CHAPTER 5: ALTERNATIVES TO THE PROPOSED PROJECT

5.1 - Introduction

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

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

5.1.1 - Significant Unavoidable Impacts

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

- **Views from Peterson Road: T**he proposed project would impact views of Potrero Hills from a segment of Peterson Road. The project has been designed, however, to retain some intermittent views for any passersby who might be inclined toward viewing Potrero Hills from their moving vehicle. Despite the views of Potrero Hills being fleeting and partially obstructed, and despite the non-mandatory nature of the applicable policy, views from the approximate 0.5-mile stretch of Peterson Road along the project site would be degraded in a manner that may be considered substantially adverse by certain individuals. As a result, this direct and cumulative impact is considered potentially significant, with no known feasible mitigation to lessen it.
- **Consistency with Air Quality Management Plan:** The proposed project would emit criterial pollutants during construction and operations that would exceed adopted thresholds and, thus, be inconsistent with regional air quality planning assumptions. Mitigation is proposed requiring emissions reduction measures. However, after implementation of feasible mitigation, criterial pollutant would still exceed adopted thresholds. The residual significance of this impact is significant and unavoidable.
- **Cumulative Criteria Pollutant Emissions:** The proposed project would emit criterial pollutants during construction and operations that would exceed adopted thresholds. Mitigation is proposed requiring emissions reduction measures. However, after implementation of feasible

mitigation, criterial pollutant emissions would still exceed adopted thresholds. The residual significance of this impact is significant and unavoidable.

- **Special-status Species:** The proposed project would result in adverse impacts to the pappose tarplant. Mitigation is proposed requiring either salvaged seeds to be provided to a mitigation bank or the purchase of credits at a mitigation bank. However, there is uncertainty regarding whether mitigation banks would accept salvaged seeds or have credits available for purchase and, therefore, the residual significance of this impact is significant and unavoidable.
- **Greenhouse Gas Emissions:** The proposed project would emit greenhouse gas (GHG) emissions during construction and operations that would exceed adopted thresholds. Mitigation is proposed requiring emissions reduction measures. However, after implementation of feasible mitigation, operational, and cumulative GHG emissions would still exceed adopted thresholds. The residual significance of this impact is significant and unavoidable.
- **Vehicle Miles Traveled:** The proposed project's Vehicle Miles Traveled (VMT) per employee would exceed adopted thresholds. Mitigation is proposed requiring implementation of transportation demand management measures. However, because the lead agency cannot assure that the transportation demand measures would reduce VMT, the residual significance of this impact is significant and unavoidable.

5.1.2 - Alternatives to the Proposed Project

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

- **No Project Alternative:** The project site would remain undeveloped for the foreseeable future and no development would occur.
- **Reduced Density Alternative:** A 1.55-million-square-foot logistics center would be developed on the project site, which represents a 25 percent reduction in square footage relative to the proposed project. The layout and project boundaries would remain the same as the proposed project.
- **Buildings A, B, C Only Alternative:** Buildings A, B, C which total 544,965 square feet, would be developed on 67 acres. The remaining 100 acres of the project site would remain undeveloped.

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

5.2 - Project Objectives

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

1. Promote economic growth through new capital investment, expansion of the tax base, creation of new employment opportunities, and payment of development fees.
2. Develop compatible land uses near Travis Air Force Base in the interests of avoiding interference with military operations and furthering the objectives of the Travis Sustainability Study.
3. Attract new employment-creating industries to Suisun City that generate new tax revenue and minimize demands on City services.
4. Improve Suisun City's jobs-housing ratio by locating employment opportunities near residential areas.
5. Continue the orderly development of the eastern gateway of Suisun City with a well-designed project.
6. Further the goals and policies of the City of Suisun City General Plan by developing land contemplated to support urban development to its highest and best use.
7. Preserve the most biologically sensitive portions of the project site as open space.
8. Install circulation improvements along Walters Road and Petersen Road that provide efficient ingress and egress to the proposed project while also ensuring these facilities operate at acceptable levels.
9. Promote public safety by incorporating security measures into the project design.
10. Mitigate impacts on the environment through implementation of feasible mitigation measures.

5.3 - Alternative 1—No Project Alternative

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

In this case, the project site is undeveloped and has supported agricultural land use activities for more than 70 years and is zoned for agricultural uses. The project site has never supported urban development and is located within unincorporated Solano County. Thus, the No Project Alternative

would represent the scenario in which the project site remains undeveloped and in unincorporated Solano County, and would continue to support agricultural land use activities for the foreseeable future. Additionally, under the No Project Alternative, the Suisun City General Plan would not be amended and the project site would not be annexed into the Suisun City limits.

5.3.1 - Impact Analysis

The project site would remain undeveloped and may continue to support cattle grazing. Accordingly, this alternative would avoid all of the proposed project's significant impacts (including significant unavoidable impacts), as well as the need to implement any mitigation measures.

5.3.2 - Conclusion

The No Project Alternative would avoid all of the proposed project's significant impacts. However, the No Project Alternative would not advance any of the project objectives.

Although the County included the project site within the Travis Reserve Area Overlay Zone, which limits incompatible adjacent uses and protects the ability of the Base to expand, the Overlay Zone does not entirely prevent development. Development of sites within the Travis Area Overlay Zone would be subject to additional requirements, limitations, and regulations accordingly. Under the no project alternative, future development of the site with other uses may be slowed. However, as a practical matter, it is highly unlikely that the project site would remain in active agricultural use given that (1) the site is contiguous to existing urban development within the Suisun City limits; (2) it is within the Suisun City Sphere of Influence; (3) it has access to regional routes (State Route [SR] 12 and Walters Road); (4) it has access to utilities and infrastructure; and (5) it is suitable to support urban development.

5.4 - Alternative 2—Reduced Density Alternative

Under the Reduced Density Alternative, a 1,544,000-square-foot logistics center would be developed on the project site, which represents a 25 percent reduction in the proposed project's square footage. This would yield a 514,667-square-foot reduction in buildout potential, which would be applied proportionately to all project buildings. The reduction in building square footage would allow for 10 additional acres of the site to be preserved in its natural state.

The project boundaries, layout, (including disturbance area) and high-cube warehouse end uses would remain the same. Vehicular access points would remain at the same locations. This alternative would employ 1,544 workers, which is 515 fewer jobs than the proposed project.

Table 5-1 summarizes the Reduced Density Alternative. The purpose of this alternative is to evaluate a smaller project with end uses identical to the proposed project that may avoid or substantially lessen the severity of significant project impacts.

Table 5-1: Reduced Density Alternative

Scenario	Acres	End Use	Square Feet
Reduced Density Alternative	167	High-Cube Warehouse	1,544,000
Proposed Project	167	High-Cube Warehouse	2,058,667
Difference	**–**	**–**	**(514,667)**
Source: FirstCarbon Solutions (FCS). 2023.			

5.4.1 - Impact Analysis

Aesthetics, Light, and Glare

The Reduced Density Alternative consists of developing 1,544,000 square feet of high-cube warehouse uses and associated infrastructure on the project site. Similar exterior light fixtures would be installed, and mitigation would be implemented. The buildings developed under this alternative would retain a similar appearance to the proposed project's structures; however, 514,667-square-foot reduction in warehouses would reduce the amount of development on the project site and add 10 acres to the open, natural area of the site, reducing and avoiding the intermittent blockage of views of Potrero Hills from Peterson Road. However, even with a significant reduction in square footage, this alternative would not retain every foot of visibility of Potrero Hills from Peterson Road. Therefore, the Reduced Density Alternative would have less impact on aesthetics, light, and glare than the proposed project but would not reduce direct or cumulative impacts related to views of Potrero Hills to below a level of significance.

Air Quality

The Reduced Density Alternative would result in less construction activity and 931 fewer daily vehicle trips (refer to Table 5-2), which have corresponding reductions in the severity of construction and operational criteria pollutant and toxic air contaminant emissions. The proposed project is anticipated to generate approximately 3,726 daily passenger vehicle trips during full operation. The Reduced Density Alternative would represent a 25 percent reduction in vehicle trips, which corresponds to an approximate 25 percent reduction in criteria air pollutant and toxic air contaminant (TAC) emissions from passenger vehicles. Additionally, this alternative would attract fewer truck trips and, thus, lessen the severity of the significant unavoidable sensitive receptor impact. Mitigation measures would be implemented under this alternative. Although this alternative would not avoid the proposed project's significant unavoidable air quality impacts, it would lessen the severity by emitting fewer pollutants from operational activities, primarily from mobile source emissions. Therefore, this alternative would have a lesser impact on air quality than the proposed project.

Biological Resources

Similar ground-disturbing activities would occur within the same development footprint as the proposed project, and Mitigation Measures (MM) BIO-1a through MM BIO-1j, MM BIO-3a, and MM BIO-3b would be implemented. Because the ground-disturbing activities would be similar to the

proposed project, significant and unavoidable direct and cumulative impacts to pappose tarplant would remain similar to the proposed project. Therefore, the Reduced Density Alternative would have similar biological resources impacts as the proposed project.

Cultural and Tribal Cultural Resources

Similar ground-disturbing activities would occur within the same development footprint as the proposed project, and mitigation measures would be implemented. Therefore, the Reduced Density Alternative would have similar cultural resources impacts as the proposed project.

Geology, Soils, and Seismicity

Similar development activities would occur within the same development footprint, and mitigation measures would be implemented. Therefore, the Reduced Density Alternative would have similar geology, soils, and seismicity resources impacts as the proposed project.

Greenhouse Gas Emissions and Energy

The Reduced Density Alternative would result in less construction activity and 931 fewer daily vehicle trips (refer to Table 5-2), which have corresponding reductions in the severity of construction and operational GHG emissions. The proposed project is anticipated to generate approximately 3,726 daily passenger vehicle trips during full operation. The Reduced Density Alternative would represent a 25 percent reduction in vehicle trips, which corresponds to an approximate 25 percent reduction in criteria air pollutant and TAC emissions from passenger vehicles. Mitigation measures would be implemented under this alternative. Although this alternative would not avoid the proposed project's significant unavoidable direct and cumulative GHG emission impacts, it would lessen the severity by emitting fewer emissions from operational activities. Therefore, this alternative would have a lesser impact on GHG emissions than the proposed project.

Hazards and Hazardous Materials

As with the proposed project, no hazardous conditions exist on-site, and, therefore, impacts would be less than significant. This alternative would result in a 514,667-square-foot reduction in high-cube warehouse development potential and, thus, would reduce ground-disturbing activity and the potential for hazardous material releases during construction and operations. Similar to the proposed project, this alternative would involve excavations that occur near hazardous materials pipelines. Accordingly, this alternative would be required to implement a measure similar to Mitigation Measure (MM) HAZ-2, which requires that pipeline safety requirements be implemented prior to the first ground-disturbing activities. Implementation of these measures would ensure that, in the unlikely event of a pipeline rupture caused by construction activities associated with this alternative, construction personnel have properly identified the location of all pipelines and taken appropriate precautions to minimize hazards. Additionally, this alternative would be located on a site that has been utilized for agricultural land use activities for more than 70 years and previously supported several buildings that were constructed prior to the federal bans on asbestos-containing material (ACM) and lead-based paint (LBP). Thus, there is the potential that residual concentrations of pesticides, organochloride termiticides, ACMs, or LBP may be present on-site. Therefore, this alternative would implement measures similar to MM HAZ-3a and MM HAZ-3b to require further

testing and investigations for these materials and abate any hazardous conditions found to be present prior to grading. Similarly, because the site has septic systems and wells that are currently present or were formerly present on-site, this alternative would implement mitigation similar to MM HAZ-3c to require the destruction of any unused septic system or wells in accordance with Solano County Code Chapter 6.4 and Chapter 13.10 prior to grading. This would ensure that, similar to the proposed project, this alternative does not adversely impact groundwater resources through improperly abandoned wells or septic systems that serve as vectors for contamination. However, due to the reduction in ground-disturbing activity associated with this alternative, the less than significant impacts would be slightly reduced compared to the proposed project. With the implementation of mitigation, impacts under this alternative would be reduced to a level of less than significant.

This alternative would also be located within Zone B1 and Zone C of the Travis Air Force Base Land Use Compatibility Plan. Although, this alternative would produce less light and glare compared to the proposed project, because it would develop uses similar to the proposed project, this alternative would implement a measure akin to MM AES-3, which requires the proposed project be designed to reduce light and glare hazards, which would reduce the impact to a level of less than significant. Therefore, this alternative would have similar, but due to the reduced density slightly less, impact on hazards and hazardous materials impacts than the proposed project.

Hydrology and Water Quality

Similar ground-disturbing activities would occur within the same development footprint, and MM HYD-1a and MM HYD-1b would be implemented. This alternative would reduce the proposed project's less than significant (after mitigation) hydrology and water quality impacts because there would be less impervious surface coverage. Therefore, the Reduced Density Alternative would have less impact on hydrology and water quality than the proposed project.

Land Use

This alternative would develop similar uses to the proposed project, and, therefore, would yield similar conclusions in terms of consistency with the Suisun City General Plan, Suisun City Code, and the Travis Air Force Base Airport Land Use Compatibility Plan. Therefore, the Reduced Density Alternative would have land use impacts similar to the proposed project.

Noise

The Reduced Density Alternative would result in less construction activity and 931 fewer daily vehicle trips (refer to Table 5-2), which would have corresponding reductions in the severity of construction and operational noise impacts. MM NOI-1 would be implemented under this alternative. Although this alternative would implement mitigation measures similar to the proposed project, the reduction in development potential and vehicle trips would reduce the severity of noise impacts. Therefore, this alternative would have less impact on noise than the proposed project.

Public Services

End uses would be similar to the proposed project. Although the proposed project's public services impacts were found to be less than significant and did not require mitigation, this alternative would

result in less demand for fire protection and police protection through the 514,667-square-foot reduction in development potential. Therefore, the Reduced Density Alternative would have less impact on public services than the proposed project.

Transportation

Table 5-2 summarizes the daily and peak-hour trip generation associated with the Reduced Density Alternative. As shown in the table, this alternative would yield a reduction of 931 daily vehicle trips, 77 AM peak-hour vehicle trips, and 82 PM peak-hour vehicle trips. The proposed project's VMT transportation impacts were found to be significant and unavoidable after mitigation. The Reduced Density Alternative would still be located on the same site, with the same access to alternative transportation. Accordingly, VMT per employee would be similar to the proposed project and would be significant and unavoidable, even though this alternative would employ 515 fewer individuals. Thus, the substantial reduction of 515 employees under the Reduced Density Alternative would be considered beneficial from a transportation perspective because it would result in fewer total trips and vehicles, although it would not reduce the impact to a level of less than significant because VMT per employee would remain the same as the proposed project. Additionally, this alternative would not help improve the City's jobs-to-housing ratio. Accordingly, this alternative would result in both direct and cumulative VMT impacts. However, the Reduced Density Alternative would have less transportation impacts than the proposed project.

Table 5-2: Reduced Density Alternative Trip Generation Comparison

Scenario	Daily	AM Peak-hour	PM Peak-hour
Reduced Density Alternative	2,795	232	247
Proposed Project	3,726	309	329
Difference	**(931)**	**(77)**	**(82)**

Notes:
Source: W-Trans. 2021; FirstCarbon Solutions (FCS). 2023.

Utilities and Service Systems

End uses would be similar to the proposed project. Although the proposed project's utilities and service system impacts were found to be less than significant and did not require mitigation, this alternative would result in less demand for water, and energy, and less generation of wastewater and solid waste through the 514,667-square-foot reduction in development potential. Therefore, the Reduced Density Alternative would have less impact on utilities and service systems than the proposed project.

5.4.2 - Conclusion

The Reduced Density Alternative would lessen the severity of, but would not avoid, the significant and unavoidable aesthetic, air quality, GHG emissions, biology, and transportation impacts associated with the proposed project. Additionally, the Reduced Density Alternative would lessen the severity of several of the significant impacts that can be reduced to a level of less than significant

with mitigation (e.g., biological resources, cultural resources, hydrology and water quality, and noise).

The Reduced Density Alternative would advance all of the project objectives, with several advanced to a lesser degree. However, the reduction in square footage would result in fewer positive economic benefits and, thus, would advance the project objectives to a lesser degree. (For example, this alternative would be expected to employ 515 fewer workers than the proposed project.) This includes objectives related to facilitating the development of land planned for business park/industrial uses to its highest and best use; positively contributing to the local economy; providing the City of Suisun City with a high-quality, employment-generating industrial development; and serving local and regional demand for logistics warehouse uses.

5.5 - Alternative 3—Buildings A, B, C Only Alternative

Buildings A, B, and of the proposed project would be developed, which consists of 544,965 million square feet on 67 acres. Buildings D, E, and F would not be pursued and the remaining 100 acres would remain undeveloped and preserved as open space. There would be a net reduction of 1,513,702 square feet in warehouses under this alternative.

Buildings A, B, and C would have the same layout and boundaries as the proposed project. Three high-cube warehouses totaling 544,965 million square feet would be developed on 67 acres along the south side of Petersen Road. Vehicular access would be taken from both Walters Road and Petersen Road. Storm drainage basins would be developed south of the warehouses. This alternative would employ 545 workers, which is 1,514 fewer jobs than the proposed project.

Table 5-3 summarizes the Buildings A, B, C Only Alternative. The purpose of this alternative is to evaluate the portion of the proposed project most likely to develop in the near-term and also reduce the development footprint and buildout potential to avoid or substantially lessen the severity of significant project impacts.

Table 5-3: Buildings A, B, C Only Alternative

Scenario	Acres	End Use	Square Feet
Buildings A, B, C Only Alternative	67	High-Cube Warehouse	544,965
Proposed Project	167	High-Cube Warehouse	2,058,667
Difference	**(100)**	**–**	**(1,513,702)**
Source: FirstCarbon Solutions (FCS). 2023.			

5.5.1 - Impact Analysis

Aesthetics, Light, and Glare

The Buildings A, B, C Only Alternative consists of developing 544,965 square feet of high-cube warehouse uses and associated infrastructure on 67 acres along Peterson Road. The remaining 100

acres would remain undeveloped for the foreseeable future but would be subject to potential future development. Similar to the proposed project, the development of the Buildings A, B, C Only alternative would result in impacts to views from Peterson Road. Because this alternative would also obscure views of Potrero Hills from the same segment of Peterson Road as the proposed project, direct and cumulative impacts to scenic resources as viewed from Peterson Road would be significant and unavoidable under this alternative.

Similar exterior light fixtures would be installed, and mitigation would be implemented. The buildings developed under this alternative would retain a similar appearance to the proposed project's structures; however, the more than half million square-foot reduction in warehouses would reduce the amount of development and add 100 acres to the open, natural area of the site. Therefore, the Buildings A, B, C Only Alternative would reduce the proposed project's less than significant impacts on aesthetics, light, and glare.

Air Quality

The Buildings A, B, C Only Alternative would result in less construction activity and 2,738 fewer daily vehicle trips (refer to Table 5-4), which have corresponding reductions in the severity of construction and operational criteria pollutant and toxic air contaminant emissions. The proposed project is anticipated to generate approximately 3,726 daily passenger vehicle trips during full operation. The Buildings A, B, and C Only Alternative would represent an 73 percent reduction in vehicle trips, which corresponds to an approximate 73 percent reduction in criteria air pollutant and TAC emissions from passenger vehicles. Additionally, this alternative would attract fewer truck trips and, thus, lessen the severity of the significant unavoidable sensitive receptor impact. Mitigation measures would be implemented under this alternative. Although this alternative would not avoid the proposed project's significant unavoidable air quality impacts, it would lessen the severity by emitting fewer pollutants from operational activities. Therefore, this alternative would have a lesser impact on air quality than the proposed project.

Biological Resources

The Buildings A, B, C Only Alternative consists of developing 544,965 square feet of high-cube warehouse uses and associated infrastructure on 67 acres. The remaining 100 acres would remain undeveloped for the foreseeable future. Similar development activities would occur for Phase 1 and, therefore, MM BIO-1a through MM BIO-1j, MM BIO-3a and MM BIO-3b would be implemented. However, the elimination of more than a half million square feet would lessen the potential for impacts to biological resources. Therefore, the Buildings A, B, C Only Alternative would result in less impact on biological resources impacts than the proposed project, but the direct and cumulative impact to pappose tarplant would still remain significant and unavoidable because of uncertainty that a for-profit organization or non-profit would be willing to accept salvaged seed to implement off-site restoration, habitat enhancement, or research to offset the occupied habitat, or that a mitigation bank will have pappose tarplant credits available prior to the start of construction.

Cultural and Tribal Cultural Resources

The Buildings A, B, C Only Alternative consists of developing 544,965 square feet of high-cube warehouse uses and associated infrastructure on 67 acres. The remaining 100 acres would remain undeveloped for the foreseeable future. Similar development activities would occur for this alternative and, therefore, mitigation measures would be implemented. However, the elimination of more than a half million square feet would lessen the potential for impacts to cultural resources. Therefore, the Buildings A, B, C Only alternative would have less impact on cultural resources impacts than the proposed project.

Geology, Soils, and Seismicity

The Buildings A, B, C Only Alternative consists of developing 544,965 square feet of high-cube warehouse uses and associated infrastructure on 67 acres. The remaining 100 acres would remain undeveloped for the foreseeable future. Similar development activities would occur for Phase 1 and, therefore, MM GEO-1 and MM GEO-5 would be implemented. However, the elimination of more than a half million square feet would lessen the potential for impacts to geology, soils, and seismicity. Therefore, the Buildings A, B, C Only Alternative would have less impact on geology, soils, and seismicity than the proposed project.

Greenhouse Gas Emissions and Energy

The Buildings A, B, C Only Alternative would result in less construction activity and 2,738 fewer daily vehicle trips (refer to Table 5-4), which have corresponding reductions in the severity of construction and operational GHG emissions. The proposed project is anticipated to generate approximately 3,253 daily passenger vehicle trips during full operation. The Buildings A, B, and C Only alternative would represent an 73 percent reduction in vehicle trips, which corresponds to an approximate 73 percent reduction in criteria air pollutant and TAC emissions from passenger vehicles. Mitigation measures would be implemented under this alternative. Although this alternative would not avoid the proposed project's significant and unavoidable direct and cumulative GHG emission impacts, it would lessen the severity by emitting fewer emissions from operational activities. Therefore, this alternative would have a lesser impact on GHG emissions than the proposed project.

Hazards and Hazardous Materials

The Buildings A, B, C Only Alternative consists of developing 544,965 square feet of high-cube warehouse uses and associated infrastructure on 67 acres. The remaining 100 acres would remain undeveloped for the foreseeable future. As with the proposed project, no hazardous conditions exist on-site, and, therefore, impacts would be less than significant. This alternative would result in a 1.5-million-square-foot reduction in high-cube warehouse development potential and, thus, would reduce the potential for hazardous material releases during construction and operations. Similar to the proposed project, this alternative would involve excavations that occur near hazardous materials pipelines. Accordingly, this alternative would be required to implement a measure similar to MM HAZ-2 that requires pipeline safety requirements be implemented prior to the first ground-disturbing activities. Implementation of these measures would ensure that, in the unlikely event of a pipeline rupture caused by construction activities associated with this alternative, construction personnel have properly identified the location of all pipelines and taken appropriate precautions to minimize hazards. Additionally, this alternative would be located on a site has been utilized for agricultural

land use activities for more than 70 years and previously supported several buildings that were constructed prior to the federal bans on ACMs and LBP. Thus, there is the potential that residual concentrations of pesticides, organochloride termiticides, ACMs, or LBP may be present on-site. Therefore, this alternative would implement measures similar to MM HAZ-3a and MM HAZ-3b to require further testing and investigations for these materials and abate any hazardous conditions found to be present prior to grading. Similarly, because the site has septic systems and wells that are currently present or were formerly present on-site, this alternative would implement mitigation similar to MM HAZ-3c to require the destruction of any unused septic system or wells in accordance with Solano County Code Chapter 6.4 and Chapter 13.10 prior to grading. This would ensure that, similar to the proposed project, this alternative does not adversely impact groundwater resources through improperly abandoned wells or septic systems that serve as vectors for contamination. However, due to the reduction in ground-disturbing activity associated with this alternative, the less than significant impacts would be slightly reduced compared to the proposed project. With the implementation of mitigation, impacts under this alternative would be reduced to a level of less than significant.

This alternative would also be located within Zone B1 and Zone C of the Travis Air Force Base Land Use Compatibility Plan. Although this alternative would produce less light and glare compared to the proposed project, because it would develop uses similar to the proposed project, this alternative would implement a measure akin to MM AES-3, which requires the proposed project be designed to reduce light and glare hazards, which would reduce the impact to a level of less than significant. Therefore, this alternative would have less impact on hazards and hazardous materials impacts similar to the proposed project; however, due to the significant reduced building footprint and ground-disturbing activities associated with this alternative, the less than significant impact would be correspondingly reduced.

Hydrology and Water Quality

The Buildings A, B, C Only Alternative consists of developing 544,965 square feet of high-cube warehouse uses and associated infrastructure on 67 acres. The remaining 100 acres would remain undeveloped for the foreseeable future. Similar development activities would occur for this alternative and, therefore, mitigation measures would be implemented. However, the elimination of more than a half million square feet would lessen the potential for impacts to hydrology and water quality. Therefore, the Buildings A, B, C Only Alternative would have less impact on hydrology and water quality than the proposed project.

Land Use

The Buildings A, B, C Only Alternative consists of developing 544,965 square feet of high-cube warehouse uses and associated infrastructure on 67 acres. The remaining 100 acres would remain undeveloped for the foreseeable future. This alternative would develop similar uses to the proposed project, and, therefore, would yield similar conclusions in terms of consistency with the Suisun City General Plan, Suisun City Code, and the Travis Air Force Base Land Use Compatibility Plan. Therefore, the Buildings A, B, C Only Alternative would have land use impacts similar to the proposed project.

Noise

The Buildings A, B, C Only Alternative would result in less construction activity and 2,738 fewer daily vehicle trips (refer to Table 5-4), which would have corresponding reductions in the severity of construction and operational noise impacts. MM NOI-1 would be implemented under this alternative. Although this alternative would implement mitigation measures similar to the proposed project, the reduction in development potential and vehicle trips would reduce the severity of noise impacts. Therefore, this alternative would have less impact on noise than the proposed project.

Public Services

End uses would be similar to the proposed project. Although the proposed project's public services impacts were found to be less than significant and did not require mitigation, this alternative would result in less demand for fire protection and police protection through the 1.5 million square-foot reduction in development potential. Therefore, the Buildings A, B, C Only Alternative would have less impact on public services than the proposed project.

Transportation

Table 5-4 summarizes the daily and peak-hour trip generation associated with the Buildings A, B, C Only Alternative. As shown in the table, this alternative would yield a reduction of 2,738 daily vehicle trips, 227 AM peak-hour vehicle trips, and 242 PM peak-hour vehicle trips. The proposed project's transportation impacts related to employee VMT were found significant and unavoidable after mitigation. Under the Buildings A, B, C Only alternative, 1,514 fewer jobs would be added to the City. Thus, the substantial reduction of the Buildings A, B, C Only Alternative would be considered beneficial from a transportation perspective although it would not necessarily reduce the impact to a level of less than significant because the VMT per employee would still exceed the City's threshold. The Buildings A, B, C Only Alternative would have less impact on transportation than the proposed project but would still have a significant and unavoidable direct and cumulative impact related to employee VMT.

Table 5-4: Buildings A, B, C Only Alternative Trip Generation Comparison

Scenario	Daily	AM Peak-hour	PM Peak-hour
Buildings A, B, C Only Alternative	988	82	87
Proposed Project	3,726	309	329
Difference	**(2,738)**	**(227)**	**(242)**

Note:
Source: W-Trans. 2021; FirstCarbon Solutions (FCS). 2023.

Utilities and Service Systems

End uses would be similar to the proposed project. Although the proposed project's utilities and service system impacts were found to be less than significant and did not require mitigation, this alternative would result in less demand for water, and energy, and less generation of wastewater and

solid waste through the 1.5 million square-foot reduction in development potential. Therefore, the Buildings A, B, C Only Alternative would have less impact on utilities and service systems than the proposed project.

5.5.2 - Conclusion

The Buildings A, B, C Only Alternative would lessen the severity of, but would not avoid, the significant and unavoidable aesthetic, air quality, GHG emissions, impacts to pappose tarplant, and transportation impacts associated with the proposed project. Additionally, the Buildings A, B, C Only Alternative would lessen the severity of several of the significant impacts that can be reduced to a level of less than significant with mitigation (e.g., biological resources, cultural resources, hydrology and water quality, and noise).

The Buildings A, B, C Only Alternative would advance all of the project objectives, with several advanced to a lesser degree. However, the reduction in square footage would result in fewer positive economic benefits and, thus, would advance the project objectives to a lesser degree. (For example, this alternative would be expected to employ 1,514 fewer workers than the proposed project.) This includes objectives related to facilitating the development of land planned for business park/industrial uses to its highest and best use; positively contributing to the local economy; providing the City of Suisun City with a high-quality, employment-generating industrial development; and serving local and regional demand for logistics warehouse uses.

5.6 - Environmentally Superior Alternative

The potential significance and qualitative environmental effect of each impact that may result from development under each alternative in relation to the proposed project are summarized in Table 5-5.

Table 5-5: Summary of Alternatives

Environmental Topic Area Potential Impact Threshold	Proposed Project	No Project Alternative	Reduced Density Alternative	Buildings A, B, C Only Alternative
Aesthetics, Light, and Glare				
Impact 1: Scenic Vista	SU (from Peterson Road only)	LTS <	SU <	SU <
Impact 2: Visual character or quality of public views	LTS	LTS <	LTS <	LTS <
Impact 3: New source of light and glare	LTS with Mitigation	LTS <	LTS with Mitigation <	LTS with Mitigation <
Cumulative	SU (impacts to scenic vistas from Peterson Road only)	LTS <	SU <	SU =

Environmental Topic Area Potential Impact Threshold	Proposed Project	No Project Alternative	Reduced Density Alternative	Buildings A, B, C Only Alternative
Air Quality				
Impact 1: Consistency with Air Quality Management Plan	SU	LTS <	SU<	SU<
Impact 2: Cumulative Criteria Pollutant Emissions impacts	SU	LTS <	SU<	SU<
Impact 3: Sensitive receptors exposure to pollutant concentrations	LTS	LTS <	LTS <	LTS <
Impact 4: Objectionable odors	LTS	LTS <	LTS <	LTS <
Cumulative	SU (criteria area pollutants)	LTS <	SU <	SU <
Biological Resources				
Impact 1: Special-Status plant and wildlife species	SU (Pappose Tarplant)	LTS <	SU=	SU<
Impact 2: Sensitive natural communities or riparian habitat	LTS with Mitigation	LTS <	LTS with Mitigation =	LTS with Mitigation <
Impact 3: Wetlands	LTS with Mitigation	LTS <	LTS with Mitigation =	LTS with Mitigation <
Impact 4: Fish or wildlife movement	LTS	LTS <	LTS =	LTS <
Impact 5: Conflict with policies or ordinances protecting biological resources	No impact	No impact	No impact	No impact
Impact 6: Conflict with Solano Multiple Species HCP	LTS with Mitigation	LTS <	LTS with Mitigation =	LTS with Mitigation <
Cumulative	SU (Pappose tarplant, only)	LTS <	SU =	SU =
Cultural and Tribal Cultural Resources				
Impact 1: Historic resource	No impact	No impact	No impact	No impact
Impact 2: Historic resource of archaeological nature or unique archaeological resource	LTS with Mitigation	LTS <	LTS with Mitigation =	LTS with Mitigation <
Impact 3: Human remains	LTS with Mitigation	LTS <	LTS with Mitigation =	LTS with Mitigation <

Environmental Topic Area Potential Impact Threshold	Proposed Project	No Project Alternative	Reduced Density Alternative	Buildings A, B, C Only Alternative
Impact 4: Listed or eligible tribal cultural resources	No impact	No impact	No impact	No impact
Impact 5: Lead agency determined tribal cultural resources	LTS with Mitigation	LTS <	LTS with Mitigation =	LTS with Mitigation <
Cumulative	LTS with Mitigation	LTS <	LTS with Mitigation =	LTS with Mitigation <
Geology, Soils, and Seismicity				
Impact 1: Seismic hazards	LTS with Mitigation	LTS <	LTS with Mitigation =	LTS with Mitigation <
Impact 2: Soil erosion or loss of topsoil	LTS with Mitigation	LTS <	LTS with Mitigation =	LTS with Mitigation <
Impact 3: Unstable geologic unit or soil	LTS	LTS <	LTS =	LTS <
Impact 4: Expansive soil	LTS with Mitigation	LTS <	LTS with Mitigation =	LTS with Mitigation <
Impact 5: Unique paleontological resource or site or unique geologic feature	LTS with Mitigation	LTS <	LTS with Mitigation =	LTS with Mitigation <
Cumulative	LTS with Mitigation	LTS <	LTS with Mitigation =	LTS with Mitigation <
Greenhouse Gas Emissions and Energy				
Impact 1: Generation of GHG emissions	SU	LTS <	SU <	SU <
Impact 2: Conflict with plan, policy, or regulation that reduces GHG emissions	LTS	LTS <	LTS <	LTS <
Impact 3: Energy consumption	LTS	LTS <	LTS <	LTS <
Impact 4: Conflict with plan for renewable energy or energy efficiency	LTS	LTS <	LTS <	LTS <
Cumulative	SU	LTS <	SU <	SU <
Hazards and Hazardous Materials				
Impact 1: Routine transport, use, or disposal of hazardous materials	LTS	LTS <	LTS <	LTS <
Impact 2: Upset and accident conditions	LTS with Mitigation	LTS <	LTS with Mitigation <	LTS with Mitigation <

Environmental Topic Area Potential Impact Threshold	Proposed Project	No Project Alternative	Reduced Density Alternative	Buildings A, B, C Only Alternative
involving release of hazardous materials				
Impact 3: Site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5	LTS with Mitigation	LTS <	LTS with Mitigation <	LTS with Mitigation <
Impact 4: Aviation safety	LTS with Mitigation	LTS <	LTS with Mitigation <	LTS with Mitigation <
Cumulative	LTS with Mitigation	LTS <	LTS with Mitigation <	LTS with Mitigation <
Hydrology and Water Quality				
Impact 1: Surface water quality	LTS with Mitigation	LTS <	LTS with Mitigation <	LTS with Mitigation <
Impact 2: Deplete groundwater supplies or interfere with groundwater recharge	LTS	LTS <	LTS <	LTS <
Impact 3: Stormwater drainage systems	LTS	LTS <	LTS <	LTS <
Impact 4: 100-year flood hazard area	LTS	LTS <	LTS <	LTS <
Impact 5: Inundation from dam failure	LTS	LTS <	LTS <	LTS <
Cumulative	LTS with Mitigation	LTS <	LTS with Mitigation <	LTS with Mitigation <
Land Use				
Impact 1: Suisun City General Plan consistency	LTS	LTS <	LTS =	LTS =
Impact 2: Suisun City Code consistency	LTS	LTS <	LTS =	LTS =
Impact 3: Travis Air Force Base Land Use Compatibility Plan consistency	LTS	LTS <	LTS =	LTS =
Impact 4: Local Agency Formation Commission consistency	LTS	LTS <	LTS =	LTS =
Cumulative	LTS	LTS <	LTS =	LTS =

Environmental Topic Area Potential Impact Threshold	Proposed Project	No Project Alternative	Reduced Density Alternative	Buildings A, B, C Only Alternative
Noise				
Impact 1: Substantial noise increase in excess of standards	LTS with Mitigation	LTS <	LTS with Mitigation <	LTS with Mitigation <
Impact 2: Substantial permanent noise increase	LTS	LTS <	LTS <	LTS <
Impact 3: Excessive groundborne vibration or groundborne noise levels	LTS	LTS <	LTS <	LTS <
Impact 4: Excessive noise levels from airport activity	LTS	LTS <	LTS <	LTS <
Cumulative	LTS	LTS <	LTS <	LTS <
Public Services				
Impact 1: Fire protection	LTS	LTS <	LTS <	LTS <
Impact 2: Police protection	LTS	LTS <	LTS <	LTS <
Cumulative	LTS	LTS <	LTS <	LTS <
Transportation				
Impact 1a: Effect on circulation system–intersection operation, roadway segment operation, and queueing	No impact	No impact	No impact	No impact
Impact 1b: Effect on circulation system–transit, roadway, bicycle, and pedestrian facilities	LTS	LTS <	LTS <	LTS <
Impact 2: Vehicle miles traveled	SU	LTS <	SU =	SU =
Impact 3: Hazards due to a geometric design feature or incompatible uses	LTS with Mitigation	LTS <	LTS with Mitigation <	LTS with Mitigation <
Impact 4: Inadequate emergency access	LTS with Mitigation	LTS <	LTS with Mitigation <	LTS with Mitigation <
Cumulative	SU (VMT only)	LTS <	SU <	SU <
Utilities and Service Systems				
Impact 1: Water supply	LTS	LTS <	LTS <	LTS <
Impact 2: Wastewater	LTS	LTS <	LTS <	LTS <
Impact 3: Storm drainage	LTS	LTS <	LTS <	LTS <
Impact 4: Solid waste	LTS	LTS <	LTS <	LTS <

Environmental Topic Area Potential Impact Threshold	Proposed Project	No Project Alternative	Reduced Density Alternative	Buildings A, B, C Only Alternative
Cumulative	LTS	LTS <	LTS <	LTS <

Key:
SU = Significant and Unavoidable
LTS with mitigation = Less than significant with mitigation incorporated
LTS = Less than significant
< Impact considered less when compared with the proposed project.
= Impact considered equal to the proposed project.
> Impact considered greater when compared with the proposed project.

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

Of the two remaining alternatives, Buildings A, B, C Only Alternative would have the greatest reduction in the severity of impacts. Therefore, the Buildings A, B, C Only Alternative is the environmentally superior alternative.

5.7 - Alternatives Rejected From Further Consideration

5.7.1 - Alternative Location

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

1. Site suitability
2. Economic viability
3. Availability of infrastructure
4. General Plan consistency
5. Other plans or regulatory limitations
6. Jurisdictional boundaries
7. Whether the project applicant can reasonably acquire, control, or otherwise have access to the alternative site

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

Table 5-6 evaluates the feasibility of a potential alternative location within the Suisun City Sphere of Influence.

Table 5-6: Alternative Location Feasibility Analysis

Site	Description	Analysis
Gentry	Approximately 473 acres bounded by Ledgewood Creek (west), SR-12 (north), Suisun Drainage Canal (east), and Cordelia Road (south) in unincorporated Solano County. The site is within the Suisun City Sphere of Influence. The Gentry site gently slopes from north to south and contains undeveloped land used for grazing. Two existing utility easements cross the site in a northeast-to-southwest direction. The California Northern Branch Line to American Canyon crosses through the project site from east to west. The Branch Line's wye or junction with the Union Pacific Railroad is located east of the site. Pennsylvania Avenue bisects the site from north to south and provides vehicular access. The Gentry site is designated "Agricultural" by the Solano County General Plan and is zoned "Exclusive Agricultural 40 Acres (A-40)" by the Solano County Zoning Ordinance. The City General Plan designates the site "Commercial Mixed-use" and "Agriculture and Open Space," which are non-binding designations.	**Not Feasible:** The applicant owns this site and has filed an application with Suisun City to develop a 1.28-million-square-foot logistics center on 93 acres of it. The proposed project consists of a 2.1-million-square-foot logistics center on 167 acres and, therefore, this site would not provide sufficient acreage to realize the project objectives.
Source: FirstCarbon Solutions (FCS). 2023.		