ability to provide service and response times that meet generally accepted standards (ECCFPD, 2017). The City of Brentwood has existing funding from development fees programmed for the construction of a new fire station on Shady Willow Lane; however, this fire station would require staffing and equipment. A specific timeframe for construction of the new station has not been identified, nor programmed. The anticipated increase in medical emergency service calls, in the absence of the additional facilities and personnel would result in a potentially significant impact.

Under this alternative and similar to the proposed project, the applicant would be required to pay the City's development impact fee pursuant to the Schedule of City Fees in effect at the time of project approval. The development impact fees are intended to finance public facilities necessary to mitigate the impacts generated by new development in the City of Brentwood and to ensure that new development pays its fair share of associated with the costs of mitigating its impact. This fee includes a Fire Fee to fund fire facilities and apparatus necessary for the safety of new development. While payment of this fee is intended to serve as full mitigation for impacts related to fire service (including facilities, response time and response to medical emergencies), the level of funding and timing for implementation of said improvements had not been determined. As such, impacts associated with increased medical emergency services would be significant and unavoidable until such time as the new station is constructed and/or sufficient facilities and equipment are identified, available and implemented resulting in the ECCFPD's ability to meet standards for industry best practices. With implementation of mitigation measures identified in Chapter 16, impacts associated with all other emergency fire protection, including wildfire risk would be reduced to a less than-significant-level.

Transportation and Circulation

Implementation of Alternative 3 would result in approximately 914 daily trips, a 50 percent reduction in overall trips generated by the proposed project. However, existing delays would continue to occur at: West Country Club Drive/American Avenue at Balfour Road; John Muir Parkway at Eagle Rock Way; SR 4 between Sand Creek Road and Balfour Road; and SR 4 between Balfour Road and Marsh Creek Road. Increased travel times would continue to occur along Balfour Road between American Avenue/West Country Club Drive and SR 4. As a result, these roadway facilities would continue to operate at unacceptable levels of service (LOS) and roadway segments would continue to experience increased travel times. Thus, the same mitigation measures required for the proposed project would also be required for this alternative.

Under Alternative 3, construction-related transportation impacts would be similar to the project, since the construction timeline for single-family homes would likely occur over a similar time frame. As identified in Chapter 17 of this Draft EIR, mitigation would be required for those intersections that currently operate at unacceptable LOS and along roadway segments where increased travel times would occur. However, similar to the proposed project, implementation of mitigation measures would reduce potentially significant impacts for Alternative 3 to a less-than-significant level. Therefore, impacts would be less than significant.

Utilities and Service Systems

Alternative 3 proposes a reduced intensity of development, thus decreasing the capacity demands on the City's existing utilities and service systems infrastructure. However, portions of the City's water supply and sewer systems are in need of expansion and or upgrades to support future buildout under the City's General Plan. Because the Deer Ridge and Shadow Lakes project area was not included in the current General Plan buildout scenarios, any additional development associated with this alternative and the proposed project could cause these systems to become

deficient. With implementation of the mitigation measures identified in Chapter 18 of this Draft EIR, impacts associated with water supply, sewer, and wastewater treatment facilities under Alternative 3 and the proposed project would be reduced to a less than-significant-level.

20.7 Potential to Eliminate Significant Environmental Effects

A key CEQA requirement for an alternative is that it must have the potential to “avoid or substantially lessen any of the significant effects of the project” (CEQA Guidelines Section 16126.6(a)). If an alternative is identified that clearly does not have the potential to provide an overall environmental advantage as compared to the proposed project, it is usually eliminated from further consideration. The significant environmental effects of the proposed project are summarized in the Executive Summary, Impact Summary Table for significant and unavoidable impacts and significant impacts that can be mitigated.

20.8 Alternatives Considered But Rejected

Section 15126.6 of the State CEQA Guidelines mandates that an EIR include a comparative evaluation of the project with a range of reasonable alternatives to the project which would feasibly attain most of the basic objectives of the project while simultaneously avoiding or substantially lessening any of its significant effects. Pursuant to Section 15126.6(f) (1) of the CEQA Guidelines, “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, 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).” Although these factors do not present a strict limit on the scope of reasonable alternatives to be considered, they help establish the context in which the “rule of reason” is measured against when determining an appropriate range of alternatives sufficient to establish and foster meaningful public participation and informed decision-making.

An EIR does not need to consider every conceivable alternative to a project, nor is it required that an EIR consider alternatives that are infeasible. Rather (as noted above), it must consider alternatives that could feasibly attain most of the project’s basic objectives, while minimizing or avoiding any of the identified significant adverse environmental effects of the project.

In the case of the proposed project, an alternative site has been rejected from consideration for the following reasons:

- The project site is within the control of the project applicant. While there are likely sites within the City or the City’s sphere that the project applicant may be able to reasonably acquire, the purpose of the proposed project is to redevelop an existing site that is currently unable to maintain financial feasibility as two golf courses. As such, there is no incentive or viable reason for the applicant to purchase another site. Purchase of another (alternative) site for the purpose of developing age-restricted housing communities would be contrary to the basic objectives of the proposed project, including redeveloping

and consolidating two underutilized and economically challenged golf courses into a single, profitable, and sustainable golf course.

The applicant considered a number of conceptual design alternatives prior to submitting the proposed project for City review and consideration. These alternatives included the following:

20.8.1 Alternative A - Reuse of Shadow Lakes Golf Club

Alternative A considered utilizing the vacated Shadow Lakes Golf Club (+/-164 ac) for development of single-family housing, similar in size and scale to the existing homes within the Shadow Lakes community. Under this alternative, approximately 730 new single-family homes at a density of approximately 4.5 du/ac were considered. Preliminary review of this alternative demonstrated that the resulting development would have generated substantial traffic impacts throughout the Shadow Lakes community and surrounding roadway network since daily traffic peak times would be the same as the existing surrounding residential development. This early conceptual alternative would have potentially led to the loss of the open space on the closed holes and a potentially greater impact to public view corridors. Unlike the proposed project, Alternative A would have also resulted in potentially significant impacts to the local schools. Because traffic, open space, aesthetics, and school impacts were considered to be of greater magnitude than those that would have been realized under the proposed project, and because this alternative failed to meet most of the basic project objectives as outlined above, this preliminary alternative was rejected from further consideration.

20.8.2 Alternative B – Multi-family Units on Current Development Parcels

Alternative B considered utilization of the current development parcels on Deer Ridge and Shadow Lakes for multi-family housing. However, based on preliminary site plan analysis, in order to achieve a similar unit count as the proposed project, the scale and the mass of the buildings would need to be substantially larger (likely requiring the addition of another floor), as individual market-rate unit sizes would be considerably larger than the 1-2 small bedrooms anticipated with a senior product type. Further, based on the site and number of unit types, the parking ratio would be higher than the parking ratio associated with the age-restricted housing units (Dahlin Group, 2017). As with Alternative A, this concept would have also resulted in significant impacts of greater magnitude than the proposed project on traffic, schools, aesthetics, public services, and parks, recreation, and open space. Similar to Alternative A, peak commute times would coincide with the existing daily peak hours as the surrounding Deer Ridge and Shadow Lakes communities, thereby adding considerably more traffic congestion to current roadway conditions. For these reasons, and because this preliminary alternative would not meet most of the basic objectives of the project as outlined above, this alternative was rejected from further review and consideration.

20.8.3 Alternative C - Development of Single-family homes on selected parcels.

Alternative C considered development of approximately six (6) single-family homes on the Shadow Lakes driving range and two (2) single-family homes within the Deer Ridge community.

While this preliminary concept would fit within the existing neighborhood land use context and have minimal environmental impacts, it would not address the project objective of providing multi-family senior housing (thus addressing the General Plan's call for a variety of housing types, for all ages), nor provide the opportunity for these two communities to serve as life-cycle housing communities. Furthermore, the development of single-family homes on the Shadow Lakes development parcel would adversely affect the functioning of the existing driving range. The addition of eight holes with no changes to the existing golf courses does not address the economic and market objectives as stated in section 20.2 above, in part caused by having two potentially unsustainable golf courses located next to each other. For these reasons, and because this preliminary alternative would not meet the basic project objectives as stated above, it was rejected from further review and consideration.

20.9 Environmentally Superior Alternative

CEQA Guidelines Section 15126(e)(2) requires that the environmentally superior alternative be identified. If the environmentally superior alternative is the No Project Alternative, the EIR shall identify an environmentally superior alternative among the other alternatives.

In comparison to the alternatives analyzed, the No Project Alternative would be the environmentally superior alternative. As required by CEQA, one of the remaining alternatives must be identified as the environmentally superior alternative. As a result, Alternative 2, the Reduced Density Alternative, is considered the environmentally superior alternative.

Alternative 2 reduces some impacts due to the reduced development intensity associated with this alternative, including a reduction in vehicle trips generated by the project by approximately 50 percent, which accounts for a reduction in air quality, GHG, noise, and traffic impacts. Other impacts would be similar in nature when compared to the proposed project. While Alternative 3, the Single-Family Homes Alternative, meets many of the overall project objectives identified in Section 20.1.1 of this Draft EIR, this alternative would not completely meet the stated project objectives of fulfilling a market demand for multi-family senior housing, increasing the supply of age-restricted communities (as stated in the General Plan), nor would it create a sustainable life-cycle housing community by locating the age-restricted community within the existing community close to recreational amenities like golf courses, open space and infrastructure. Finally, this alternative may not meet other stated project objectives of generating sufficient revenue to make the golf course viable by eliminating the existing debt, performing the deferred maintenance, re-opening the driving range and constructing the open space improvements on the closed holes.