

## 4. ALTERNATIVES TO THE PROPOSED PROJECT

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### 4.1 INTRODUCTION

This chapter presents the alternatives analysis for the proposed Project, as required by the California Environmental Quality Act (CEQA). CEQA requires that an environmental impact report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project and evaluate the comparative merits of the alternatives” (CEQA Guidelines Section 15126.6[a]).

The discussion includes an explanation of the methodology used to select alternatives to the proposed Project, with the intent of identifying potentially feasible alternatives that could avoid or substantially lessen the significant impacts identified for the proposed Project while still meeting most of the basic project objectives, pursuant to CEQA Guidelines Section 15126.6(a). This chapter identifies a reasonable range of alternatives that meet these criteria, and these alternatives are evaluated with respect to minimizing adverse environmental effects as compared to the proposed Project. It also describes other alternatives and alternative concepts that were considered but eliminated from detailed consideration and the reasons for their elimination. For the alternatives selected for analysis, this chapter evaluates the impacts of the alternatives against baseline environmental conditions and compares the potential impacts of the alternatives with those of the proposed Project. Finally, as required under CEQA Guidelines Section 15126.6(e), based on this analysis, this chapter then discusses the Environmentally Superior Alternative.

The following discussion is intended to inform the public and decision makers of feasible alternatives to the proposed Project that would avoid or substantially lessen any of the significant effects of the proposed Project. Section 15126.6, *Consideration and Discussion of Alternatives to the Proposed Project*, of the CEQA Guidelines states that:

An EIR shall describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for

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selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

## 4.2 FACTORS CONSIDERED WHEN DEVELOPING ALTERNATIVES

This section describes the basis for determining the range of CEQA alternatives and identifies the specific alternatives that are analyzed in this Draft EIR. The primary factors considered when determining feasible alternatives to the proposed Project are the identified project objectives and those significant impacts that have been identified for the proposed Project. Section 15126.6(c) of the CEQA Guidelines states:

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 describe 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. Additional information explaining the choice of alternatives may be included in the administrative record.

Therefore, these two considerations are summarized below.

### 4.2.1 Project Objectives

Chapter 2, *Project Description*, of this Draft EIR provides objectives that have been established for the proposed Project and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts. These objectives are listed in Section 2.5, *Project Objectives*. In this alternatives analysis, Table 4.3, *Ability to Meet Proposed Project Objectives*, compares the degree to which each alternative meets the project's objectives, identifying whether an alternative meets, partially meets, or does not meet the stated objectives.

## 4.2.2 Significant Impacts

As described, apart from the No Project Alternative, other alternatives to a project should be evaluated because of their ability to feasibly attain most of the basic objectives of the project and avoid or lessen the project's identified significant impacts. The proposed Project would result in eight significant impacts.

### SIGNIFICANT AND UNAVOIDABLE IMPACTS

All the potential environmental impacts associated with adoption and implementation of the proposed Project were found to be either less than significant without mitigation or less than significant with mitigating General Plan 2045 goals and policies, except for impacts to agricultural resources (AGR), air quality (AQ), greenhouse gas emissions (GHG), mineral resources (MIN), and noise (NOI), which were found to be significant and unavoidable at the program level. As described in the impact discussions of these sections, although the proposed Project results in significant and unavoidable impacts, the identification of these program-level impacts does not preclude the finding of less-than-significant impacts for subsequent development proposals analyzed at the project level that do not exceed the applicable project-level thresholds. The program-level significant and unavoidable impacts include the following:

#### Agricultural Resources

- **Impact AGR-1:** Implementation of the proposed Project could result in the conversion of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency to nonagricultural uses.
- **Impact AGR-2:** Implementation of the proposed Project could conflict with existing zoning for agricultural use and Williamson Act contracts.
- **Impact AGR-3:** Implementation of the proposed Project could involve other changes in the existing environment, which, due to their location or nature, could result in conversion of farmland to nonagricultural use.
- **Impact AGR-4:** Implementation of the proposed Project could result in a significant cumulative impact with respect to the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), existing zoning for agricultural uses, and Williamson Act properties, and farmland to nonagricultural uses.

#### Air Quality

- **Impact AQ-2:** Implementation of the proposed Project could result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard during construction and operation.

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- **Impact AQ-5:** Implementation of the proposed Project could result in cumulative air quality impacts with respect to generation of criteria pollutants and exposure of substantial pollutant concentrations at sensitive receptors.

### Greenhouse Gas Emissions

- **Impact GHG-1:** Implementation of the proposed Project could generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- **Impact GHG-2:** Implementation of the proposed Project could conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.
- **Impact GHG-3:** Implementation of the proposed Project could result in a significant cumulative impact with respect to generation of greenhouse gas (GHG) emissions that may have a significant impact on the environment and conflict with an applicable plan adopted for the purpose of reducing GHG emissions.

### Mineral Resources

- **Impact MIN-1:** Implementation of the proposed Project could result in the loss of availability of known mineral resources that would be of value to the region and the residents of the State.
- **Impact MIN-3:** Implementation of the proposed Project could result in a significant cumulative impact with respect to the loss of availability of known mineral resources that are of value to the region and the residents of the State.

### Noise

- **Impact NOI-1:** Implementation of the proposed Project could generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- **Impact NOI-4:** Implementation of the proposed Project could generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, resulting in a significant cumulative impact.

## 4.3 ALTERNATIVES CONSIDERED BUT REJECTED

As described in Section 4.1, *Introduction*, CEQA Guidelines Section 15126.6(c) requires EIRs to 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 15126.6(c) provides that among the factors that may be used to eliminate alternatives from detailed consideration in the EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. The following is a discussion of alternatives considered and rejected, along with the reasons that alternative was not included in the analysis.

### 4.3.1 Reduced Housing Alternative

The City considered alternatives that would potentially reduce the impacts from development consistent by reducing the proposed buildout potential, including the amount of potential housing development. The City rejected any alternative that would reduce the amount of housing due to the ongoing housing crisis.

None of the significant and unavoidable impacts are directly attributable to the increase in housing or population, therefore a reduction in housing, no matter the reduction, would reduce these impacts to a less-than-significant level. For example, with respect to GHG emissions, implementation of the proposed Project would result in a net decrease in GHG emissions from existing conditions (4.8 MTCO<sub>2</sub>e/SP to 3.5 MTCO<sub>2</sub>e/SP). The significant unavoidable impact is related to the 2022 Climate Action Plan's (CAP's) long-term per-capita efficiency target of zero MTCO<sub>2</sub>e per person per year, which relies, in part, on future technological advancements and statewide actions that are outside the City's authority.

The State of California has enacted several laws intended to address California's housing needs. California Housing Element Law (Government Code Sections 65580-65589.8) includes provisions related to the requirements for Housing Elements of local government General Plans. These requirements include an assessment of housing needs and an inventory of resources and constraints relevant to meeting these needs. Additionally, to ensure that counties and cities contribute to the attainment of the State housing goals, this section of the Government Code calls for local jurisdictions to plan for and allow the construction of a share of the region's projected housing needs, known as the Regional Housing Needs Allocation (RHNA). Pursuant to Senate Bill 166, Housing Elements are required to include a "buffer" of additional sites to ensure that if the sites listed in the housing opportunity sites inventory are developed without housing, or are developed with less than the full amount of housing claimed in the inventory, there is remaining capacity to ensure an ongoing supply of sites for the full RHNA during the eight years of the Housing Element cycle. The proposed General Plan 2045 land use map includes enough land designated for housing to fulfill the City's 2023-2031 RHNA and buffer, as

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well as future housing sites that may need to be identified in the upcoming 7th cycle Housing Element, which will cover the period 2032-2040, within the horizon of General Plan 2045. The land use map cannot legally or feasibly include less housing or residential density than proposed.

This alternative is fundamentally flawed in that it reduces the amount of housing during an ongoing housing crisis, is antithetical to State law, and does not meet the basic project objective of “plan[ning] for diverse housing choices so that individuals and families of all income levels and lifestyle can find housing, while also meeting the State-mandated RHNA requirements for the current and estimated future housing cycles through 2045.” CEQA Guidelines Section 15126.6(c) provides that among the factors that may be used to eliminate alternatives from detailed consideration in the EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. Therefore, due to the well-documented housing crisis and the lack of housing in Livermore and inability of this alternative to meet basic project objectives or avoid significant environmental impacts, a reduced housing alternative is considered infeasible.

### **4.3.2 Expanded Urban Growth Boundary and Sphere of Influence Alternative**

During the General Plan update process, the expansion of the Urban Growth Boundary (UGB) and/or Sphere of Influence (SOI) east of Greenville Road was considered to provide additional industrial land and meet the City’s goals for job creation and a stable local economy. The General Plan land use alternatives for this area also explored opportunities for a research or educational campus and enhanced preservation of open space and vineyard areas in and around the study area. This alternative would require a ballot measure for Livermore voter consideration to expand the UGB before those land uses could take effect. After the completion of the General Plan land use alternatives evaluation, and based on consideration of input from the community, the General Plan Advisory Committee, and Planning Commission, the City Council directed that the proposed General Plan 2045 should not identify land use designations in the East of Greenville Road area or propose expanding the UGB. Instead, the City Council directed that the General Plan should include policies that identify conditions under which it would be appropriate to study future land uses for this area.

Although the expansion of the UGB was considered as one potential land use alternative during the General Plan update process, as noted previously, CEQA Guidelines Section 15126.6 describes a different role for the alternatives to the proposed project in an EIR. In this Draft EIR, “[t]he range of potential alternatives to the proposed project shall include those that could... avoid or substantially lessen one or more of the significant effects.” The City finds that with implementation of the proposed General Plan 2045 land use map and goals and policies that require the evaluation and mitigation of impacts from future development, the expansion of the

UBG and/or SOI is not required to accommodate the proposed potential buildout or to reduce any potentially significant impacts. Rather, the City finds that the potential expansion of the UGB or SOI to accommodate growth in areas would potentially increase impacts caused by developing on undisturbed lands and on lands further away from core services areas such that vehicle miles traveled (VMT) could be increased when compared to the proposed Project. Therefore, this alternative was rejected and is not included in this alternatives analysis.

## 4.4 ALTERNATIVES SELECTED FOR ANALYSIS

The following alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the basic objectives of the proposed Project and that may avoid or substantially lessen any of the significant impacts of the proposed Project.

- **Alternative A:** No Project Alternative (Existing General Plan)
- **Alternative B:** Reduced Industrial and Concentrated Residential Alternative

## 4.5 ALTERNATIVE A: NO PROJECT ALTERNATIVE

Pursuant to CEQA Guidelines Section 15126.6(e)(1), the No Project Alternative (Alternative A) is required as part of the “reasonable range of alternatives” to allow decision makers to compare the impacts of approving the proposed Project with the impacts of taking no action or not approving the proposed Project. Consistent with CEQA Guidelines Section 15126.6(e)(3)(A), when the project is the revision of a plan, as in this case, the no project alternative would be the continuation of the existing plan. Under Alternative A, future development would continue to be subject to existing policies, regulations, development standards, and land use designations of the existing 2003 General Plan. Alternative A would not implement the Livermore Municipal Code (LMC) and Livermore Development Code (LDC) amendments associated with the proposed General Plan 2045.

As described in Chapter 2, *Project Description*, of this Draft EIR, the existing General Plan included a horizon year of 2025. Several State and federal laws guiding General Plan policies have also been updated during this time. Many of the community issues vetted in the current General Plan are still relevant, well addressed, and do not require major changes. However, Alternative A would not incorporate new topics that are now required by State law, such as environmental justice, and would not revise relevant goals and policies to meet those requirements.

Pursuant to CEQA Guidelines Section 15126.6(e)(3)(C), the City of Livermore, acting as the lead agency, should analyze the impacts of Alternative A by projecting what would reasonably be expected to occur in the foreseeable future if the proposed Project were not approved, based on current plans and consistent with available infrastructure and community services. Future

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development consistent with Alternative A would not increase development potential in Livermore beyond what was considered in the existing General Plan. Alternative A assumes the projected buildout in Table 4-1, *Projected Buildout Under the Proposed Project and Alternative A*, would occur through 2045. No General Plan land use designations changes or LMC and LDC amendments would be required to accommodate these uses.

As shown in Table 4-1, Alternative A would result in less residential and population growth when compared to the proposed Project, but higher job growth since the existing General Plan would continue the nonresidential land use designations in the Midtown Specific Plan Area and Vasco Row area. The existing General Plan overestimated job growth and the projections for the proposed Project are based on the past 20 years of data and are more realistic.

**Table 4-1 Projected Buildout Under the Proposed Project and Alternative A**

Category	Proposed Project	Alternative A: No Project	Difference between Proposed Project and Alternative A
Housing Units	49,640	48,078	1,562 less housing units
Total Population	131,750	136,079	4,329 more people
Jobs	63,330	62,499	831 less jobs

Source: Kittelson and Associates Inc. 2023.

Note: Numbers are rounded from original sources.

### 4.5.1 Aesthetics

As described in Section 3.1, *Aesthetics*, of this Draft EIR, the proposed Project would not result in any significant impacts related to aesthetics.

The EIR Study Area contains scenic views featuring natural landscape, rolling hills, and ridgelines, especially as seen from the Interstate (I-) 580 scenic corridor. Development under both the proposed Project and Alternative A could potentially impact views from I-580, a State scenic highway. Future development subject to discretionary approval would be required to comply with the City’s Design Standards and Guidelines and the regulations of the LMC and LDC, as well as various planning documents that govern scenic quality. Alternative A would protect scenic views and establish inviting gateways into Livermore by continuing the existing I-580 Scenic Corridor Implementation requirements as part of the General Plan rather than adopting the Scenic Resources Overlay District. Therefore, impacts related to scenic views and views from I-580 would be similar under Alternative A.

Under both the proposed Project and Alternative A, future development subject to discretionary approval would be required to comply with the City’s Design Standards and Guidelines and the regulations of the LMC and LDC, as well as various planning documents that govern scenic quality in the city to be confirmed during the project approval process. As such,

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the proposed Project and Alternative A would not conflict with applicable zoning or other regulations and impacts would be similar.

Similar to the proposed Project, Alternative A would result in future development and activities that could intensify lighting sources and incrementally increase glare throughout the EIR Study Area. In addition to the general best management practices (BMPs) that require lighting that is context sensitive in style and intensity required under CALGreen (California Green Building Standards Code, Title 24, Part 11), future development under both the proposed Project and Alternative A would be required to comply with the City's Design Standards and Guidelines and the regulations of the LMC and LDC, as well as various planning documents that govern scenic quality in the city. However, Alternative A would not include the new or modified General Plan 2045 goals and policies that were prepared as part of the proposed Project, specifically the policies under Goal CI-11 to protect the nighttime sky as a significant scenic resource of Livermore. Therefore, impacts related to light and glare would be greater under Alternative A.

Overall, without inclusion of the new or modified General Plan 2045 goals and policies that were prepared as part of the proposed Project, impacts under Alternative A related to aesthetics would be **greater** when compared to the proposed Project.

## **4.5.2 Agricultural Resources**

As concluded in Section 3.2, *Agricultural Resources*, of this Draft EIR, the proposed Project would result in significant and unavoidable impacts related to the loss of Farmland (Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) and conflict with Williamson Act contracts due to the potential conversion of Farmland to nonagricultural land uses. Implementation of the proposed General Plan 2045 goals and policies would reduce impacts related to the conversion of qualifying agricultural lands, but not to a less-than-significant level and impacts would remain significant and unavoidable.

The EIR Study Area includes 338 acres of Prime Farmland, 728 acres of Unique Farmland, and 409 acres of Farmland of Statewide Importance. The EIR Study Area also contains 1,317 acres of land zoned for Agriculture (OS-A), Planned Development/Agriculture (PD-AG), and South Livermore Valley/Agriculture (SLV-AG) and 1,909 acres of agricultural land under Williamson Act contracts. Like the proposed Project, Alternative A would allow similar land use patterns that allow conflicting uses on Farmland, land zoned for agricultural uses, and agricultural land under Williamson Act contracts. Impacts related to the conversion of Farmland and conflict with existing agricultural zoning and Williamson Act contracts would be similar under Alternative A.

Similar to the proposed project, Alternative A would result in potentially incompatible urban uses next to farms or ranches, creating circumstances that could impair the productivity and profitability of agricultural operations, and could eventually lead farmers to take their land out of production. Under both the proposed Project and Alternative A, the City would be required

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to collaborate with Alameda County and Alameda County Local Agency Formation Commission (LAFCO) to protect existing land uses from development inappropriate for rural areas. As such, impacts would be similar.

Overall, impacts under Alternative A related to agricultural resources would be **similar** when compared to the proposed Project.

### 4.5.3 Air Quality

As concluded in Section 3.3, *Air Quality*, of this Draft EIR, the proposed Project would result in significant and unavoidable impacts related to the construction and operation of development generating emissions that would exceed the Bay Area Air District's regional significance thresholds and cumulatively contribute to the nonattainment designations of the San Francisco Bay Area Air Basin (SFBAAB). Implementation of the proposed General Plan 2045 goals and policies would reduce impacts related to the generation of emissions, but not to a less-than-significant level and impacts would remain significant and unavoidable.

The 2017 Clean Air Plan strategy is based on regional population and employment projections in the Bay Area compiled by the Association of Bay Area Governments (ABAG), which are based in part on cities' General Plan land use designations. Neither the proposed Project nor Alternative A would exceed the regional growth projections and would not conflict with the 2017 Clean Air Plan. Thus, there would be a similar impact.

New development under both the proposed Project and Alternative A would increase air pollutant emissions and contribute to the overall emissions inventory in the SFBAAB, as well as expose sensitive receptors to pollutant concentrations. Permitted sources of emissions under the proposed Project and Alternative A would be regulated by the Air District to ensure that, on a project-by-project basis, emissions achieve their permit thresholds. However, Alternative A would not include the new or modified General Plan 2045 goals and policies that were prepared as part of the proposed Project, specifically the policies under Goal OS-6 to limit air pollutant emissions and provide adequate buffer distances and appropriate mitigation to protect sensitive receptors. However, because the proposed Project and Alternative A would both result in net increase of criteria pollutants and exposure of sensitive receptors to substantial pollutant concentrations, impacts would be similar.

Similar to the proposed Project, Alternative A would result in odor emissions. Odors are regulated under Air District Regulation 1, Rule 1-301, *Public Nuisance*. Future development under both the proposed Project and Alternative A would be required to comply with Air District Regulation 1, which would ensure that odor impacts associated with the proposed Project are minimized. Therefore, impacts would be similar.

Overall, the proposed Project and Alternative A would result in **similar** air quality impacts when compared to the proposed Project.

#### 4.5.4 Biological Resources

As concluded in Section 3.4, *Biological Resources*, of this Draft EIR, the proposed Project would result in less-than-significant impacts related to wildlife movement with implementation of Mitigation Measure BIO-4 requiring bird-safe design measures by project applicants to reduce potential impacts on migratory and resident birds to less than significant.

Future development under both the proposed Project and Alternative A would require compliance with all federal, State, and local regulations to protect special-status species, riparian habitats, wetlands, and wildlife movement corridors. This includes the requirements of the United States Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), the strategies of the East Alameda County Conservation Strategy (EACCS), and the BMPs of the Stream Maintenance Program (SMP).

However, Alternative A would not include the new or modified General Plan 2045 goals and policies that were prepared as part of the proposed Project, specifically the policies under Goal OS-2 to adopt the Livermore Habitat Conservation Plan (HCP) and coordinate with other agencies to plan for wildlife linkage. Additionally, Alternative A would not include Mitigation Measure BIO-4 to reduce potential impacts on migratory and resident birds.

The proposed Project would provide additional protection and coordination mechanisms that Alternative A would not. Because Alternative A would not incorporate these policies and mitigation measures, its impacts on special-status species, riparian habitat, wetlands, and wildlife movement corridors would be greater than those of the proposed Project.

Neither the proposed Project nor Alternative A would conflict with any local policies or ordinances protecting biological resources or the provisions of an adopted HCP. As such, impacts would be similar.

Overall, without inclusion of the new or modified General Plan 2045 goals and policies that were prepared as part of the proposed Project and Mitigation Measure BIO-4, impacts under Alternative A related to biological resources would be **greater** when compared to the proposed Project.

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## **4.5.5 Cultural and Tribal Cultural Resources**

As described in Section 3.5, *Cultural and Tribal Cultural Resources*, of this Draft EIR, the proposed Project would result in less-than-significant impacts related to unknown archaeological and tribal cultural resources with implementation of Mitigation Measures CUL-2, CUL-4, and CUL-5, which would ensure that archaeological and tribal cultural resources identified during construction would be identified, evaluated, and protected or appropriately treated.

Future development under both the proposed Project and Alternative A would be required to comply with the City's Design Standards and Guidelines and the regulations of the LMC and LDC, including the Historic Preservation Ordinance. Future development would also be subject to the procedures of conduct following the discovery of human remains as mandated by CEQA Section 15064.5(e), PRC Section 5097.98, and Health and Safety Code Section 7050.5. Impacts related to historic resources and human remains would be similar to the proposed Project under Alternative A.

Under the proposed Project and Alternative A, future development would be subject to PRC Section 5097.5(a), which specifies that a person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any archaeological sites without the express permission of the public agency having jurisdiction over the lands. Tribal consultation pursuant to AB 52 and SB 18 would also be required, as appropriate. However, new and modified General Plan 2045 goals and policies serve as means to reduce environmental impacts under CEQA. For example, CI-12.6 directs the City to respect and protect tribal cultural resources and maintain a collaborative relationship with local Native American tribal representatives. Alternative A would not realize the new or modified General Plan 2045 goals and policies that were prepared as part of the proposed Project. In addition, Alternative A would not implement Mitigation Measures CUL-2, CUL-4, and CUL-5, which ensure that archaeological and tribal cultural resources identified during construction would be identified, evaluated, and protected or appropriately treated. Impacts related to archaeological and tribal cultural resources would be greater under Alternative A.

Overall, without inclusion of Mitigation Measures CUL-2, CUL-4, and CUL-5 and adoption of the new or modified General Plan 2045 goals and policies that were prepared as part of the proposed Project, impacts under Alternative A related to cultural and tribal cultural resources would be **greater** when compared to the proposed Project.

## 4.5.6 Energy

As described in Section 3.6, *Energy*, of this Draft EIR, the proposed Project would result in less-than-significant impacts related to energy.

Future development under both the proposed Project and Alternative A would be required to comply with building requirements in the California Green Building Code and Building and Energy Efficiency Standards, which would ensure new development would not result in wasteful or inefficient energy usage. Compliance with LMC Chapter 15.26 and the 2022 CAP would further support the incorporation of electric and energy efficiency systems in new development.

However, Alternative A would not include the new or modified General Plan 2045 goals and policies prepared as part of the proposed Project, specifically the policies under Goal OS-8 to promote clean and resilient energy through increased energy efficiency and support the statewide goal of transitioning the electricity grid to renewable sources. These additional policies would further encourage reductions in energy consumption and support consistency with State and local renewable energy and energy-efficiency objectives.

While both the proposed Project and Alternative A would comply with existing regulatory requirements, the proposed Project would provide additional policy direction that would further reduce energy use and strengthen consistency with applicable State and local plans. Therefore, Alternative A would result in greater impacts related to energy efficiency and consistency with renewable energy and energy-efficiency plans.

Therefore, without inclusion of the new or modified General Plan 2045 goals and policies that were prepared as part of the proposed Project, impacts under Alternative A related to energy would be **greater** when compared to the proposed Project.

## 4.5.7 Geology and Soils

As described in Section 3.7, *Geology and Soils*, of this Draft EIR, the proposed Project would result in less-than-significant impacts related to geology and soils.

Portions of active faults in the EIR Study Area are designated within Alquist-Priolo Earthquake Fault Zones, which have a high likelihood of producing intense ground shaking. Much of the EIR Study Area is in an area of high liquefaction susceptibility and some portions are landslide prone. There is also potential for collapsible and expansive soils. Future development under both the proposed Project and Alternative A would be subject to the same federal, State, and local regulations that address and prevent hazards associated with geology, soils, and seismicity, including the California Building Code (CBC), Construction General Permit (CGP), LMC, and LDC. Alternative A would have similar impacts related to seismic hazards, soil erosion, unstable soils, and alternative wastewater systems as the proposed Project.

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Geological formations underlying the EIR Study Area have the potential to contain unique paleontological resources. Under both the proposed Project and Alternative A, future development would be required to comply with the federal Paleontological Resources Preservation Act and Public Resources Code (PRC) Section 5097 that prohibits the removal of any paleontological site or feature from public lands without the permission of the jurisdictional agency. However, Alternative A would not include the new or modified General Plan 2045 goals and policies that were prepared as part of the proposed Project, specifically the policies under Goal CI-5 to protect paleontological resources. Impacts related to paleontological resources would be greater under Alternative A.

Overall, without inclusion of the new or modified General Plan 2045 goals and policies that were prepared as part of the proposed Project, impacts under Alternative A related to geology and soils would be **greater** when compared to the proposed Project.

### 4.5.8 Greenhouse Gas Emissions

As concluded in Section 3.8, *Greenhouse Gas Emissions*, of this Draft EIR, implementation of the proposed General Plan 2045 goals and policies would reduce impacts related to GHG emissions and CAP consistency, but not to a less-than-significant level, and impacts would be significant and unavoidable.

Under Alternative A, the existing General Plan would remain and not be updated to reflect current federal and State laws, including the State's GHG reduction goal for year 2045 under Assembly Bill (AB) 1279. Alternative A would not achieve the GHG reduction goals under AB 1279 and would not include the new or modified General Plan 2045 goals and policies developed to support GHG reduction, climate adaptation, and sustainability. As a result, Alternative A would not provide the updated and enhanced policy direction for reducing GHG emissions that is included in the proposed Project.

Climate adaptation and sustainability has been woven into all the elements of the proposed General Plan 2045, including, among others, new policies in the Land Use Element that call for transit-supportive development, maximizing infill development, planning for climate change, considering climate change impacts during the development review process, and implementing the strategies in Plan Bay Area 2050; new policies in the Mobility Element that prioritize public transit, active transportation and zero-emission vehicles, plan for mobility hubs, and require new development to use Transportation Demand Management strategies; new policies in the Open Space Element to reduce per-capita energy use, replace City-owned gasoline and diesel-powered equipment with zero-emission models, purchase City vehicles that have alternative fuel systems, and power City facilities with resilient, carbon-free energy sources; and new policies in the Safety Element to increase installation of solar and battery systems and promote

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the transition to clean, energy-efficient heating and cooling technologies in new and existing buildings. These policies would not be adopted under Alternative A.

In comparison to the proposed Project, Alternative A would have a reduced ability to support long-term GHG reductions and to advance consistency with State climate goals. While the proposed Project would provide a more robust framework for addressing GHG emissions, both the proposed Project and Alternative A would face similar challenges in meeting the State's 2045 GHG reduction target under AB 1279. Therefore, Alternative A would not lessen the GHG-related impacts identified for the proposed Project, and impacts would be **similar**.

### **4.5.9 Hazards and Hazardous Materials**

As described in Section 3.9, *Hazards and Hazardous Materials*, of this Draft EIR, the proposed Project would result in less-than-significant impacts related to hazards and hazardous materials.

Under both the proposed Project and Alternative A, all hazardous materials to be transported must remain in compliance with United States Department of Transportation (USDOT) regulations. Future development under both scenarios would be subject to regulatory programs such as those overseen by Department of Toxic Substances Control (DTSC), State Water Resources Control Board (SWRCB), and Alameda County Department of Environmental Health (ACDEH). Nonresidential development that would require the use of hazardous materials regulated by federal, State, regional, and local agencies would issue permits for the use of the hazardous materials, which would be monitored and routinely updated by the responsible agency depending on the type of material. These agencies also require applicants for development of potentially contaminated properties to perform investigation and cleanup if the site is found to be contaminated with hazardous substances. Therefore, impacts related to the use, transport, handling, emission, and release of hazardous materials would be similar under Alternative A.

The EIR Study Area contains 30 hazardous materials sites that have not been fully remediated or had their cases closed, two of which are on the Cortese List compiled pursuant to Government Code Section 65962.5. Future development occurs on a designated hazardous materials site would be subject to site-specific Environmental Site Management Plans that include measures for identifying, testing, and managing soil and groundwater suspected of or known to contain hazardous materials. Impacts related to development on a site that is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 would be similar under Alternative A.

Under both scenarios, future development in the Livermore Municipal Airport Influence Area (AIA) must be reviewed by the Alameda County Airport Land Use Commission (ALUC) to ensure consistency with the Livermore Municipal Airport Land Use Compatibility Plan (ACLUP) and confirm that it would not result in safety hazards or excessive noise. Impacts related to safety

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hazards and excessive noise within an airport land use plan would be similar under Alternative A.

The proposed Project has been prepared in coordination with the City's Emergency Manager, who is responsible for coordinating agency response to disasters or other large-scale emergencies in the city and the Livermore-Pleasanton Fire Department (LPFD). Alternative A would not include the new or modified General Plan 2045 goals and policies that were prepared as part of the proposed Project, specifically the policies under Goal S-1 to facilitate efficient evacuation and emergency response. Furthermore, without the new and modified General Plan 2045 goals and policies, Alternative A would not be compliant with California Government Code Section 65302(g)(5), which requires Safety Elements to identify residential developments that do not have at least two emergency evacuation routes. Because Alternative A would not be consistent with State laws regarding efficient evacuation planning, this impact would be greater under Alternative A.

Overall, without inclusion of the new or modified General Plan 2045 goals and policies that were prepared as part of the proposed Project, impacts under Alternative A related to hazards and hazardous materials would be **greater** when compared to the proposed Project.

### 4.5.10 Hydrology and Water Quality

As described in Section 3.10, *Hydrology and Water Quality*, of this Draft EIR, the proposed Project would not result in significant impacts related to hydrology and water quality.

Future development under both the proposed Project and Alternative A would be subject to the same existing federal, State, and local regulations that serve to minimize pre- and post-construction impacts on water quality. Future development would be required to implement construction- and post-construction BMPs consistent with the CGP, the regional Municipal Separate Storm Sewer System (MS4) Permit, and the Alameda Countywide Clean Water Program (ACCWP) C.3 Stormwater Technical Guidance Manual. Future development would also be subject to CALGreen and California Plumbing Code water-efficient requirements, the Model Water Efficient Landscape Ordinance (MWELO) requirements for water-efficient landscaping, and LMC requirements that prohibit pollutants from entering storm drains. Future development that disturb one acre or more would be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) that identifies erosion control and pollution prevention measures to protect water quality. Future development that meets the criteria under California Water Code Section 10912 would be required to prepare a Water Supply Assessment (WSA) that demonstrates that project water demands would not exceed water supplies. Therefore, impacts related to water quality standards, groundwater supply, and drainage pattern alterations would be similar under Alternative A.

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The EIR Study Area is not within a tsunami or seiche zone. However, like the proposed Project, future development under Alternative A could occur in Federal Emergency Management Agency (FEMA) 100-year flood zones and would be subject to the LMC floodplain requirements. Inundation zones for the Del Valle Dam and Patterson Dam could reach the western and eastern portions of the EIR Study Area. However, Alternative A would not include the new or modified General Plan 2045 goals and policies that were prepared as part of the proposed Project, specifically the policies under Goal S-7 to minimize flood risks and the policies under Goal S-8 to minimize risks associated with dam failure. Impacts related to inundation would be greater under Alternative A.

The Department of Water Resources determined that Livermore Valley Groundwater basin continues to be managed sustainably to meet the requirements of the Sustainable Groundwater Management Act (SGMA). Future development under the proposed Project and Alternative A would be subject to existing regulatory frameworks, including the CGP, regional MS4 Permit, and LMC, which would ensure that both surface and groundwater quality are protected during construction and ongoing development and there would not be a conflict with a water quality control plan or sustainable groundwater management plan. Thus, impacts would be similar.

Overall, without inclusion of the new or modified General Plan 2045 goals and policies that were prepared as part of the proposed Project, impacts under Alternative A related to hydrology and water quality would be **greater** when compared to the proposed Project.

#### **4.5.11 Land Use and Planning**

As described in Section 3.11, *Land Use and Planning*, of this Draft EIR, the proposed Project would result in less-than-significant impacts related to land use and planning.

Similar to the proposed Project, future development under Alternative A would be subject to the existing land use regulations, such as those described in the LMC and LDC. Both the proposed Project and Alternative A would generally aim to improve connectivity, integrate infill development, and would not create physical barriers within existing communities. Impacts related to division of an established community would be similar under Alternative A.

Alternative A would not update the General Plan to ensure consistency with the zoning, regional plans, and federal and State laws. Furthermore, Alternative A would not implement the new or modified General Plan 2045 goals and policies prepared as part of the proposed Project, to avoid conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, Alternative A would not achieve the same level of consistency with the intent of the Cortese-Knox Act, the California Housing Element law, Plan Bay Area, East County Area Plan (ECAP), and ALCUP, as well as the other plans, policies, and regulations concerning a wide range of topics discussed throughout this Draft EIR. These

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inconsistencies could lead to greater potential for land use conflicts compared to the proposed Project. Impacts would be greater under Alternative A.

Overall, without inclusion of the new or modified General Plan 2045 goals and policies that were prepared as part of the proposed Project, impacts under Alternative A related to land use and planning would be **greater** when compared to the proposed Project.

### 4.5.12 Mineral Resources

As concluded in Section 3.12, *Mineral Resources*, of this Draft EIR, the proposed Project would result in significant and unavoidable impacts related to the loss of mineral resources due to incompatible land uses allowed in Mineral Resource Zone 2 (MRZ-2). Implementation of the proposed General Plan 2045 goals and policies would reduce impacts related to the loss of mineral resources, but not to a less-than-significant level, and impacts would be significant and unavoidable.

Most of the central and western portions of the EIR Study Area, including existing developed neighborhoods and commercial areas, have been classified as MRZ-2, where the land is underlain by demonstrated mineral resources considered important to the region or the State. Future development under both the proposed Project and Alternative A could occur in these areas and would be required to comply with the Surface Mining and Reclamation Act (SMARA) Section 2762(e), which requires an evaluation of the site to ascertain the significance of the mineral deposit in the area. The results of the evaluation would be submitted to the State Geologist and the SMGB for review. Impacts would be similar under Alternative A.

Therefore, overall impacts under Alternative A related to mineral resources would be **similar** when compared to the proposed Project.

### 4.5.13 Noise

As concluded in Section 3.13, *Noise*, of this Draft EIR, the proposed Project would result in significant and unavoidable impacts related to the substantial increase in noise levels above ambient conditions. Implementation of the proposed General Plan 2045 goals and policies would reduce impacts related to noise, but not to a less-than-significant level, and impacts would remain significant and unavoidable.

Under both the proposed Project and Alternative A, the primary source of temporary noise and vibration within the EIR Study Area would be demolition and construction activities associated with development projects. Operational noise is expected from additional traffic and new stationary noise sources. Future development under both the proposed Project and Alternative A would be required to comply with the FTA standards and the City's Noise Ordinance. Impacts

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related to an increase in ambient noise levels in excess of established standards and excessive groundborne vibration would be similar for construction-related noise and similar for construction-related vibration and operational noise under Alternative A.

Under both the proposed Project and Alternative A, there would be no existing or planned noise-sensitive uses within the 65 dBA CNEL noise level contour of the Livermore Municipal Airport. Impacts related to exposure of excessive noise levels to sensitive receptors within an ALUCP would be similar under Alternative A.

Overall, noise impacts would be **similar** under Alternative A when compared to the proposed Project.

#### **4.5.14 Population and Housing**

As described in Section 3.14, *Population and Housing*, of this Draft EIR, the proposed Project would result in less-than-significant impacts related to population and housing.

As shown in Table 4-1, Alternative A has a remaining growth capacity of 7,130 housing units and 17,150 residents, which is 9,480 units and 26,670 residents fewer than the proposed Project. Unlike the proposed Project, Alternative A would not include the updated policy framework that ensures adequate planning to accommodate future development and population increases through 2045. While the remaining growth under Alternative A could cover the City's 2023–2031 RHNA allocation of 4,570 units, it would not account for the following RHNA cycles through 2045. Additionally, Alternative A would not include the new or modified General Plan 2045 goals and policies that were prepared as part of the proposed Project, specifically the policies under Goal LU-22 to collaborate with other agencies on regional and local land use issues to influence and be aware of projected growth assumptions for Livermore. Under Alternative A, fewer residential units would be developed than under the proposed Project, consistent with the allowable buildout under the existing General Plan. However, statewide and regional population growth and needs would not be met, thus resulting in potentially **greater** unplanned population growth than under the proposed Project. In addition, this alternative would not meet the balanced growth or smart and sensitive development objectives.

Under both the proposed Project and Alternative A, the scale of temporary removal of housing would be typical for urban development projects. The small levels of displacement that may occur would be addressed through compliance with existing local regulations, including the LMC. Impacts related to displacement would be similar under Alternative A.

Overall, without the update to the General Plan to comprehensively account for population changes through 2045, impacts under Alternative A related to population and housing would be **greater** when compared to the proposed Project.

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### 4.5.15 Public Services, Parks, and Recreation

As described in Section 3.15, *Public Services, Parks, and Recreation*, of this Draft EIR, the proposed Project would result in less-than-significant impacts related to public services, parks, and recreation.

Future development under both the proposed Project and Alternative A would be required to comply with City and State regulations, including Title 24 of the California Code of Regulations (CCR), to ensure any new development meets the most current building and fire codes; SB 50, which requires and provides for full and complete school facilities mitigation for the impacts of future development; and the LMC for school facilities fees and parkland dedication. Impacts related to public services, parks, and recreation would be similar under Alternative A.

Therefore, overall impacts under Alternative A related to public services, parks, and recreation would be **similar** when compared to the proposed Project.

### 4.5.16 Transportation

As described in Section 3.16, *Transportation*, of this Draft EIR, the proposed Project would result in less-than-significant impacts related to transportation.

Alternative A would not update the General Plan to ensure consistency with the regional plans. Furthermore, Alternative A would not implement the new or modified General Plan 2045 goals and policies prepared as part of the proposed Project, specifically the policies in the Mobility Element to improve transit, roadway, bicycle pedestrian facilities, and the overall circulation system. Therefore, Alternative A would not achieve the same level of consistency with plans addressing the circulation system, such as Plan Bay Area, and impacts with respect to conflicting with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, and pedestrian facilities would be greater under Alternative A.

As described in Section 3.16, *Transportation*, under the proposed Project, the VMT per capita is estimated to be 23.9 and the VMT per employee is estimated to be 14.5. Under Alternative A, the VMT per capita is estimated to be 23.4 and the VMT per employee is estimated to be 13.9. Thus, Alternative A would result in a lower VMT than the proposed Project, though VMT for both the proposed Project and Alternative A are anticipated to be below the threshold for VMT per capita of 27.8 and per employee of 18.1. The proposed Project would include goals and policies, specifically those in the Mobility Element, that would not be implemented under Alternative A, which would serve to reduce VMT.

Future development under the proposed Project and Alternative A would be evaluated prior to design, installation, and implementation to ensure compliance with relevant federal, State, and local design standards and adequate emergency access. As such, impacts related to hazards due

to geometric design hazard or incompatible use and inadequate emergency access would be similar under Alternative A.

Therefore, overall, impacts under Alternative A related to transportation would be **similar** when compared to the proposed Project.

### 4.5.17 Utilities and Service Systems

As described in Section 3.17, *Utilities and Service Systems*, of this Draft EIR, the proposed Project would result in less-than-significant impacts related to utilities and service systems.

Similar to the proposed Project, future development under Alternative A would be subject to applicable federal, State, and local regulations such as the CGP, CALGreen, California Plumbing Code, California Energy Code, MWEL, regional MS4 Permit, CCWP C.3 Stormwater Technical Guidance Manual, and LMC. Therefore, impacts related to the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities; sufficient water supply; and wastewater treatment capacity would be similar under Alternative A.

Future development under the proposed Project and Alternative A would be required to comply with Division 4.4 of the CALGreen Building Code, which requires that at least 65 percent of nonhazardous construction and demolition waste from residential and nonresidential operations be recycled and/or salvaged for reuse. New development and redevelopment would also need to comply with the requirements of AB 341 that mandates recycling for commercial and multifamily residential land uses. Impacts related to solid waste generation and compliance with solid waste regulations would be similar under Alternative A.

While the proposed Project would allow for more overall development than Alternative A, the proposed Project includes goals and policies, including those in the Infrastructure Element as discussed in Section 3.17, *Utilities and Service Systems*, in this Draft EIR, that would ensure associated infrastructure is in place and keeps pace with development. Therefore, overall impacts under Alternative A related to utilities and service systems would be **similar** when compared to the proposed Project.

### 4.5.18 Wildfire

As described in Section 3.18, *Wildfire*, of this Draft EIR, the proposed Project would result in less-than-significant impacts related to wildfire.

Future development under both the proposed Project and Alternative A would be required to comply with adopted local, regional, and State plans and regulations addressing emergency access, response, and evacuation. Additionally, future development in Fire Hazard Severity

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Zones (FHSZs) would be required to comply with the CBC, California Fire Code (CFC), and LMC, which have minimum widths and vegetation fuel management around roadways. Future development would be reviewed by the LPPD for compliance with these requirements.

However, Alternative A would not include the new or modified General Plan 2045 goals and policies that were prepared as part of the proposed Project, specifically the policies under Goal S-1 to facilitate efficient evacuation and emergency response. Furthermore, without the new and modified General Plan 2045 goals and policies, Alternative A would not be compliant with California Government Code Section 65302(g)(5), which requires Safety Elements to identify residential developments that don't have at least two emergency evacuation routes. Because Alternative A would not be consistent with State laws regarding efficient evacuation planning, this impact would be greater under Alternative A.

Under both the proposed Project and Alternative A, future development would be required to comply with adopted local, regional, and State plans and regulations, such as the California Department of Forestry and Fire Protection (CAL FIRE) Strategic Fire Plan, Tri-Valley Local Hazard Mitigation Plan (LHMP), Alameda County Community Wildfire Protection Plan (CWPP), Livermore Emergency Operations Plan (EOP), and Livermore CAP to reduce wildfire hazards and coordinate response to these hazards on a statewide and regional scale. Additionally, all potential future development in wildfire-prone areas would be required to comply with PRC Section 4291, CBC, CFC, and LMC for grading standards and vegetation management. The California Public Utilities Commission (CPUC) also requires maintenance of vegetation around power lines, strict wire-to-wire clearances, annual inspections of aboveground power lines, and preparation of fire prevention plans for aboveground power lines in high-fire-threat districts. However, Alternative A would not include the new or modified General Plan 2045 goals and policies that were prepared as part of the proposed Project, specifically the policies under Goal S-5 to consider wildland fire hazards when planning for new developments. As such, impacts related to exacerbation of wildfire risks from slope, prevailing winds, vegetation management, installation or maintenance of infrastructure, and drainage patterns would be greater under Alternative A.

Overall, without inclusion of the new or modified General Plan 2045 goals and policies that were prepared as part of the proposed Project, impacts under Alternative A related to wildfire would be **greater** when compared to the proposed Project.

## 4.6 ALTERNATIVE B: REDUCED INDUSTRIAL AND CONCENTRATED RESIDENTIAL ALTERNATIVE

The Reduced Industrial and Concentrated Residential Alternative (Alternative B) assumes that like the proposed Project, the General Plan would be updated and the associated amendments to the LMC and LDC would be adopted. However, its primary objective is to avoid development on lands with important agricultural or mineral resource value. To achieve this, Alternative B would redesignate land uses in undeveloped areas that have been classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (referred to together as Farmland), or MRZ-2 areas to non-development designations.

Because these restrictions remove development potential from several areas, the City would need to redistribute land use elsewhere to maintain overall capacity. To maintain a similar amount of industrial land capacity as under the proposed Project, this alternative would retain a greater amount of land in the Midtown Specific Plan area in its current industrial designation. In turn, residential capacity in Midtown would decrease as compared to the proposed Project.

To maintain the same amount of overall residential capacity as in the proposed Project, this alternative would increase the allowable residential density in the Downtown and Isabel Neighborhood Specific Plan areas, add residential designations in the Vasco Row Special Planning Area, and increase the allowable residential densities on the Las Colinas site. Residential designations on Farmland in the South Livermore Valley Specific Plan area would also be redistributed to these same areas. Under this redistribution, Alternative B assumes development of the same amount of population and housing units as the proposed Project.

However, this alternative would not be able to fully accommodate the square footage allowed under the industrial designations as proposed in the General Plan 2045 land use map because there is not sufficient industrial land available within the UGB. Therefore, Alternative B would result in less industrial square footage and accordingly result in fewer jobs when compared to the proposed Project.

### 4.6.1 Aesthetics

As described in Section 3.1, *Aesthetics*, of this Draft EIR, the proposed Project would result in less-than-significant impacts related to aesthetics.

The EIR Study Area contains scenic views featuring natural landscape, rolling hills, and ridgelines, especially as seen from the I-580 scenic corridor. Development under both the proposed Project and Alternative B could potentially damage views from I-580, a State scenic highway. Future development subject to discretionary approval under both the proposed

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Project and Alternative B would be required to comply with the City's Design Standards and Guidelines and the regulations of the LMC and LDC, as well as various planning documents that govern scenic quality in the city. Like the proposed Project, Alternative B would implement the proposed General Plan 2045 goals and policies, including those protecting scenic views, and adopt the proposed Scenic Resources Overlay District. Impacts related to scenic views and views from I-580 would be similar under Alternative B.

The proposed Project is intended to ensure consistency between the General Plan, LDC, and federal and State laws. The proposed General Plan 2045 is the overriding planning document for Livermore. Like the proposed Project, Alternative B would amend the current General Plan and the LDC. As such, the proposed Project and Alternative B would not conflict with applicable zoning or other regulations and impacts would be similar.

Similar to the proposed Project, Alternative B would result in future development and activities that could intensify lighting sources and incrementally increase glare throughout the EIR Study Area. In addition to the general BMPs that require lighting that is context sensitive in style and intensity required under CALGreen, future development under both the proposed Project and Alternative B would be required to comply with the City's Design Standards and Guidelines and the regulations of the LMC and LDC, as well as various planning documents that govern scenic quality in the city. Like the proposed Project, Alternative B would implement the proposed General Plan 2045 goals and policies, including those protecting the nighttime sky as a significant scenic resource of Livermore. Impacts related to night and glare would be similar under Alternative B.

Therefore, overall impacts under Alternative B related to aesthetics would be **similar** when compared to the proposed Project.

### 4.6.2 Agricultural Resources

As concluded in Section 3.2, *Agricultural Resources*, of this Draft EIR, the proposed Project would result in significant and unavoidable impacts related to the loss of Farmland (Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) and conflict with Williamson Act contracts due to the potential conversion to nonagricultural land uses. Implementation of the proposed General Plan 2045 goals and policies would reduce impacts related to the conversion of qualifying agricultural lands, but not to a less-than-significant level, and impacts would remain significant and unavoidable.

The EIR Study Area includes 338 acres of Prime Farmland, 728 acres of Unique Farmland, and 409 acres of Farmland of Statewide Importance. The EIR Study Area also contains 1,317 acres of land zoned for Agriculture (OS-A), Planned Development/Agriculture (PD-AG), and South Livermore Valley/Agriculture (SLV-AG) and 1,909 acres of agricultural land under Williamson Act contracts. Under Alternative B, residential designations on Farmland in the South Livermore

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Valley Specific Plan area would be redesignated to non-development designations. Thus, more Farmland would be protected from development and there would be less potential for conflict with a Williamson Act contract compared to the proposed Project. Impacts related to the conversion of Farmland and conflict with the Williamson Act would be reduced under Alternative B.

Similar to the proposed project, Alternative B would result in potentially incompatible urban uses next to farms or ranches, creating circumstances that could impair the productivity and profitability of agricultural operations, and could eventually lead farmers to take their land out of production. Under both the proposed Project and Alternative B, the City would be required to collaborate with Alameda County and Alameda County LAFCO to protect existing land uses from development inappropriate for rural areas. As such, impacts would be similar.

Overall, impacts under Alternative B related to agricultural resources would be **reduced** when compared to the proposed Project. However, the proposed Project's significant and unavoidable impacts would not be completely avoided under Alternative B.

### **4.6.3 Air Quality**

As concluded in Section 3.3, *Air Quality*, of this Draft EIR, the proposed Project would result in significant and unavoidable impacts related to the construction and operation of future development generating emissions that would exceed the Bay Area Air District's regional significance thresholds and cumulatively contribute to the nonattainment designations of the SFBAAB. Implementation of the proposed General Plan 2045 goals and policies would reduce impacts related to the generation of emissions, but not to a less-than-significant level and impacts would remain significant and unavoidable.

The 2017 Clean Air Plan strategy is based on regional population and employment projections in the Bay Area compiled by ABAG, which are based in part on cities' General Plan land use designations. Neither the proposed Project nor Alternative B would exceed the regional growth projections and would not conflict with the 2017 Clean Air Plan. Thus, there would be a similar impact.

New development under both the proposed Project and Alternative B would increase air pollutant emissions and contribute to the overall emissions inventory in the SFBAAB, as well as expose sensitive receptors to pollutant concentrations. Permitted sources of emissions under the proposed Project and Alternative B would be regulated by the Air District to ensure that, on a project-by-project basis, emissions achieve their permit thresholds. Like the proposed Project, Alternative B would implement the proposed General Plan 2045 goals and policies, including those to limit air pollutant emissions and provide adequate buffer distances and appropriate mitigation to protect sensitive receptors.

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Alternative B would not result in the full buildout of industrial development as allowed under the proposed Project. As such, it would generate fewer criteria pollutant emissions and would reduce the potential for exposure of sensitive receptors. However, the reduction in industrial square footage would not be substantial enough to avoid the significant and unavoidable air quality impacts identified for the proposed Project. Alternative B would therefore lessen, but not eliminate, the proposed Project's significant impacts related to criteria pollutant emissions and exposure of sensitive receptors.

Similar to the proposed Project, Alternative B could result in odor emissions. Odors are regulated under Air District Regulation 1, Rule 1-301, *Public Nuisance*. Future development under both proposed Project and Alternative B would be required to comply with Air District Regulation 1 would ensure that odor impacts associated with the proposed Project are minimized. However, Alternative B would not allow the full buildout of industrial development as allowed under the proposed Project. As such, there would be less odor emissions from industrial development and impacts would be reduced compared to the proposed Project.

Overall, with less industrial development, air quality impacts under Alternative B would be **reduced** when compared to the proposed Project. However, the project's significant and unavoidable impacts would not be completely avoided under Alternative B.

### 4.6.4 Biological Resources

As concluded in Section 3.4, *Biological Resources*, of this Draft EIR, the proposed Project would result in less-than-significant impacts related to wildlife movement with implementation of Mitigation Measure BIO-4 requiring bird-safe design measures by project applicants to reduce potential impacts on migratory and resident birds to less than significant.

Future development under both the proposed Project and Alternative B would be required to follow all federal, State, and local regulations to protect special-status species, riparian habitats, wetlands, and wildlife movement corridors, including the requirements of the USFWS, CDFW, the strategies of the EACCS, and the BMPs of the SMP. Like the proposed Project, Alternative B would implement the proposed General Plan 2045 goals and policies, including those to implement the EACCS, adopt the Livermore HCP, and coordinate with other agencies to plan for wildlife linkage, as well as Mitigation Measure BIO-4 to reduce potential impacts on migratory and resident birds. Impacts related to special-status species, riparian habitats, wetlands, and wildlife movement corridors would be similar under Alternative B.

Neither the proposed Project nor Alternative B would conflict with any local policies or ordinances protecting biological resources or the provisions of an adopted HCP. As such, impacts would be similar under Alternative B.

Therefore, overall impacts under Alternative B related to biological resources would be **similar** when compared to the proposed Project.

#### 4.6.5 Cultural and Tribal Cultural Resources

As described in Section 3.5, *Cultural and Tribal Cultural Resources*, the proposed Project would result in less-than-significant impacts related to unknown archaeological and tribal cultural resources with implementation of Mitigation Measures CUL-2, CUL-4, and CUL-5, which would ensure that archaeological and tribal cultural resources identified during construction would be identified, evaluated, and protected or appropriately treated.

Future development under both the proposed Project and Alternative B would be required to comply with the City's Design Standards and Guidelines and the regulations of the LMC and LDC, including the Historic Preservation Ordinance. Future development would also be subject to the procedures of conduct following the discovery of human remains as mandated by CEQA Section 15064.5(e), PRC Section 5097.98, and Health and Safety Code Section 7050.5. Impacts related to historic resources and human remains would be similar impacts under Alternative B.

Under the proposed Project and Alternative B, future development would be subject to PRC Section 5097.5(a), which specifies that a person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any archaeological sites without the express permission of the public agency having jurisdiction over the lands. Tribal consultation pursuant to AB 52 and SB 18 would also be required, as appropriate. Like the proposed Project, Alternative B would implement Mitigation Measures CUL-2, CUL-4, and CUL-5, and new and modified General Plan 2045 goals and policies serving to reduce environmental impacts under CEQA. For example, CI-12.6 directs the City to respect and protect tribal cultural resources and maintain a collaborative relation with local Native American tribal representatives. Implementation of these mitigation measures and these goals and policies would ensure that archaeological and tribal cultural resources identified during construction would be identified, evaluated, and protected or appropriately treated. Impacts related to archaeological and tribal cultural resources would be similar under Alternative B.

Therefore, overall impacts under Alternative B related to cultural and tribal cultural resources would be **similar** when compared to the proposed Project.

#### 4.6.6 Energy

As described in Section 3.6, *Energy*, of this Draft EIR, the proposed Project would result in less-than-significant impacts related to energy.

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Future development under both the proposed Project and Alternative B would be required to comply with building requirements in the California Green Building Code and Building and Energy Efficiency Standards, which would ensure new development would not result in wasteful or inefficient energy usage. Compliance with LMC Chapter 15.26 and the 2022 CAP would further support the incorporation of electric and energy efficiency systems in new development. Like the proposed Project, Alternative B would implement the proposed General Plan 2045 goals and policies, including those to promote clean and resilient energy through increased energy efficiency and support the statewide goal of transitioning the electricity grid to renewable sources. Impacts related to energy efficiency and conflicting with a state or local plan for renewable energy or energy efficiency would be similar under Alternative B.

Therefore, overall impacts under Alternative B related to energy would be **similar** when compared to the proposed Project.

### 4.6.7 Geology and Soils

As described in Section 3.7, *Geology and Soils*, of this Draft EIR, the proposed Project would result in less-than-significant impacts related to geology and soils.

Portions of active faults in the EIR Study Area are designated within Alquist-Priolo Earthquake Fault Zones, which have a high likelihood of producing the intense ground shaking. Much of the EIR Study Area is in an area of high liquefaction susceptibility and some of portions are landslide prone. There is also potential for collapsible and expansive soils. Future development under both the proposed Project and Alternative B would be subject to the same federal, State, and local regulations that address and prevent hazards associated with geology, soils, and seismicity, including the CBC, CGP, LMC, and LDC. Like the proposed Project, Alternative B would implement the proposed General Plan 2045 goals and policies. Impacts related to seismic hazards, soil erosion, unstable soils, and alternative wastewater systems would be similar under Alternative B.

Geological formations underlying the EIR Study Area have the potential to contain unique paleontological resources. Under both the proposed Project and Alternative B, future development would be required to comply with the federal Paleontological Resources Preservation Act and PRC Section 5097 that prohibits the removal of any paleontological site or feature from public lands without the permission of the jurisdictional agency. Like the proposed Project, Alternative B would implement the proposed General Plan 2045 goals and policies, including those to protect paleontological resources. Impacts related to paleontological resources would be similar under Alternative B.

Therefore, overall impacts under Alternative B related to geology and soils would be **similar** when compared to the proposed Project.

## 4.6.8 Greenhouse Gas Emissions

As concluded in Section 3.8, *Greenhouse Gas Emissions*, of this Draft EIR, implementation of the proposed General Plan 2045 goals and policies would reduce impacts related to GHG emissions and CAP consistency, but not to a less-than-significant level, and impacts would be significant and unavoidable.

The proposed General Plan 2045 is the primary planning document for the City of Livermore, and the proposed Project is intended to ensure consistency between the General Plan, Zoning Ordinance, regional plans, and federal and State laws. Like the proposed Project, Alternative B would implement the proposed General Plan 2045 goals and policies, including those to reduce VMT and increase energy and water efficiency and renewable energy improvements. In addition, Alternative B would redistribute residential and industrial development to the Midtown, Downtown, and Isabel Neighborhood Specific Plan areas by increasing densities in these urban areas. This redistribution would further reduce VMT by collocating housing, jobs, and transit, and consequently, reduce GHG emissions. As such, impacts related to GHG emissions would be reduced under Alternative B.

However, because Alternative B would still allow much of the development allowed under the proposed Project, it is anticipated that GHG emissions under Alternative B would remain similar to those of the proposed Project and would therefore not substantially lessen the proposed Project's identified conflicts with AB 1279 or other applicable plans, policies, or regulations adopted for the purpose of reducing the emission of greenhouse gases. As such, impacts would be similar under Alternative B.

Overall, with increased density in concentrated urban areas, impacts related to GHG emissions under Alternative B would be **reduced** when compared to the proposed Project. However, significant and unavoidable impacts under the proposed Project would not be completely avoided under Alternative B.

## 4.6.9 Hazards and Hazardous Materials

As described in Section 3.9, *Hazards and Hazardous Materials*, of this Draft EIR, the proposed Project would not result in less-than-significant impacts related to hazards and hazardous materials.

Under both the proposed Project and Alternative B, all hazardous materials to be transported must remain in compliance with USDOT regulations. Future development would be subject to regulatory programs such as those overseen by DTSC, SWRCB, and ACDEH. Nonresidential development that would require the use of hazardous materials regulated by federal, State, regional, and local agencies would issue permits for the use of the hazardous materials, which would be monitored and routinely updated by the responsible agency depending on the type of

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material. These agencies also require applicants for development of potentially contaminated properties to perform investigation and cleanup if the site is found to be contaminated with hazardous substances. Like the proposed Project, Alternative B would implement the proposed General Plan 2045 goals and policies, including those to minimize risk from hazardous materials. Because both scenarios would allow for the transport of hazardous materials and would be requirement to comply with the same regulations, impacts would be similar.

The EIR Study Area contains ten hazardous materials sites which have not been fully remediated or had their cases closed, two of which are on the Cortese List compiled pursuant to Government Code Section 65962.5. Future development under the proposed Project and Alternative B that occur on a designated hazardous materials site would be subject to site specific Environmental Site Management Plans that include measures for identifying, testing, and managing soil and groundwater suspected of or known to contain hazardous materials. Impacts related to development on a site that is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 would be similar under Alternative B.

Under the proposed Project and Alternative B, future development in the Livermore Municipal AIA must be reviewed by the Alameda County ALUC to ensure consistency with the ACLUP and confirm that it would not result in safety hazards or excessive noise. Impacts related to safety hazards and excessive noise within an airport land use plan would be similar under Alternative B.

The proposed Project has been prepared in coordination with the City's Emergency Manager, who is responsible for coordinating agency response to disasters or other large-scale emergencies in the city and the LFPD. Like the proposed Project, Alternative B would implement the proposed General Plan 2045 and policies, including those to facilitate efficient evacuation and emergency response. As such, impacts related to evacuation and emergency response would be similar under the Alternative B.

Therefore, though there would be less industrial development, overall impacts under Alternative B related to hazards and hazardous materials would be **similar** when compared to the proposed Project.

### 4.6.10 Hydrology and Water Quality

As described in Section 3.10, *Hydrology and Water Quality*, of this Draft EIR, the proposed Project would not result in any significant impacts related to hydrology and water quality.

Future development under both the proposed Project and Alternative B would be subject to the same existing federal, State, and local regulations that serve to minimize pre- and post-construction impacts to water quality. Future development would be required to implement construction- and post-construction BMPs consistent with the CGP, the regional MS4 Permit,

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and the ACCWP C.3 Stormwater Technical Guidance Manual. Future development would also be subject to CALGreen and California Plumbing Code water-efficient requirements, the MWELo requirements for water-efficient landscaping, and LMC requirements that prohibit pollutants from entering storm drains. Future development that disturbs one acre or more would be required to prepare and implement a SWPPP that identifies erosion control and pollution prevention measures to protect water quality. Future development that meets the criteria under California Water Code Section 10912 would be required to prepare a WSA that demonstrates that project water demands would not exceed water supplies. Like the proposed Project, Alternative B would implement the proposed General Plan 2045 goals and policies, including those to protect water quality, groundwater supply, and the stormwater drainage system. Impacts related to water quality standards, groundwater supply, and drainage pattern alterations would be similar under Alternative B.

The EIR Study Area is not within a tsunami or seiche zone. However, like the proposed Project, future development under Alternative B could occur in FEMA 100-year flood zones and would be subject to the LMC floodplain requirements. Inundation zones for the Del Valle Dam and Patterson Dam could reach the western and eastern portions of the EIR Study Area. Like the proposed Project, Alternative B would implement the proposed General Plan 2045 goals and policies, including those to minimize flood risks and risks associated with dam failure. Impacts related to inundation would be similar to Alternative B.

The Department of Water Resources determined that Livermore Valley Groundwater basin continues to be managed sustainably to meet the requirements of SGMA. Future development under the proposed Project and Alternative B would be subject to existing regulatory frameworks, including the CGP, regional MS4 Permit, and LMC, which would ensure that both surface and groundwater quality are protected during construction and ongoing development. Like the proposed Project, Alternative B would implement the proposed General Plan 2045 goals and policies, including those to protect paleontological resources. As such, there would be no conflict with a water quality control plan or sustainable groundwater management plan and impacts would be similar.

Therefore, overall impacts under Alternative B related to hydrology and water quality would be **similar** when compared to the proposed Project.

#### **4.6.11 Land Use and Planning**

As described in Section 3.11, *Land Use and Planning*, of this Draft EIR, the proposed Project would result in less-than-significant impacts related to land use and planning.

Similar to the proposed Project, future development under Alternative B would be subject to the existing land use regulations, such as those described in the LMC and LDC. Both the proposed Project and Alternative B would generally aim to improve connectivity, integrate infill

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development, and would not create physical barriers within existing communities. Impacts related to division of an established community would be similar under Alternative B.

The proposed General Plan 2045 is the primary planning document for the City of Livermore, and the proposed Project is intended to ensure consistency between the General Plan, Zoning Ordinance, regional plans, and federal and State laws. Under Alternative B, future development would be required to comply with the proposed General Plan 2045 goals and policies prepared as part of the proposed Project. Therefore, Alternative B would also be consistent with the Cortese-Knox Act, the California Housing Element Law, Plan Bay Area, ECAP, and ALUCP. Impacts would be similar under Alternative B.

Therefore, overall impacts under Alternative B related to land use and planning would be **similar** when compared to the proposed Project.

### 4.6.12 Mineral Resources

As concluded in Section 3.12, *Mineral Resources*, of this Draft EIR, the proposed Project would result in significant and unavoidable impacts related to the loss of mineral resources due to incompatible land uses allowed in MRZ-2. Implementation of the proposed General Plan 2045 goals and policies would reduce impacts related to the loss of mineral resources, but not to a less-than-significant level, and impacts would be significant and unavoidable.

Most of the central and western portions of the EIR Study Area, including existing developed neighborhoods and commercial areas, have been classified as MRZ-2, where the land is underlain by demonstrated mineral resources considered important to the region or the State. Future development under both the proposed Project and Alternative B could occur in these areas and would be required to comply with the SMARA Section 2762(e), which requires an evaluation of the site to ascertain the significance of the mineral deposit in the area. The results of the evaluation would be submitted to the State Geologist and the SMGB for review.

However, under Alternative B, select parcels in MRZ-2 areas would be redesignated to non-development designations, resulting in less incompatible development in MRZ-2 areas compared to the proposed Project. This would reduce the extent of potential land use conflicts compared to the proposed Project. However, because some MRZ-2 areas could still be converted to non-mining designations, Alternative B would not fully avoid the types of conflicts identified for the proposed Project. Overall, impacts under Alternative B related to mineral resources would be **reduced** when compared to the proposed Project. However, the proposed Project's significant and unavoidable impacts would not be completely avoided under Alternative B.

### 4.6.13 Noise

As concluded in Section 3.13, *Noise*, of this Draft EIR, the proposed Project would result in significant and unavoidable impacts related to the substantial increase in noise levels above ambient conditions. Implementation of the proposed General Plan 2045 goals and policies would reduce impacts related to noise, but not to a less-than-significant level, and impacts would remain significant and unavoidable.

Under both the proposed Project and Alternative B, the primary source of temporary noise and vibration within the EIR Study Area would be demolition and construction activities associated with development projects. Operational noise is expected from additional traffic, and new stationary noise sources. Future development under both the proposed Project and Alternative B would be required to comply with the FTA standards and the City's Noise Ordinance. Impacts related to increase in ambient noise levels in excess of established standards and excessive groundborne vibration would be similar for construction-related noise and construction related vibration and operational noise under Alternative B.

Under both the proposed Project and the Alternative B, there would be no existing or planned noise sensitive uses within the 65 dBA CNEL noise level contour of the Livermore Municipal Airport. Impacts related to exposure of excessive noise levels to sensitive receptors within an ALUCP be similar under Alternative B.

Overall, noise impacts under Alternative B would be **similar** when compared to the proposed Project.

### 4.6.14 Population and Housing

As described in Section 3.14, *Population and Housing*, of this Draft EIR, the proposed Project would result in less-than-significant impacts related to population and housing.

Alternative B assumes the same amount of housing units and population growth as the proposed Project. Like the proposed Project, Alternative B would include updated policy framework that ensures adequate planning to accommodate future development and population increases through 2045. Like the proposed Project, Alternative B would implement the proposed General Plan 2045 goals and policies, including those to collaborate with other agencies on regional and local land use issues to influence and be aware of projected growth assumptions for Livermore. Impacts related to unplanned population growth would be similar under Alternative B.

Under both the proposed Project and Alternative B, the scale of temporary removal of housing would be typical for urban development projects. The small levels of displacement that may

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occur would be addressed through compliance with existing local regulations, including the LMC. Impacts related to displacement would be similar under Alternative B.

Therefore, overall impacts under Alternative B related to population and housing would be **similar** when compared to the proposed Project.

### 4.6.15 Public Services, Parks, and Recreation

As described in Section 3.15, *Public Services, Parks, and Recreation*, of this Draft EIR, the proposed Project would result in less-than-significant impacts related to public services, parks, and recreation.

Future development under both the proposed Project and Alternative B would be required to comply City and State regulations, including Title 24 of the CCR, to ensure any new development proposed meets the most current building and fire codes; SB 50, which requires and provides for full and complete school facilities mitigation for the impacts of future development; and the LMC, for school facilities fees and parkland dedication. Like the proposed Project, Alternative B would implement the proposed General Plan 2045 goals and policies, including those that serve to minimize impacts on fire protection services, schools, libraries, and park and recreational facilities. Impacts related to public services, parks, and recreation would be similar under Alternative B.

Therefore, overall impacts under Alternative B related to public services, parks, and recreation would be **similar** when compared to the proposed Project.

### 4.6.16 Transportation

As described in Section 3.16, *Transportation*, of this Draft EIR, the proposed Project would result in less-than-significant impacts related to transportation.

Like the proposed Project, Alternative B would implement the proposed General Plan 2045 goals and policies, including the policies in the Mobility Element to improve transit, roadway, bicycle pedestrian facilities, and the overall circulation system. Therefore, Alternative B would achieve consistency with plans addressing the circulation system. As such, impacts would be similar under Alternative B.

As described in Section 3.16, *Transportation*, under the proposed Project, the VMT per capita is estimated to be 23.9 and the VMT per employee is estimated to be 14.5, which is below the established threshold for VMT per capita of 27.8 and per employee of 18.1. Under Alternative B, residential and industrial development would be redistributed to the Midtown, Downtown, and Isabel Neighborhood Specific Plan areas by increasing densities in these urban areas, which

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would further reduce VMT, by co-locating housing, jobs, and transit. Impacts would be similar under Alternative B.

Future development under the proposed Project and Alternative B would be evaluated prior to design, installation, and implementation to ensure compliance with relevant federal, State, and local design standards and adequate emergency access. As such, impacts related to hazards due to geometric design hazard or incompatible use and inadequate emergency access would be similar under Alternative B.

Therefore, impacts under Alternative B related to transportation would be **similar** when compared to the proposed Project.

#### **4.6.17 Utilities and Service Systems**

As described in Section 3.17, *Utilities and Service Systems*, of this Draft EIR, the proposed Project would result in less-than-significant impacts related to utilities and service systems.

Similar to the proposed Project, future development under Alternative B would be subject to applicable federal, State, and local regulations such as the CGP, CALGreen, California Plumbing Code, California Energy Code, MWEL, regional MS4 Permit, CCWP C.3 Stormwater Technical Guidance Manual, and LMC. Like the proposed Project, Alternative B would implement the proposed General Plan 2045 goals and policies, including those that promote water conservation, adequate stormwater drainage, and energy efficiency. However, Alternative B would not be able to fully accommodate the reallocation of industrial designations under the proposed Project and would therefore result in less demand for utilities and service systems because infrastructure would not have to be expanded to as many new areas and there would be less industrial square footage for service providers to serve. Impacts related to the relocation or construction of new or expanded water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities; sufficient water supply; and wastewater treatment capacity would be reduced under the proposed Project.

Future development under the proposed Project and Alternative B would be required to comply with Division 4.4 of the CALGreen Building Code, which requires that at least 65 percent of nonhazardous construction and demolition waste from residential and nonresidential operations be recycled and/or salvaged for reuse. New development and redevelopment would also need to comply with the requirements of AB 341 that mandates recycling for commercial and multi-family residential land uses. Like the proposed Project, Alternative B would implement the proposed General Plan 2045 goals and policies, including those to promote waste management and diversion. However, Alternative B would not be able to fully accommodate the reallocation of industrial uses under the proposed Project and would therefore result in reduced solid waste generation. Impacts related to solid waste generation would be reduced under Alternative B because less industrial square footage would result in

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less generation of solid waste associated with such industrial uses. Lastly, because the proposed Project and Alternative B would be required to comply with the same regulations intended to reduce waste, impacts would be similar in this regard.

Overall, with less industrial square footage, impacts related to utilities and service systems under Alternative B would be **reduced** when compared to the proposed Project.

### 4.6.18 Wildfire

As described in Section 3.18, *Wildfire*, of this Draft EIR, the proposed Project would result in less-than-significant impacts related to wildfire.

Future development under both the proposed Project and Alternative B would be required to comply with adopted local, regional, and State plans and regulations addressing emergency access, response, and evacuation. Additionally, future development in Fire Hazard Severity Zones (FHSZ) would be required to comply with the CBC, CFC, and LMC, which have minimum widths and vegetation fuel management around roadways. Potential development would be reviewed by the LPFD for compliance with these requirements. Like the proposed Project, Alternative B would implement the proposed General Plan 2045 goals and policies, including those to facilitate efficient evacuation and emergency response. As such, impacts related to evacuation and emergency response would be similar under Alternative B.

Under both the proposed Project and Alternative B, future development would be required to comply with adopted local, regional, and State plans and regulations, such as the CAL FIRE Strategic Fire Plan, Tri-Valley LHMP, Alameda County CWPP, Livermore EOP, and Livermore CAP to reduce wildfire hazards and coordinate response to these hazards on a statewide and regional scale. Additionally, all potential future development in wildfire-prone areas in Livermore would be required to comply with PRC Section 4291, CBC, CFC, and LMC for grading standards and vegetation management. The CPUC also requires maintenance of vegetation around power lines, strict wire-to-wire clearances, annual inspections of aboveground power lines, and preparation of fire prevention plans for aboveground power lines in high-fire-threat districts. Like the proposed Project, Alternative B would implement the proposed General Plan 2045 goals and policies, including those to consider wildland fire hazards when planning for new developments. As such, impacts related to exacerbation of wildfire risks from slope, prevailing winds, vegetation management, installation or maintenance of infrastructure, and drainage patterns would be similar under Alternative B.

Therefore, overall impacts under Alternative B related to wildfire would be **similar** when compared to the proposed Project.

## 4.7 SUMMARY OF ALTERNATIVES EVALUATION

Table 4-2, *Comparison of Project Alternative Impacts*, compares the impact of each alternative to impacts of the proposed Project. The impacts of each alternative are classified as having a reduced (↓), similar or comparable to (=), or greater (↑) level of impact when compared to the proposed Project.

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**Table 4-2 Comparison of Project Alternative Impacts**

<b>Environmental Topic</b>	<b>Proposed Project <sup>1</sup></b>	<b>Alternative A: No Project Alternative</b>	<b>Alternative B: Reduced Industrial and Concentrated Residential Alternative</b>
3.1 Aesthetics	LTS	↑	=
3.2 Agricultural Resources	SU	=	↓
3.3 Air Quality	SU	=	↓
3.4 Biological Resources	LTS/M	↑	=
3.5 Cultural and Tribal Cultural Resources	LTS/M	↑	=
3.6 Energy	LTS	↑	=
3.7 Geology and Soils	LTS	↑	=
3.8 Greenhouse Gas Emissions	SU	=	↓
3.9 Hazards and Hazardous Materials	LTS	↑	=
3.10 Hydrology and Water Quality	LTS	↑	=
3.11 Land Use and Planning	LTS	↑	=
3.12 Mineral Resources	SU	=	↓
3.13 Noise	SU	=	=
3.14 Population and Housing	LTS	↑	=
3.15 Public Services, Parks, and Recreation	LTS	=	=
3.16 Transportation	LTS	=	=
3.17 Utilities and Service Systems	LTS	=	↓
3.18 Wildfire	LTS	↑	=

Notes:

LTS Less than Significant

LTS/M Less than Significant with Mitigation

SU Significant and Unavoidable

1. The impacts listed in this column represent the highest significance determination for each respective topic.

Table 4-3, *Ability to Meet Proposed Project Objectives*, identifies the ability of each of the project alternatives to meet the proposed Project’s objectives.

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**Table 4-3 Ability to Meet Proposed Project Objectives**

Objective	Proposed Project	Alternative A: No Project Alternative	Alternative B: Reduced Industrial and Concentrated Residential Alternative
Establish a comprehensive framework to guide Livermore’s physical development, resource conservation, and provision of infrastructure and public services over a 20-year horizon.	Yes	<b>No.</b> The General Plan, which includes a vision, guiding principles, goals, policies, and actions, functions as the City’s primary land use regulatory tool. The proposed General Plan 2045 incorporates regional forecasts for 2045 that extend the planning horizon by approximately 20 years from the current 2025 horizon. Because the existing General Plan would not be updated under Alternative A, it would not incorporate these forecasts and would not achieve this objective.	<b>Yes.</b> Like the proposed Project, Alternative B would update the General Plan. Therefore, Alternative B would incorporate regional forecasts for 2045 that extend the planning horizon by approximately 20 years from the current 2025 horizon. Because Alternative B would incorporate these forecasts, it would fully achieve this objective.
Focus future housing and job growth within the Urban Growth Boundary, emphasizing infill development over dispersed growth at lower densities.	Yes	<b>Partial.</b> The existing General Plan allows housing within the UGB and emphasizes infill over dispersed growth. However, the proposed General Plan 2045 allows for more housing within infill areas than the existing General Plan, and therefore, this alternative would only partially achieve this objective.	<b>Partial.</b> This alternative would not be able to fully accommodate the reallocation of square footage allowed under the industrial designations as proposed in the General Plan 2045 land use map because there is not sufficient industrial land available within the UGB. Therefore, Alternative B would result in less industrial square footage and, accordingly, result in fewer jobs when compared to the proposed Project, which could result in a jobs to housing imbalance and residents commuting to other communities for work. Therefore, this alternative only partially meets this objective.
Plan for vibrant, mixed-use districts that have access to multi-modal transportation opportunities including regional rail and local transit services.	Yes	<b>Partial.</b> The proposed General Plan 2045 includes the Midtown Specific Plan Area, which is a Priority Development Area, and this designation is intended to create a mixed-use, transit-supportive neighborhood that balances housing, commercial, office, and industrial uses. While Alternative A would allow a mix of uses, the proposed General Plan 2045 provides updates to mixed-use districts	<b>Yes.</b> Like the proposed Project, Alternative B would update the General Plan. Like the proposed Project, Alternative B would include the Midtown Specific Plan Area, which is a Priority Development Area. This designation is intended to create a mixed-use, transit-supportive neighborhood that balances housing, commercial, office, and industrial uses. Alternative B would also include

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**Table 4-3 Ability to Meet Proposed Project Objectives**

Objective	Proposed Project	Alternative A: No Project Alternative	Alternative B: Reduced Industrial and Concentrated Residential Alternative
		to spur this type of development. Therefore, Alternative A would only partially achieve this objective.	updates to mixed-use districts to spur this type of development. Therefore, this alternative would fully achieve this objective.
Plan for diverse housing choices so that individuals and families of all income levels and lifestyles can find housing, while also meeting the State-mandated Regional Housing Needs Allocation requirements for the current and estimated future housing cycles through 2045.	Yes	<b>No.</b> Remaining growth under Alternative A could cover the City’s 2023–2031 RHNA allocation of 4,570 units, but it would not account for the following RHNA cycles through 2045. Therefore, because it would not accommodate adequate housing capacity to achieve RHNA requirements through 2045, it would not achieve this objective.	<b>Yes.</b> Alternative B assumes the same amount of housing units and population growth as the proposed Project. Like the proposed Project, Alternative B would include updated policy framework that ensures adequate planning to accommodate future development and population increases through 2045. Therefore, this alternative would fully achieve this objective.
Accommodate a diverse range of jobs and businesses to support a thriving and resilient economy and to increase the opportunity for Livermore residents to work in Livermore.	Yes	<b>Partial.</b> A critical component of balanced land use is achieving a comparable ratio of jobs and housing to facilitate the option to both live and work in Livermore. The City’s goal is to have jobs and salaries that allow workers to afford Livermore home and rent prices. Several modified and new goals and policies (e.g., LU-1.2, LU-5.1, LU-6.1, and LU-6.2) support this objective by maintaining and allowing a variety of job-generating land uses. While the existing General Plan also provides for job growth, it does not include goals and policies that focus on providing a diverse range of jobs to accommodate Livermore residents and, therefore, only partially achieves this objective.	<b>Partial.</b> Alternative B would result in less industrial square footage than the proposed Project, and accordingly, result in fewer jobs when compared to the proposed Project, which could result in a jobs to housing imbalance and residents commuting to other communities for work. Therefore, this alternative only partially meets this objective.

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**Table 4-3 Ability to Meet Proposed Project Objectives**

Objective	Proposed Project	Alternative A: No Project Alternative	Alternative B: Reduced Industrial and Concentrated Residential Alternative
<p>Promote Livermore’s long-term fiscal sustainability by identifying development types, intensities, and locations that generate public revenues sufficient to fund infrastructure, services, and maintenance over time.</p>	<p>Yes</p>	<p><b>Partial.</b> Industrial lands support a range of businesses, many of which provide significant tax revenue. The City is committed to ensuring sufficient industrial land remains available to existing businesses and for future industrial enterprises, strengthening Livermore’s position as an employment center, fostering continued innovation, and supporting a resilient local economy. Several modified and new goals and policies (e.g., LU-6.1 and LU-6.2) support this objective by maintaining and allowing a variety of industrial land uses, which provide living-wage jobs and generate significant tax revenue. While the existing General Plan also provides for tax-generating land uses, it does not include goals and policies that focus on providing a diverse range of industrial jobs, and, therefore, only partially achieves this objective.</p>	<p><b>Partial.</b> Industrial lands support a range of businesses, many of which provide significant tax revenue. The City is committed to ensuring sufficient industrial land remains available to existing businesses and for future industrial enterprises, strengthening Livermore’s position as an employment center, fostering continued innovation, and supporting a resilient local economy. Because this alternative would not be able to fully accommodate the square footage allowed under the industrial designations as provided in the proposed Project, it would provide for less tax-generating land uses and would only partially achieve this objective.</p>
<p>Plan for future circulation and infrastructure improvements.</p>	<p>Yes</p>	<p><b>No.</b> Alternative A would not update the General Plan to ensure consistency with regional and local plans (such as those discussed in Section 3.16, <i>Transportation</i>, and Section 3.17, <i>Utilities and Service Systems</i>), planning for future circulation and infrastructure improvements. Furthermore, Alternative A would not implement the new or modified General Plan 2045 goals, policies, and actions prepared as part of the proposed Project, specifically the policies in the Mobility Element, to improve transit, roadway, bicycle pedestrian facilities, and the overall circulation system.</p>	<p><b>Yes.</b> Alternative B would update the General Plan to ensure consistency with regional and local plans (such as those discussed in Section 3.16, <i>Transportation</i>, and Section 3.17, <i>Utilities and Service Systems</i>), planning for future circulation and infrastructure improvements. Furthermore, Alternative B would implement the new or modified General Plan 2045 goals, policies, and actions prepared as part of the proposed Project, specifically the policies in the Mobility Element, to improve transit, roadway, bicycle pedestrian facilities, and the overall circulation system.</p>

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**Table 4-3 Ability to Meet Proposed Project Objectives**

Objective	Proposed Project	Alternative A: No Project Alternative	Alternative B: Reduced Industrial and Concentrated Residential Alternative
		Therefore, Alternative A would not achieve the same level of consistency with plans addressing the circulation system and would not achieve this objective.	Therefore, Alternative B would fully achieve this objective.
Keep the community safe from natural and human-caused hazards, such as earthquakes, landslides, floods, and wildfires, including increased risks from climate change.	Yes	<b>Partial.</b> Future development under Alternative A would be required to comply with adopted local, regional, and State plans and regulations addressing community safety. However, Alternative A would not include the new or modified General Plan 2045 goals and policies that were prepared as part of the proposed Project, specifically those within the Safety Element, and, without adoption and implementation of those goals and policies, would not be consistent with new state laws regarding issues such as efficient evacuation planning. Therefore, Alternative A would only partially achieve this objective.	<b>Yes.</b> Future development under Alternative B would be required to comply with adopted local, regional, and State plans and regulations addressing community safety. Alternative B would also include the new or modified General Plan 2045 goals and policies that were prepared as part of the proposed Project, specifically those within the Safety Element. Therefore, Alternative B would achieve this objective.
Protect natural resources, such as agriculture, water, air, and biological resources, and preserve and improve open spaces, including open space for recreation, for habitat, or for public health and safety.	Yes	<b>Partial.</b> Future development under Alternative A would be required to comply with adopted local, regional, and State plans and regulations addressing the protection of natural resources. However, Alternative A would not implement the new or modified General Plan 2045 goals and policies prepared as part of the proposed Project, adopted for the purpose of protecting natural resources. Therefore, Alternative A would only partially achieve this objective.	<b>Yes.</b> Future development under Alternative B would be required to comply with adopted local, regional, and State plans and regulations addressing the protection of natural resources. In addition, Alternative B would implement the new or modified General Plan 2045 goals and policies prepared as part of the proposed Project, adopted for the purpose of protecting natural resources. Therefore, Alternative B would achieve this objective.

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**Table 4-3 Ability to Meet Proposed Project Objectives**

<b>Objective</b>	<b>Proposed Project</b>	<b>Alternative A: No Project Alternative</b>	<b>Alternative B: Reduced Industrial and Concentrated Residential Alternative</b>
Provide public services that support the health, welfare, and civic engagement of all members of the community.	Yes	<b>Partial.</b> Future development under Alternative A would be required to comply with adopted local, regional, and State plans and regulations addressing the provision of public services. However, Alternative A would not update the General Plan to ensure consistency with local and regional plans. Furthermore, Alternative A would not implement the new or modified General Plan 2045 goals and policies prepared as part of the proposed Project, specifically the goals and policies in the Community Services and Infrastructure Elements, to ensure community services keep pace with development. Therefore, Alternative A would only partially achieve this objective.	<b>Yes.</b> Future development under Alternative B would be required to comply with adopted local, regional, and State plans and regulations addressing the provision of public services. Alternative B includes updates to the General Plan to ensure consistency with local and regional plans. Furthermore, Alternative B would implement the new or modified General Plan 2045 goals and policies prepared as part of the proposed Project, specifically the goals and policies in the Community Services and Infrastructure Elements, to ensure community services keep pace with development. Therefore, Alternative B would fully achieve this objective.

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### 4.7.1 Summary of Alternative A: No Project Alternative

As shown in Table 4-2, the No Project Alternative would result in similar impacts related to agricultural resources, air quality, GHG emissions, mineral resources, noise, public services, parks, and recreation, transportation, and utilities and service systems to the proposed Project. Impacts related to aesthetics, biological resources, cultural and tribal cultural resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, and wildfire would be greater when compared to the proposed Project.

As shown in Table 4-3, the No Project Alternative would not meet the project objectives to establish a comprehensive framework to guide Livermore or promote Livermore's long-term fiscal sustainability. It would partially meet all other objectives.

### 4.7.2 Summary of Alternative B: Reduced Industrial and Concentrated Residential Alternative

As shown in Table 4-2, the Reduced Industrial and Concentrated Residential Alternative would result in similar impacts related to aesthetics, biological resources, cultural and tribal cultural resources, energy, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, parks, and recreation, transportation, and wildfire when compared to the proposed Project. All other impacts (agricultural resources, air quality, GHG emissions, mineral resources, and utilities and service systems) would be reduced when compared to the proposed Project.

As shown in Table 4-3, the Reduced Industrial and Concentrated Residential, this alternative does not meet the project objectives to the same degree as the proposed Project.

## 4.8 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of the proposed Project and the alternatives, CEQA Guidelines Section 15126.6 requires that an "environmentally superior" alternative be selected and the reasons for such a selection be disclosed. In general, the environmentally superior alternative is the alternative to the proposed Project that would be expected to generate the least number of significant impacts compared to the proposed Project while still meeting most of the basic project objectives. Identification of the environmentally superior alternative is an informational procedure and the alternative to the proposed Project selected may not be the alternative to the proposed Project that best meets the goals or needs of the City of Livermore.

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Because CEQA Guidelines Section 15126.6(c) requires an evaluation of a reasonable range of alternatives to the proposed Project, the proposed Project under consideration cannot be identified as the environmentally superior alternative. Additionally, in accordance with CEQA Guidelines Section 15126.6(e)(2), if the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

As shown in Table 4-2, the Reduced Industrial and Concentrated Residential Alternative (Alternative B), would reduce impacts for 5 out of 18 environmental topics when compared to the proposed Project and is considered the environmentally superior alternative. However, this alternative does not meet the project objectives to the same degree as the proposed project, specifically it would accommodate less industrial square footage than the proposed Project, and accordingly, result in fewer jobs, which could result in a jobs to housing imbalance and residents commuting to other communities for work.

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