

SECTION 5: ALTERNATIVES TO THE PROPOSED PROJECT

5.1 - Introduction

In accordance with CEQA Guidelines Section 15126.6, this Draft EIR contains a comparative impact assessment of alternatives to the proposed project. The primary purpose of this section is to provide decision makers and the general public with a reasonable number of feasible project alternatives that could attain most of the basic project objectives, while avoiding or reducing any of the 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/Greenhouse Gas Emissions

- **Air Quality Plan (SEQ Area):** The proposed SEQ General Plan Amendments have the potential to facilitate development and land use activities that generate a substantial increase in vehicle miles traveled (VMT) that would exceed the planning projections contained in the BAAQMD 2010 Clean Air Plan. Because of the programmatic nature of the General Plan Amendments, there is no feasible mitigation for this impact. Therefore, the residual significance of this impact is significant and unavoidable.
- **Criteria Pollutants (SEQ Area):** The proposed SEQ General Plan Amendments have the potential to facilitate development and land use activities that generate a substantial increase in VMT that would result in criteria air pollutant emissions that would exceed BAAQMD thresholds. Because of the programmatic nature of the General Plan Amendments, there is no feasible mitigation for this impact. Therefore, the residual significance of this impact is significant and unavoidable.

Noise

- **Generation of Noise Levels in Excess of Standards (SEQ Area):** Construction and operational activities associated with the SEQ programmatic uses would expose persons to or generate noise levels in excess of standards established in the General Plan or Noise Ordinance or applicable standards of other agencies. Construction noise can be fully mitigated to a level of less than significant; however, due to the uncertainties regarding the feasible feasibility of roadway noise mitigation, operational noise cannot be fully mitigated to a level of less than significant. Therefore, the residual significance of this impact is significant and unavoidable.

Transportation

- **Existing Plus Project Traffic Conditions (SEQ Area):** The SEQ land uses would generate new vehicle trips that would contribute to unacceptable intersection operations. Mitigation is proposed requiring SEQ Area development projects to pay applicable transportation-related impact fees; however, because this does not assure that the improvements would be implemented when needed, the residual significance of the impact is significant and unavoidable.
- **2030 General Plan Traffic Conditions (SEQ Area):** The SEQ land uses would generate new vehicle trips that would contribute to unacceptable intersection operations. Mitigation is proposed requiring SEQ Area development projects to pay applicable transportation-related impact fees; however, because this does not assure that the improvements would be implemented when needed, the residual significance of the impact is significant and unavoidable.
- **2030 General Plan Traffic Conditions (High School – Phase 2 and Subsequent Phases):** The High School would generate new vehicle trips that would contribute to deficient intersection operations. Mitigation is proposed requiring the High School to install necessary traffic improvements; however, because certain improvements are outside of the jurisdictional control of the City of Morgan Hill, the residual significance of the impact is significant and unavoidable.
- **Congestion Management Plan (SEQ Area):** The SEQ land uses would generate new vehicle trips that would contribute to existing unacceptable freeway operations. No feasible mitigation is available to mitigate this impact; therefore, the residual significance of the impact is significant and unavoidable.
- **Congestion Management Plan (High School – Phase 2 and Subsequent Phases):** Buildout of the High School would generate new vehicle trips that would contribute to unacceptable freeway operations. Mitigation is proposed that would require the implementation of a Transportation Demand Management Program; however, this would not fully mitigate the impact to a level of less than significant. Therefore, the residual significance of the impact is significant and unavoidable.

5.1.2 - Alternatives to the Proposed Project

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

- **No Project Alternative:** The Citywide Agriculture Preservation Program and Southeast Quadrant Land Use Plan Project would not be pursued, and no changes in land use designations, jurisdiction boundaries, or land use activities would occur.
- **Sports-Recreation-Leisure/High School/Agricultural Lands Preservation Program Alternative:** The SRL and High School components would be pursued on 289 acres of the SEQ Area, and the balance of the project would not be pursued. The SRL General Plan and Zoning Code Amendments would be implemented on 251 acres near the US 101/Tennant Avenue interchange as contemplated by the proposed project. The private High School would occupy 38 acres and accommodate up to 1,600 students. The Agricultural Lands Preservation Program would be established as contemplated by the project.
- **Agricultural Lands Preservation Program Only Alternative:** The Agricultural Lands Preservation Program would be pursued, and the balance of the project would be eliminated. The Agricultural Lands Preservation Program would be established as contemplated by the project, including the creation of a greenbelt in the southern portion of the SEQ Area.
- **High School Only Alternative:** The proposed private High School would be developed as contemplated and the programmatic aspects of the SEQ Area project would not be pursued. The private High School would occupy 38 acres and accommodate up to 1,600 students.

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

5.2 - Project Objectives

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

1. Identify lands within the SEQ Area viable for permanent agriculture.
2. Develop a program that fosters permanent agriculture within the SEQ Area and Citywide through land use planning, agricultural preservation policies/programs, and agricultural mitigation.
3. Create an open space/agricultural greenbelt along the southern edge of the City's Sphere of Influence boundary.

Alternatives to the Proposed Project

4. Establish a new Sports-Recreation-Leisure General Plan land use designation and zoning classification, and implement the new Sports-Recreation-Leisure (SRL) land use designation and zoning district over a portion of the SEQ Area.
5. Establish an Urban Limit Line within the SEQ Area and extend the Urban Growth Boundary and Urban Service Area over a portion of the SEQ Area.
6. Annex a portion of the SEQ Area into the Morgan Hill City Limits.
7. Provide for a transition of land uses and zoning with more intensive land uses and activities to occur close to Highway 101, and less intensive land uses and activities to occur further east.
8. Allow for land uses that enhance job creation and economic development objectives.
9. Strengthen the City's historic role as an agricultural center, and its identity as an active, healthy, quality, fun, family-friendly community.
10. Develop a new private High School in the southern portion of Santa Clara County to serve existing and future local demand for private education.

5.3 - Alternative 1 – No Project Alternative

Under the No Project Alternative, the Citywide Agriculture Preservation Program and Southeast Quadrant Land Use Plan Project would not be pursued and no changes in land use designations, jurisdictional boundaries, or land use activities would occur.

The SEQ Area would retain its existing land use designations (refer to Exhibits 2-5 through 2-7). The portion of the SEQ Area located outside the Morgan Hill city limits would remain in unincorporated Santa Clara County for the foreseeable future (refer to Exhibit 2-4). In addition, the Agricultural Lands Preservation Program would not be implemented. Finally, the private High School would not be developed.

The No Project Alternative reflects the requirements of CEQA Guidelines Section 15126.6(e)(3)(A), which requires EIRs to evaluate the “continuation of the existing plan, policy, or operation into the future” in the event the proposed project is not pursued.

5.3.1 - Impact Analysis

Existing land use activities within the SEQ Area would continue for the foreseeable future. No changes to land use designations or jurisdictional boundaries would occur. The High School would not be developed. As such, this alternative would avoid all of the proposed project's significant unavoidable impacts and potentially significant impacts that can be reduced to a level of less than significant after mitigation.

5.3.2 - Conclusion

The No Project Alternative would avoid the proposed project's significant unavoidable impacts and would have less impact on all environmental topical areas. However, this alternative would not advance any of the project objectives, including those pertaining to the establishment of the Agricultural Lands Preservation Program; developing SRL uses; expanding city boundaries to encompass portions of the SEQ Area and closing a gap in the City's existing ULL boundary; allowing for land uses that support economic development objectives; strengthening the City's identity as an active, healthy, quality, fun, family-friendly community; and developing a new private High School.

In addition, the No Project Alternative would not advance the planning objective to guide future development and land use activities within the 1,290-acre project area boundaries. Without city planning activity, the SEQ Area would likely continue the trend of gradual cessation of agricultural and orchard uses, with "rural residential" homesites consisting of large homes on unincorporated lots of 8 to 10 acres or greater in size becoming a more prevalent development pattern. Under the existing County General Plan land use and zoning designations, rural residential development is allowed. Therefore, the public policy purpose for the City is to carry out planning activities to preserve agricultural lands and allow for complementary private education, commercial sports/recreation/leisure, and other uses within a portion of the SEQ Area. By incorporating portions of the SEQ Area and placing it under the City's jurisdiction, the City is able to transfer development rights and cluster a limited number of homesites near the urbanized areas of the City, allowing for the aggregation and preservation of viable agricultural activities in the area.

The No Project Alternative would not address the conversion of agricultural land in and around Morgan Hill. The proposed project would include the implementation of agricultural mitigation and preservation policies intended to ensure the success and viability of agricultural uses Citywide, including the proposed Agricultural Priority Area within the SEQ Area, which is intended to be the focus for acquiring permanent conservation easements to preserve large areas of agriculture and open space.

5.4 - Alternative 2 – Sports-Recreation-Leisure/High School/Agricultural Lands Preservation Program Alternative

Under the SRL/High School/Agricultural Lands Preservation Program Alternative, the SRL component and High School components would be pursued on 289 acres of the SEQ Area, and the balance of the project would not be pursued.

The SRL area encompasses 251 acres and the High School site encompasses 38 acres. The two areas are contiguous to each other (as well as to the Morgan Hill city limits) and occupy the western portion of the SEQ Area near the US 101/Tennant Avenue interchange.

The SRL General Plan and Zoning Code Amendments would be implemented as contemplated by the proposed project. To summarize, SRL would feature two Subdistricts (A and B) that would support a variety of sports, recreation, and leisure uses, including but not limited to adventure sports/facilities, arts and crafts, batting cages, equestrian centers, farmers markets, and indoor/outdoor sports centers (Subdistrict A), and gas stations, restaurants, motels/hotels, and grandstands/stadiums (Subdistrict B).

Within the SRL area, the following three programmatic land use applications would be encompassed by this alternative: Craiker, Puliafico, and Jacoby. The City-initiated SRL land use amendments would also be included. (The Chiala programmatic land use application would be eliminated, as it is outside of the SRL area.) Each is briefly summarized:

- **Craiker Sports Retail/Restaurant Uses (4 acres):** 40,000 square feet of sports retail and a 3,000-square-foot, sports-themed, sit-down restaurant on 4 acres, located at the northeastern corner of Condit Road and Tennant Avenue.
- **Puliafico SRL Uses (38 acres):** Outdoor sports fields and a possible indoor facility to house recreational uses such as indoor soccer, batting cages, volleyball courts and a ropes challenge course, and medical offices for minor sports-related injuries along the south side of Tennant Avenue.
- **Jacoby SRL Uses (26 acres):** Commercial recreation retail and open fields for recreation located south of Tennant Avenue and east of Highway 101.

The private High School would be located on 38 acres north of Tennant Avenue and east of Murphy Avenue. At buildout, the facility would accommodate up to 1,600 students. Facilities would include classrooms, a gymnasium, a library, a theater, music room, a chapel, track and field facilities, sports fields, and baseball/basketball/tennis courts. At complete buildout, the proposed buildings would encompass approximately 210,441 square feet.

The Citywide Agricultural Lands Preservation Program would also be established as contemplated by the project.

The development of the SRL portion and private High School would require adjustments of the Morgan Hill City limits, Urban Service Area, Urban Growth Boundary, and Urban Limit Line to encompass the SRL and High School areas. The boundary adjustments would be limited to those areas and would exclude any other areas. Thus, the maximum area encompassed by the boundary adjustments would be 289 acres.

Table 5-1 summarizes the SRL/High School/Agricultural Lands Preservation Program Alternative. The purpose of this alternative is to evaluate the urban uses located closest to the US 101/Tennant Avenue interchange in order to keep the urban footprint and associated boundaries as compact as possible.

Additionally, this alternative would keep agricultural and rural residential uses in unincorporated Santa Clara County and would avoid the annexation and urbanization of land outside the USA.

Table 5-1: Sports-Recreation-Leisure/High School/Agricultural Lands Preservation Program Alternative Summary

Scenario	Use	Characteristics
Sports-Recreational-Leisure/ High School/Agricultural Lands Preservation Program Alternative	Sports-Recreational-Leisure General Plan and Zone Code Amendments	251 acres
	Programmatic Project Applications (Craiker, Puliafico, Jacoby)	68 acres
	Adjustment of City Limits (i.e., annexation), Urban Service Area, Urban Growth Boundary, Urban Limit Line	289 acres maximum; a portion of the area is already in the UGB
	Private High School	38 acres/1,600 student High School
	Agricultural Lands Preservation Program	Citywide
Proposed Project	Agricultural Lands Preservation Program	Citywide
	Adjustment of City Limits (i.e. Annexation)	759 acres
	Adjustment of Urban Service Area	305 acres
	Adjustment of Urban Growth Boundary	659 acres
	Adjustment of Urban Limit Line	840 acres
	Programmatic Project Applications (Craiker, Puliafico, Jacoby, Chiala)	375 acres*
	Sports-Recreational-Leisure General Plan and Zone Code Amendment	251 acres
	Remaining General Plan Amendments (Residential Estate and Open Space)	470 acres
Private High School	38 acres/1,600 student High School	
Note: * All Chiala acreage included in the Open Space acreage, while Craiker, Puliafico, and Jacoby included in Sports- Recreational-Leisure General Plan and Zone Code Amendment acreage. Source: Michael Brandman Associates, 2013.		

5.4.1 - Impact Analysis

Aesthetics, Light, and Glare

This alternative would result in the development of the SRL uses on 251 acres (including programmatic applications) and the private High School on 38 acres. This alternative would omit the

Residential Estate and Open Space General Plan Amendments, the associated boundary adjustments, and the Chiala programmatic application, including the immediate surrounding lands. The proposed SRL uses and High School were found to have a less than significant impact on aesthetics because it was visually compatible with its surroundings. The High School was found to have a potentially significant impact on light and glare, which would be reduced to a level of less than significant with mitigation. This alternative would result in an identical finding. The elimination of the remaining acres of the SEQ Area (including associated General Plan Amendment and boundary adjustments) would obviate potential impacts within this area. Therefore, this alternative would have less impact on aesthetics, light, and glare than the proposed project.

Agricultural Resources

This alternative would result in the development of the SRL uses on 251 acres (including programmatic applications) and the private High School on 38 acres. This alternative would omit the Residential Estate and Open Space General Plan Amendments, the associated boundary adjustments, and the Chiala programmatic application, including the immediate surrounding lands. The proposed programmatic uses (including SRL uses) and High School were found to have a less than significant impact on agricultural resources after implementation of mitigation, which would consist of participation in the Agricultural Lands Preservation Program. The bulk of the Important Farmland acreage is contained within the SRL area; thus, this alternative would result in an identical finding for both the SEQ Area and High School. This alternative includes the establishment of the Agricultural Lands Preservation Program as contemplated by the project, which would serve to facilitate preservation of agriculture in the SEQ Area and Citywide. The SEQ programmatic uses and High School would have a less than significant impact on all other topics. On balance, this alternative would be expected to result in less conversion of agricultural lands to non-agricultural uses. Therefore, this alternative would have less impact on agricultural resources than the proposed project.

Air Quality/Greenhouse Gas Emissions

This alternative would result in the development of the SRL uses on 251 acres (including programmatic applications) and the private High School on 38 acres. This alternative would omit the Residential Estate and Open Space General Plan Amendments, the associated boundary adjustments, and the Chiala programmatic application, including the immediate surrounding lands. The proposed SEQ Area programmatic uses were found to have significant unavoidable impacts associated with conflicts with the BAAQMD Clean Air Plan and criteria pollutant emissions, for which no feasible mitigation was available. The High School was found to have less than significant impacts after mitigation or less than significant impacts with no mitigation necessary for all air quality and greenhouse gas emissions topics. This alternative would result in an identical finding for both the SEQ programmatic uses and the High School. However, the elimination of the remaining approximately 470 acres of the SEQ Area (including associated General Plan Amendment and boundary adjustments) would lessen the severity of the SEQ's programmatic significant unavoidable

impacts because it would obviate potential impacts within this area. Therefore, this alternative would have less impact on air quality and greenhouse gases than the proposed project.

Biological Resources

This alternative would result in the development of the SRL uses on 251 acres (including programmatic applications) and the private High School on 38 acres. This alternative would omit the Residential Estate and Open Space General Plan Amendments, the associated boundary adjustments, and the Chiala programmatic application, including the immediate surrounding lands. The proposed SRL uses were found to have a less than significant impact on biological resources. However, the High School was found to have significant impacts on special-status species and wildlife movement. Mitigation was proposed to address this impact and would fully mitigate this issue to a level of less than significant. This alternative would result in an identical finding. The elimination of the remaining acres of the SEQ Area (including associated General Plan Amendment and boundary adjustments) would obviate potential impacts within this area. Therefore, this alternative would have less impact on biological resources than the proposed project.

Cultural Resources

This alternative would result in the development of the SRL uses on 251 acres (including programmatic applications) and the private High School on 38 acres. This alternative would omit the Residential Estate and Open Space General Plan Amendments, the associated boundary adjustments, and the Chiala programmatic application, including the immediate surrounding lands. The proposed SRL uses were found to have a less than significant impact on cultural resources. However, the proposed High School was found to have significant impacts on historical resources, archaeological resources, paleontological resources, and burial sites. Mitigation was proposed to address all of these impacts and would fully mitigate these issues to a level of less than significant. This alternative would result in an identical finding. The elimination of the remaining acres of the SEQ Area (including associated General Plan Amendment and boundary adjustments) would obviate potential impacts within this area. Therefore, this alternative would have less impact on cultural resources than the proposed project.

Geology, Soils, and Seismicity

This alternative would result in the development of the SRL uses on 251 acres (including programmatic applications) and the private High School on 38 acres. This alternative would omit the Residential Estate and Open Space General Plan Amendments, the associated boundary adjustments, and the Chiala programmatic application, including the immediate surrounding lands. The proposed SRL uses were found to have a less than significant impact on geology, soils, and seismicity. However, the proposed High School was found to have significant impacts on seismic hazards, erosion, and expansive soils. Mitigation was proposed to address all of these impacts and would fully mitigate them to a level of less than significant. This alternative would result in an identical finding. The elimination of the remaining acres of the SEQ Area (including associated General Plan

Amendment and boundary adjustments) would obviate potential impacts within this area. Therefore, this alternative would have less impact on geology, soils, and seismicity than the proposed project.

Hazards and Hazardous Materials

This alternative would result in the development of the SRL uses on 251 acres (including programmatic applications) and the private High School on 38 acres. This alternative would omit the Residential Estate and Open Space General Plan Amendments, the associated boundary adjustments, and the Chiala programmatic application, including the immediate surrounding lands. The proposed SRL uses were found to have a less than significant impact on hazards and hazardous materials. However, the proposed High School was found to have significant impacts on routine use/risk of upset and hazards associated with prior use. Mitigation was proposed to address all of these impacts and would fully mitigate these issues to a level of less than significant. This alternative would result in an identical finding. The elimination of the remaining acres of the SEQ Area (including associated General Plan Amendment and boundary adjustments) would obviate potential impacts within this area. Therefore, this alternative would have less impact on hazards and hazardous materials than the proposed project.

Hydrology and Water Quality

This alternative would result in the development of the SRL uses on 251 acres (including programmatic applications) and the private High School on 38 acres. This alternative would omit the Residential Estate and Open Space General Plan Amendments, the associated boundary adjustments, and the Chiala programmatic application, including the immediate surrounding lands. The SRL uses were found to have significant impacts on drainage and 100-year floodplains; the proposed High School was found to have significant impacts on water quality and drainage. Mitigation was proposed to address all of these impacts and would fully mitigate these issues to a level of less than significant. This alternative would result in an identical finding. The elimination of the remaining acres of the SEQ Area (including associated General Plan Amendment and boundary adjustments) would obviate potential impacts within this area. Therefore, this alternative would have less impact on hydrology and water quality than the proposed project.

Land Use

This alternative would result in the development of the SRL uses on 251 acres (including programmatic applications) and the private High School on 38 acres. This alternative would omit the Residential Estate and Open Space General Plan Amendments, the associated boundary adjustments, and the Chiala programmatic application, including the immediate surrounding lands. This alternative would only involve discretionary approvals associated with the SRL uses and High School: General Plan Amendment, Zone Change, Boundary Adjustments (urban service area, urban growth boundary, urban limit line, and city limits), Development Agreement, Conditional Use Permit, and Design Permit. These approvals would be limited to the westernmost 251 acres of the SEQ Area. The programmatic aspects of the proposed project not included in this alternative also involve a

number of discretionary approvals (General Plan Amendment, zoning changes, and boundary adjustments) that would encompass various portions of the 1,290-acre SEQ Area. The elimination of the remaining acres of the SEQ Area (including associated General Plan Amendment and boundary adjustments) would obviate potential impacts within this area. Therefore, this alternative would have less impact on land use than the proposed project.

Noise

This alternative would result in the development of the SRL uses on 251 acres (including programmatic applications) and the private High School on 38 acres. This alternative would omit the Residential Estate and Open Space General Plan Amendments, the associated boundary adjustments, and the Chiala programmatic application, including the immediate surrounding lands. The proposed SEQ programmatic uses were found to have a significant unavoidable impact after mitigation associated with exceedance of adopted noise standards, while the High School was found to have a less than significant impact and did not require mitigation. All other noise impacts were less than significant. This alternative would result in an identical finding. The elimination of the remaining acres of the SEQ Area (including associated General Plan Amendment and boundary adjustments) would obviate potential impacts within this area. Therefore, this alternative would have less impact on noise than the proposed project.

Population and Housing

This alternative would result in the development of the SRL uses on 251 acres (including programmatic applications) and the private High School on 38 acres. This alternative would omit the Residential Estate and Open Space General Plan Amendments, the associated boundary adjustments, and the Chiala programmatic application, including the immediate surrounding lands. The proposed programmatic uses and High School were found to have less than significant impacts on population and housing; therefore, this alternative would yield similar conclusions. The elimination of the remaining acres of the SEQ Area (including associated General Plan Amendment and boundary adjustments) would obviate potential impacts within this area. Therefore, this alternative would have less impact on population and housing than the proposed project.

Public Services and Recreation

This alternative would result in the development of the SRL uses on 251 acres (including programmatic applications) and the private High School on 38 acres. This alternative would omit the Residential Estate and Open Space General Plan Amendments, the associated boundary adjustments, and the Chiala programmatic application, including the immediate surrounding lands. The proposed programmatic uses were found to have less than significant impacts on public services and recreational facilities. The proposed High School was found to have a significant impact on police protection, which would be fully mitigated to a level of less than significant; all other impacts would be less than significant. The elimination of the remaining acres of the SEQ Area (including associated General Plan Amendment and boundary adjustments) would obviate potential impacts

within this area. Therefore, this alternative would have less impact on public services and recreation than the proposed project.

Transportation

This alternative would result in the development of the SRL uses on 251 acres (including programmatic applications) and the private High School on 38 acres. This alternative would omit the Residential Estate and Open Space General Plan Amendments, the associated boundary adjustments, and the Chiala programmatic application, including the immediate surrounding lands. Table 5-2 compares the SRL/High School/Agricultural Lands Preservation Program Alternative’s peak-hour trip generation with the proposed project’s peak-hour trip generation. As shown in the table, this alternative would generate 568 fewer weekday trips, 82 fewer AM peak-hour trips, and 69 fewer PM peak-hour trips than the proposed project. Although the reduction in peak-hour trip generation would not be enough to reduce the significant unavoidable finding for traffic impacts (both SEQ and High School), it would substantially lessen the severity of these impacts.

Table 5-2: Sports-Recreation-Leisure/High School/Agricultural Lands Preservation Program Alternative Trip Generation Comparison

Scenario	Daily Trips	AM Peak Hour Trips	PM Peak Hour Trips
Sports-Recreation-Leisure/ High School Alternative	25,052	2,107	2,585
Proposed Project	25,620	2,189	2,654
Difference	(568)	(82)	(69)
Source: Fehr & Peers, 2013.			

Utility Systems

This alternative would result in the development of the SRL uses on 251 acres (including programmatic applications) and the private High School on 38 acres. This alternative would omit the Residential Estate and Open Space General Plan Amendments, the associated boundary adjustments, and the Chiala programmatic application, including the immediate surrounding lands. The proposed programmatic uses were found to have significant impacts on drainage, while the proposed High School was found to have significant impacts on drainage and solid waste. Mitigation was proposed to address all of these impacts and would fully mitigate these issues to a level of less than significant. This alternative would result in an identical finding. The elimination of the remaining acres of the SEQ Area (including associated General Plan Amendment and boundary adjustments) would obviate potential impacts within this area. Therefore, this alternative would have less impact on utility systems than the proposed project.

5.4.2 - Conclusion

The SRL/High School/Agricultural Lands Preservation Program Alternative would result in the same significant unavoidable project-findings as the proposed project for air quality and greenhouse gas

emissions, and transportation impacts. This alternative would substantially lessen the severity of other impacts, including aesthetics, light, and glare; agricultural resources; biological resources; cultural resources; geology, soils, and seismicity; hazards and hazardous materials; hydrology and water quality; land use; noise; population and housing; public services and recreation; and utility systems.

The SRL/High School/Agricultural Lands Preservation Program Alternative would advance the project objectives associated with developing a program that fosters permanent agriculture within the SEQ Area; expanding city boundaries to encompass portions of the SEQ Area; developing the SRL uses and associated programmatic applications; strengthening the City's identity as an active, healthy, quality, fun, family-friendly community; and providing a private High School. However, it would not advance other objectives to the same degree as the proposed project because it would eliminate the remaining programmatic aspects (including Chiala programmatic application) of the proposed project where the transfer and clustering of existing development rights is proposed in order to create more aggregated and viable agricultural areas within the SEQ.

5.5 - Alternative 3 – Agricultural Lands Preservation Program Only Alternative

Under the Agricultural Lands Preservation Program Only Alternative, the Agricultural Lands Preservation Program would be pursued, and the balance of the project would be eliminated.

The Citywide Agricultural Lands Preservation Program would be established as contemplated by the project, including the creation of a greenbelt in the southern portion of the SEQ Area through voluntary participation by property owners wishing to record agricultural conservation easements on their property. In the interests of promoting agricultural preservation within the SEQ Area, no adjustments would be made to the City of Morgan Hill's jurisdictional boundaries including city limits, UGB, ULL, or USA. The current City of Morgan Hill General Plan designations for the SEQ Area would be maintained.

The proposed SRL, Residential Estate, Open Space and Public Facilities land use designations would not be pursued, nor would the proposed High School. Additionally, the four programmatic applications (Craiker, Puliafico, Jacoby, and Chiala) would not be pursued.

Table 5-3 summarizes the Agricultural Lands Preservation Program Only Alternative. The purpose of this alternative is to evaluate the portion of the proposed project that would maintain existing agricultural and rural residential land use activities within the SEQ Area and avoid any development of urban uses.

Table 5-3: Agricultural Lands Preservation Program Only Alternative Summary

Scenario	Use	Characteristics
Agricultural Lands Preservation Program Only Alternative	Agricultural Lands Preservation Program	Citywide
Proposed Project	Agricultural Lands Preservation Program	Citywide
	Adjustment of City Limits (i.e., Annexation)	759 acres
	Adjustment of Urban Service Area	305 acres
	Adjustment of Urban Growth Boundary	659 acres
	Adjustment of Urban Limit Line	840 acres
	Sports-Recreational-Leisure General Plan and Zone Code Amendment	251 acres
	Remaining General Plan Amendments (Residential Estate and Open Space)	470 acres
	Programmatic Project Applications (Craiker, Puliafico, Jacoby, Chiala)	375 acres
	Private High School	38 acres/1,600 student High School
Source: Michael Brandman Associates, 2013.		

5.5.1 - Impact Analysis

Aesthetics, Light, and Glare

This alternative would result in adoption of the Agricultural Lands Preservation Program (Citywide). This alternative would eliminate the SRL, Public Facilities, Open Space, and Residential Estate land use designation changes; the four programmatic applications; and the proposed High School. The programmatic uses and High School were found to have a less than significant impact on aesthetics because they were visually compatible with its surroundings. The High School was found to have a potentially significant impact on light and glare, which would be reduced to a level of less than significant with mitigation. This alternative would establish the agricultural mitigation program and avoid the introduction of any changes in existing land use activities within the 1,290-acre SEQ Area. These characteristics would obviate potential impacts within this area. Therefore, this alternative would have less impact on aesthetics, light, and glare than the proposed project.

Agricultural Resources

This alternative would result in adoption of the Agricultural Lands Preservation Program (Citywide). This alternative would eliminate the SRL, Public Facilities, Open Space, and Residential Estate land use designation changes; the four programmatic applications; and the proposed High School. The proposed programmatic uses and High School were found to have a less than significant impact on

agricultural resources after mitigation. This alternative would establish the agricultural mitigation program and avoid the conversion of any agricultural land use activities within the 1,290-acre SEQ Area. These characteristics would avoid the need for mitigation associated with conversion of farmland. Therefore, this alternative would have less impact on agricultural resources than the proposed project.

Air Quality/Greenhouse Gas Emissions

This alternative would result in adoption of the Agricultural Lands Preservation Program (Citywide). This alternative would eliminate the SRL, Public Facilities, Open Space, and Residential Estate land use designation changes; the four programmatic applications; and the proposed High School. The proposed SEQ Area programmatic uses was found to have significant unavoidable impacts associated with conflicts with the BAAQMD Clean Air Plan and criteria pollutant emissions, for which no feasible mitigation was available. The High School was found to have less than significant impacts after mitigation or less than significant impacts with no mitigation necessary for all air quality and greenhouse gas emissions topics. This alternative would avoid all of these significant unavoidable impacts, because it would not alter existing land use activities or generate new daily trips relative to existing conditions. Therefore, this alternative would have fewer impacts on air quality and greenhouse gases than the proposed project.

Biological Resources

This alternative would result in adoption of the Agricultural Lands Preservation Program (Citywide). This alternative would eliminate the SRL, Public Facilities, Open Space, and Residential Estate land use designation changes; the four programmatic applications; and the proposed High School. The proposed programmatic uses were found to have a less than significant impact on biological resources. However, the High School was found to have significant impacts on special-status species and wildlife movement. Mitigation was proposed to address this impact and would fully mitigate this issue to a level of less than significant. This alternative would establish the agricultural mitigation program and avoid the introduction of any changes in existing land use activities within the 1,290-acre SEQ Area. These characteristics would obviate potential impacts within this area. Therefore, this alternative would have less impact on biological resources than the proposed project.

Cultural Resources

This alternative would result in adoption of the Agricultural Lands Preservation Program (Citywide). This alternative would eliminate the SRL, Public Facilities, Open Space, and Residential Estate land use designation changes; the four programmatic applications; and the proposed High School. The proposed programmatic uses were found to have a less than significant impact on cultural resources. However, the proposed High School was found to have significant impacts on historical resources, archaeological resources, paleontological resources, and burial sites. Mitigation was proposed to address all of these impacts and would fully mitigate these issues to a level of less than significant. This alternative would establish the agricultural mitigation program and avoid the introduction of any

changes in existing land use activities within the 1,290-acre SEQ Area. These characteristics would obviate potential impacts within this area. Therefore, this alternative would have less impact on cultural resources than the proposed project.

Geology, Soils, and Seismicity

This alternative would result in adoption of the Agricultural Lands Preservation Program (Citywide). This alternative would eliminate the SRL, Public Facilities, Open Space, and Residential Estate land use designation changes; the four programmatic applications; and the proposed High School. The proposed programmatic uses were found to have a less than significant impact on geology, soils, and seismicity. However, the proposed High School was found to have significant impacts on seismic hazards, erosion, and expansive soils. Mitigation was proposed to address all of these impacts and would fully mitigate these issues to a level of less than significant. This alternative would establish the agricultural mitigation program and avoid the introduction of any changes in existing land use activities within the 1,290-acre SEQ Area. These characteristics would obviate potential impacts within this area. Therefore, this alternative would have less impact on geology, soils, and seismicity than the proposed project.

Hazards and Hazardous Materials

This alternative would result in adoption of the Agricultural Lands Preservation Program (Citywide). This alternative would eliminate the SRL, Public Facilities, Open Space, and Residential Estate land use designation changes; the four programmatic applications; and the proposed High School. The proposed programmatic uses were found to have a less than significant impact on hazards and hazardous materials. However, the proposed High School was found to have significant impacts on routine use/risk of upset and hazard associated with prior use. Mitigation was proposed to address all of these impacts and would fully mitigate these issues to a level of less than significant. This alternative would establish the agricultural mitigation program and avoid the introduction of any changes in existing land use activities within the 1,290-acre SEQ Area. These characteristics would obviate potential impacts within this area. Therefore, this alternative would have less impact on hazards and hazardous materials than the proposed project.

Hydrology and Water Quality

This alternative would result in adoption of the Agricultural Lands Preservation Program (Citywide). This alternative would eliminate the SRL, Public Facilities, Open Space, and Residential Estate land use designation changes; the four programmatic applications; and the proposed High School. The proposed programmatic uses were found to have significant impacts on drainage and 100-year floodplains; the proposed High School was found to have significant impacts on water quality and drainage. Mitigation was proposed to address all of these impacts and would fully mitigate these issues to a level of less than significant. This alternative would establish the agricultural mitigation program and avoid the introduction of any changes in existing land use activities within the 1,290-

acre SEQ Area. These characteristics would obviate potential impacts within this area. Therefore, this alternative would have less impact on hydrology and water quality than the proposed project.

Land Use

This alternative would result in adoption of the Agricultural Lands Preservation Program (Citywide). This alternative would eliminate the SRL, Public Facilities, Open Space, and Residential Estate land use designation changes; the four programmatic applications; and the proposed High School. This alternative would only involve discretionary approvals associated with the agricultural program. All other discretionary approvals associated with the programmatic applications and private High School would not occur, which would obviate potential impacts within this area. Therefore, this alternative would have less impact on land use than the proposed project.

Noise

This alternative would result in adoption of the Agricultural Lands Preservation Program (Citywide). This alternative would eliminate the SRL, Public Facilities, Open Space, and Residential Estate land use designation changes; the four programmatic applications; and the proposed High School. The proposed SEQ programmatic uses were found to have a significant unavoidable impact after mitigation associated with exceedance of adopted noise standards, while the High School was found to have a less than significant impact and did not require mitigation. This alternative would avoid any impact related to noise because it would not generate new daily trips relative to existing conditions and, therefore, avoid the significant unavoidable impact associated with the SEQ programmatic uses. Therefore, this alternative would have fewer impacts on noise than the proposed project.

Population and Housing

This alternative would result in adoption of the Agricultural Lands Preservation Program (Citywide). This alternative would eliminate the SRL, Public Facilities, Open Space, and Residential Estate land use designation changes; the four programmatic applications; and the proposed High School. The proposed programmatic uses and proposed High School was found to have less than significant impacts on population and housing. This alternative would establish the agricultural mitigation program and avoid the introduction of any changes in existing land use activities within the 1,290-acre SEQ Area. These characteristics would obviate potential impacts within this area. Therefore, this alternative would have less impact on population and housing than the proposed project.

Public Services and Recreation

This alternative would result in adoption of the Agricultural Lands Preservation Program (Citywide). This alternative would eliminate the SRL, Public Facilities, Open Space, and Residential Estate land use designation changes; the four programmatic applications; and the proposed High School. The proposed programmatic uses were found to have less than significant impacts on public services and recreational facilities. The proposed High School was found to have a significant impact on police protection, which would be fully mitigated to a level of less than significant; all other impacts would

Alternatives to the Proposed Project

be less than significant. This alternative would not introduce new development to the SEQ Area and, therefore, obviate potential impacts on public service providers. Therefore, this alternative would have less impact on public services and recreation than the proposed project.

Transportation

This alternative would result in adoption of the Agricultural Lands Preservation Program (Citywide). This alternative would eliminate the SRL, Public Facilities, Open Space, and Residential Estate land use designation changes; the four programmatic applications; and the proposed High School. Table 5-4 compares this alternative’s peak-hour trip generation with the proposed project’s peak-hour trip generation. As shown in the table, this alternative would generate no increase in daily or peak-hour trips and, therefore, would avoid significant unavoidable findings for traffic impacts for both the SEQ and High School.

Table 5-4: Agricultural Lands Preservation Program Only Alternative Trip Generation Comparison

Scenario	Daily Trips	AM Peak Hour Trips	PM Peak Hour Trips
Agricultural Lands Preservation Program Only Alternative	0	0	0
Proposed Project	25,620	2,189	2,654
Difference	(25,620)	(2,189)	(2,654)
Source: Fehr & Peers, 2013.			

Utility Systems

This alternative would result in adoption of the Agricultural Lands Preservation Program (Citywide). This alternative would eliminate the SRL, Public Facilities, Open Space, and Residential Estate land use designation changes; the four programmatic applications; and the proposed High School. The proposed programmatic uses were found to have significant impacts on drainage, while the proposed High School was found to have significant impacts on drainage and solid waste. Mitigation was proposed to address all of these impacts and would fully mitigate these issues to a level of less than significant. This alternative would establish the agricultural mitigation program and avoid the introduction of any changes in existing land use activities within the 1,290-acre SEQ Area. These characteristics would obviate potential impacts within this area. Therefore, this alternative would have less impact on utility systems than the proposed project.

5.5.2 - Conclusion

The Agricultural Lands Preservation Program Only Alternative would avoid the proposed project’s significant unavoidable impacts associated with air quality and greenhouse gas emissions, noise, and transportation impacts. This alternative would also lessen the severity of all other impacts, with the exception of public services and recreation, for which impacts would be greater.

The Agricultural Lands Preservation Program Only Alternative would advance the project objective associated with the establishment of such a program. However, it would not advance any of the other objectives, because it would eliminate the SRL uses, boundary adjustments, programmatic applications, and the private High School aspects of the proposed project.

In addition, the Agricultural Lands Preservation Program Only Alternative would not advance the planning objective to guide future development and land use activities within the 1,290-acre project area boundaries. Without city planning activity, the SEQ Area would likely continue the trend of gradual cessation of agricultural and orchard uses, with “rural residential” homesites consisting of large homes on unincorporated lots of 8 to 10 acres or greater in size becoming a more prevalent development pattern. Under the existing County General Plan land use and zoning designations, rural residential development is allowed. Therefore, the public policy purpose for the City is to carry out planning activities to preserve agricultural lands and allow for complementary private education, commercial sports/recreation/leisure, and other uses within a portion of the SEQ Area. By incorporating portions of the SEQ Area and placing it under the City’s jurisdiction, the City is able to transfer development rights and cluster a limited number of homesites near the urbanized areas of the City, allowing for the aggregation and preservation of viable agricultural activities in the area.

5.6 - Alternative 4 – High School Only Alternative

Under the High School Only Alternative, the proposed private High School would be developed as contemplated and the balance of the Citywide Agriculture Preservation Program and Southeast Quadrant Land Use Plan Project would not be pursued.

To recap, the private High School would be located on 38 acres north of Tennant Avenue and east of Murphy Avenue. At buildout, the facility would accommodate up to 1,600 students. Facilities would include classrooms, a gymnasium, a library, a theater, music room, a chapel, track and field facilities, sports fields, and baseball/basketball/tennis courts. At complete buildout, the proposed buildings would encompass approximately 210,441 square feet.

The development of the private High School would require adjustments of the Morgan Hill city limits, Urban Service Area, Urban Growth Boundary, and Urban Limit Line to encompass the High School site, which would also include some neighboring properties to create contiguous and logical boundaries. The City would not pursue the Agricultural Lands Preservation Program Project because the scope of this alternative would be limited to only the High School.

Table 5-5 summarizes the High School Only Alternative. The purpose of this alternative is to evaluate only the project-level component of the proposed project, which is the use most likely to be developed in the near term. Furthermore, because of its proximity to the existing Morgan Hill city limits, the expansion of the various city boundaries would be limited to encompass only the High

School site and neighboring properties, thereby obviating any changes to existing land use activities elsewhere in the SEQ Area.

Table 5-5: High School Only Alternative Summary

Scenario	Use	Characteristics
High School Only Alternative	Private High School	38 acres/1,600 student High School
	Adjustment of City Limits, Urban Service Area, Urban Growth Boundary, Urban Limit Line	60 acres maximum; a portion of the area is already in the UGB
Proposed Project	Agricultural Lands Preservation Program	Citywide
	Adjustment of City Limits	759 acres
	Adjustment of Urban Service Area	305 acres
	Adjustment of Urban Growth Boundary	659 acres
	Adjustment of Urban Limit Line	840acres
	Sports-Recreational-Leisure General Plan and Zone Code Amendment	251 acres
	Remaining General Plan Amendments (Residential Estate and Open Space)	470 acres
	Programmatic Project Applications (Craiker, Puliafico, Jacoby, Chiala)	375 acres
	Private High School	38 acres/1,600 student High School
Source: Michael Brandman Associates, 2013.		

5.6.1 - Impact Analysis

Aesthetics, Light, and Glare

This alternative would result in the development of the private High School on 38 acres and the elimination of the SEQ Area programmatic aspects of the project. The proposed High School was found to have a less than significant impact on aesthetics because it was visually compatible with its surroundings. The High School was found to have a potentially significant impact on light and glare, which would be reduced to a level of less than significant with mitigation. This alternative would result in an identical finding. The programmatic aspects of the proposed project involve General Plan Amendments, Zoning Amendments including rezoning, boundary adjustments, and four, programmatic private applications that encompass portions of the balance of the SEQ Area. The elimination of the programmatic aspects of the proposed project would obviate potential impacts within this area. Therefore, this alternative would have less impact on aesthetics, light, and glare than the proposed project.

Agricultural Resources

This alternative would result in the development of the private High School on 38 acres and the elimination of the SEQ Area programmatic aspects of the project. The proposed programmatic uses and High School were found to have a less than significant impact on agricultural resources after implementation of mitigation. (Note that because the Agricultural Lands Preservation Program would not be pursued under this alternative, the High School would be required to mitigate for impacts on Important Farmland elsewhere in Santa Clara County). This alternative would result in an identical finding as it relates to the High School. However, the programmatic uses associated with the SEQ Area involve conversion of a significant amount of additional Important Farmland to non-agricultural uses. Thus, this alternative would have less impact on agricultural resources than the proposed project.

Air Quality/Greenhouse Gas Emissions

This alternative would result in the development of the private High School on 38 acres and the elimination of the SEQ Area programmatic aspects of the project. The proposed SEQ Area programmatic uses were found to have significant unavoidable impacts associated with conflicts with the BAAQMD Clean Air Plan and criteria pollutant emissions, for which no feasible mitigation was available. The High School was found to have less than significant impacts after mitigation or less than significant impacts with no mitigation necessary for all air quality and greenhouse gas emissions topics. This alternative would avoid the significant unavoidable impacts of the SEQ programmatic uses and would result in an identical finding for the High School. Therefore, this alternative would have less impact on air quality and greenhouse gases than the proposed project.

Biological Resources

This alternative would result in the development of the private High School on 38 acres and the elimination of the SEQ Area programmatic aspects of the project. The proposed High School was found to have significant impacts on special-status species and wildlife movement. Mitigation was proposed to address this impact and would fully mitigate this issue to a level of less than significant. This alternative would result in an identical finding. The programmatic aspects of the proposed project involve General Plan Amendments, Zoning Amendments including rezoning, boundary adjustments, and four, programmatic private applications that encompass portions of the balance of the SEQ Area. The elimination of the programmatic aspects of the proposed project would obviate potential impacts within this area. Therefore, this alternative would have less impact on biological resources than the proposed project.

Cultural Resources

This alternative would result in the development of the private High School on 38 acres and the elimination of the SEQ Area programmatic aspects of the project. The proposed High School was found to have significant impacts on historical resources, archaeological resources, paleontological resources, and burial sites. Mitigation was proposed to address all of these impacts and would fully

mitigate these issues to a level of less than significant. This alternative would result in an identical finding. The programmatic aspects of the proposed project involve General Plan Amendments, Zoning Amendments including rezoning, boundary adjustments, and four, programmatic private applications that encompass portions of the balance of the SEQ Area. The elimination of the programmatic aspects of the proposed project would obviate potential impacts within this area. Therefore, this alternative would have less impact on cultural resources than the proposed project.

Geology, Soils, and Seismicity

This alternative would result in the development of the private High School on 38 acres and the elimination of the SEQ Area programmatic aspects of the project. The proposed High School was found to have significant impacts on seismic hazards, erosion, and expansive soils. Mitigation was proposed to address all of these impacts and would fully mitigate these issues to a level of less than significant. This alternative would result in an identical finding. The programmatic aspects of the proposed project involve General Plan Amendments, Zoning Amendments including rezoning, boundary adjustments, and four, programmatic private applications that encompass portions of the balance of the SEQ Area. The elimination of the programmatic aspects of the proposed project would obviate potential impacts within this area. Therefore, this alternative would have less impact on geology, soils, and seismicity than the proposed project.

Hazards and Hazardous Material

This alternative would result in the development of the private High School on 38 acres and the elimination of the SEQ Area programmatic aspects of the project. The proposed High School was found to have significant impacts associated with routine use/risk of upset and hazards associated with prior uses. Mitigation was proposed that would fully mitigate these issues to a level of less than significant. This alternative would result in an identical finding. The programmatic aspects of the proposed project involve General Plan Amendments, Zoning Amendments including rezoning, boundary adjustments, and four, programmatic private applications that encompass portions of the balance of the SEQ Area. The elimination of the programmatic aspects of the proposed project would obviate potential impacts within this area. Therefore, this alternative would have less impact on hazards and hazardous materials impacts than the proposed project.

Hydrology and Water Quality

This alternative would result in the development of the private High School on 38 acres and the elimination of the SEQ Area programmatic aspects of the project. The proposed High School was found to have significant impacts on water quality and drainage. Mitigation was proposed to address all of these impacts and would fully mitigate these issues to a level of less than significant. This alternative would result in an identical finding. The programmatic aspects of the proposed project involve General Plan Amendments, Zoning Amendments including rezoning, boundary adjustments, and four, programmatic private applications that encompass portions of the balance of the SEQ Area. The elimination of the programmatic aspects of the proposed project would obviate potential impacts

within this area. Therefore, this alternative would have less impact on hydrology and water quality than the proposed project.

Land Use

This alternative would result in the development of the private High School on 38 acres and the elimination of the SEQ Area programmatic aspects of the project. This alternative would involve only discretionary approvals associated with the High School and neighboring parcels: General Plan Amendment, Zoning Amendment including rezoning, Boundary Adjustments (urban service area, urban growth boundary, urban limit line, and city limits), Development Agreement, Conditional Use Permit, and Design Permit. These approvals would be limited to the 38-acre High School site and neighboring parcels in order to create contiguous and logical boundaries. The programmatic aspects of the proposed project involve General Plan Amendments, Zoning Amendments including rezoning, boundary adjustments, and four, programmatic private applications that encompass portions of the balance of the SEQ Area. The elimination of the programmatic aspects of the proposed project would obviate the need for these land use changes, which would be considered more beneficial. Therefore, this alternative would have less impact on land use than the proposed project.

Noise

This alternative would result in the development of the private High School on 38 acres and the elimination of the SEQ Area programmatic aspects of the project. The proposed High School was found to have a less than significant impact and did not require mitigation associated with exceedance of adopted noise standards. All other noise impacts were less than significant. This alternative would result in an identical finding for the High School and avoid the significant unavoidable finding for the SEQ. Therefore, this alternative would have less impact on noise than the proposed project.

Population and Housing

This alternative would result in the development of the private High School on 38 acres and the elimination of the SEQ Area programmatic aspects of the project. The proposed High School was found to have less than significant impacts on population and housing; therefore, this alternative would yield similar conclusions. Furthermore, the programmatic aspects of the proposed project involve General Plan Amendments, Zoning Amendments including rezoning, boundary adjustments, and four, programmatic private applications that encompass portions of the balance of the SEQ Area. The elimination of the programmatic aspects of the proposed project would obviate potential impacts within this area. Therefore, this alternative would have less impact on population and housing than the proposed project.

Public Services and Recreation

This alternative would result in the development of the private High School on 38 acres and the elimination of the SEQ Area programmatic aspects of the project. The proposed High School was found to have a significant impact on police protection, which would be fully mitigated to a level of

less than significant; all other impacts would be less than significant. As such, this alternative would yield similar conclusions and would result in an identical finding. The programmatic aspects of the proposed project involve General Plan Amendments, Zoning Amendments including rezoning, boundary adjustments, and four, programmatic private applications that encompass portions of the balance of the SEQ Area. The elimination of the programmatic aspects of the proposed project would obviate potential impacts within this area. Therefore, this alternative would have less impact on public services and recreation than the proposed project.

Transportation

This alternative would result in the development of the private High School on 38 acres and the elimination of the SEQ Area programmatic aspects of the project. Table 5-6 compares the High School Only Alternative’s peak-hour trip generation with the proposed project’s peak-hour trip generation. As shown in the table, this alternative would generate 21,652 fewer weekday trips, 893 fewer AM peak-hour trips, and 2,382 fewer PM peak-hour trips than the proposed project. The elimination of the programmatic uses would avoid the significant unavoidable findings for those uses. However, this alternative would yield similar significant unavoidable impacts for the High School alone, because the trip generation would be identical. Overall, avoidance of the SEQ’s significant unavoidable traffic impacts would be more beneficial.

Table 5-6: High School Only Alternative Trip Generation Comparison

Scenario	Daily Trips	AM Peak Hour Trips	PM Peak Hour Trips
High School Only Alternative	3,968	1,296	272
Proposed Project	25,620	2,189	2,654
Difference	(21,652)	(893)	(2,382)
Source: Fehr & Peers, 2013.			

Utility Systems

This alternative would result in the development of the private High School on 38 acres and the elimination of the SEQ Area programmatic aspects of the project. The proposed High School was found to have significant impacts on drainage and solid waste. Mitigation was proposed to address all of these impacts and would fully mitigate these issues to a level of less than significant. This alternative would result in an identical finding. The programmatic aspects of the proposed project involve General Plan Amendments, Zoning Amendments including rezoning, boundary adjustments, and four, programmatic private applications that encompass portions of the balance of the SEQ Area. The elimination of the programmatic aspects of the proposed project would obviate potential impacts within this area. Therefore, this alternative would have less impact on utility systems than the proposed project.

5.6.2 - Conclusion

The High School Only Alternative would avoid the SEQ significant unavoidable impacts associated with air quality and greenhouse gases, noise, and transportation, but would result in the same High School significant unavoidable impacts for transportation impacts. This alternative would also lessen the severity of all other impacts.

The High School Only Alternative would advance the project objective associated with development of the High School, and it would partially advance the project objectives associated with expanding city boundaries to encompass portions of the SEQ Area and strengthening the City’s identity as an active, healthy, quality, fun, family-friendly community. However, it would not advance any of the other objectives because it would eliminate the programmatic aspects of the proposed project, including the Agricultural Lands Preservation Program.

In addition, the High School Only Alternative would not advance the planning objective to guide future development and land use activities within the 1,290-acre project area boundaries. Without City planning activity, the SEQ Area would likely continue the trend of gradual cessation of agricultural and orchard uses, with “rural residential” homesites consisting of large homes on unincorporated lots of 8 to 10 acres or greater in size becoming a more prevalent development pattern. Under the existing County General Plan land use and zoning designations, rural residential development is allowed. Therefore, the public policy purpose for the City is to carry out planning activities to preserve agricultural lands and allow for complementary private education, commercial sports/recreation/leisure, and other uses within a portion of the SEQ Area. By incorporating portions of the SEQ Area and placing it under the City’s jurisdiction, the City is able to transfer development rights and cluster a limited number of homesites near the urbanized areas of the City, allowing for the aggregation and preservation of viable agricultural activities in the area.

5.7 - Environmentally Superior Alternative

The qualitative environmental effects of each alternative in relation to the proposed project are summarized in Table 5-7.

Table 5-7: Summary of Alternatives

Environmental Topic Area	Proposed Project – Significant Unavoidable Impact(s)?	No Project Alternative	SRL/High School/ Agricultural Lands Preservation Program Alternative	Agricultural Lands Preservation Program Only Alternative	High School Only Alternative
Aesthetics, Light, and Glare	No	Less Impact	Less Impact	Less Impact	Less Impact
Agricultural Resources	No	Less Impact	Less Impact	Less Impact	Less Impact

Table 5-7 (cont.): Summary of Alternatives

Environmental Topic Area	Proposed Project – Significant Unavoidable Impact(s)?	No Project Alternative	SRL/High School/ Agricultural Lands Preservation Program Alternative	Agricultural Lands Preservation Program Only Alternative	High School Only Alternative
Air Quality/ Greenhouse Gas Emissions	Yes	Less Impact	Less Impact	Less Impact	Less Impact
Biological Resources	No	Less Impact	Less Impact	Less Impact	Less Impact
Cultural Resources	No	Less Impact	Less Impact	Less Impact	Less Impact
Geology, Soils, and Seismicity	No	Less Impact	Less Impact	Less Impact	Less Impact
Hazards and Hazardous Materials	No	Less Impact	Less Impact	Less Impact	Less Impact
Hydrology and Water Quality	No	Less Impact	Less Impact	Less Impact	Less Impact
Land Use	No	Less Impact	Less Impact	Less Impact	Less Impact
Noise	Yes	Less Impact	Less Impact	Less Impact	Less Impact
Population and Housing	No	Less Impact	Less Impact	Less Impact	Less Impact
Public Services and Recreation	No	Less Impact	Less Impact	Less Impact	Less Impact
Transportation	Yes	Less Impact	Less Impact	Less Impact	Less Impact
Utility Systems	No	Less Impact	Less Impact	Less Impact	Less Impact

Source: Michael Brandman Associates, 2013.

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

As previously discussed in this section, the No Project Alternative avoids all of the proposed project’s significant unavoidable impacts (air quality/greenhouse gas emissions and transportation) and has less impact on all topical areas. Because the No Project Alternative is the Environmentally Superior Alternative, another alternative must be identified from among the remaining development alternatives.

In this case, the Agricultural Lands Preservation Program Only Alternative would also avoid all of the proposed project’s significant unavoidable impacts.

The SRL/High School/Agricultural Lands Preservation Program Alternative would not avoid any of the proposed project’s significant unavoidable impacts, while the High School Only Alternative

would avoid only two significant unavoidable impacts. Therefore, the Agricultural Lands Preservation Program Only Alternative would be the Environmentally Superior Alternative.

While the No Project Alternative and the Agricultural Lands Preservation Program Only Alternative may be the Environmentally Superior Alternatives, neither alternative would advance the planning objective to guide future development and land use activities within the 1,290-acre project area boundaries. Without City planning activity, the SEQ Area would likely continue the trend of gradual cessation of agricultural and orchard uses, with “rural residential” homesites consisting of large homes on unincorporated lots of 8 to 10 acres or greater in size becoming a more prevalent development pattern. Under the existing County General Plan land use and zoning designations, rural residential development is allowed. Therefore, the public policy purpose for the City is to carry out planning activities to preserve agricultural lands and allow for complementary private education, commercial sports/recreation/leisure, and other uses within a portion of the SEQ Area. By incorporating portions of the SEQ Area and placing it under the City’s jurisdiction, the City is able to transfer development rights and cluster a limited number of homesites near the urbanized areas of the City, allowing for the aggregation and preservation of viable agricultural activities in the area.

5.8 - Alternatives Rejected From Further Consideration

The following alternative was initially considered but was rejected from further consideration for the reasons described below.

5.8.1 - Alternative Location

CEQA Guidelines Section 15126.6(f)(2) sets forth considerations in evaluating an alternative location as part of CEQA alternatives analysis. The section indicates that EIRs should only discuss alternative locations if they can avoid or substantially lessen significant project impacts. In addition, the section establishes that if a lead agency determines that no feasible alternative locations exist, it should explain its reasoning for this conclusion.

In this case, the City of Morgan Hill has determined that no other feasible locations exist for the Agricultural Lands Preservation Program, programmatic land use changes and project applications, or private High School for the following reasons:

- **Citywide-Nature of Agricultural Lands Preservation Program:** The proposed Agricultural Lands Preservation Program applies Citywide; by definition, it cannot be pursued elsewhere because it would be outside of the jurisdictional control of the City of Morgan Hill.
- **Location and Land Use Characteristics:** The SEQ Area contains large parcels that are adjacent to the Morgan Hill city limits and within 1 mile or less of the US 101/Tennant Avenue interchange. These parcels have access to arterial and collector roadways such as Tennant Avenue, Condit Road, Murphy Avenue, and Hill Road. The SEQ Area primarily contains flat

land and has fewer environmental constraints (e.g., low-lying areas). The SEQ Area is also adjacent to other existing SRL land uses (e.g., hotels, Morgan Hill Aquatics Center, and Morgan Hill Outdoor Sports Center). Finally, the SEQ Area is devoid of existing single-family residential subdivisions, which otherwise may create limitations from a land use compatibility perspective. These characteristics make the SEQ Area well suited to support visitor-serving and sports-recreation-leisure (including land extensive uses) land use activities.

- **Basis for Programmatic General Plan Land Use/Boundary Adjustment Approvals:** The planning basis for programmatic General Plan land use and boundary adjustment approvals is to comprehensively plan the SEQ Area to support a range of land use activities, including SRL, Public Facilities, Residential Estate, and Open Space, and to preserve agriculture. These uses are planned in such a manner that locate more intensive, urban uses near the US 101/Tennant Avenue interchange, thereby allowing a transition to an agricultural preservation area (greenbelt) in the southern portion of the SEQ Area. In addition, it allows the City to close a gap in the existing ULL boundary, which is consistent with creating logical and orderly jurisdictional boundaries. Finally, in the absence of these proposed changes, the SEQ Area would be expected to continue its historical trend of conversion of agricultural land use activities to large-parcel (8 to 10 acres) “ranchettes.” This latter trend is undesirable from the City’s perspective, as population growth outside of, but immediately adjacent to the Morgan Hill City limits would ultimately result in greater demand for city services and infrastructure without the underlying tax base to support it, as well as the loss of viable agricultural land.
- **Property Owner Control:** The four sites associated with the programmatic applications (Craiker, Puliafico, Jacoby, and Chiala) and the High School site are controlled by the respective property owners. These property owners do not control similar amounts of developable acreage elsewhere in the Morgan Hill area where these uses could be readily developed.

In summary, the SEQ Area is the only area within or near Morgan Hill that has the ability to support the various land use activities envisioned by the project (Agricultural Lands Preservation Program, boundary adjustments, programmatic land use changes and project applications, and private High School). As such, it is not feasible to evaluate an alternative location for any of the project components.