

5 Alternatives

As required by *CEQA Guidelines* Section 15126.6, this chapter examines a range of reasonable alternatives to the proposed project that would attain most of the basic project objectives and avoid or substantially lessen significant adverse impacts. As discussed in Section 2, *Project Description*, the guiding principles of Ukiah 2040, which are considered the basic project objectives, are as follows:

- Guide land uses and development that meet the needs of the community, are environmentally conscious, and maintain Ukiah as a diverse, family-oriented, and friendly community, where people from all racial, ethnic, and cultural backgrounds thrive socially, economically, academically, and physically.
- Ensure development in all neighborhoods is compatible with the unique characteristics and land use patterns and fosters a sense of place.
- Promote resilient and sustainable facilities and infrastructure to ensure delivery of high-quality services.
- Promote a diverse, local, business-friendly economy that fosters new job growth and is adaptable to changes in consumer habits and market trends.
- Maintain and advance a well interconnected circulation network that accommodates and encourages alternative modes of transportation that reduce congestion and encourage walkable and bikeable neighborhoods.
- Preserve existing open space resources while enhancing accessibility to parks and recreational amenities; and manage, conserve, and preserve the existing natural environment to ensure sustainable longevity for present and future generations.
- Provide for a safe community through resilient infrastructure, community-wide education and preparation, and hazard planning that is responsive to potential climate-related, natural, and human-caused disasters.
- Preserve Ukiah Regional Airport as a vital economic driver and transportation system and maintain consistency with the criteria and policies of the Ukiah Municipal Airport Master Plan.
- Foster an inclusive community through conditions that allow for and stimulate a diversity of housing options for community members of all ages, incomes, and ethnicities.

This analysis presents two alternatives, including the CEQA-required “no project” alternative, that involve changes to the project that may reduce the project-related environmental impacts identified in this EIR. These Alternatives have been developed to provide a reasonable range of options that would help decision-makers and the public understand the general implications of revising or eliminating certain components of the proposed project. The following alternatives are evaluated in this EIR:

1. Alternative 1: No Project
2. Alternative 2: Decreased Residential Density

Table 5-1 provides a summary comparison of the proposed project and each of the alternatives considered. Detailed descriptions of the alternatives are included in the impact analysis for each alternative. The potential environmental impacts of each alternative are analyzed in Sections 5.1 and 5.2.

Table 5-1 Comparison of Project Alternatives' Buildout Characteristics

	Proposed Project	Alternative 1: No Project	Alternative 2: Decreased Residential Density
Total Allowable Dwelling Units Under ¹ Alternative	2,350	1,692	1,868
Change in Total Maximum Dwelling Units Compared to Proposed Project	N/A	-658 du	-482 du
Total Additional Residents Under Alternative ¹	5,640 persons	4,061 persons	4,483 persons
Change in Population Potential Compared to Proposed Project (Number of Residents)	N/A	- 1,579 persons	-1,157 persons
Total Additional Non-Residential Square Footage Under Alternative ¹	4,514,820 sf	3,831,300 sf	3,831,300 sf ²
Change in Total Additional Non-Residential Square Footage Compared to Proposed Project	N/A	-683,520 sf	-683,520 sf

du = dwelling units, sf = square feet

¹ The estimates for additional dwelling units, residences, and non-residential square footage are a conservative estimate based on the maximum buildout scenario. Overall, maximum growth will be dependent on multiple factors, including local economic conditions, market demand, and other financing considerations. These numbers are not meant to be a predictor of future growth.

² Non-residential square footage in Alternative 2 was assumed to be the same as the existing General Plan and only residential densities were changed.

5.1 Alternative 1: No Project Alternative

The *CEQA Guidelines* (Section 15126.6[e][2]) require that the alternatives discussion include an analysis of a No Project Alternative. Pursuant to CEQA, the No Project Alternative refers to the analysis of existing conditions and what would reasonably be 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. The No Project Alternative typically will proceed along one of two lines: (1) when a project is a revision of an existing regulatory plan or policy, the No Project Alternative will be continuation of the existing plan or policy; or (2) if a project is a development project on identifiable property, the No Project Alternative is the circumstance under which the project does not proceed. In this case, the No Project Alternative represents the continuation of existing zoning and General Plan designations within the City's Sphere of Influence and full buildout under those existing designations is assumed to occur under this alternative. Typical development assumptions are included in the analysis of this alternative below, including compliance with applicable regulations or typical City-required measures.

5.1.1 Description

The No Project Alternative assumes there is no change in zoning or General Plan land use designations and analyzes the existing General Plan land use designations and densities for vacant land within the City. The No Project Alternative includes identified sites for annexation, as well as housing sites identified as part of the 2019-2027 Housing Element. As the No Project Alternative focuses on existing designations, Annexation Areas would have existing land use designations, in contrast to the proposed project, which apply City land use designations to these areas. Buildout under the No Project Alternative, assuming a maximum buildout scenario, would allow for 1,692 housing units and approximately 3,831,300 square feet of additional non-residential land uses. However, the No Project Alternative would not accomplish project objectives to the extent that the proposed project would, as the No Project Alternative would provide reduced housing options and

exclude multiple policies from Ukiah 2040 pertaining to community development, preservation of natural resources, sustainability, and improvement of Ukiah's circulation network.

5.1.2 Impact Analysis

a. Aesthetics

Development under the No Project Alternative would continue the land use pattern that currently exists in Ukiah. Impacts to scenic vistas and light and glare under this alternative would be reduced when compared to the proposed project, as this alternative would involve less development. Nonetheless, development under the No Project Alternative could affect aesthetics and would be required to comply with the same Ukiah City Code regulations as the proposed project. Both the No Project Alternative and the proposed project would have less than significant impacts on aesthetics; however, the severity of the impact for the No Project Alternative would be slightly less than for the proposed project. This is because the No Project Alternative would have less development than the proposed project.

b. Agriculture and Forestry Resources

Development under the No Project Alternative would continue the agricultural land use pattern currently in Ukiah. Impacts to Farmland, land under Williamson Act contract, or regarding the conversion of agricultural land to non-agricultural use would be the same as the proposed project because the proposed project does not include the conversion of such lands. However, the No Project Alternative would not include Ukiah 2040 policies designed to encourage the continued operation of agricultural lands in Ukiah. There are no zoned Timber Production Zones or forest lands within City limits or proposed annexation areas. Thus, the No Project Alternative would have no impact to forest land and would not result in the conversion of forest land to non-forest use, like the proposed project.

c. Air Quality

Like the proposed project, buildout under the No Project Alternative would not preclude planned transit or bike pathways and would not disrupt regional planning efforts to reduce vehicle miles traveled (VMT) and meet federal and State air quality standards. The No Project Alternative would be consistent with applicable 2017 Clean Air Plan control measures, although not to the extent as the proposed project, as the No Project Alternative would not include Ukiah 2040 policies designed to reduce criteria pollutant emissions. Impacts regarding conflict with applicable air quality plans would be less than significant, albeit greater than the proposed project.

Buildout under the existing General Plan land use and zoning designations would accommodate approximately 658 fewer housing units than under the proposed project. Short-term construction emissions that would occur from construction of the 658 housing units would be avoided under the No Project Alternative. Similarly, non-residential development would be reduced under this alternative, resulting in reduced construction-related emissions as compared to the proposed project. Similar to the proposed project, mitigation may be applied to individual projects that require CEQA review to comply with the Bay Area Air Quality Management District's (BAAQMD) and the Mendocino County Air Quality Management District's (MCAQMD) current recommended basic control measures. The No Project Alternative would have fewer overall construction-related impacts to air quality due to the reduced buildout.

As stated in Section 4.3, *Air Quality*, the greatest source of criteria pollutants in Ukiah is from transportation sources, specifically mobile emissions from roadway traffic. Considering 658 fewer residential units would be constructed in Ukiah under the No Project Alternative, the long-term on-site emissions from vehicle use would be reduced when compared to the proposed project. An overall reduction in total VMT would result in less operational emissions associated with mobile sources. However, the No Project Alternative would not include proposed Ukiah 2040 policies that support VMT reduction or electric vehicle adoption. These policies would ultimately reduce VMT per capita. Overall, operational air quality impacts for the No Project Alternative would also be significant and unavoidable. However, impacts from the No Project Alternative would be less than impacts from the proposed project, due to the reduction in overall VMT from reduced buildout.

Overall, the No Project Alternative would result in less infill development, leading to lower density development near stationary sources, freeways, and high-volume roadways. Therefore, the No Project Alternative would result in lower toxic air contaminants (TAC) near sensitive receptors when compared to the proposed project. However, as described in Section 4.3, *Air Quality*, the proposed project includes Ukiah 2040 goals and policies designed to promote clean air quality, protect public health and safety, and mitigate adverse air quality impacts. The No Project Alternative would not implement these policies. Similar to the proposed project, mitigation may be applied to individual projects that require CEQA review to prepare a construction health risk assessment. The No Project Alternative would have fewer overall construction-related TAC impacts to air quality due to the reduced buildout.

Like the proposed project, construction activities under the No Project Alternative would generate odors, which would be temporary and limited to the constructed period. Similar to the proposed project, the No Project Alternative would have a less than significant impact regarding creation of objectionable odors.

Overall, the significance conclusions for the No Project Alternative would be the same as the proposed project; however, the severity of the impact would be less for the No Project Alternative due to the reduced buildout.

d. Biological Resources

As described in Section 4.4, *Biological Resources*, potential habitat suitable for special-status species occurs in streams, grasslands, riparian woodland, and forests within the Planning Area. The No Project Alternative would result in overall reduced development when compared to the proposed project; however, development under the No Project Alternative may potentially impact special-status species or their habitat, including riparian habitat and wildlife corridors. Similar to the proposed project, mitigation may be applied to individual projects that require CEQA review to prepare a biological resources assessment, conduct pre-construction bird-surveys, roosting bird surveys, and apply bird-safe design. Impacts from the No Project Alternative would be slightly less, compared to the proposed project due to the reduction in buildout.

e. Cultural Resources

The No Project Alternative would have the potential to impact historic and archaeological resources in Ukiah through development of individual projects. Under the No Project Alternative, residential and nonresidential buildout would be less than for the proposed project; therefore, the No Project Alternative would have reduced, but still potentially significant impacts to historic and archaeological resources. Furthermore, in contrast to the proposed project, the No Project Alternative would not include updated General Plan goals and policies designed to preserve and

protect historic and archaeological resources in Ukiah. However, similar to the proposed project, mitigation may be applied to individual projects that require CEQA review to require a historic and archaeological resources study. Nevertheless, as development under the No Project Alternative may result in the permanent loss or damage to historic structures, impacts under this alternative would be significant and unavoidable, like the proposed project.

f. Greenhouse Gas Emissions

Under the No Project Alternative, less development would occur, consistent with allowed existing zoning. Temporary construction-related greenhouse gas (GHG) emissions that result from grading and construction of new housing and non-residential development, as well as long-term impacts resulting from building operation (such as energy use, maintenance, and traffic) would be reduced when compared to the proposed project, as the No Project Alternative would involve decreased residential and non-residential buildout. However, the No Project Alternative would not include policies ENV-7.3 (Implement Clean Air Plan) and ENV-7.5 (Construction and Operations) within the Ukiah 2040 Environment and Sustainability Element, which are designed to reduce the impact of GHG emissions generated with construction activities.

Under existing conditions, Ukiah's General Plan does not outline how the City would meet State-mandated goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045. Therefore, the No Project Alternative would not be consistent with the California Executive Order B-55-18 goal of carbon neutrality by 2045 and would not include a qualified GHG reduction plan to guide progress towards State goals. Consequently, impacts related to generation of GHG emissions and consistency with State GHG reduction plans under the No Project Alternative would be potentially significant. Under the No Project Alternative, the CEQA GHG emissions threshold of significance and updated Climate Action Plan would not be implemented. As such, while the No Project Alternative would have less GHG emissions than the proposed project (due to the reduced buildout), the No Project Alternative would actually result in greater impacts on GHG emissions compared to the proposed project, because CEQA GHG emissions threshold of significance and an updated Climate Action Plan would not be implemented.

g. Land Use and Planning

Under the No Project Alternative, vacant/underutilized sites and annexation sites would retain their existing zoning, allowing future buildout in accordance with that zoning. The No Project Alternative would not alter connectivity with adjacent areas or divide established communities. Like the proposed project, future development under existing zoning would be required to comply with regulatory goals and policies, including the Ukiah Municipal Airport Land Use Compatibility Plan, the Ukiah Valley Area Plan, and Mendocino County Regional Transportation Plan, as discussed in Impact LU-2 in Section 4.7, *Land Use and Planning*. The No Project Alternative would result in less intensive future development, as it does not include new land use designations that would change the development density/intensity of residential and non-residential buildings. Consequently, the No Project Alternative would provide 658 fewer housing units than the proposed project and would not meet the project objectives to the extent that the proposed project would. Impacts regarding land use and planning would be less than significant, like the proposed project.

h. Noise

Buildout under the No Project Alternative would result in reduced development compared to the proposed project. Therefore, less construction and associated construction noise and vibration

would occur under the No Project Alternative as compared to the proposed project. Like the proposed project, construction noise under the No Project Alternative could temporarily increase noise levels, potentially affecting nearby noise-sensitive land uses and leading to a significant and unavoidable impact. Similar to the proposed project, mitigation may be applied to individual projects that require CEQA review to implement construction noise reduction measures. However, construction noise could still exceed the significance threshold of 80 dBA L_{eq} during the daytime at residential uses. Furthermore, due to construction projects that could occur simultaneously in the same area and the potential duration of construction activities, construction impacts would remain significant and unavoidable, like the proposed project.

Noise generated by on-site stationary equipment for new development would be subject to the City's noise limits, like the proposed project. Adherence to Ukiah Municipal Code noise limits for heating, ventilation, and air conditioning (HVAC) units and other stationary noise sources associated with future development would ensure that operational stationary noise under the No Project Alternative is less than significant. However, the No Project Alternative would not include Ukiah 2040 policies designed to reduce operational noise impacts, and consequently, the No Project Alternative would have a greater impact to operational noise than the proposed project.

Implementation of the No Project Alternative could result in buildout, which would generate new vehicle trips that could incrementally increase the exposure of land uses along roadways to traffic noise. Although the No Project Alternative would result in reduced overall VMT, there would still be an increase in VMT compared to existing conditions and it is anticipated that a significant and unavoidable traffic noise impact would occur.

Development facilitated under the No Project Alternative could temporarily generate groundborne vibration during construction, potentially affecting nearby land uses. Similar to the proposed project, mitigation may be applied to individual projects that require CEQA review to prepare a construction vibration control plan. Operation of future development under the No Project Alternative would not involve substantial vibration or groundborne noise. Thus, impacts involving groundborne vibration and noise would be similar to the impacts of the proposed project.

Residents and businesses facilitated by the No Project Alternative would not be served by the Ukiah Municipal Airport, except for emergency medical and fire services. Thus, development facilitated under this alternative would not result in significantly increased airport or airstrip activity. Continued regulation of airport noise consistent with State and federal regulations would minimize disturbance to people residing or working within proximity of the Ukiah Municipal Airport. Impacts would be less than significant, like the proposed project. However, since the No Project Alternative does not include Ukiah 2040 policies designed to reduce noise from the Ukiah Municipal Airport through disclosure, attenuation, and studies, impacts would be greater under this alternative than for the proposed project.

i. Population and Housing

Under the No Project Alternative, existing land use designations and zoning would continue to define the type of development that occurs throughout Ukiah. Assuming a maximum buildout scenario, implementation of the No Project Alternative would accommodate approximately 1,579 fewer residents and 658 fewer housing units than would be accommodated by implementation of the proposed project (refer to Table 5-1). Thus, compared to the proposed project, the No Project Alternative would result in less population growth, and would not induce substantial unplanned population growth. The current General Plan provides for orderly development and growth. The displacement of people or housing units under the No Project Alternative would be minimal, as

development in Ukiah would continue in accordance with the existing General Plan. Impacts would be less than significant. When compared to the proposed project, the No Project Alternative would have reduced impacts to population and housing.

j. Public Services and Recreation

Development allowed by existing land use and zoning regulations would occur under the No Project Alternative, which would result in an increase to emergency calls in the area, as well as an increase in additional demand for schools, parks, libraries, recreational facilities, or other public services. Assuming a maximum buildout scenario, the No Project Alternative would add approximately 4,061 new residents to Ukiah, which is 1,579 fewer residents than the proposed project's 5,640 new residents. Thus, the increase in demand for public services under the No Project Alternative would be smaller than the proposed project's increase in demand. Impacts to public services and recreation would be less than the proposed project. Nonetheless, both would result in a less than significant impact.

k. Transportation

The No Project Alternative would result in development that follows the existing land use and zoning regulations. Goals and policies within the existing General Plan would apply under this alternative. Given the compliance with existing General Plan goals and policies that pertain to provision of "complete streets," increased connectivity, adequate emergency access, and safety design, the No Project Alternative would have a less than significant impact regarding conflict with circulation programs, plans, ordinances, or policies. The No Project Alternative would also have a less than significant impact regarding substantially increased transportation hazards and inadequate emergency access.

Development under the No Project Alternative would follow existing General Plan land use designations. However, the No Project Alternative would not include proposed Ukiah 2040 policies that support VMT reduction, which would ultimately reduce VMT per capita. The No Project Alternative could result in an increase to non-residential area (3,831,300 square feet) and residential units (1,692 units), relative to existing conditions. This buildout would add jobs and dwelling units to the City; however, compared to the proposed project, the ratio of jobs per dwelling units for the No Project Alternative would be greater than the proposed project. As such, the No Project Alternative would have a reduced land use diversity index compared to the proposed project. Overall, the No Project Alternative would result in greater VMT per capita impacts than the proposed project.

l. Tribal Cultural Resources

As discussed in Section 4.12, *Tribal Cultural Resources*, tribal cultural resource (TCR) impacts are highly dependent on the individual project site conditions and the characteristics of the proposed activity, including level of ground disturbance. Under the No Project Alternative, existing land use designations and zoning would continue to define the type of development that occurs throughout Ukiah. Like the proposed project, development facilitated under the No Project Alternative may involve excavation, which could potentially impact previously unidentified TCRs. The No Project Alternative would not include updated General Plan policies designed to preserve and protect TCRs; however, similar to the proposed project, mitigation may be applied to individual projects that require CEQA review to avoid TCRs and follow protocols in the case of an unanticipated discovery.

Overall because the No Project Alternative would result in less development, the severity of impacts would be slightly less than the proposed project.

m. Utilities and Service Systems

Development facilitated under the No Project Alternative would create additional demand for water, wastewater, electricity, natural gas, telecommunication, and stormwater drainage facilities. Any utility expansion within City limits or the Annexation Areas would be subject to existing Mendocino County Local Agency Formation Commission (LAFCo) and General Plan policies, which are intended to reduce potential impacts of utility expansion. In addition, similar to the proposed project, mitigation may be applied to individual projects that require CEQA review to minimize impacts on the physical environment due to the installation of utilities. Although the No Project Alternative would not include Ukiah 2040 policies that require implementation of low impact development, energy conservation, and energy efficiency strategies, there are existing regulations that would require similar measures. Impacts involving utility expansion under the No Project Alternative would be less than significant, but slightly less than the proposed project because the No Project Alternative would have less development and, therefore, fewer utility connections.

As discussed in Section 4.13, *Utilities and Service Systems*, the City's Public Works Department would have adequate water supply to service the City's anticipated growth under the proposed project. Considering that development under the No Project Alternative would result in 1,579 fewer residents (assuming a maximum buildout scenario) than the proposed project, growth under the No Project Alternative would also be accommodated by the City's existing water system. Although development under the No Project Alternative would increase water demand, the City would continue to have sufficient water supply during normal, dry, and multiple dry years, and impacts to water supply would be less than significant.

Development facilitated under the No Project Alternative would increase demand for wastewater treatment. Like the proposed project, the timing, intensity, and location of an expansion of wastewater treatment facilities is unknown at this time. Like the proposed project, wastewater expansion for the No Project Alternative would require additional CEQA review, would be advanced when the wastewater expansion is advanced, and impacts would be less than significant. Considering the No Project Alternative would add 1,579 fewer residents to Ukiah (assuming a maximum buildout scenario), demand for wastewater and overall wastewater impacts would be less under the No Project Alternative than for the proposed project.

Implementation of the No Project Alternative would generate solid waste from construction and operation of development (including typical residential, commercial, and office solid waste). As discussed in Section 4.13, *Utilities and Service Systems*, the Ukiah Transfer Station would have adequate capacity to serve the population growth under the proposed project. Considering the No Project Alternative would result in 1,579 fewer people than the proposed project (assuming a maximum buildout scenario), the Ukiah Transfer Station would also accommodate population growth under this alternative. However, the No Project Alternative would not include Ukiah 2040 policies that focus on reducing solid waste generation and increasing recycling and composting. Like the proposed project, impacts involving solid waste under the No Project Alternative would be less than significant.

n. Wildfire

Under the No Project Alternative, development under existing general plan and zoning regulations would be allowed on sites that are mapped within or near State Responsibility Areas and fire hazard

severity zones (FHSZ). There are approximately 387 acres of Very High FHSZ within the city limits of Ukiah, and approximately 2,670 acres of Very High FHSZ within the city's existing Sphere of Influence, as discussed in Section 4.14, *Wildfire*. Under the No Project Alternative, development could still occur within a FHSZ and the No Project Alternative would be subject to the same regulations as described for the proposed project, including the Ukiah City Code, which adopted State Responsibility Area (SRA) regulations for land within the City limits located in High or Very High FHSZs. Similar to the proposed project, mitigation may be applied to individual projects that require CEQA review to reduce construction and design wildfire risk. Overall, the No Project Alternative would have a similar impact on wildfire than the proposed project.

o. Paleontological Resources

As discussed in Section 4.15, *Paleontological Resources*, a portion of the City overlays the Quaternary terrace geologic unit, which has high paleontological sensitivity. Under the No Project Alternative, ground disturbance associated with buildout of existing General Plan land use designations, as well as development in Annexation Areas, may result in potentially significant impacts to paleontological resources. Similar to the proposed project, mitigation may be applied to individual projects that require CEQA review to minimize impacts on paleontological resources. However, the No Project Alternative would involve less overall development than the proposed project, and thus would be less likely to impact paleontological resources.

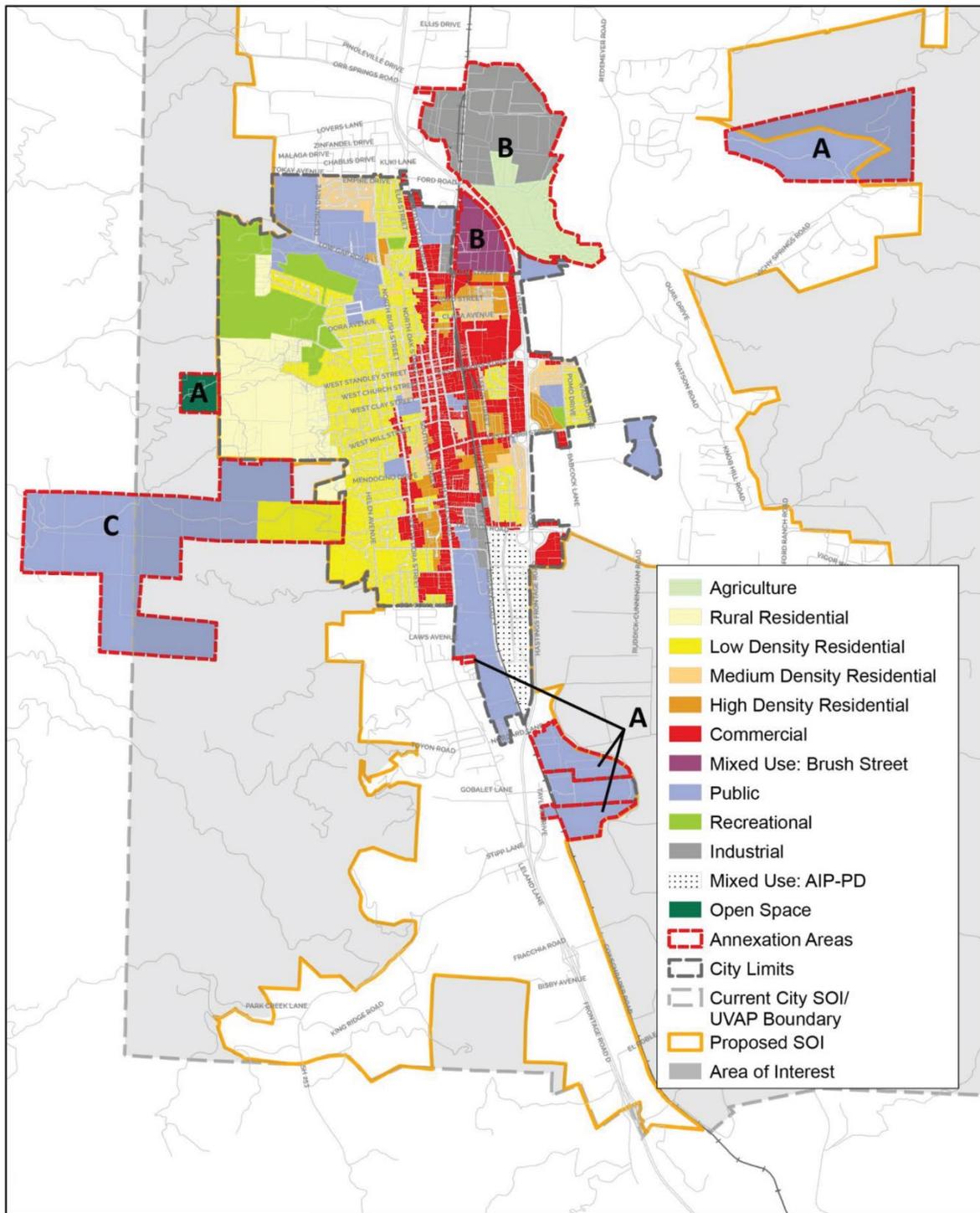
5.2 Alternative 2: Decreased Residential Density

5.2.1 Description

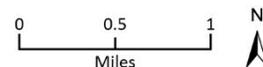
The Decreased Residential Density Alternative (Alternative 2) assumes increased residential densities (1,868 units total) allowed by each land use designation compared to the existing General Plan or No Project Alternative (1,692 units total) but decreased residential densities when compared to the proposed project (2,350 total units). For example, the existing General Plan allows High Density Residential development of up to 28 dwelling units per acre (du/ac) and the proposed project (as well as Alternative 2) would allow a density of up to 40 du/ac. Both the proposed project and Alternative 2 would apply new and/or existing General Plan land use designations to lands within the city limits and Annexation Areas. However, Alternative 2 would not add new land use designations intended to increase commercial land uses and would rely on existing General Plan land use designations (and densities). Because Alternative 2 would maintain the same designations as the General Plans for non-residential spaces, the buildout of non-residential space would be the same as the No Project Alternative. In addition, Alternative 2 would not add some of the new land use designations identified for the proposed project, which explains why Alternative 2 would have less residential units than the proposed project. Figure 5-1 shows the land use designations for Alternative 2.

Assuming a maximum buildout scenario, buildout under Alternative 2 would allow for 1,868 housing units and approximately 3,831,300 square feet of additional non-residential land uses (refer to Table 5-1). Non-residential development would be the same as the No Project Alternative but would be less than the proposed project. Resulting residential density would be less than the proposed project and more than the No Project Alternative. However, Alternative 2 would not accomplish project objectives to the extent that the proposed project would, as Alternative 2 would provide reduced housing options.

Figure 5-1 Alternative 2 Land Use Designations



Source: City of Ukiah, 2/2/2022; City of Ukiah, 2021; Mendocino County, 2011; Mendocino County, 2019.



5.2.2 Impact Analysis

a. Aesthetics

Development under Alternative 2 would introduce a new land use pattern that would encourage increased residential density relative to the existing General Plan but less than the proposed project. Annexation areas would be given City land use designations and would potentially change the visual character of both the annexation areas as well as the overall City of Ukiah. However, impacts to visual character would be reduced when compared to the proposed project, as Alternative 2 would entail less overall residential and non-residential development. Similarly, impacts to scenic vistas and light and glare would be reduced under Alternative 2 when compared to the proposed project, as this alternative would involve less dense infill development. Nonetheless, development under Alternative 2 could affect aesthetics and would be required to comply with the same Ukiah City Code regulations as the proposed project. Both Alternative 2 and the proposed project would have less than significant impacts on aesthetics; however, the severity of the impact for Alternative 2 would be slightly less than for the proposed project. This is because the Alternative 2 would have less development than the proposed project.

b. Agriculture and Forestry Resources

Development under Alternative 2 would continue the agricultural land use pattern currently in Ukiah, as no new agricultural land use designations would be introduced. Impacts to Farmland, land under Williamson Act contract, or regarding the conversion of agricultural land to non-agricultural use would be the same as the proposed project. There are no zoned Timber Production Zones or forest lands within City limits or proposed annexation areas. Thus, Alternative 2 would have no impact to forest land and would not result in the conversion of forest land to non-forest use, like the proposed project.

c. Air Quality

Like the proposed project, buildout under Alternative 2 would not preclude planned transit or bike pathways and would not disrupt regional planning efforts to reduce VMT and meet federal and State air quality standards. Alternative 2 would be consistent with applicable 2017 Clean Air Plan control measures. Impacts regarding conflict with applicable air quality plans would be less than significant, the same as the proposed project.

Buildout from Alternative 2 would accommodate approximately 482 fewer housing units than under the proposed project. Short-term emissions that would occur from construction of the 482 housing units would be avoided under Alternative 2. Similarly, non-residential development would be reduced under this alternative, resulting in reduced construction-related emissions as compared to the proposed project. Additionally, Alternative 2 would implement Mitigation Measure AQ-1, (Implement BAAQMD and MCAQMD Basic Construction Mitigation Measures), which would further reduce construction impacts to air quality. Alternative 2 would have fewer overall construction-related impacts to air quality. Like the proposed project, air quality impacts from construction of Alternative 2 would be less than significant with mitigation; however, Alternative 2 would have fewer overall construction-related impacts to air quality due to the reduced buildout.

As stated in Section 4.3, *Air Quality*, the greatest source of criteria pollutants in Ukiah is from transportation sources, specifically mobile emissions from roadway traffic. Considering 482 fewer residential units would be constructed in Ukiah under this alternative, the long-term on-site

emissions from vehicle use would be reduced when compared to the proposed project. An overall reduction in VMT would result in less operational emissions associated with mobile sources. Like the proposed project, Alternative 2 would implement Mitigation Measure AQ-2, (Implement Measures to Reduce Operational Emissions), which would reduce operational impacts to air quality. Nonetheless, operational air quality impacts for Alternative 2 would also be significant and unavoidable.

Overall, Alternative 2 would result in less infill development than the proposed project, leading to lower density development near stationary sources, freeways, and high-volume roadways. Therefore, Alternative 2 would result in lower TAC near sensitive receptors when compared to the proposed project. However, as described in Section 4.3, *Air Quality*, the proposed project includes Ukiah 2040 goals and policies designed to promote clean air quality, protect public health and safety, and mitigate adverse air quality impacts. Alternative 2 would implement these policies and would also require Mitigation Measure AQ-2 (Conduct Construction Health Risk Assessment) to reduce impacts to a less than significant level.

Like the proposed project, construction activities under Alternative 2 would generate odors, which would be temporary and limited to the constructed period. Similar to the proposed project, Alternative 2 would have a less than significant impact regarding creation of objectionable odors.

Overall, the significance conclusions for Alternative 2 would be the same as the proposed project.

d. Biological Resources

As described in Section 4.4, *Biological Resources*, potential habitat suitable for special-status species occurs in streams, grasslands, riparian woodland, and forests within the Planning Area. Alternative 2 would result in overall reduced development when compared to the proposed project; however, development under Alternative 2 may potentially impact special-status species or their habitat, including riparian habitat and wildlife corridors. Mitigation Measures BIO-1 (Biological Resource Assessment), BIO-2 (Pre-Construction Bird Surveys, Avoidance, and Notification), BIO-3 (Roosting Bat Surveys and Avoidance Prior to Removal) and BIO-4 (Bird Safe Design) would be implemented for Alternative 2 and would help reduce associated biological resource impacts, similar to the proposed project. Overall, impacts to biological resources under Alternative 2 would be less than significant with mitigation incorporated, like the proposed project. Impacts from Alternative 2 would be slightly less, compared to the proposed project due to the reduction in buildout.

e. Cultural Resources

Under Alternative 2, less residential and nonresidential development than under the proposed project would occur; however, individual projects would have the potential to impact historic and archaeological resources. Alternative 2 would have reduced, but still potentially significant impacts to historic and archaeological resources. Like the proposed project, Alternative 2 would include Mitigation Measures CUL-1 (Historic Resources Study Program) and CUL-2 (Archaeological Resources Study Program), which require project applicants to investigate the potential to disturb historic or archaeological resources. Like the proposed project, Alternative 2 would include updated General Plan goals and policies designed to preserve and protect historic and archaeological resources in Ukiah. Development under Alternative 2 may result in the permanent loss or damage to historic structures, impacts under this alternative would be significant and unavoidable, like the proposed project.

f. Greenhouse Gas Emissions

Less development would occur under Alternative 2 and temporary construction-related GHG emissions that result from grading and construction of new housing and non-residential development, as well as long-term impacts resulting from building operation (such as energy use, maintenance, and traffic) would be reduced when compared to the proposed project. Alternative 2 would include Policies ENV-7.3 (Implement Clean Air Plan) and ENV-7.5 (Construction and Operations) within the Ukiah 2040 Environment and Sustainability Element, which are designed to reduce the impact of GHG emissions generated with construction activities.

Under existing conditions, Ukiah's General Plan does not outline how the City would meet State-mandated goals to reduce emissions to 40 percent below 1990 levels by 2030 and carbon neutrality by 2045. Therefore, Alternative 2 would not be consistent with the California Executive Order B-55-18 goal of carbon neutrality by 2045 and would not include a qualified GHG reduction plan to guide progress towards State goals. Consequently, impacts related to generation of GHG emissions and consistency with State GHG reduction plans under Alternative 2 would be potentially significant. Like the proposed project, Alternative 2 would implement Mitigation Measure GHG-1, through which the City would add a new General Plan policy to prepare, adopt, and implement a CEQA GHG emissions threshold of significance; and Mitigation Measure GHG-2, which would require the City to update Ukiah's Climate Action Plan to meet State goals of 40 percent below 1990 emissions levels and 2045 goal of carbon neutrality. Implementation of these mitigation measures would ensure development under Alternative 2 would be consistent with State emissions goals; however, individual projects that occur prior to adoption of the Climate Action Plan under MM GHG-2 may not be consistent. While overall GHG emissions impacts under Alternative 2 would be reduced when compared to the proposed project, such impacts would remain significant and unavoidable.

g. Land Use and Planning

While Alternative 2 would increase the intensity of development for residential land uses compared to the No Project Alternative (but decrease residential land uses when compared to the proposed project), such uses would be consistent with updated residential land use designations and would not conflict with Ukiah's General Plan or Zoning Ordinance. Overall, Alternative 2 would result in less intensive future development, as it does not include new land use designations that would change the development intensity of non-residential buildings and would provide 482 fewer housing units than the proposed project. Alternative 2 would not alter connectivity with adjacent areas or divide established communities. Like the proposed project, future development under existing zoning would be required to comply with regulatory goals and policies, including the Ukiah Municipal Airport Land Use Compatibility, the Ukiah Valley Area Plan, and Mendocino County Regional Transportation Plan, as discussed in Impact LU-2 within Section 4.7, *Land Use and Planning*. Impacts regarding land use and planning would be less than significant, like the proposed project.

h. Noise

Buildout under Alternative 2 would result in reduced development compared to the proposed project. Therefore, less construction and associated construction noise and vibration would occur under Alternative 2 as compared to the proposed project. Like the proposed project, construction noise under Alternative 2 could temporarily increase noise levels, potentially affecting nearby noise-sensitive land uses and leading to a significant and unavoidable impact. Alternative 2 would implement Mitigation Measure NOI-1 (Construction Noise Reduction Measures), which would help reduce construction noise. However, implementation of Mitigation Measure NOI-1 would not

ensure that construction noise impacts would be reduced to below the significance threshold of 80 dBA Leq during the daytime at residential uses. Furthermore, due to construction projects that could occur simultaneously in the same area and the potential duration of construction activities, construction impacts would remain significant and unavoidable under Alternative 2, like the proposed project.

Noise generated by on-site stationary equipment for new development would be subject to the City's noise limits, like the proposed project. Adherence to Ukiah Municipal Code noise limits for HVAC units and other stationary noise sources associated with future development would ensure that operational stationary noise under Alternative 2 is less than significant.

Implementation of Alternative 2 could result in buildout, which would generate new vehicle trips that could incrementally increase the exposure of land uses along roadways to traffic noise. Although Alternative 2 would result in reduced overall VMT, there would still be an increase in VMT compared to existing conditions and a significant and unavoidable traffic noise impact would occur.

Development facilitated under Alternative 2 could temporarily generate groundborne vibration during construction, potentially affecting nearby land uses. Mitigation Measure NOI-2 (Construction Vibration Control Plan) would require implementation of measures to reduce vibration impacts during construction. Operation of future development under Alternative 2 would not involve substantial vibration or groundborne noise. Thus, impacts involving groundborne vibration and noise would be less than significant with mitigation incorporated, like the proposed project.

The redesignation of three parcels in the far northwestern corner of the community, which are currently designated Rural Residential, would not result in significant noise impacts, as these parcels would have a Recreational designation and are currently developed with recreation uses.

Residents and businesses facilitated by Alternative 2 would not be served by the Ukiah Municipal Airport, except for emergency medical and fire services. Thus, development facilitated under this alternative would not result in significantly increased airport or airstrip activity. Continued regulation of airport noise consistent with State and federal regulations would minimize disturbance to people residing or working within proximity of the Ukiah Municipal Airport. Impacts would be less than significant, like the proposed project. In addition, Alternative 2 would include Ukiah 2040 policies designed to reduce noise from the Ukiah Municipal Airport through disclosure, attenuation, and studies; therefore, impacts would be the same under this alternative than the proposed project.

i. Population and Housing

Under Alternative 2, land use designations within Ukiah would allow for increased residential density when compared to the No Project Alternative; however, the existing General Plan land use designations would continue to define Ukiah's development pattern. Assuming a maximum buildout scenario, implementation of Alternative 2 would accommodate approximately 1,157 fewer residents and 482 fewer housing units than would be accommodated by implementation of the proposed project (refer to Table 5-1). Thus, compared to the proposed project, Alternative 2 would result in less population growth, and would not induce substantial unplanned population growth.

The current General Plan provides for orderly development and growth. The displacement of people or housing units under Alternative 2 would be minimal, as development in Ukiah would continue in accordance with the General Plan. Impacts would be less than significant. When compared to the proposed project, Alternative 2 would have reduced impacts to population and housing.

j. Public Services and Recreation

When compared to the No Project Alternative, increased buildout from Alternative 2 would result in an increase to emergency calls in the area, as well as an increase in additional demand for schools, parks, libraries, recreational facilities, or other public services. Assuming a maximum buildout scenario, Alternative 2 would add approximately 4,483 new residents to Ukiah when compared to the No Project Alternative; however, this is 1,157 fewer residents than the proposed project's 5,640 new residents. Thus, the increase in demand for public services under Alternative 2 would be smaller than the proposed project's increase in demand. Impacts to public services and recreation would be less than the proposed project. Nonetheless, both would result in a less than significant impact.

k. Transportation

For the same reasons as the proposed project, Alternative 2 would have a less than significant impact regarding conflict with circulation programs, plans, ordinances, or policies; substantially increased transportation hazards and inadequate emergency access. Development under Alternative 2 would primarily follow existing General Plan land use designations, along with increased residential density. Alternative 2 could result in an increase to non-residential area (3,831,300 square feet) and residential units (1,868 units), relative to existing conditions. This buildout would add jobs and dwelling units to the City; however, compared to the proposed project, the ratio of jobs per dwelling units for Alternative 2 would be greater than the proposed project. As such, Alternative 2 would have a reduced land use diversity index compared to the proposed project. Overall, Alternative 2 would result in greater VMT per capita impacts than the proposed project.

l. Tribal Cultural Resources

Like the No Project Alternative and proposed project, development facilitated under Alternative 2 may involve excavation, which could potentially impact previously unidentified TCRs. Alternative 2 would include Mitigation Measures TCR-1 (Avoidance of Tribal Cultural Resources) and TCR-2 (Unanticipated Discovery). Implementation of these mitigation measures would reduce potential impacts to TCRs from development facilitated by this alternative to less than significant levels by requiring avoidance and monitoring in areas identified as sensitive for TCRs. As Alternative 2 would include the same mitigation as the proposed project, impacts to TCRs would be less than significant with mitigation incorporated. Overall because Alternative 2 would result in less development than the proposed project, the severity of impacts would be slightly less than the proposed project.

m. Utilities and Service Systems

Development facilitated under Alternative 2 would create additional demand for water, wastewater, electricity, natural gas, telecommunication, and stormwater drainage facilities compared to the No Project Alternative. Any utility expansion within City limits or the Annexation Areas would be subject to proposed Ukiah 2040 policies and mitigation measures identified throughout the Alternative 2 analysis, which would reduce potential impacts of utility expansion. Thus, impacts involving utility expansion under Alternative 2 would be less than significant, same as the proposed project and No Project Alternative.

As discussed in Section 4.13, *Utilities and Service Systems*, the City's Public Works Department would have adequate water supply to service the City's anticipated growth under the proposed

project. Alternative 2 would add approximately 4,483 new residents to Ukiah when compared to the No Project Alternative; however, this is 1,157 fewer residents than the proposed project's 5,640 new residents. As such, growth under Alternative 2 would also be accommodated by the City's existing water system. Although development under Alternative 2 would increase water demand, the City would continue to have sufficient water supply during normal, dry, and multiple dry years, and impacts to water supply would be less than significant.

Development facilitated under Alternative 2 would increase demand for wastewater treatment. Like the proposed project and No Project Alternative, the timing, intensity, and location of an expansion of wastewater treatment facilities is unknown at this time. Like the proposed project and No Project Alternative, wastewater expansion for Alternative 2 would require additional CEQA review, would be advanced when the wastewater expansion is advanced, and impacts would be less than significant. However, considering Alternative 2 would add approximately 4,483 new residents to Ukiah when compared to the No Project Alternative but 1,157 fewer residents to Ukiah when compared to the proposed project, demand for wastewater and overall wastewater impacts would be less under Alternative 2 than for the proposed project.

Implementation of Alternative 2 would generate solid waste from construction and operation of development (including typical residential, commercial, and office solid waste). As discussed in Section 4.13, *Utilities and Service Systems*, the Ukiah Transfer Station would have adequate capacity to serve the population growth under the proposed project. Considering Alternative 2 would add approximately 4,483 new residents to Ukiah when compared to the No Project Alternative but 1,157 fewer people than the proposed project, the Ukiah Transfer Station would also accommodate population growth under this alternative. Impacts involving solid waste would be less than significant, like the proposed project and No Project Alternative.

n. Wildfire

Development facilitated under Alternative 2 would occur primarily as infill and redevelopment within the urbanized areas of Ukiah. However, Alternative 2 would increase residential land use densities when compared to the No Project Alternative, and consequently may result in increased residential exposure to wildfire or risks involving wildfires, especially in the western area of the City, where residential development overlaps with High and Very High FHSZ. However, like the proposed project, Alternative 2 would implement Mitigation Measure WFR-1, which would require wildfire risk reduction during project construction, as well as Mitigation Measure WFR-2, which outlines project design wildfire risk reduction criteria. In addition, any new development within or near a High or Very High FHSZ would be required to the SRA regulations pursuant to the Ukiah City Code, as described in Section 4.14, *Wildfire*. As such, like the proposed project, impacts would be less than significant with mitigation.

o. Paleontological Resources

As discussed in Section 4.15, *Paleontological Resources*, the City overlay the Quaternary terrace geologic unit, which has high paleontological sensitivity. Like the No Project Alternative and the proposed project, ground disturbance associated with Alternative 2 may result in potentially significant impacts to paleontological resources. However, Alternative 2 would involve less overall development than the proposed project and thus would be less likely to impact paleontological resources. Like the proposed project, implementation of Mitigation Measure PAL-1 (Retention of Qualified Professional Paleontologist) would reduce adverse impacts associated with construction activities. Like the proposed project, Alternative 2 would include Ukiah 2040 policies designed to

protect archaeological resources, including paleontological resources. Impacts to paleontological resources under Alternative 2 would be less than significant with mitigation incorporated, and less than the proposed project.

5.3 Alternatives Considered but Rejected

The following summarizes those alternatives considered, but ultimately rejected for inclusion in the analysis as they would not meet most of the project objectives, would not substantially reduce impacts compared to the proposed project, or were determined to be infeasible.

The City considered an alternative that would require an update to the zoning code to include requiring noise barriers to reduce construction noise for development on project sites. Noise barriers would reduce on-site noise by about 10 to 20 dBA depending on construction materials and barrier height, since noise barriers are traditionally constructed of material with a minimum weight of 2 pounds per square foot with no gaps or perforations. Noise barriers may be constructed of, but are not limited to, 5/8-inch plywood, 5/8-inch oriented strand board, or hay bales. This alternative, which would require noise barriers that would reduce construction noise, could reduce the significant construction noise impact, but would not reduce the significant and unavoidable operational noise impact. Additionally, construction of noise barriers could result in increased impacts associated with ground disturbance (such as those related to biological resources, geology and soils, air quality, etc.) and visual impacts. Lastly, this alternative would meet project objectives to provide housing, but fewer housing units would likely be built, because development on certain sites would be infeasible due to construction cost constraints.

5.4 Environmentally Superior Alternative

CEQA requires identification of the environmentally superior alternative among the alternatives to the proposed project. The environmentally superior alternative must be an alternative that reduces some of the project's environmental impacts, regardless of the financial costs associated. Identification of the environmentally superior alternative is an informational procedure and the alternative identified as the environmentally superior alternative may not be that which best meets the goals or needs of the proposed project. Table 5-2 indicates whether each alternative's environmental impact is greater than, less than, or equal to the proposed project for each of the issue areas studied.

Overall, none of the alternatives identified in this analysis changed the impact conclusions that were identified for the proposed project. However, some of the alternatives did reduce the severity of the impact; thus, this analysis considers the severity of the impact to identify the environmentally superior alternative. Based on the analysis of alternatives in this section, the No Project Alternative is the environmentally superior alternative as it lessens the severity of most impacts of the proposed project. Because the No Project Alternative would reduce overall development (residential and non-residential) compared to the proposed project, the overall impacts from construction would also be reduced since there would be less construction. For example, potential impacts on air quality construction emissions, biological resources, cultural resources, temporary noise, tribal cultural resources, and paleontological resources would be reduced due to less area being affected (i.e., excavated, graded, etc.) and due to less use of construction equipment. In addition, operationally there would be reduced aesthetic impacts because there would be fewer buildings; less air quality emissions because there would be less overall VMT; less operational noise

because there would be less traffic and fewer HVAC units; and less demand for public services, recreation, and utilities. The No Project Alternative, however, would introduce less diversity of land uses than the proposed project and would result in greater transportation impacts than the proposed project. Furthermore, the No Project Alternative would have greater GHG impacts because CEQA GHG emissions threshold of significance and an updated Climate Action Plan would not be implemented for the No Project Alternative. In addition, this alternative would not meet the project objectives, as it would have reduced housing options and exclude all policies from Ukiah 2040.

If the No Project Alternative is determined to avoid or reduce more impacts than any other alternative, CEQA requires that the EIR identify an environmentally superior alternative among the other alternatives (CEQA Guidelines Section 15126.6[e]). Of the other alternatives evaluated in this EIR, the Decreased Residential Density Alternative (Alternative 2) would be the environmentally superior alternative. Like the No Project Alternative, Alternative 2 would result in less construction impacts (air quality construction emissions, biological resources, cultural resources, greenhouse gas emissions, temporary noise, tribal cultural resources, and paleontological resources) than the proposed project because of a reduction in buildout. In addition, Alternative 2 would result in less operational impacts (aesthetics, air quality, greenhouse gas emissions, noise, public services, recreation, and utilities) due to the reduced buildout. Nonetheless, compared to the proposed project, Alternative 2 would not fulfill the project objectives as well. This is because the proposed project would offer more housing opportunities and a diversity of land uses for future Ukiah residents.

Pursuant to CEQA requirements, Alternative 2 would be considered the environmentally superior alternative; however, the proposed project would offer benefits that would not be achieved by Alternative 2, primarily housing opportunities and a diversity of land uses.

Table 5-2 Impact Comparison of Alternatives

Issue	Proposed Project Impact Classification	Alternative 1: No Project	Alternative 2: Decreased Residential Density
Aesthetics	Less than Significant	+	+
Agriculture and Forestry Resources	Less than Significant	=	=
Air Quality	Significant and Unavoidable	+	+
Biological Resources	Less than Significant with Mitigation Incorporated	+	+
Cultural Resources	Significant and Unavoidable	+	+
Greenhouse Gas Emissions	Significant and Unavoidable	-	+
Land Use and Planning	Less than Significant	=	=
Noise	Significant and Unavoidable	+	+
Population and Housing	Less than Significant	+	+
Public Services and Recreation	Less than Significant	+	+
Transportation	Less than Significant	-	-
Tribal Cultural Resources	Less than Significant with Mitigation Incorporated	+	+
Utilities and Service Systems	Less than Significant	+	+

Issue	Proposed Project Impact Classification	Alternative 1: No Project	Alternative 2: Decreased Residential Density
Wildfire	Less than Significant with Mitigation Incorporated	=	=
Paleontological Resources	Less than Significant with Mitigation Incorporated	+	+
<p>+ Superior to the proposed project (reduced level of impact)</p> <p>- Inferior to the proposed project (increased level of impact)</p> <p>= Similar level of impact to the proposed project</p>			

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