

## SECTION 5: ALTERNATIVES TO THE PROPOSED PROJECT

### 5.1 - Introduction

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

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

#### 5.1.1 - Significant Unavoidable Impacts

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

- **Air Quality Plan Consistency:** The project would exceed the Bay Area Air Quality Management District's significance thresholds during operation. As such, this impact would remain significant and unavoidable after mitigation.
- **Freeway Traffic and Cumulative Freeway Traffic:** The project will contribute funding toward the I-80 Express Lanes project for the segment south of Redwood Parkway in Vallejo, if and when the project is programmed for funding by the MTC and the STA, through traffic impact fees administered by Solano County or the City of Vallejo. Because the funding and construction of the express lanes cannot be assured, this impact remains significant and unavoidable after mitigation.
- **Intersection Operations and Cumulative Intersection Operations:** The project would mitigate the Phase 1, 2 and 3 impacts identified above as follows:
  - **Phase 1 (Option a):** Contribute a proportional share toward the widening of the westbound leg of Redwood Street at Fairgrounds Drive to provide space for a dedicated right-turn lane onto Fairgrounds Drive, and re-time signal accordingly. Widening would take place west of the I-80 bridge structure. The project's proportional share of the need for this improvement is 11 percent.

- **Phase 1 (Option b):** Allocate mitigation funds equivalent to that described in Option (a) toward the ultimate improvements at the Fairgrounds Drive/Redwood Parkway interchange, to be held in a dedicated fund until those improvements are constructed.
- **Event Management Plan** to ensure that the summer weekend late morning peak hour trips do not exceed the current trip generation.

For summer weekends, May - October (when Six Flags Discovery Kingdom is open), the following Exposition Hall and general Fairgrounds event management plan should be followed:

1. When Banquet Seating, Assembly Seating, or Trade Show events with estimated attendance at 75 percent or higher occupancy are scheduled on weekend days starting by 1 p.m., all other events on-site should have start times staggered by a minimum of two (2) hours (later than the Exposition Hall event start time). End times for those events should also be staggered by at least two (2) hours.
  2. When Banquet, Assembly or Trade Show events with estimated attendance from 50 percent to 75 percent occupancy are scheduled on weekend days starting by 1 p.m., all other events on-site should have start times staggered by at least one (1) hour (later than the Exposition Hall event start time). End times should also be staggered by at least one (1) hour.
  3. Non-seated concert events with estimated attendance at 50 percent or higher occupancy should not be scheduled to start before 1 p.m. on weekend days.
  4. When non-seated concert events with estimated attendance below 50 percent are scheduled for weekend days starting by 1 p.m., all other events should have start times staggered by at least two (2) hours (later than the concert). End times should also be staggered by two 2 hours.
  5. In addition to the above guidelines, when multiple venues including the Exposition Hall are scheduled on summer Saturdays and Sundays, all events should be staggered by a minimum of one (1) hour.
- **Phase 2:** Contribute funds toward the construction of the Redwood Parkway/Fairgrounds Drive improvement project at the two interchanges, at a level proportional to the full project's share of total future traffic at 2035, and considering other sources of potential traffic growth not modeled in this analysis, in particular that of Six Flags Discovery Kingdom. The project's share of total 2035 traffic, as modeled in this analysis – without any Six Flags Discovery Kingdom traffic growth—is as follows:
    - At Fairgrounds Drive/SR-37 Ramps: 23 percent
    - At Redwood Street/I-80 Ramps: 10 percent

The above proportions may be subject to reduction if growth plans for Six Flags Discovery Kingdom are proposed and approved.

The mitigation is tied to the Project's proportional share of total future traffic because the Redwood Parkway/Fairgrounds Drive Improvement Project's purpose, as defined by Caltrans and the STA, is to:

- Relieve existing congestion and improve traffic flow on the local roadway network for approved redevelopment and planned land uses in the area;
- Improve the existing interchanges and intersection operations;
- Improve the safety of the local roadway network by reducing congestion.

Thus, the project is not designed solely to serve traffic growth, but also to address existing deficiencies.

In addition to the above Phase 2 mitigation, the retiming of intersection #8, Columbus Parkway/Admiral Callaghan Lane, is required.

- **Phase 3:** Adjust signal timing of intersection #1, Fairgrounds Drive/Whitney Lane.

Because the full funding and construction of the Fairgrounds Drive/Redwood Parkway Interchange improvements cannot be assured, the impacts at intersections #2, #3, and #15 remain significant and unavoidable.

### 5.1.2 - Alternatives to the Proposed Project

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

- **No Project Alternative:** The existing fairground facilities and other existing uses would continue to operate in a status quo condition.
- **Fair of the Future + Entertainment Commercial (EC) Only Alternative:** The Fair of the Future would be developed as proposed in the Plan and all areas in the Plan designated for Entertainment Mixed Use (EMU) would be changed to Entertainment Commercial (EC).
- **Fair of the Future Only Alternative:** The Fair of the Future would be developed as shown in the Plan and no EMU or EC uses would be developed. The remainder of the site would be utilized for parking.

Three alternatives to the proposed project are analyzed below. These analyses compare the proposed project to each individual project alternative. In several cases, the description of the impact may be the same under each alternative when compared with the CEQA Thresholds of Significance (i.e., both the project and the alternative would result in a less than significant impact). The actual degree of impact may be slightly different between the proposed project and each alternative, and this relative difference is the basis for a conclusion of greater or lesser impacts. A summary of the amount of development that would occur under each scenario is provided in Table 5-2.

**Table 5-1: Summary of Alternatives**

Alternative	New Development (square feet)		
	Public Development (Fair of the Future)	Private Development	Total
Alternative 1 No Project Alternative	0	0	0
Alternative 2 Fair of the Future = Entertainment Commercial (EC) Only Alternative	149,500	327,571	477,071
Alternative 3 Fair of the Future Only Alternative	149,500	0	149,500
Source: Michael Brandman Associates, 2012.			

**5.1.3 - Project Objectives**

The following overall objectives provide consistency with the Solano360 Guiding Principles and establish a basis for the plans, programs, and policies of the Plan.

- Generate revenues for Solano County and the City of Vallejo, create jobs, and ensure long-term economic sustainability.
- Establish a unique place with an unmistakable identity that serves as a destination for visitors as well as a pedestrian-friendly, community gathering place.
- Explore a mix of complementary land uses, including retail, commercial, hospitality, recreational, residential, family and youth oriented, educational, and civic uses that seamlessly integrate with the “Fair of the Future.”
- Explore increased physical connectivity and synergy with Six Flags Discovery Kingdom, downtown Vallejo, the waterfront and other existing commercial operations.
- Provide pedestrian, bicycle, vehicular, and transit facilities that foster access to, from, and within the site.
- Incorporate sustainable and green principles in all aspects of the development.

**5.2 - Alternative 1 - No Project Alternative**

Under this alternative, the existing fairground facilities and other existing uses would continue to operate in a status quo condition. Routine maintenance and building replacement could occur over time, with the understanding that the footprint of the fairgrounds does not increase.

**5.2.1 - Impact Analysis**

Under this alternative, none of the significant unavoidable impacts associated with the proposed project would occur and the potentially significant impacts that can be reduced to a level of less than significant would also not occur. In addition, environmental benefits that would be expected from

development of the proposed project would not occur. Those benefits include a reduction in flooding on the southern end of the site and lands to the south. In addition, water quality benefits to Lake Chabot as a result of the project would not occur.

### **5.2.2 - Conclusion**

Although this alternative would result in fewer mitigable, potentially significant and unavoidable environmental impacts, it would not advance any of the project objectives. This alternative would also not result in any of the positive environmental project-related benefits described above.

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## **5.3 - Alternative 2 - Fair of the Future + Entertainment Commercial (EC) Only**

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Under this alternative, the Fair of the Future would be developed as proposed in the Specific Plan and all areas in the Specific Plan designated for Entertainment Mixed Use (EMU) would be changed to Entertainment Commercial (EC).

### **5.3.1 - Impact Analysis**

#### **Aesthetics, Light, and Glare**

This alternative would result in the development of the Fair of the Future as well as up to 327, 571 square feet of retail, commercial, entertainment, and office space as authorized within those Plan areas designated as Entertainment Commercial (EC). The appearance of the resulting commercial development would be as aesthetically pleasing as that of the proposed project because the Plan includes development standards and urban design guidelines to address issues such as design and appearance, building coverage, building height, landscaping, and signage in both the EMU and EC areas. Therefore, the underlying change in visual character would be similar. Similar landscaping and signage would be provided. Exterior lighting fixtures would be installed and would require adherence to the Plan's performance standards to reduce potential light spillage impacts to a level of less than significant. Overall, this alternative would have aesthetics, light, and glare impacts similar to the proposed project.

#### **Air Quality**

This alternative would result in the development of the same total square foot of allowable land uses as the proposed project. Construction activities would be similar to the proposed project and would result in a comparable amount of pollutant emissions. Similar to the proposed project, this alternative would require mitigation to ensure construction emissions are below Bay Area Air Quality Management District's thresholds. From an operational emissions perspective, this alternative would generate the same daily trips; however, the trip length may be slightly different depending on the actual uses. This would result in similar emissions of criteria pollutants on a daily basis. Similar to the proposed project, this alternative would require mitigation. This alternative would also not expose surrounding sensitive receptors to substantial pollutant concentrations associated with air toxics (e.g., diesel particulate matter). Therefore, this alternative would have air quality impacts similar to the proposed project.

### **Biological Resources**

This alternative would result in many of the same potential impacts to biological resources as the proposed project, and therefore require many of the same mitigation measures. Construction activities relating to this alternative would include improvements to the creek system (requiring permits from the regulatory agencies and presence/absence surveys for California red-legged frog and Pacific pond turtle), potential fill of wetlands, and removal of existing trees. The improvements to the creek system are still expected to increase the biotic value of the site. Accordingly, this alternative would have impacts on biotic resources similar to the proposed project.

### **Cultural Resources**

This alternative would result in ground-disturbing activities similar to the proposed project. As such, it would have the potential to damage or destroy undiscovered cultural resources, paleontological resources or human remains. Mitigation similar to that of the proposed project would be implemented to ensure that undiscovered cultural resources, paleontological resources, or human remains would not be adversely affected by this alternative's construction activities. Therefore, this alternative would have cultural resources impacts similar to the proposed project.

### **Geology, Soils, and Seismicity**

The structures developed under this alternative would implement mitigation similar to the proposed project to reduce potential seismic hazards to a level of less than significant. Construction activities associated with this alternative would result in ground disturbance that could create erosion. Mitigation similar to that of the proposed project would be required to ensure that standard stormwater quality control measures are implemented to reduce potential erosion impacts to a level of less than significant. Therefore, this alternative would have geology, soils, and seismicity impacts similar to the proposed project.

### **Greenhouse Gas Emissions**

This alternative would result in similar quantities of greenhouse gas emissions as the proposed project. In addition, the alternative's design components and layout would likely be the same as the proposed project. Therefore, this alternative would have the greenhouse gas emissions impacts similar to the proposed project.

### **Hazards and Hazardous Materials**

This alternative would result in construction and operational activities similar to the proposed project. Moreover, this alternative would require similar mitigation measures to those required for the proposed project to address the four recognized environmental constraints identified within the Phase I Environmental Assessment. As with the proposed project, this alternative would not create aviation hazards, impair emergency response or evacuation, or create exposure to wildland fires. For that reason, impacts related to hazards and hazardous materials resulting from this alternative would be similar to the proposed project.

## Hydrology and Water Quality

This alternative would result in construction activities on the same acreage as the proposed project and would result in the same overall square footage of development. Construction activities would result in ground disturbance that could cause stormwater pollution. Operational activities may also cause stormwater pollution. Mitigation similar to that of the proposed project would be implemented to ensure that standard stormwater quality control measures are implemented during construction and operations to reduce potential impacts to a level of less than significant. Further, similar drainage improvements, as identified in the Plan, would be needed to reduce potential drainage and flooding impacts to a less than significant level. Accordingly, this alternative would have impacts on hydrology and water quality similar to the proposed project.

## Noise

This alternative would result in the development of the Fair of the Future as well as up to 327,571 square feet of retail, commercial, entertainment, and office space as authorized within those Plan areas designated as Entertainment Commercial (EC). This alternative would generate a similar number of daily traffic trips as the proposed project because, as defined within the Plan, the EMU and EC authorized uses are close in nature. Therefore, noise impacts from project-related traffic would be similar to those of the proposed project. The noise impacts of the resulting commercial development would be similar to those of proposed project because the Plan includes development standards and urban design guidelines to address issues such as wall and fencing design, building coverage, building height, and landscaping in both the EMU and EC areas. Therefore, the underlying change in the noise environment would be similar. Similar types of walls, berms, and fencing would be installed and would require adherence to the Plan's performance standards to reduce potential noise impacts to a level of less than significant. Overall, this alternative would have noise impacts similar to that of the proposed project.

## Public Services

The Fair of the Future and EC uses would result in a similar demand for police protection, fire protection, emergency medical services, schools, parks, and other public facilities as the proposed project because the authorized uses under the Plan would be similar in nature to those permitted in the proposed project.

## Transportation/Traffic

This alternative would generate a similar number of daily trips as the proposed project because, as defined within the Plan, the EMU and EC authorized uses are close in nature. Mitigation similar to that of the proposed project would be implemented; however, it would not reduce this impact to a level of less than significant because funding for the necessary improvements cannot be assured. Therefore, impact significance would remain significant and unavoidable. Similar to the proposed project, this alternative would provide bicycle storage and enhanced pedestrian and transit facilities. Therefore, this alternative would have impacts on transportation similar to the proposed project.

## **Utilities and Service Systems**

This alternative would result in similar water consumption, wastewater generation, solid waste generation, and energy consumption as the proposed project because of the similar nature of the proposed commercial uses. As such, impacts to utilities and service systems would be similar to the proposed project.

### **5.3.2 - Conclusion**

This alternative would have environmental impacts that are similar to the proposed project. However, this alternative would achieve the project's objectives to the same degree as the proposed project because of the exclusion of the proposed EMU uses.

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## **5.4 - Alternative 3 - Fair of the Future Only**

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Under this alternative the Fair of the Future, as depicted in the Specific Plan would be developed. No Entertainment Mixed Use (EMU) or Entertainment Commercial (EC) uses would be developed. The remainder of the site would be devoted to parking.

### **5.4.1 - Impact Analysis**

#### **Aesthetics, Light, and Glare**

This alternative would result in the development of the Fair of the Future only without the proposed commercial uses identified in the Plan. The appearance of the Fair of the Future would be as aesthetically pleasing as that of the proposed project because the Plan includes development standards and urban design guidelines to address issues such as design and appearance, building coverage, building height, landscaping, and signage. However, this alternative would feature significantly less overall development at the project site. Therefore, the underlying change in visual character would be less than the proposed project. Reduced landscaping and signage would be provided. Exterior lighting fixtures would be installed and would require adherence to the Plan's performance standards to reduce potential light spillage impacts to a level of less than significant. Overall, this alternative would have fewer aesthetics, light, and glare impacts than the proposed project.

#### **Air Quality**

This alternative would result in the development of less square foot of allowable land uses as the proposed project. Therefore, construction activities would be less extensive in scope and duration as the proposed project and would result in a fewer pollutant emissions. Similar to the proposed project, this alternative would require mitigation to ensure construction emissions are below Bay Area Air Quality Management District's thresholds. From an operational emissions perspective, this alternative may result in fewer daily trips. This would result in fewer emissions of criteria pollutants on a daily basis. Similar to the proposed project, this alternative would require mitigation to ensure daily operational emissions were less than significant. This alternative would also not expose surrounding sensitive receptors to substantial pollutant concentrations associated with air toxics (e.g.,



diesel particulate matter). Therefore, this alternative would have fewer air quality impacts than the proposed project.

### **Biological Resources**

While this alternative would not have an EMU or EC use, it would result in many of the same potential impacts to biological resources as the proposed project, and therefore require many of the same mitigation measures. It is still anticipated under Alternative 3 that construction activities would include improvements to the creek system (requiring permits from the regulatory agencies and presence/absence surveys for California red-legged frog and Pacific pond turtle), potential fill of wetlands, and removal of existing trees. The improvement to the creek system is still expected to increase the biotic value of the site. Accordingly, this alternative would have impacts on biotic resources similar to the proposed project.

### **Cultural Resources**

This alternative would result in ground-disturbing activities similar to the proposed project. As such, it would have the potential to damage or destroy undiscovered cultural resources, paleontological resources or human remains. Mitigation similar to that of the proposed project would be implemented to ensure that undiscovered cultural resources, paleontological resources, or human remains would not be adversely affected by this alternative's construction activities. Therefore, this alternative would have cultural resources impacts similar to the proposed project.

### **Geology and Soils**

The Fair of the Future developed under this alternative would implement mitigation similar to the proposed project to reduce potential seismic hazards to a level of less than significant. Construction activities associated with this alternative would result in ground disturbance that could create erosion. Mitigation similar to that of the proposed project would be required to ensure that standard stormwater quality control measures are implemented to reduce potential erosion impacts to a level of less than significant. Therefore, this alternative would have geology, soils, and seismicity impacts similar to the proposed project.

### **Greenhouse Gas Emissions**

This alternative would likely result in less greenhouse gas emissions than as the proposed project. The alternative's design components and layout of the Fair of the Future would likely be the same as the proposed project; therefore, consistency with applicable climate action plans would be similar to the proposed project. This alternative would have the fewer greenhouse gas emissions impacts than the proposed project.

### **Hazards and Hazardous Materials**

Although this alternative would result in reduced construction and operational activities than the proposed project, it would still require similar mitigation measures to those required for the proposed project to address the four recognized environmental constraints identified within the Phase I

Environmental Assessment. As with the proposed project, this alternative would not create aviation hazards, impair emergency response or evacuation, or create exposure to wildland fires. For that reason, impacts related to hazards and hazardous materials resulting from this alternative would be similar to the proposed project.

### **Hydrology and Water Quality**

Although this alternative would result in construction activities on the same acreage as the proposed project, it would result in a reduced overall square footage of development. Construction activities, including the construction of parking areas, would result in ground disturbance that could cause stormwater pollution. Operational activities may also cause stormwater pollution. Mitigation similar to that of the proposed project would be implemented to ensure that standard stormwater quality control measures are implemented during construction and operations to reduce potential impacts to a level of less than significant. Further, similar drainage improvements, as identified in the Plan, would be needed to reduce potential drainage and flooding impacts to a less than significant level.

Accordingly, this alternative would have impacts on hydrology and water quality similar to the proposed project.

### **Noise**

This alternative would generate a reduced number of daily traffic trips compared to the proposed project because the EMU and EC uses would not be developed. However, as the noise impacts generated by project-related traffic are less than significant for the proposed project, they will also be less than significant for this alternative. Potential noise impacts from the Fair of the Future will be similar to those analyzed for the proposed project. The closest sensitive receptor is approximately 85 feet from the site's southern boundary and will be impacted by the Fair's activities in a similar manner as the proposed project. Many activities within the EMU and EC uses would have occurred within the proposed buildings within these uses and as such, would not contribute significantly to exterior noise levels. However, adherence to design guidelines specifying wall heights and locations will ensure onsite noise impacts from the Fair of the Future to adjacent uses will be less than or equal to the required noise standard levels.

### **Public Services**

The Fair of the Future only alternative would result in a reduced demand for police protection, fire protection, emergency medical services, schools, parks, and other public facilities compared with the proposed project, because the commercial and residential uses authorized under the Plan would not be proposed.

### **Transportation and Traffic**

This alternative would generate a reduced number of daily trips than the proposed project because the EMU and EC uses would not be developed. Mitigation similar to that of the proposed project would be implemented and the significant and unavoidable impacts identified for the proposed project would

be eliminated. Similar to the proposed project, this alternative would provide bicycle storage and enhanced pedestrian and transit facilities. Overall, this alternative would have fewer impacts on transportation than the proposed project.

**Utilities and Service Systems**

This alternative would result in less water consumption, wastewater generation, solid waste generation, and energy consumption as the proposed project because it includes the Fair of the Future only. As such, impacts to utilities and service systems would be less than the proposed project.

**5.4.2 - Conclusion**

This alternative would reduce certain potentially significant, mitigable impacts. It would also eliminate significant and unavoidable traffic impacts associated with the project. This alternative would advance some, but not all of the project objectives. Notably, the Fair of the Future without the accompanying Entertainment Commercial and Mixed Use Entertainment uses would not create the synergistic relationship that was anticipated in the Vision Plan and in the Plan.

**5.5 - Environmentally Superior Alternative**

CEQA Guidelines Section 15126(e)(2) requires an EIR to identify an “environmentally superior alternative.” The qualitative environmental effects of each alternative in relation to the proposed project are summarized in Table 5-2. To quantitatively identify an environmentally superior alternative a numeric value has been applied to each qualitative environmental effect: +1 for greater impacts, 0 for similar impacts, and -1 for fewer impacts. Accordingly, the alternative with the lowest score is the environmentally superior alternative.

**Table 5-2: Summary of Alternatives**

Environmental Topic Area	No Project Alternative	Fair of the Future + EC Only Alternative	Fair of the Future Only Alternative
Aesthetics, Light, and Glare	Fewer -1	Similar 0	Fewer -1
Air Quality	Fewer -1	Similar 0	Fewer -1
Biological Resources	Fewer -1	Similar 0	Similar 0
Cultural Resources	Fewer -1	Similar 0	Similar 0
Geology, Soils, and Seismicity	Fewer -1	Similar 0	Similar 0
Greenhouse Gas Emissions	Fewer -1	Similar 0	Fewer -1

**Table 5-2 (cont.): Summary of Alternatives**

Environmental Topic Area	No Project Alternative	Fair of the Future + EC Only Alternative	Fair of the Future Only Alternative
Hazards and Hazardous Materials	Fewer -1	Similar 0	Similar 0
Hydrology and Water Quality	Fewer -1	Similar 0	Similar 0
Noise	Fewer -1	Similar 0	Similar 0
Public Services	Fewer -1	Similar 0	Fewer -1
Transportation	Fewer -1	Similar 0	Fewer -1
Utilities and Service Systems	Fewer -1	Similar 0	Fewer -1
Score	-12	0	-6
Source: Michael Brandman Associates, 2012.			

As shown in Table 5-2, the No Project Alternative is the environmentally superior alternative, as the project site would remain in its existing condition, thereby avoiding any potentially adverse environmental impacts. In accordance with CEQA requirements, if the No Project Alternative is the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives. In this case, the proposed project would result in significant unavoidable impacts associated with air quality plan consistency, greenhouse gas emissions, freeway traffic and intersection operations. As discussed in Section 3.11, Transportation/Traffic, AM and PM peak-hour vehicle trips are the basis for assessing freeway traffic and intersection operations impacts. Thus, the alternative that achieves the greatest reduction in peak-hour trip generation would be considered environmentally superior. Similarly, impacts related to air quality and greenhouse gas emissions would be reduced.

Because the Fair of the Future Only Alternative achieves trip reductions during both peak hours, it would eliminate the significant unavoidable impacts associated with traffic. Therefore, the Fair of the Future Only Alternative is the environmentally superior alternative.

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## **5.6 - Alternatives Rejected from Further Consideration**

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The following alternatives were initially considered, but were rejected from further consideration for the reasons described below.

### 5.6.1 - Vision Plan

As noted in Section 2, Project Description, the land use concept depicted in the Plan is based on the land use concept that was developed as a result of the Vision Plan process. Subsequent to development of the Vision Plan and prior to preparation of the Plan, a market demand study was conducted by the County (Gruen Associates, 2011). Among other findings, the market demand study forecast that development of retail commercial land uses depicted in the Vision Plan could compete with local retail commercial uses to point of potentially causing store closures, thereby contributing to urban blight. Because of the lack of a sufficiently strong market for retail commercial uses and the potential for causing urban blight, the Vision Plan was rejected as a project alternative.

### 5.6.2 - Alternative Location

CEQA Guidelines Section 15126.6(f)(2) sets forth considerations to be used in evaluating an alternative location. The section states that the “key question” is whether any of the significant effects of the project would be avoided or substantially lessened by relocating the project. The CEQA Guidelines establish that only locations that would accomplish this objective should be considered.

The County has rejected the idea of developing the proposed project at an alternative location for the following reasons:

- The Handlery parcel, which consists of 27 acres contains a deed restriction that limits its use to County Fair purposes. If the County does not develop the project at the proposed location, 27 acres would be left in an undevelopable condition.
- Developing a new County Fair at a new location would have excess land acquisition and capital improvement costs that would create an undue burden on the County. It should be noted, as well, that development of an alternative site outside of the city of Vallejo would not benefit from the cost sharing agreement reached between the City of Vallejo and the County.
- Development of an alternative site would mean that flooding the currently affects the southern end of the project site and areas to the south would not be reduced, as planned by the proposed project. Similarly, water quality benefits to Lake Chabot, which are likely to result from the proposed project, would not occur.

