6 Alternatives

As required by Section 15126(d) of the State CEQA Guidelines, this EIR examines a reasonable range of alternatives to the proposed 2022 RTP/SCS. Section 15126.6 of the CEQA Guidelines requires that an EIR "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives."

In addition, the CEQA Guidelines state the following:

- An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are infeasible. The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly discuss the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (i) failure to meet most of the basic project objectives, (ii), infeasibility, or (iii) inability to avoid significant environmental impacts. (CEQA Guidelines Section 15126.6(a)(c).)
- "Feasible" means capable of being accomplished within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors. (CEQA Guidelines Section 15364.)

The primary objective of the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) is to comply with applicable regulatory requirements, including California Transportation Commission (CTC) Guidelines and Senate Bill (SB) 375 regional greenhouse gas (GHG) reduction targets. SJCOG's specific objectives for the proposed 2022 RTP/SCS are to additionally ensure that the transportation system planned for the SJCOG region accomplishes the following:

- Serves regional goals, objectives, policies and plans.
- Responds to community and regional transportation needs.
- Promotes energy efficient, environmentally sound modes of travel and facilities and services.
- Promotes equity and efficiency in the distribution of transportation projects and services.

More specific objectives of the proposed 2022 RTP/SCS are listed in Section 2.2 of the Project Description.

Each scenario analyzed during the RTP/SCS process was developed according to a theme to help ensure that choices regarding land use and transportation investments were consistent with one another. Land use choices in each scenario included development patterns, such as where to locate new housing, new job centers, and new mixed-use areas relative to existing communities (e.g., infill vs. converted farmland or open space). They also considered the density of new development, which dictates the relative proportion of large-lot single-family housing to small-lot single-family

housing and multifamily housing, and complementary uses, such as locating new housing near services and employment centers. Transportation investment choices in a scenario included decisions about spending levels on new roadway capacity, roadway maintenance, transit, and alternative modes of travel (e.g., bike and pedestrian). The alternative land use and transportation scenarios modeled and analyzed by SJCOG are described in Appendix S of the proposed 2022 RTP/SCS and the preferred scenario (proposed project) is described in detail within Chapter 1, *Introduction, Chapter 2, Public Engagement*, and *Chapter 3, Policies and Strategies* of the proposed 2022 RTP/SCS, as well as Chapter 2 of this EIR.

6.1 Alternatives Development and Screening Process

During the development of the proposed 2022 RTP/SCS, SJCOG developed and evaluated scenarios that included various land use assumptions to see how each scenario could achieve the GHG targets established by CARB for the SJCOG region as well as other performance measures based on the proposed transportation system improvements and investments in the RTP. Extensive outreach with partner agencies, local jurisdictions, key stakeholders, and the public was ongoing throughout the proposed 2022 RTP/SCS planning process. Four scenarios were evaluated by SJCOG. The proposed 2022 RTP/SCS evaluated throughout this EIR is Scenario E. Alternative 1 is Scenario A, Alternative 2 is Scenario B, and Scenarios C and D are discussed under Section 6-3, *Alternatives Considered but Rejected*.

This alternatives analysis herein includes the following:

- **Alternative 1: No Project Alternative** (SCS Scenario A: Stay the Course). In this scenario, the region does not change course and makes investments based on the last regional plan. Growth occurs primarily in new growth areas identified in the region's General or Specific Plans. The prioritized land use strategies include the following:
  - Prioritize projects that make more efficient use of existing road network
  - Prioritize large employer recruitment
  - Improve access to safe and convenient walking and biking options
  - Prioritize projects that improve and expand access to public transit

  Transportation investments are focused on managed lanes, ACE Rail, enhanced bus rapid transit. The prioritized transportation strategies include the following:

  - Only transportation projects included in the 2018 RTP would be constructed (excludes projects listed in Table 6-1)
  - Prioritize expanding the roadway network
- **Alternative 2: Remake Centers and Corridors** (SCS Scenario B: Remake Centers and Corridors). Traditional employment centers and aging commercial corridors are remade into residentially-focused neighborhoods. Growth is focused on urban arterials, existing neighborhoods, and job centers. The prioritized land use strategies include the following:
  - Encourage infill development
  - Promote a broader range of housing types
  - Develop a regional trust fund dedicated to addressing housing issues

Transportation focus investments in transit and bike/ped for infill locations along existing arterials, improvements/maintenance to local arterials to facilitate new types of development. The prioritized land use strategies include the following:

- Prioritize "complete streets" projects throughout the region
- Greater prioritization on projects that improve and expand access to public transit

Each alternative is described and analyzed below to determine whether environmental impacts would be similar to, less than, or greater than those of the preferred scenario in the proposed 2022 RTP/SCS. As required by CEQA, this section also includes a discussion of the "environmentally superior alternative" among those studied.

6.2 Alternatives Considered but Rejected

The CEQA Guidelines state that an EIR should identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination (CEQA Guidelines Section 15126.2(c). Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are (i) failure to meet most of the basic project objectives, (ii), infeasibility, or (iii) inability to avoid significant environmental impacts (CEQA Guidelines Section 15126.6(c)).

For this EIR, two alternatives were considered by SJCOG and rejected as infeasible. These alternatives and the reasons for elimination are described below.

6.2.1 20 Minute Neighborhoods

The 20 Minute Neighborhoods Alternative (SCS Scenario C: 20 Minute Neighborhoods) plans new growth areas that are redesigned to accommodate a greater mix of uses and modes. Commercial uses develop in traditionally residential areas. This scenario provides a broader range of daily destinations close to home and prioritizes transportation investments in transit and bike/pedestrian facilities for new growth locations that improves internal circulation in these neighborhoods. In SJCOG modeling, this alternative had similar impacts to the proposed project for farmland and total land consumed, energy, and Total VMT, but greater impact on Prime Farmland and increased impacts to environmental justice (EJ) communities, land use, hazards, and noise due to the more compact development. Therefore, this alternative was rejected as it was not environmentally superior to the project and similar in impacts to the proposed project.

6.2.2 Commuter Villages

The Commuter Villages Alternative (SCS Scenario D: Commuter Villages) incentivizes household and employment growth in urban arterials near existing and planned regional rail stations and near existing and planned high quality transit hubs. Transportation priorities would reinforce transit-oriented development by focusing on first mile/last mile connections to transit hubs (rail and bus transfer hubs). In SJCOG modeling, this alternative had similar impacts to the proposed 2022 RTP/SCS for farmland, total land consumed, and VMT. Therefore, this alternative was rejected as it was not environmentally superior to the project and similar in impacts to the proposed project.

6.2.3 Aggressive VMT Reduction Alternative

Due to the nature of the SJCOG region, certain aggressive VMT reducing measures are infeasible. For example, the region has a high variability in residential density and has a large rural component, with substantially longer trip lengths and therefore higher VMT for those in rural areas and commuting outside the region. These commuter trips are not easily replaced by transit, as longer transit trip lengths typically require multiple stops and/or transfers, making commuting via transit less attractive. These industries require a high level of in-person work and are therefore not conducive to telecommuting.

There are also significant agriculture activities from farm workers making seasonal transient (field-to-field) trips and agriculture goods movements. These trips are not conducive to transit and often generate longer trip lengths and thus higher VMT. The VMT generated by these activities does not respond to VMT reduction strategies such as increased transit or telecommuting.

Other measures such as higher parking fees as well as tolling highway travel are only feasible in highly urbanized areas where increased transit services are available as an alternative mode. Therefore, an aggressive VMT reduction alternative was not considered as an alternative for detailed consideration in this EIR.

6.3 Alternative 1: Stay The Course

6.3.1 Description

Alternative 1, the Stay The Course Alternative, represents the region moving forward only building out using funded transportation projects within the four-year period of the Federal Transportation Improvement Program (FTIP). This means, it only includes transportation project that would be complete by the year 2026. As it relates to land use, Alternative 1 used the 2018 Preferred Scenario as the starting point and updated it to reflect more recent development trends, as discussed in interviews with local jurisdictions, but updated land use growth to better match general plans and/or area plans prepared since 2018. In this scenario, the region does not change course and makes investments based on the last regional plan. Growth occurs primarily in new growth areas identified in the region's General or Specific Plans and transportation investments are focused on managed lanes, ACE Rail, enhanced bus rapid transit. This scenario has the following prioritized strategies and policies:

Transportation:

- Only funded transportation projects within the four-year period of the FTIP are included, meaning transportation projects that would be complete by the year 2026 (projects are listed in Table 6-1)

Land Use:

- Prioritize projects that make more efficient use of existing road network
- Prioritize large employer recruitment
- Improve access to safe and convenient walking and biking options
- Prioritize projects that improve and expand access to public transit

Alternative 1 allocates 63 percent of its growth in new growth areas, 18 percent in established neighborhoods and employment areas, 11 percent in urban arterials, and 8 percent in high-quality transit areas. This alternative has an overall gross acre residential density of 5.3 units per acre with 32 percent multifamily housing growth.

Table 6-1 Transportation Projects Included in Alternative 1

Project ID	Location	Description
Caltrans		
SJ14-1004	SR 99/120 Connector Project Phase 1A	(Widen the eastbound SR 120 to southbound SR 99 connector ramp from one-lane to two-lanes; Remove the Austin Road overcrossing and replace with a new 4 lane structure spanning SR 99 and UPRR; Add a new connecting road from Austin Road to Woodward Ave and Moffat Blvd and modify the existing UPRR gated crossing at Woodward Ave; Temporarily close the Austin Road northbound entrance and southbound exit ramps, resulting in a partial interchange.)
SJ18-1002	SR 99/120 Connector Project Phase 1B	Widen the northbound SR 99 to westbound SR 120 connector ramp from one-lane to two-lanes; Add an auxiliary lane in the existing median of westbound SR 120 from Main Street to SR 99; Convert the existing 99/120 separation structure to two lanes and construct a new separation structure to serve the eastbound 120 to northbound 99 connector ramp.
City of Escalon		
SJ07-3013	Ullrey Avenue/McHenry Avenue Intersection	Reconstruct intersection, including addition of turn pockets, improvement of traffic signal and installation of train pre-emption system for UPRR railroad crossing.
SJ07-3011	SR 120/Brennan Ave Intersection	Intersection improvements
City of Lathrop		
SJ14-2004	SR 120 at Yosemite Ave/Guthmiller Road	Reconstruct interchange
SJ07-3014	Golden Valley Parkway	Construct new roadway parallel to I-5, 2 lanes from Brookhurst Blvd to Stewart Road
City of Lodi		
SJ07-1020	SR-99 at Turner Road	Reconstruct interchange to provide operational and safety improvements on SR-99 at Turner Road (PM 31.3/31.6)
SJ07-3018	Harney Lane	Widen from 2/3 lane collector to 4-lane divided arterial
City of Manteca		
SJ07-2009	SR-120 at McKinley Ave	Construct new interchange
SJ07-3023	Airport Way	Widen from 2 to 4 lanes
SJ11-3008	Airport Way	Widen from 2 to 4 lanes
SJ07-3027	Louise Avenue	Widen from 2 to 4 lanes
SJ11-3011	Atherton Drive	Construct new 4 lane roadway
SJ07-3024	Lathrop Road	Widen from 2 to 4 lanes
SJ11-3014	Raymus Expressway	Construct new 4 lane expressway
City of Ripon		
SJ11-3017	Jack Tone Road, Phase 1	Widen from 2 to 6 lanes
SJ11-3019	Garrison Road Gap Closure	Construct 2-lane extension of Garrison Road

Project ID	Location	Description
SJ07-3137	W. Ripon Road	Widen from 2 to 6 lanes
SJ14-3006	Canal Boulevard Extension	Construct 4-lane extension of Canal Boulevard
City of Stockton		
SJ07-3084	Morada Lane	Widen from 3 to 6 lanes
SJ07-3093	Alpine Avenue	Widen from 2 to 4 lanes with a middle turn lane. Construct curb, gutter, sidewalks and driveways
SJ11-3044	Arch Road	Widen from 2 to 6 lanes
SJ11-3045	Arch Road	Widen from 2 to 6 lanes
SJ07-3078	Maranatha Dr	Construction of new 4 lane road
SJ11-3062	Maranatha Dr	Construction of new 4 lane road
SJ11-3056	Lower Sacramento Rd	Widen from 4 to 6 lanes
SJ11-3039	Lower Sacramento Rd	Widen from 2 to 6 lanes
SJ11-3047	Eight Mile Rd	Widen from 2 to 4 lanes
SJ11-3048	Eight Mile Rd	Widen from 2 to 4 lanes
County of San Joaquin		
SJ11-3029	Howard Road	Passing lanes and channelization
SJ14-3005	Grant Line Road Corridor Improvements	Realign roadway and widen from 2 to 4 lanes with operational and safety improvements
SJ11-3031	Tracy Boulevard	Passing lanes and channelization
City of Tracy		
SJ14-2002	I-580 at International Pkwy/Patterson Pass Road	Reconstruct interchange
SJ18-3002	International Parkway	Widen from 2 to 4 lanes, including reconstruction of Delta-Mendota Canal and California Aqueduct bridges
SJ07-3110	Corral Hollow Road	Widen from 2 to 4 lanes
SJ22-3107	Grant Line Road	Widen from 3 to 4 lanes
SJ07-3181	Corral Hollow Road Widening	Widen 2 to 4 lanes including ROW and construction of two bridges

6.3.2 Impact Analysis

a. Visual Resources

Implementation of this alternative would result in fewer visual impacts as compared to the proposed 2022 RTP/SCS, because many of the proposed interchange improvements, auxiliary and transition lanes, new roadways and overcrossings and road extensions, would not be constructed (See Table 6-1). Nevertheless, many transportation projects would still be constructed under this alternative with the potential to impact scenic vistas on designated scenic highways. Over 5,000 acres of more land consumed under this alternative compared to the proposed project which may result in greater impacts to scenic resources in the less developed portions of the SJCOG region. Thus, impacts related to visual character would be significant and unavoidable for this alternative, as they would be with the proposed 2022 RTP/SCS. The overall level of impact resulting from combined transportation improvement and land use projects would be similar when compared to the proposed 2022 RTP/SCS with some impacts greater while other impacts less but would remain significant and unavoidable.

b. Air Quality

Implementation of this alternative would reduce short-term air quality impacts from construction activity, as fewer transportation projects would be implemented and therefore less construction activity would occur. Because emissions are directly correlated with VMT, it can be reasonably assumed that emissions for all pollutants would be equal to lower under the No Project Alternative compared to the proposed 2022 RTP/SCS as it has a slightly lower total VMT and per capita VMT compared to the proposed project. The land use scenario in the No Project Alternative would contribute to more new growth in undeveloped areas compared to that of the proposed RTP/SCS. Because the proposed 2022 RTP/SCS would emphasize infill development, Alternative 1 would likely result in more land development construction related air quality impacts related to dust and particulate matter.

Future land use development under this alternative would not be infill or transit-oriented development (TOD)-focused. As such, the No Project Alternative would not concentrate population adjacent to high quality transit areas and other transportation facilities that could result in more people being exposed to elevated health risks from Toxic Air Contaminants (TACs). Accordingly, impacts related to TAC exposure to sensitive receptors would be less under this alternative than under the proposed 2022 RTP/SCS but would remain significant and unavoidable.

Overall air quality impacts would be similar under this alternative when compared to the proposed 2022 RTP/SCS because VMT would be slightly lower under this alternative. Under this alternative, TACs would be reduced due to reduced development near transit and transportation facilities. However, long term operational impacts related exposure of sensitive receptors to substantial hazardous air pollutant concentrations and objectionable odors would remain significant and unavoidable, as they would be for the proposed 2022 RTP/SCS.

c. Biological Resources

Future transportation projects developed under this alternative would result in fewer impacts to biological resources, as fewer roadway extensions, widening projects, and creek crossings would occur under this alternative. However, because this alternative would continue current regional growth trends rather than emphasizing an infill approach to land use and housing, more development would be expected to occur outside of existing urbanized areas, including in areas providing habitat for special status plant and animal species. Overall impacts to special status plants, animals, wetlands and/or riparian habitat and wildlife movement outside developed urban areas would therefore be greater than under the 2022 RTP/SCS. Impacts would remain significant and unavoidable, as they would be for the proposed 2022 RTP/SCS.

d. Cultural Resources

As described in Section 4.5, *Cultural Resources,* some of the proposed 2022 RTP/SCS projects may be located in proximity to historical resources or include repair or replacement of potentially historical structures (e.g., bridges). Because fewer transportation projects would be developed under the No Project Alternative, these impacts would be reduced. In addition, because less infill development would occur under this alternative, fewer impacts involving redevelopment or demolition of existing structures resulting from land use development would occur. Impacts to historic resources would therefore be reduced when compared to the proposed 2022 RTP/SCS. However, project specific impacts may still be significant, as they are for the proposed 2022 RTP/SCS.

Implementation of this alternative would involve less ground disturbance associated with transportation improvements than would occur under the proposed 2022 RTP/SCS. However, because more land use development could occur outside of existing urbanized areas, more ground disturbance would be expected to occur in previously undeveloped areas. As such, the potential for uncovering known or unknown archaeological resources would increase under this alternative for new development but decrease for transportation projects. The overall level of impact resulting from combined transportation improvement and land use projects would be similar when compared to the proposed 2022 RTP/SCS assuming relative equalization between the historic and archaeologic impacts between the proposed 2022 RTP/SCS and Alternative 1. Impacts to archaeological resources would remain significant and unavoidable, as they are for the proposed 2022 RTP/SCS.

e. Energy

Because this alternative would result in less construction of transportation infrastructure, overall energy use associated with construction activities would be reduced when compared to the proposed 2022 RTP/SCS. However, this alternative would not include many of the capital improvements envisioned under the proposed 2022 RTP/SCS that would improve transportation efficiency and reduce regional energy demand, such as active transportation projects. Energy use will increase over time as the result of regional socioeconomic (population and employment) growth, regardless of implementation of the proposed 2022 RTP/SCS. The No Project Alternative would result in similar total and per capita energy use as compared to the proposed 2022 RTP/SCS. As discussed in Section 4.6, *Energy,* the proposed 2022 RTP/SCS would not result in inefficient, unnecessary, or wasteful direct or indirect consumption of energy, and would be consistent with applicable energy conservation policies. Because the No Project Alternative would be similar in both total and per capita energy use, impacts would be similar when compared to the proposed 2022 RTP/SCS and impacts related to inefficient, unnecessary, or wasteful direct or indirect energy consumption would be less than significant, as they are for the proposed 2022 RTP/SCS.

f. Agriculture and Forestry Resources

This alternative would result in fewer transportation projects being constructed, including roadway widening and other projects that could directly convert agricultural land to non-agricultural use. However, because this alternative would continue current growth trends rather than emphasizing an infill approach to land use and housing, more development would be expected to occur outside of existing urbanized areas, including within areas currently used for agricultural production. Given this land use trend and the extent of Important Farmland in the SJCOG region, impacts related to converting Important Farmland to non-agricultural use, conflicts between urban and agricultural land uses, and conflicts with existing agricultural zoning and/or Williamson Act contracts would be worse under this alternative than for the proposed 2022 RTP/SCS.

Because there is no identified forestland in the SJCOG region, there is no impact to forest or timberlands.

The overall impact to agriculture resources resulting from the No Build Alternative would be greater than under the 2022 RTP/SCS.

g. Environmental Justice

This alternative would result in fewer transportation projects being constructed, including roadway widening and other projects and would not emphasize an infill approach to land use and housing that could potentially impact, displace or divide an EJ community compared to the project.

However, because this alternative would continue current growth trends rather than emphasizing an infill approach to land use and housing, more development would be expected to occur outside of existing urbanized areas that are not near transit that EJ communities need for transportation.

Unlike the 2022 RTP/SCS, this alternative would not promote infill and mixed use development. Infill and mixed use development would improve mobility for low income and minority populations and communities of concerns because housing and jobs would be located within closer proximity to public transit facilities. Therefore, without this type of development, Alternative 1 may result in a smaller percentage of EJ populations having convenient access to mobility. Performance measures developed by SJCOG indicate that 25 percent fewer households in jobs-rich areas would be developed compared to the proposed 2022 RTP/SCS under Alternative 1, making access to jobs more difficult for EJ communities with limited transportation options.

Overall, implementation of Alternative 1 would result in similar impacts related to environmental justice than the proposed 2022 RTP/SCS with fewer impacts on potential displacement but also less access to transit and housing near jobs.

h. Geology and Soils

Impacts of this alternative related to erosion and loss of topsoil would be less than significant pursuant to compliance with existing regulations, similar to the proposed 2022 RTP/SCS. Because this alternative does not include as many new interchanges, roads and fixed facilities, there would be less exposure of new structures to hazardous geologic conditions, including expansive soils, landslides, ground-shaking, and flooding. Conversely, if inadequate structures are not replaced, the potential for these existing structures and people using these structures to be harmed by geologic hazards could be greater than under the proposed 2022 RTP/SCS. Implementation of this alternative would involve less ground disturbance associated with transportation improvements than would occur under the proposed 2022 RTP/SCS. However, because more land use development could occur outside of existing urbanized areas due to growth continuing under the existing land use pattern, more development would be expected to occur in previously undeveloped areas. While development under the No Project Alternative would also be required to comply with the California Building Code and requirements set forth by the Alquist Priolo Zone Act, the No Project Alternative would result in a greater area of land being converted from undeveloped to developed uses that could be located in areas with greater susceptibility to seismic related risks. Impacts related to susceptibility to seismic related risks would be less than significant, as under the proposed 2022 RTP/SCS.

Impacts to paleontological resources would be greater under this alternative compared to the proposed 2022 RTP/SCS, as greater amounts of ground disturbing activities would increase the potential for impacts that could result in significant and unavoidable impacts, greater than the proposed 2022 RTP/SCS.

Overall, impacts to geology and soils would be slightly greater compared to the proposed 2022 RTP/SCS with greater land disturbance but would remain less than significant. Impacts to paleontological resources would also be greater and would be significant and unavoidable.

i. Greenhouse Gas Emissions and Climate Change

The No Project Alternative would result in fewer impacts associated with GHG emissions during construction activities as fewer transportation infrastructure projects would be constructed compared to the proposed 2022 RTP/SCS. Also, operation of the No Project Alternative would

decrease per capita GHG emissions from 3.08 to 2.88 MT of CO_2e per person per year, a 6.5 percent decrease. The No Project Alternative, with less active transportation and transit projects and less compact land use pattern would promote less sustainable modes of travel, clean vehicle technologies and traffic operational improvements within the SJCOG region than the project. The overall impact of this alternative would be similar to the proposed project and remain significant and unavoidable.

j. Hazards and Hazardous Materials

This alternative would result in fewer infrastructure projects being constructed, thereby reducing hazardous material use, storage, and transportation resulting from construction of those projects. However, the volume of hazardous materials being transported to support land use development in the region would remain the same, as land use development would continue to occur under this alternative. Because future development under the No Project Alternative would be subject to applicable hazardous materials regulations and programs, impacts relating to routine transport, use, or disposal of hazardous materials; risk of upset and accident conditions; emissions within one-quarter mile of a school; and airport hazards would be less than significant, similar to the proposed 2022 RTP/SCS. Overall hazards and hazardous materials impacts would be similar under this alternative as under the proposed 2022 RTP/SCS.

k. Hydrology and Water Quality

This alternative would result in fewer transportation infrastructure projects being constructed. Therefore, this alternative would reduce water quality impacts resulting from construction-related erosion and sedimentation and would generate less water demand for dust suppression activities for transportation projects. These impacts would remain less than significant pursuant to compliance with existing regulations, as they are for the proposed 2022 RTP/SCS.

Because this alternative would continue current growth trends rather than emphasizing an infill approach to land use and housing, more development would be expected to occur outside of existing urbanized areas. As such, impervious surfaces would be expected to increase under this alternative. Because projects would be located in less developed areas, runoff would include fewer urban pollutants such as heavy metals from auto emissions, oil and grease than projects under the proposed 2022 RTP/SCS. However, because more development would occur in and therefore be adjacent to agricultural areas, runoff from those adjacent agricultural areas would contain more fertilizers and pesticides. While projects under this alternative may require more grading and vegetation removal, including in proximity to creeks, less infill development may result in less disturbance of soils on previously contaminated sites. As such, water quality in creeks may be more impacted, but water quality within urban areas may be less impacted. Because of these tradeoffs, the No Project Alternative would result in impacts to water quality that are overall comparable to the proposed 2022 RTP/SCS with some impacts greater while other impacts would be less; water quality impacts would remain less than significant, pursuant to compliance with existing regulations, as they are for the proposed 2022 RTP/SCS.

l. Land Use and Planning

As with the 2022 RTP/SCS, this alternative would not be anticipated to divide an established community. As noted in Section 4.12, *Land Use and Planning,* the 2022 RTP/SCS includes a list of planned and programmed projects including local and regional capital improvements that have been anticipated or accounted for in local general plans and regional, statewide, and federal

transportation improvement programs. In addition, the objective of the 2022 RTP/SCS is to provide for a comprehensive transportation system of facilities and services that meets public need for the movement of people and goods, and that is consistent with the social, economic, and environmental goals and policies of the region. The No Project Alternative would not provide the same number of capital improvements anticipated within applicable general plans and transportation improvement programs, nor would it guide development to explicitly meet social, economic, and environmental goals and policies of the region as anticipated under the 2022 RTP/SCS. Due to the more dispersed land use pattern, the amount of undeveloped land impacted would be greater under this alternative.

Although the No Project Alternative would continue existing land use patterns and trends, it would increase the severity of several environmental impacts, as discussed herein. As such, it could result in conflicts with State and local policies and regulations adopted for the purpose of avoiding or mitigating environmental effects. Because environmental effects would generally increase under this alternative, the overall impacts on land use would be greater under this alternative when compared to the 2022 RTP/SCS but would remain less than significant.

m. Noise

From a programmatic perspective, fewer transportation infrastructure projects would result in less construction activity under the No Project Alternative. This would reduce temporary noise impacts throughout the SJCOG region. In addition, because the number of infill or TOD projects would be less under the No Project Alternative, construction-related noise impacts on adjacent sensitive receptors would also decrease. However, construction noise would still occur, and impacts would continue to be significant, as they are for the proposed 2022 RTP/SCS.

Although the number of transportation projects would be reduced as compared to the 2022 RTP/SCS, increased traffic volumes resulting from regional growth would continue to occur. Whether noise impacts would be greater or less than those anticipated under the 2022 RTP/SCS remains dependent on site specific considerations that cannot currently be known. Regionally, the difference in VMT between the No Project Alternative and the proposed 2022 RTP/SCS (66,215 difference in Total Annual VMT in 2046 distributed across the entire network) is not enough to noticeably change overall noise levels in the SJCOG region. Mobile source noise levels resulting from traffic would therefore be similar under the No Project Alternative when compared to the proposed 2022 RTP/SCS and would remain significant and unavoidable. Overall, noise-related impacts across the region would be similar to the proposed 2022 RTP/SCS and would continue to be significant and unavoidable.

n. Transportation

This alternative would not include many of the projects envisioned under the proposed 2022 RTP/SCS as listed above, including new highway and intersection projects, new bikeway and pedestrian projects (active transportation), new railroad projects, new transit projects, new intelligent transportation system/transportation demand management projects and aviation projects. Many of these projects are intended to address VMT, and in many cases would serve as mitigation measures to reduce potential impacts associated with planned long-term development.

Overall, VMT within the SJCOG region would increase from the baseline 2016 VMT of 17,015,116 as a result of regional population growth, regardless of implementation of the 2022 RTP/SCS. Under the No Project Alternative, total VMT in the SJCOG region would increase less than for the proposed

project. The decrease would be from 23,495,442 under the 2022 RTP/SCS to 23,429,227 – a decrease of 66,215 Total VMT, or 0.3 percent reduction from the proposed project.

Under the No Project Alternative, projects to increase bus capacity on congested facilities and the frequency of bus lines would not be implemented. Additionally, the proposed 2022 RTP/SCS projects that are intended to ensure a reliable bus fleet would not be implemented under the No Project Alternative. Without these types of projects, operation of public transit may be unreliable or fail to meet the frequency and performance standards established by the transit agencies in the SJCOG region. Thus, compared to the proposed 2022 RTP/SCS, the No Project Alternative would have a greater adverse impact on transit service in the SJCOG region with less dense development and less transit projects being funded.

Overall, the No Project Alternative would result in decreased daily VMT in the SJCOG region compared to the proposed 2022 RTP/SCS and have an adverse impact to transit service as projects to increase capacity on congested facilities and bus lines would not be implemented. Thus, overall, impacts to transportation would be similar under the No Project Alternative and would remain significant and unavoidable.

o. Tribal Cultural Resources

Implementation of this alternative would involve less ground disturbance associated with transportation improvements than would occur under the proposed 2022 RTP/SCS. However, because more land use development could occur outside of existing urbanized areas, more ground disturbance would be expected to occur in previously undeveloped or open space areas. As such, the potential to disturb tribal cultural resources, including ancestral remains and sacred sites, would increase under this alternative. Future projects would be required to comply with AB 52, which may require formal tribal consultation. Compliance with this requirement would reduce impacts to a less than significant level, similar to the proposed 2022 RTP/SCS. However, because of the increased potential to disturb tribal cultural resources from development outside of urbanized areas and no mitigation applicable to this alternative, the overall impact of the No Project Alternative would be greater than under the proposed 2022 RTP/SCS.

p. Wildfire

The No Project Alternative would allow more housing near wildlands and would increase the vulnerability of people and structures to wildland fire. Under the No Project Alternative land use development could occur outside of existing urbanized areas and extend into more wildland areas. This impact, which is significant and unavoidable for the proposed 2022 RTP/SCS, would be greater under the No Project Alternative and would remain significant and unavoidable.

6.4 Alternative 2: Remake Centers and Corridors

6.4.1 Description

Alternative 2, the Remake Centers & Corridors, would focus on growth on urban arterials, existing neighborhoods, and job centers. Traditional employment centers and aging commercial corridors are remade into residentially-focused neighborhoods. Growth is focused on urban arterials, existing neighborhoods, and job centers. The prioritized land use strategies and policies include the following:

- Encourage infill development

- Promote a broader range of housing types
- Develop a regional trust fund dedicated to addressing housing issues

Transportation focus investments in transit and bike/ped for infill locations along existing arterials, improvements/maintenance to local arterials to facilitate new types of development. The prioritized land use strategies and policies include the following:

- Prioritize "complete streets" projects throughout the region
- Greater prioritization on projects that improve and expand access to public transit

Compared to the proposed 2022 RTP/SCS, Alternative 2 would increase gross residential density by 8.8 percent, be three percent higher for households in jobs-rich areas and include 47 percent more dwelling units at 20+ units per acre. In addition, it would consume 17,394 acres of land (a reduction of 2,932 acres) compared to the proposed 2022 RTP/SCS with 2,914 less acres of Prime Farmland impacted.

Alternative 2 allocates 27 percent of its growth in new growth areas, 24 percent in established neighborhoods and job centers, 30 percent along arterials, and 20 percent in high quality transit areas.

6.4.2 Impact Analysis

a. Visual Resources

This alternative would include greater development intensities around urban arterials and new growth areas where there would be the potential to impact scenic vistas on designated scenic highways. Higher density housing in transit areas and urban centers would have would occur in many parts of the SJCOG region, potentially changing current viewsheds. Land use development envisioned under this alternative would be denser than the proposed 2022 RTP/SCS and would result in greater aesthetic impacts to scenic resources in the developed portions of the SJCOG region. As land use development would be denser in infill areas, there would be less development in scenic viewshed areas, and this alternative would result in fewer changes in character from rural to urban. Impacts to scenic resources would be less under this alternative compared to the proposed 2022 RTP/SCS. Nevertheless, impacts related to visual character would be significant and unavoidable as with the proposed 2022 RTP/SCS. While the overall level of impact resulting from land use projects would be less when compared to the proposed 2022 RTP/SCS, impacts would remain significant and unavoidable.

b. Air Quality

Under this alternative, the land use development pattern would have higher densities in urban areas near transit. As such, it is likely that more sensitive receptors would be exposed to health risks from TACs during construction or operation. As a result, exposure to substantial hazardous air pollutant concentrations and objectionable odors would remain significant and unavoidable, as under the proposed 2022 RTP/SCS.

This alternative would reduce VMT more than the proposed project, and therefore would reduce air pollutant emissions when compared to the proposed RTP/SCS including CO_2, (30,175 metric tons/yr.) and $C0_2e$ (30,808 metric tons/yr.) (Appendix A). Impacts overall would be less than the proposed 2022 RTP/SCS but would remain significant and unavoidable.

c. Biological Resources

This alternative would further emphasize an infill approach to land use and housing. As with the proposed 2022 RTP/SCS, development would primarily occur in already urbanized areas and would not result in development of areas that provide habitat for special status plant and animal species. Overall impacts to special status plants, animals, wetlands and/or riparian habitat and wildlife movement outside developed urban areas would therefore be reduced when compared the proposed 2022 RTP/SCS. However, impacts would remain significant and unavoidable.

d. Cultural Resources

As described in Section 4.5, *Cultural Resources,* some of the proposed 2022 RTP/SCS projects may be located in proximity to historical resources or include repair or replacement of potentially historical structures (e.g., bridges). Under this alternative, all of the projects that would include repair or replacement of potentially historic resources would still occur. Impacts to historical resources would therefore be similar compared to the proposed 2022 RTP/SCS. Land use development impacts under this alternative could be greater as there is greater potential to redevelop and demolish historic structures in urbanized areas.

Land use development would be at a denser rate requiring less ground disturbance activities than under the proposed 2022 RTP/SCS. As such, the potential for uncovering known or unknown archaeological resources as a result of land use development would be reduced under this alternative. Although overall archaeological resources impacts would be reduced, the potential would remain for unearthing known or previously unidentified resources. As such, overall impacts would be similar to the proposed project and remain significant and unavoidable.

e. Energy

Energy use will increase over time as the result of regional socioeconomic (population and employment) growth, regardless of implementation of the proposed 2022 RTP/SCS. As discussed in Section 4.5, *Energy,* the proposed 2022 RTP/SCS would not result in inefficient, unnecessary, or wasteful direct or indirect consumption of energy, and would be consistent with applicable energy conservation policies. Because this alternative would reduce vehicular travel as shown through reduced VMT, energy use would be reduced. Impacts related to inefficient, unnecessary, or wasteful direct or indirect energy consumption would be reduced when compared to the proposed 2022 RTP/SCS and would similarly remain less than significant.

f. Agriculture and Forestry Resources

Land use development under this alternative would further concentrate higher density housing in transit and urban areas. Impacts from land use projects converting agricultural resources would have less impacts compared to the proposed 2022 RTP/SCS, as development would not extend into agricultural land to the same extent. As a result, Alternative 2 would convert 2,914 fewer acres of Prime Farmland than the proposed 2022 RTP/SCS, a decrease of 72 percent. This impact would be less than for the proposed 2022 RTP/SCS but would remain significant and unavoidable because some development on Prime Farmland could still occur.

g. Environmental Justice

Alternative 2 would include greater development intensities around transit and within urban centers. Higher density housing in transit areas and urban centers would have the potential to

displace existing EJ communities where the new development would occur but also provide an increased access to transit to EJ communities through higher density development along transportation corridors. This alternative would provide more housing in jobs-rich areas, 4 percent more than the proposed project. This alternative would also provide 47 percent more housing at 20-plus units per acre, providing an even greater mix of housing type allows for a greater range of options for all populations, including EJ populations, and also provides for a greater range of housing affordability compared to the proposed project. Overall, implementation of Alternative B would reduce impacts related to environmental justice compared to the proposed 2022 RTP/SCS with better access to transit, affordable housing, and housing near jobs.

h. Geology and Soils

Similar to the proposed 2022 RTP/SCS, this alternative would replace inadequate existing structures, such as existing buildings and bridges, and would reduce the potential for these existing structures and people using these structures to be harmed by geologic hazards and would be the same as the proposed 2022 RTP/SCS. Development under Alternative 2 would also be required to comply with the California Building Code and requirements set forth by the Alquist Priolo Zone Act. Overall, seismic related impacts would be similar to the proposed 2022 RTP/SCS. Implementation of mitigation measures, as under the proposed 2022 RTP/SCS, would still be required and impacts would remain significant and unavoidable.

Impacts to paleontological resources would be less under this alternative compared to the proposed 2022 RTP/SCS as development outside of urbanized areas would be less, but would still result in significant and unavoidable impacts, similar to the proposed 2022 RTP/SCS. Impacts to paleontological resources would be significant and unavoidable but would be reduced under this alternative.

i. Greenhouse Gas Emissions and Climate Change

Alternative 2 would likely result in fewer impacts associated with GHG emissions during construction activities for transit projects as the scale of construction would be smaller. Additionally, operational GHG impacts would likely decrease because the increased housing density envisioned by this alternative would reduce the need for a personal vehicle and subsequently reduce VMT. This compact development would also increase the effectiveness of public transit and multimodal transportation networks, which could further reduce GHG emissions beyond the proposed 2022 RTP/SCS. This alternative would decrease per capita GHG emissions of 30,808 MT of CO_2e per person per year, a 1.0 percent decrease compared to the proposed project. This alternative would also provide greater access to transit and active transportation projects, further reducing GHG emissions. Therefore, GHG impacts would be less as compared to the proposed 2022 RTP/SCS but would remain significant and unavoidable.

j. Hazards and Hazardous Materials

This alternative would result in similar infrastructure projects being constructed, thereby having similar hazardous material use, storage and transportation resulting from construction of those projects. The volume of hazardous materials being transported to support land use development in the region would be less given the infill rate of the alternative. Because Alternative 2 would be subject to existing regulations and programs, impacts relating to routine transport, use, or disposal of hazardous materials; risk of upset and accident conditions; emissions within one-quarter mile of a school; airport hazards; and interference with emergency response and evacuation plans would be

less than significant, similar to the proposed 2022 RTP/SCS. Overall hazards and hazardous materials impacts would be less under this alternative instead of the proposed 2022 RTP/SCS.

k. Hydrology and Water Quality

This alternative would further emphasize an infill approach to land use and housing. As such, land development would result in fewer impervious surfaces than would be expected under the proposed 2022 RTP/SCS. Nonetheless, infill development would generate runoff that would include urban pollutants such as heavy metals from auto emissions, oil, and grease, similar to projects under the proposed 2022 RTP/SCS. Therefore, impacts to water quality would be less than those of the proposed 2022 RTP/SCS because less development would occur that would result in additional impervious surfaces compared to the proposed project. Infill development would generate runoff that would include urban pollutants similar such as heavy metals from auto emissions, oil, and grease, similar to the proposed 2022 RTP/SCS. Therefore, overall impacts to water quality would be less compared to the proposed 2022 RTP/SCS and impacts would remain significant and unavoidable.

l. Land Use and Planning

As noted in Section 4.12, *Land Use and Planning,* the proposed 2022 RTP/SCS includes a list of planned and programmed projects including local and regional capital improvements that have been anticipated or accounted for in local general plans and regional, statewide, and federal transportation improvement programs. Higher density housing in urbanized areas, primarily infill, would be anticipated to result in greater conflicts with local land use plans as this alternative would prioritize higher density beyond existing growth projections and would be inconsistent with growth projections of local General Plans and Specific Plans.

Development under this alternative would be concentrated in urbanized areas and would consist of primarily infill projects. As such, the land use pattern under this alternative would not result in the physical division of communities and impacts would be similar to the proposed 2022 RTP/SCS.

Development under this alternative could conflict with land use plans, policies, and programs through the shifting of residential development into commercial urban areas and corridors requiring change in zoning or land use designations. As such, implementation of this alternative would conflict with State and local policies and regulations adopted for the purpose of avoiding or mitigating environmental effects.

Under this alternative, impacts related to physically dividing an established community would be similar and impacts due to a conflict with any land use plan, policy, or regulation would be greater and overall greater when compared to the proposed 2022 RTP/SCS and would remain less than significant.

m. Noise

Land use development under this alternative would occur primarily in infill and TOD areas. As such, increased noise levels from increased transit onto development in the area would be greater than under the proposed 2022 RTP/SCS and would result in more sensitive receivers exposed to greater sound levels. Increased ambient noise levels for sensitive receivers in these areas would be significant and unavoidable under this alternative, as it is for the proposed 2022 RTP/SCS.

Noise would generally be the same as compared to the proposed 2022 RTP/SCS, as cumulative regional traffic volumes would increase regardless of implementation of the proposed 2022 RTP/SCS

or this alternative. Whether noise impacts would be greater or less than those anticipated under the proposed 2022 RTP/SCS remains dependent on site specific considerations that cannot currently be known. Regionally, the difference in VMT between the proposed 2022 RTP/SCS and Alternative 2 is not enough to noticeably change overall noise levels in the region. Mobile source noise levels resulting from traffic would be slightly less under Alternative 2 than the proposed 2022 RTP/SCS as this alternative would result in less VMT.

Construction and operation of future development under this alternative could be located in close proximity to a public airport or private airstrip, as under the proposed 2022 RTP/SCS, and would result in exposure of people residing or working in the area to excessive noise levels. As under the proposed 2022 RTP/SCS, this alternative could result in the exposure of people residing or working near public airports or private airstrips to excessive noise levels. Mitigation measures identified in Section 4.13, *Noise,* would continue to be required under this alternative and impacts would be similar as under the proposed 2022 RTP/SCS and would remain significant and unavoidable. Overall, noise-related impacts across the region would be similar to the proposed 2022 RTP/SCS and would continue to be significant and unavoidable.

n. Transportation

This alternative incorporates less dispersed land use and development and a more compact growth footprint than the proposed 2022 RTP/SCS, and increased use of regional transit service to generate an increase in regional transit ridership and corresponding decrease in VMT. Alternative 2 would generate 97,559 less total VMT in 2046 compared to the proposed project, 0.4 percent reduction. Impacts related to conflicts with any program, plan, ordinance, or policy addressing the circulation system or inconsistency with CEQA Guidelines section 15064.3, increasing a hazard, or regarding emergency access or emergency response plan, would be similar between Alternative 2 and the proposed project.

Overall, this alternative would reduce transportation related impacts compared to the proposed 2022 RTP/SCS. However, because VMT would still be above adopted thresholds, impacts would remain significant and unavoidable.

o. Tribal Cultural Resources

Under this alternative, land use development would occur in infill areas to a greater extent than the proposed 2022 RTP/SCS. Higher density development within already urbanized areas would reduce ground disturbance, as less disturbance would occur outside these areas. As such, the potential to disturb tribal cultural resources, including ancestral remains and sacred sites, would decrease under this alternative. Future projects would still be required to comply with AB 52, which would encourage tribal consultation with local California Native American tribes and require the identification of project specific substantial adverse effects on tribal cultural resources and appropriate project specific mitigation measures. If it is determined that a specific project would result a substantial adverse change in the significance of a tribal cultural resource, the impact would be significant. Therefore, impacts would be significant and unavoidable, as they would be for the proposed 2022 RTP/SCS but would be reduced compared to the proposed 2022 RTP/SCS due to the reduced level of ground disturbance outside of urban areas.

p. Wildfire

The land use pattern under this alternative would construct higher density housing in urban areas which would reduce the amount of land development within and near wildland urban interface

areas. However, there is still the potential for development under this alternative to result in exacerbated wildfire risk. Exacerbated wildfire risk would result in additional impacts related to flooding, landslides, and other associated hazards. Under this alternative, mitigation would still be required; however, impacts would still be significant and unavoidable, as under the proposed 2022 RTP/SCS.

While development of both land use and transportation structures under this alternative would still be required to comply with the California Fire Code, and mitigation would still be required, impacts under this alternative would remain significant and unavoidable as potential risks from wildfire cannot be feasibly reduced to less than significant. Overall, wildfire impacts would be reduced when compared to the proposed 2022 RTP/SCS but would remain significant and unavoidable.

6.5 Environmentally Superior Alternative

State CEQA Guidelines Section 15126.6 requires that an EIR identify the environmentally superior alternative among the alternatives analyzed. Section 15126.6(d)(2) states that if the No Project Alternative is identified as the environmentally superior alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives analyzed. This section compares the impacts of the two alternatives under consideration to those of the proposed 2022 RTP/SCS in compliance with the *State CEQA Guidelines*.

Table 6-2 shows whether each alternative would have impacts that are less than, similar to, or greater than the proposed 2022 RTP/SCS for each of the issue areas studied.

Based on the above analysis and summary in Table 6-2, Alternative 2 is the environmentally superior alternative, assuming all environmental issue areas are weighted equally. Under Alternative 2, land use patterns would be concentrated in infill and TOD areas. Alternative 2 would result in a higher density development pattern than the proposed 2022 RTP/SCS. This results in Alternative 2 reducing VMT to a greater extent than the proposed 2022 RTP/SCS. This VMT reduction would also result in less generation of criteria pollutants and GHG emissions compared to the project. Alternative 2 could be considered environmentally superior to the proposed 2022 RTP/SCS primarily because, as shown in Table 6-2, overall impacts to the following resources would be less: air quality , biological resources, energy, agriculture resources, environmental justice, geology and soils, greenhouse gas emissions, hazards, hydrology, transportation (VMT), tribal resources, and wildfire.

The No Project Alternative (Alternative 1) would result in a less dense development pattern compared to the proposed 2022 RTP/SCS, as it would continue existing land use trends. Because of the increased land development outside of existing urbanized areas, Alternative 1 would result in more ground disturbance than the proposed 2022 RTP/SCS. Consequently, compared to the proposed 2022 RTP/SCS, Alternative 1 would have greater overall impacts to, biological resources, agricultural resources, geology and soils, land use, transportation, tribal cultural resources, and wildfire. As shown in Table 6-2, Alternative 1 would result in greater impacts than the proposed 2022 RTP/SCS, although it would reduce VMT emissions compared to the proposed project, but not to the extent Alternative 2 does. It would also fail to meet most basic project objectives promote equitable access opportunities, provide a mix of land uses and compact development patterns and encourage infill development to preserve agricultural land and natural resources, and maintain or reduce congestion as compared to current levels.

The proposed project was selected over Alternative 2 as overall, it was determined to better meet the identified objectives developed by SJCOG in preparing the RTP/SCS. The proposed project better

serves regional goals, objectives, policies and plans of the County and the cities in the SJCOG region, better meets community and regional transportation needs while still promoting energy efficient, environmentally sound modes of travel and facilities and services, and promotes equity and efficiency in the distribution of transportation projects and services. Although Alternative 2 is identified as environmentally superior most impacts were still identified as being significant and unavoidable. The proposed project was equal to Alternative 2 regarding cultural resources and noise, and less environmental impacts regarding land use and planning.

Table 6-2 Impact Comparison of Alternatives

Issue Area	Proposed 2022 RTP/SCS	Alternative 1: No Project Alternative	Alternative 2: Remake Centers and Corridors
Visual Resources	SU	=	<
Air Quality	SU	<	<
Biology	SU	>	<
Cultural Resources	SU	=	=
Energy	LTS	=	<
Agriculture and Forestry	SU	>	<
Environmental Justice	SU	=	<
Geology and Soils	SU	>	<
Greenhouse Gas Emissions and Climate Change	SU	=	<
Hazards and Hazardous Materials	LTS	=	<
Hydrology and Water Quality	SU	=	<
Land Use and Planning	LTS	>	>
Noise	SU	=	=
Transportation	LTS	>	<
Tribal Cultural Resources	LTS	>	<
Wildfire	LTS	>	<

Note: Comparison of impacts is based on the overall impact of the alternative on the resource or issue.

< Alternative impacts would be less than those of the proposed 2022 RTP/SCS

= Alternative would result in impacts similar to the proposed 2022 RTP/SCS

> Alternative impacts would be greater than those of the proposed 2022 RTP/SCS

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