
CHAPTER 6 ALTERNATIVES

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Introduction

The primary intent of the alternatives evaluation in an EIR, as stated in Section 15126.6 (c) of the CEQA Guidelines, is to ensure that “the range of potential alternatives to the Proposed Project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects.” CEQA Guidelines Section 15162.6(b) states that the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” An EIR must describe a range of reasonable alternatives to the Proposed Project (or to its location) that could feasibly attain most of the basic objectives of the project. The feasibility of an alternative may be determined based on a variety of factors including, but not limited to, site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and site accessibility and control (CEQA Guidelines Section 15126.6(f)(1)).

Project Objectives

The selection of alternatives is guided primarily by the need both to reduce or eliminate project impacts and to achieve project objectives. The objectives of the project were used to identify appropriate alternatives. As stated in Chapter 3, Project Description, the objectives of the City of Dixon in considering the Proposed Project and amendments to the NQSP and/or General Plan are to:

- Provide civic and cultural opportunities for the community and the region;
- Provide local venues for entertainment;
- Increase local shopping opportunities;
- Provide alternative land uses superior to existing land uses;
- Create an opportunity to provide high quality mixed retail/entertainment/office/hotel project in the NQSP to serve community and region;
- Take advantage of I-80 visual accessibility to create a regional landmark destination;
- Provide for economic uses capable of fully paying for infrastructure and public service costs while improving the long term municipal finance situation;

- Create diverse employment opportunities; and
- Create anchor uses which can help attract other significant economic activity to the NQSP area.

The objectives of the project applicant are to:

- Reinvigorate the sport of thoroughbred horse racing in Northern California;
- Generate significant new employment opportunities at a location designated by the Dixon General Plan as a major employment center;
- Build upon and preserve the City of Dixon's agricultural heritage;
- Anchor a destination entertainment/dining/retail/hotel/conference/office/recreation complex that would enhance the quality of life for those who live and work in Dixon and the surrounding region;
- Provide a signature land use and distinguishing, high quality design statement at the northeastern entry to the City; and
- Locate regional serving commercial/entertainment land use adjacent to I-80 and in proximity to two I-80 interchanges serving the City of Dixon.

More specifically, the principal objectives of the Proposed Project as stated by the applicant are:

1. To bring to Dixon and the surrounding region a state-of-the-art thoroughbred horse racing and training venue.
2. To complement Dixon's agricultural heritage through the development of a thoroughbred horse racing/training facility that will serve as the centerpiece of a destination entertainment, dining, retail, hotel, conference center and office complex.
3. To be located in proximity to one of the world's greatest schools of veterinary medicine (University of California, Davis) and its equine care facilities.
4. To bring entertainment, recreation, shopping and jobs to Dixon in a design format that respects and embraces the small town values and lifestyle that give Dixon its unique character.
5. To provide live, high quality thoroughbred horse racing entertainment and for multi-media broadcast around the world via satellite and the internet.
6. To introduce a new generation of thoroughbred racing and training facilities:
 - (a) by attracting the best stables and racehorses in the Country with high amenity accommodations for both the horses as well as those responsible for their care and training; and

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- (b) by attracting a new generation of horse racing fans with exciting, multi-dimensional family entertainment presented in an architecturally striking and beautifully landscaped setting.
 7. To add value to the surrounding community and contribute to the establishment of a strong local economic base through:
 - (a) job creation;
 - (b) the economic stimulus that comes with the multi-million dollar investment required to build and operate Dixon Downs; and
 - (c) the significantly expanded local tax base resulting from several new sources of general fund revenue including property tax, sales tax, wagering tax and hotel tax.
 8. To provide employment, entertainment, dining, shopping and office workplace opportunities not otherwise available within the Dixon vicinity.
 9. To provide a multi-use entertainment Pavilion that can serve the community by providing:
 - (a) a theater stage that can be used for high school or other community-based theatrical productions;
 - (b) meeting rooms that can be used by community service organizations; and
 - (c) conference facilities that can be used for charitable functions and social events such as high school proms.
 10. To locate the project on a site:
 - (a) that has already been designated for development with employment-generating land uses by the Dixon General Plan.
 - (b) that is located immediately adjacent to the I-80 corridor which would allow non-local patrons to reach and leave the venue without disrupting or otherwise impacting Dixon's residential neighborhoods or neighboring communities.
 11. To contribute to financing and constructing the infrastructure improvements required to support development of the employment generating land uses planned for the Northeast Quadrant Specific Plan.
 12. To provide a destination entertainment/dining/retail/hotel/conference venue that would optimize use of the major rail transit improvements planned for the area.
 13. To provide land uses that would generate employment activity and address regional demand for entertainment, dining, shopping, hotel rooms, conference facilities, and office space in proximity to the I-80 and rail transportation corridors where regional site access is provided with minimal impact on local roadways.

14. To provide a signature land use at the northeast entry to the City, which would establish a scenic gateway to the community and, at the same time, function as the focal point and the principal defining element of the Northeast Quadrant Specific Plan.
15. To provide at a single location an integrated and complimentary combination of amenities and land uses (e.g., entertainment, dining, retail, hotel, conference and office) not otherwise available except on a scattered site basis.
16. To develop a distinctive design theme that would tie the project together in terms of both the internal relationships among uses as well as the external compatibility with the surrounding community.
17. To phase development so that the racing and training facilities are constructed first and each additional subsequent phase of the project builds upon and extends the design theme established by the racetrack.
18. To provide a self-mitigating project, whereby mitigation measures are incorporated in the project design so as to minimize the project's environmental impacts.
19. To create a site plan that concentrates the more intense employment generating land uses (including the multi-purpose Pavilion and finish line facilities, the hotel/conference center, the retail, the business/professional office and the parking to support these uses) between the racetrack and the I-80 corridor and uses the racetrack, with its approximately 100 acres of landscaped open space, to buffer the agricultural land uses in the unincorporated area to the east.

Significant Effects of the Proposed Project

Project-Specific Significant Unavoidable Impacts

Project-specific significant and unavoidable impacts identified for the Proposed Project include:

- **Construction activities associated with the Proposed Project would generate emissions of criteria pollutants** (Impact 4.2-1, Phase 1, Phases 1 and 2).
- **Operation of the Phase 1 combined with construction of Phase 2, and operation of Phases 1 and 2 combined would generate emissions of ROG and NO_x** (Impact 4.2-2, Phase 1, Phases 1 and 2).
- **Development of the Proposed Project would result in the conversion of Prime Farmland to non-agricultural uses** (Impact 4.7-2, Phase 1, Phases 1 and 2).
- **Large events could increase noise levels in the vicinity of the project site** (Impact 4.8-4, Phase 1, Phases 1 and 2).
- **Implementation of the Proposed Project (Tier 1 event) could cause existing operations at study intersections to worsen from acceptable to unacceptable levels** (Impact 4.10-1, Phase 2 only).

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- **Implementation of the Proposed Project (Tier 1 event) could cause existing operations on I-80 to worsen from acceptable to unacceptable levels** (Impact 4.10-3, Phase 1, Phases 1 and 2).
 - **Implementation of the Proposed Project (Tier 1 event) could cause existing operations on roadways of regional significance to worsen from acceptable to unacceptable levels** (Impact 4.10-4, Phase 1 only).
 - **Implementation of the Proposed Project (Tier 2 and 3 events) could cause existing operations at study intersections and freeway segments to worsen from acceptable to unacceptable levels** (Impact 4.10-5, Phase 1, Phases 1 and 2).
 - **Implementation of the Proposed Project could reduce safety on Pedrick Road by creating potential conflicts with farm equipment and vehicles** (Impact 4.10-6, Phase 1, Phases 1 and 2).
 - **Implementation of the Proposed Project could increase the number of vehicles that cross at-grade railroad tracks** (Impact 4.10-8, Phase 1, Phases 1 and 2).
 - **Implementation of the Proposed Project could provide an inadequate number of on-site parking spaces** (Impact 4.10-11, Phases 1 and 2 only).
 - **The Proposed Project would result in the need for expansion of the City's wastewater treatment plant facilities** (Impact 4.11-6, Phases 1 and 2 only).

Cumulative Significant and Unavoidable Impacts

Cumulative significant and unavoidable impacts identified for the Proposed Project include:

- **Combined Phase 1 operation and Phase 2 construction and operation, in combination with other existing and future development within the SVAB could generate emission of ROG and NO_x contributing to a cumulative impact** (Impact 4.2-6, Phase 1, Phases 1 and 2). This would be a cumulatively considerable impact.
- **Construction activities associated with of the Proposed Project, in combination with other existing and future development, could generate emissions of PM₁₀ contributing to a significant impact** (Impact 4.2-7, Phase 1, Phases 1 and 2). This would be a cumulatively considerable impact.
- **The Proposed Project, in combination with other development, would result in the loss of Prime Farmland** (Impact 4.7-4, Phase 1, Phases 1 and 2). This would be a cumulatively considerable impact.
- **Implementation of the Proposed Project could result in a cumulatively considerable noise increase in the project vicinity** (Impact 4.8-5, Phase 1, Phases 1 and 2). This would be a cumulatively considerable impact.

- **Implementation of the Proposed Project could exacerbate cumulatively unacceptable operations at study intersections** (Impact 4.10-13, Phase 1, Phases 1 and 2). This would be a cumulatively considerable impact.
- **Implementation of the Proposed Project, in conjunction with other cumulative development, could exacerbate unacceptable operations on Interstate 80** (Impact 4.10-14, Phase 1, Phases 1 and 2). This would be a cumulatively considerable impact.
- **The Proposed Project, in combination with other development in the City of Dixon, could result in the need for new or physically altered wastewater treatment facilities that could result in significant environmental effects** (Impact 4.11-9, Phase 1, Phases 1 and 2). This would be a cumulatively considerable impact.

Alternatives Considered but Eliminated from Further Analysis

In developing the alternatives, primary consideration was given to reducing significant unavoidable impacts. Certain impacts that are identified as being significant and unavoidable (e.g., increase in air pollutants from project construction and operation, loss of Prime Farmland) are due primarily to development of an area that is currently undeveloped. These impacts would not be possible to eliminate, but could be reduced by limiting the size of the project. Alternatives that reduce development on the site or change the mix of uses are addressed below. The following alternatives were considered but rejected from further analysis:

Reduce Capacity of Phase 1 Alternative: One alternative that was considered was reducing the size of the racetrack from a maximum of 6,800 seats to 3,400 seats. However, the reduction in the size of Phase 1 was considered primarily to reduce vehicle trips in the hope of either reducing or avoiding some of the significant traffic impacts identified as part of the project. After reviewing the types of traffic impacts it was determined that reducing the size of Phase 1 would not be enough to appreciably reduce the severity of the traffic impacts identified.

Reconfiguration of the Proposed Project: A reconfiguration of the racetrack on the project site was also considered. However, due to the location of the racetrack and the required design of a horse track it was determined that reconfiguring the racetrack on the project site was not a feasible option due to safety concerns. Reorienting the racetrack would not allow for a 1 1/8 mile track or a 7/8 of a mile track that could be safely designed to ensure the proper corner dimensions and other required elements.

Alternatives Analyzed

This section provides a description of the alternatives to the Proposed Project analyzed in this DEIR and presents how specific impacts differ in severity from those associated with the project. For the most part, significant impacts of the alternatives can be mitigated by mitigation measures identified in Chapter 4, which contains the environmental analysis of the Proposed Project. The alternatives analyzed in this chapter are outlined below.

- **Alternative 1, No Project/No Development Alternative**, which assumes the site would remain under its current use, agricultural production.

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- **Alternative 2, No Project/No Action Alternative**, which assumes that the project site is developed under current land use and zoning designations included within the NQSP.
 - **Alternative 3, Smaller Phase 2 Alternative**, assumes that Phase 1 would not be altered, but the total amount of retail space in Phase 2 would be reduced by 30 percent, to 616,000 sf, and no office uses would be developed. Under this alternative, the hotel/conference facility would not change from what was assumed under the Proposed Project.
 - **Alternative 4, Off-Site Alternative**, which assumes the project, as is currently proposed would be developed in the Southeast Quadrant Specific Plan area located in the City.

Each of the alternatives is described in more detail and analyzed below. For each subject area, Table 6-1 indicates whether the impacts of the project alternatives are more or less severe than those of the Proposed Project. As required under Section 15126.6(e) of the State CEQA Guidelines, a discussion of the environmentally superior alternative appears at the end of this chapter.

Alternative 1: No Project/No Development Alternative

Description

CEQA requires the evaluation of the comparative impacts of the "No Project" alternative (CEQA Guidelines Section 15126.6(e)(1)). The No Project/No Development Alternative describes an alternative in which no development would occur on the project site and the uses on the site would remain the same as under existing conditions. Under the No Project/No Development Alternative, the project site would likely continue to be used for agricultural production. The site-specific impacts of the No Project/No Development alternative are best described by the existing conditions presented in the environmental setting sections of Chapter 4 of this Draft EIR.

Comparative Environmental Effects

The No Project/No Development alternative would produce no changes on the project site, effectively eliminating those project impacts discussed in this EIR. Because the site would remain in its current condition, there would be no impacts associated with introducing buildings and people into an area that is currently undeveloped.

**TABLE 6-1
COMPARISON OF ALTERNATIVES**

Impact	Proposed Project	No Project/No Development Alternative 1	No Project/No Action Alternative 2	Smaller Phase 2 Alternative 3	Off Site Alternative 4
4.1 Aesthetics					
4.1-1 The Proposed Project could substantially, adversely alter the visual character of the project site and could be visually incompatible with the surrounding land uses.	LS	-	=	=	=
4.1-2 The Proposed Project could create a substantial new source of substantial light or glare, which would adversely affect the surrounding area.	LS	-	=	=	=
4.1-3 The Proposed Project could create a substantial new source of light, which would contribute to sky glow in the surrounding area.	LS	-	-	=	=
4.1-4 The Proposed Project, in combination with other cumulative development, could substantially, adversely alter the visual character of the project site and could be visually incompatible with the surrounding land uses.	LS	-	=	=	=
4.1-5 The Proposed Project, in combination with other development, could create a substantial new source of light or glare, which could create an adverse effect for users of the surrounding area.	LS	-	=	=	=
4.2 Air Quality					
4.2-1 Construction activities associated with the Proposed Project would generate emissions of criteria pollutants.	SU	-	=	=	=
4.2-2 Operation of the Phase 1 combined with construction of Phase 2, and operation of Phases 1 and 2 combined would generate emissions of reactive organic gases and nitrogen oxides.	SU	-	+	-	=
4.2-3 The Proposed Project would generate increased traffic volumes that could increase concentrations of carbon monoxide at local intersections.	LS	-	+	-	=

LS = Less than Significant
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Impact	Proposed Project	No Project/No Development Alternative 1	No Project/No Action Alternative 2	Smaller Phase 2 Alternative 3	Off Site Alternative 4
4.2-4 Operation of the Proposed Project could create odors associated with the horseracing venue that may affect nearby receptors.	LS	-	-	=	=
4.2-5 The Proposed Project could expose sensitive receptors in close proximity to the project site to toxic air contaminants.	LS	-	-	-	=
4.2-6 Combined Phase 1 operation and Phase 2 construction and operation, in combination with other existing and future development within the Sacramento Valley Air Basin could generate emission of reactive organic gases and nitrogen oxides contributing to a cumulative impact.	SU	-	=	-	=
4.2-7 Construction activities associated with the Proposed Project, in combination with other existing and future development could generate significant emissions of PM ₁₀ contributing to a significant impact.	SU	-	+	-	=
4.3 Biological Resources					
4.3-1 Construction of the Proposed Project could result in the loss of foraging habitat for Swainson's hawk and other raptors (birds-of-prey).	LS	-	=	=	=
4.3-2 Construction of the Proposed Project (grading and vegetation clearing) could result in the loss of nesting birds that are protected by the California Department of Fish and Game or the Migratory Bird Treaty Act.	LS	-	=	=	=
4.3-3 Development of the Proposed Project would fill irrigation ditches that could be wetlands under State or federal jurisdiction.	LS	-	=	=	-

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4.3-4 Cumulative development within the Solano, Yolo, and San Joaquin County portion of the Central Valley, including the Proposed Project, would contribute to the cumulative loss of foraging habitat for Swainson’s hawk and other raptors.	LS	-	=	=	=
4.3-5 Cumulative development within the City of Dixon, including the Proposed Project, could contribute to the cumulative loss of jurisdictional wetlands or waters of the State.	LS	-	=	=	=
4.3-6 Cumulative development within the City of Dixon, including the Proposed Project, could adversely contribute to the cumulative loss of non-sensitive nesting birds that are protected by the California Department of Fish and Game or the Migratory Bird Treaty Act.	LS	-	=	=	=
4.4 Cultural Resources					
4.4-1 The Proposed Project could disturb or destroy any unidentified subsurface archaeological resources during construction.	LS	-	=	=	+
4.4-2 The Proposed Project, in combination with surrounding development, could disturb or destroy unidentified subsurface archeological resources during construction pursuant to Section 15064.5 or the CEQA Guidelines.	LS	-	=	=	=
4.5 Hazardous Materials and Public Safety					
4.5-1 The Proposed Project would involve the use of products containing hazardous materials during construction and operation, which could increase the risk of accidental release of chemicals that could affect people or the environment.	LS	-	=	=	=

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4.5-2 The Proposed Project could result in the exposure of people and the environment to potential disease hazards associated with horse wastes and bedding materials and vectors.	LS	-	-	=	=
4.5-3 Construction and occupancy of the Proposed Project could create a health hazard to people and the environment due to soil contamination.	LS	-	=	=	=
4.5-4 Large events at the project site would result in a substantial concentration of people immediately before, during, and after events, which could affect emergency response and/or evacuation conditions.	LS	-	-	-	=
4.5-5 Cumulative development, including the Proposed Project, could expose people and the environment to hazards and hazardous materials through reasonable foreseeable upset and accident conditions.	LS	-	=	=	=
4.5-6 Cumulative development, including the Proposed Project, could expose people to hazards associated with soil or groundwater contamination.	LS	-	=	=	=
4.5-7 Cumulative development, including the Proposed Project, could overwhelm emergency response services or affect evacuation routes under a worst-case, simultaneous events scenario.	LS	-	-	-	=
4.6 Hydrology and Water Quality					
4.6-1 Implementation of the Proposed Project would change local drainage patterns and could contribute to exceedence of existing or planned drainage systems.	LS	-	=	=	+

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4.6-2 Development of the Proposed Project would alter drainage patterns and hydrology that could contribute to on- or off-site flooding.	LS	-	=	=	+
4.6-3 Development of the Proposed Project would place structures and possibly fill material within a flood area that could impede or restrict flow or otherwise contribute to off-site flooding.	LS	-	=	=	+
4.6-4 Development of the Proposed Project could result in erosion and siltation during the construction phases.	LS	-	=	=	=
4.6-5 Development of the Proposed Project could result in post-construction erosion and siltation.	LS	-	=	=	=
4.6-6 Development of the Proposed Project could contribute additional polluted runoff to downstream receiving waters or otherwise contribute to degradation of water quality.	LS	-	=	=	+
4.6-7 Development of the Proposed Project could substantially impede groundwater recharge diminish groundwater supplies, or contribute to groundwater quality degradation.	LS	-	=	=	=
4.6-8 The Proposed Project, in combination with other development, would exceed existing and planned drainage system capacities.	LS	-	=	=	=
4.6-9 The Proposed Project, in combination with other development, would contribute sediment and other pollution to downstream receiving waters.	LS	-	=	=	=
4.6-10 The Proposed Project, in addition to existing and future water demands in the Solano groundwater basin, would increase pumping of groundwater which could degrade local groundwater quality.	LS	-	=	=	=

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4.7 Land Use, Planning, and Agricultural Resources					
4.7-1 Implementation of the Proposed Project could conflict with the City of Dixon General Plan, NQSP, Zoning Ordinance, and other applicable policies that are intended to protect the environment.	NI	-	-	=	=
4.7-2 Development of the Proposed Project would result in the conversion of Prime Farmland to non-agricultural uses.	SU	-	=	=	=
4.7-3 Development of the Proposed Project could create incompatible uses such that the productivity of adjacent agricultural land is substantially reduced due to nuisances associated with project development or operation.	LS	-	=	=	=
4.7-4 The Proposed Project, in combination with other development, would result in the loss of Prime Farmland.	SU	-	=	=	=
4.8 Noise					
4.8-1 Construction activities could create noise that may exceed noise level standards.	LS	-	=	=	=
4.8-2 The Proposed Project would create temporary groundborne vibration that could affect nearby receptors, but would not create permanent sources of groundborne vibration.	LS	-	=	=	=
4.8-3 Traffic generated by the Proposed Project would increase levels of roadway noise along roads in the vicinity of the project site.	LS	-	+	-	=
4.8-4 Large events could increase noise levels in the vicinity of the project site.	SU	-	-	=	=
4.8-5 Implementation of the Proposed Project could result in a cumulative noise increase in the project vicinity.	SU	-	-	=	=

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4.9 Public Services					
4.9-1 The Proposed Project could result in degradation of response times and service ratios, resulting in the need for additional personnel and/or equipment.	LS	-	-	-	=
4.9-2 The Proposed Project could result in the construction or modification of law enforcement facilities in order to maintain acceptable service ratios, response times, or other performance objectives, the construction or modification of which could result in substantial adverse environmental effects.	LS	-	-	-	=
4.9-3 The Proposed Project, in combination with other development in the City of Dixon, could result in the need for new or physically altered law enforcement facilities.	LS	-	-	-	=
4.9-4 The Proposed Project could result in the degradation of fire response times and service ratios, resulting in the need for additional personnel and/or equipment.	LS	-	-	-	=
4.9-5 The Proposed Project could result in the construction or modification of fire protection facilities in order to maintain acceptable service ratios, response times, or other performance objectives, the construction or modification of which could result in substantial adverse environmental effects.	LS	-	-	-	=
4.9-6 The Proposed Project, in combination with other development, could result in the need for new or physically altered fire protection facilities.	LS	-	-	-	=

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4.9-7 The Proposed Project could unreasonably reduce the planned useful life of a licensed landfill facility by exceeding the planned waste stream.	LS	-	-	-	=
4.9-8 The Proposed Project, in combination with other development, would generate solid waste that could exceed the capacity of existing facilities.	LS	-	-	-	=
4.9-9 The Proposed Project could result in the construction of new or physically altered school facilities.	LS	-	-	-	=
4.9-10 The Proposed Project, in combination with other development, could result in the construction of new or physically altered school facilities.	LS	-	-	-	=
4.9-11 The Proposed Project could include recreational facilities or require the construction or expansion of existing recreational facilities, which might have an adverse physical effect on the environment.	LS	-	-	-	=
4.9-12 The Proposed Project, in combination with other development in the City, could include recreational facilities or require the construction or expansion of existing recreational facilities, which might have an adverse physical effect on the environment.	LS	-	-	-	=
4.10 Transportation and Circulation					
4.10-1 Implementation of the Proposed Project (Tier 1 event) could cause existing operations at study intersections to worsen from acceptable to unacceptable levels.	SU	-	-	-	=

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Impact	Proposed Project	No Project/No Development Alternative 1	No Project/No Action Alternative 2	Smaller Phase 2 Alternative 3	Off Site Alternative 4
4.10-2 Implementation of the Proposed Project (Tier 1 event) could result in inadequate vehicular access to the project site from Pedrick Road under existing conditions.	LS	-	-	=	-
4.10-3 Implementation of the Proposed Project (Tier 1 Event) could cause existing operations on I-80 to worsen from acceptable to unacceptable levels.	SU	-	-	=	=
4.10-4 Implementation of the Proposed Project (Tier 1 event) could cause existing operations on roadways of regional significance to worsen from acceptable to unacceptable levels.	SU	-	-	=	=
4.10-5 Implementation of the Proposed Project (Tier 2 and 3 events) could cause existing operations at study intersections and freeway segments to worsen from acceptable to unacceptable levels.	SU	-	-	=	=
4.10-6 Implementation of the Proposed Project could reduce safety on Pedrick Road by creating potential conflicts with farm equipment and vehicles.	SU	-	=	=	-
4.10-7 Implementation of the Proposed Project could fail to provide adequate facilities to encourage the use of public transit.	LS	-	=	=	=
4.10-8 Implementation of the Proposed Project could increase the number of vehicles that cross at-grade railroad tracks.	SU	-	=	=	-
4.10-9 Implementation of the Proposed Project could interfere with planned bicycle and pedestrian facilities in the NQSP area.	LS	-	-	=	N/A
4.10-10 Implementation of the Proposed Project could provide inadequate emergency access.	LS	-	-	=	=

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4.10-11 Implementation of the Proposed Project could provide an inadequate number of on-site parking spaces.	SU	-	-	-	=
4.10-12 Implementation of the Proposed Project could provide insufficient access and internal circulation.	LS	-	-	=	=
4.10-13 Implementation of the Proposed Project could exacerbate cumulatively unacceptable operations at study intersections.	SU	-	-	=	=
4.10-14 Implementation of the Proposed Project, in conjunction with other cumulative development, could exacerbate unacceptable operations on Interstate 80.	SU	-	-	=	=
4.11 Utilities					
4.11-1 The Proposed Project's demand for water could exceed available sources of groundwater supplies.	LS	-	-	-	=
4.11-2 The Proposed Project would install and operate one new groundwater well that could affect groundwater levels in areas within and adjacent to the Proposed Project areas.	LS	-	-	-	=
4.11-3 The Proposed Project would affect the structural integrity of the Vaughn Pipeline which could interrupt water deliveries to Solano Irrigation District agricultural customers.	LS	-	=	=	-
4.11-4 Development of the Proposed Project, in combination with development in the Solano groundwater basin, would result in a decline in groundwater levels.	LS	-	-	-	-

LS = Less than Significant
 SU = Significant and Unavoidable
 - = Alternative impact less severe than the Proposed Project
 = = Impacts of the alternative and Proposed Project are identical or very similar

S = Significant
 PS = Potentially Significant
 + = Alternative impact more severe than the Proposed Project

NI = No Impact

**TABLE 6-1
COMPARISON OF ALTERNATIVES**

Impact	Proposed Project	No Project/No Development Alternative 1	No Project/No Action Alternative 2	Smaller Phase 2 Alternative 3	Off Site Alternative 4
4.11-5 The Proposed Project would discharge flows to the existing City sewer system, which would exceed City Engineering Standards for peak flow in the lines.	LS	-	-	-	=
4.11-6 The Proposed Project would result in the need for expansion of the City's wastewater treatment plant facilities.	SU	-	-	-	=
4.11-7 Stormwater runoff from the horse barns would be discharged to the sewer for conveyance to the City's wastewater treatment plant. Constituents in the wastewater could temporarily and intermittently affect the chemical character of the water entering the wastewater treatment plant, as compared to typical wastewater flows from residential, commercial, or retail land uses.	LS	-	-	=	=
4.11-8 The Proposed Project, in combination with other development in the City of Dixon, could result in the need for new or physically altered wastewater collection facilities that could result in significant environmental effects.	LS	-	-	-	=
4.11-9 The Proposed Project, in combination with other development in the City of Dixon, could result in the need for new or physically altered wastewater treatment facilities that could result in significant environmental effects.	SU	-	-	-	=
4.11-10 The Proposed Project, in combination with other non-residential development in the City of Dixon, would discharge wastewater to the sewer that could contain constituents that could affect the quality of wastewater treated and disposed of at the City's wastewater treatment plant.	LS	-	-	-	=

LS = Less than Significant
 SU = Significant and Unavoidable
 - = Alternative impact less severe than the Proposed Project
 = = Impacts of the alternative and Proposed Project are identical or very similar

S = Significant
 PS = Potentially Significant
 + = Alternative impact more severe than the Proposed Project

NI = No Impact

Under the No Project/No Development Alternative, there would be no change in the existing visual environment. No light sources would be created and there would be no change to the existing visual character of the project site. There would be no increase in air pollutants associated with project construction nor an increase in pollutants associated with more vehicles accessing the area. The loss of foraging habitat for the Swainson's hawk and other raptors would not occur because the site would not be developed, nor would there be a loss in Prime Farmland. In addition, the potential disturbance to any unknown subsurface cultural resources would not be an issue because the site would not be disturbed to accommodate the construction of new buildings. Any hazards associated with building design or use would not occur, nor would there be any changes to the existing drainage and water quality. The current drainage pattern would not be changed. The loss of Prime Farmland and productive agricultural land would not occur, nor would there be an increase in noise associated with project construction and/or any noise impacts associated with construction or future operational activities. Lastly, impacts to public services and public utilities would not occur under this alternative because the site would not be developed so there would be no need for additional police or fire services, sewer capacity or potable water. Under this alternative, the number of vehicles accessing the site would not change; therefore, there would be no operational impacts to the surrounding roadway network or freeway interchanges.

Relationship of the No Project/No Development Alternative to the Project Objectives

The No Project/No Development Alternative would not meet any of the City or the project applicant's project objectives because the site would not be developed with any uses. Because no development would occur, the site would remain as agricultural land and no new commercial, retail, office or hotel uses would be developed. Therefore, this alternative would not create new employment; locate regional serving commercial/entertainment land use adjacent to I-80; or, bring to Dixon and the surrounding region a state-of-the-art, world-class thoroughbred horse racing and training venue. None of the project objectives would be met under this alternative. In addition, the City of Dixon has adopted General Plan designations and a Specific Plan intended to convert the site to urban uses. The No Project/No Development Alternative would conflict with General Plan policy and the approved Specific Plan.

Alternative 2: No Project/No Action Alternative

Description

As stated above, CEQA requires the evaluation of the comparative impacts of the "No Project" alternative (CEQA Guidelines Section 15126.6(e)). The No Project Alternative can be defined either as "no action taken on the Proposed Project" or "no development" on the project site.

A "no action" alternative would assume that future conditions would be what is reasonably expected to occur under the City's General Plan and the NQSP consistent with available infrastructure and community services. For this discussion, development under existing City and NQSP designations would serve as the basis for the No Project/No Action Alternative. The purpose of the NQSP was to implement the goals and policies defined by the City General Plan which required designating this area for future industrial and commercial development due to its proximity to I-80.

Under this alternative, the site is assumed to remain as it is currently designated in the NQSP for Light Industrial, Community Commercial, and Professional/Administrative office uses. Table 6-2 provides a breakdown of land uses, based on the NQSP, which could be developed on the project site.

Uses that could be developed under Light Industrial (which is consistent with the light industrial (ML) district in the Dixon Zoning Ordinance, Section 12.13) include, but are not limited to, light manufacturing, research facilities, office and administrative facilities, as well as some commercial uses. The General Commercial designation includes retail services to serve the workers and residents that live within the NQSP area. Under the professional and administrative office designation (consistent with the Professional and Administrative office district in the Dixon Zoning Ordinance, Section 12.07) uses that could be developed, but are not limited to, include health and legal services, clinics, advertising and management agencies, and membership organizations. The NQSP calls for a majority of buildings to be developed with a FAR of between 0.3 and 0.6 to allow for two-story buildings. The NQSP anticipated that a total of approximately 4,702 employees could be created under this alternative using the rates provided in Table 2-2 on page 2-8 of the NQSP.

Table 6-2
NQSP Land Uses

Land Use	Acreage
Professional/Administrative	60 acres
Light Industrial	195 acres
General Commercial	5 acres
Total	260 acres

Source: Land Use/Zoning Map, Figure 203, NQSP, page 2-4.

Table 6-3 provides the number of jobs that would be created if the NQSP was builtout consistent with existing designations, according to the Goodwin Consulting Group. The number of direct jobs is very similar to what was anticipated in 1994 when the NQSP was written.

Table 6-3
NQSP Employment Impacts

Land Use	Jobs
Retail	510
Office	1,469
Light Industrial	1,929
Neighborhood Commercial	214
Total	4,122

Source: Minnesota Implan Group; Goodwin Consulting Group, Inc., 2005.

Comparative Environmental Effects

Impacts Identified as being the Same or Similar to the Proposed Project

Under this alternative it is assumed that impacts associated with the change in visual character would be very similar to the analysis of the Proposed Project. However, under this alternative, light industrial uses would be developed which would presumably not require the same level of design review as the Proposed Project. It is assumed that the development of an urban environment in this area would change the existing visual environment. As stated in the NQSP, each proposed development would be required to go through the City's PUD (or PD) process which would likely require preparation of Design Guidelines and/or a Development Plan. It is likely Mitigation Measure 4.1-2 would also be required to mitigate impacts associated with an increase in light and glare.

Impacts associated with construction activities, which include impacts to air quality and noise associated with construction equipment could be the same or slightly greater than the Proposed Project, because it is assumed the site would be developed with a variety of buildings, roads, utilities and other infrastructure resulting in an increase in air pollutants and construction-related noise. Under this alternative it is feasible that more buildings could be constructed compared to what is proposed under the project which could also translate into more cars and employees accessing the local roadways as well as more truck trips compared to the project. Air Quality Mitigation Measure 4.2-1(a) through (d) would also be required if the project site were developed consistent with the NQSP. To address construction noise, Mitigation Measure 4.8-1 would also be required.

Impacts associated with the loss of undeveloped land, which include impacts to biological resources, cultural resources, and Prime Farmland would be the same as the Proposed Project because it is assumed under the NQSP that a majority of the project site would be disturbed, as with the Proposed Project. Therefore, Alternative 2 would result in a loss of foraging habitat for raptors, the potential disturbance of any unknown subsurface cultural resources, and the loss of active Prime Farmland. It is assumed Mitigation Measures 4.3-1(a) and (b) and 4.7-1 would also still be required if the site were to be developed under the NQSP. In addition, to ensure construction activities do not adversely affect nesting birds, Mitigation Measure 4.3-2(a) and (b) would be required. Mitigation Measure 4.3-3, which requires the preparation of a wetland delineation is also assumed to be required under this alternative. To prevent impacts to any buried historic or prehistoric resource or human remains Mitigation Measure 4.4-1(a) and (b) would also be imposed under this alternative.

Impacts associated with the hazards of exposing people and the environment to hazards associated with horse waste and bedding material would not be an issue under this alternative. However, because portions of the project site were previously developed, and the potential for hazards exists, Mitigation Measures 4.5-1(a) through (c) would also be required for this alternative. Under this alternative it is also feasible that some of the uses that could be developed within a light industrial area could contain the use and storage of hazardous materials. It is assumed, as with the Proposed Project, that these uses would be highly regulated by existing federal and State laws on the use, handling and disposal of hazardous materials. The NQSP uses would not include gathering areas for large people; therefore, impacts associated with emergency response and traffic access would not be an issue under this alternative in contrast to the Proposed Project.

It is also anticipated that development of the site under the NQSP would result in similar impacts to drainage because it is assumed a majority of the site would be developed with some type of impervious surfaces.

Impacts Identified as being Less Severe than the Proposed Project

It is assumed that development under this alternative would result in less severe impacts to transportation because the types of land uses are different. Under this alternative, the NQSP calls for development of a majority of the site for light industrial or office uses which typically generate fewer trips than retail or commercial uses. However, during the peak hour the trips would be more concentrated compared to the project and it is assumed there would be more truck trips generated under this alternative compared to the project. It is not anticipated that any large-scale special events would occur similar to what is proposed under the project. Therefore, impacts identified under the Proposed Project associated with the increase in traffic associated with the racetrack and retail, office and hotel uses, as well as special events, would not occur to the same degree under this alternative.

Development of the NQSP would require additional police and fire services; however, the light industrial and commercial uses would require less police and fire services than the large events and regional retail associated with the Proposed Project.

In addition, noise associated with large special events including concerts and horse racing events would not occur under this alternative because the light industrial and office uses proposed for the site under the NQSP do not provide facilities for these types of special events. Therefore, noise impacts under this alternative are anticipated to be less severe than what was analyzed under the Proposed Project.

Potential impacts associated with hazards and public safety associated with emergency access of large numbers of people attending a large event are not anticipated to occur under this alternative because the proposed uses do not include facilities or uses that would host large-scale events.

Impacts Identified as Being More Severe than the Proposed Project

Assuming the maximum development allowed under existing zoning would occur under Alternative 2, impacts associated with operational vehicle emissions would be more severe than the Proposed Project. The existing zoning could result in more intense industrial and commercial development, which would require more daily trips than the Proposed Project, which would result in high traffic volumes occasionally rather than consistently. The increased emissions for Alternative 2 are shown in Table 6-. However, Mitigation Measure 4.2-2 (a) and (b) would most likely still be required. In addition, Alternative 2 would generate more wastewater than the Proposed Project.

Conclusion

Overall, development of the project site under the land uses proposed within the NQSP would result in very similar impacts to what was identified under the Proposed Project because essentially the entire site would be developed. However, under this alternative the types of uses that could be developed would be considered less intense than the project. Therefore, impacts associated with an increase in noise attributed to special events such as concert; impacts to the existing local and regional roadway network due to the number of patrons attending events; and impacts to public services also associated with the

number of patrons attending events would either not exist or be less-than-significant impacts under this alternative.

Table 6-4 provides a quantitative comparison of the increase in solid waste, water, wastewater, and air pollutants associated with the Proposed Project and Alternative 2.

Table 6-4
Alternative 2 Impact Comparison

	Alternative 2	Proposed Project
Solid Waste ¹	2,300 tons/year	3,300 tons/yr
Water	524 AFY	702 AFY
Wastewater	0.39 mgd	0.25 mgd
Air Quality		
ROG	1,338 lbs/day	305 lbs/day
NO _x	1,383 lbs/day	409 lbs/day
PM ₁₀	1,121 lbs/day	391 lbs/day
CO	13,936 lbs/day	3,848 lbs/day

Notes: 1. Assumes 2.7 lbs/employee/day
Source: EIP Associates, 2005.

Relationship of the No Project/No Action Alternative to the Project Objectives

Alternative 2 would achieve only a few of the City’s goals, including providing alternative land uses to those currently existing. The alternative fails, however, to provide an entertainment venue, a retail center, and would not take advantage of the site’s proximity to I-80. In addition, the No Project/No Action Alternative would not create the local and regional serving, high quality, mixed use development outlined in the City’s goals.

The No Project/No Action Alternative would only meet a few of the project applicant’s project objectives. Under this alternative, the site would develop under the NQSP; however, uses would be limited to light industrial, office and general commercial. Development of these land uses would provide additional employment opportunities and would provide an economic stimulus to the City. However, a majority of the applicant’s project objectives would not be met under this alternative because this alternative does not provide a venue for horse racing, as well as entertainment, dining, and shopping opportunities for the people of Dixon as well as the region.

Alternative 3, Smaller Phase 2 Alternative

Description

Under Alternative 3, Phase 1 of the project would be as is currently proposed, but the total amount of retail space in Phase 2 would be reduced by 30 percent, to 616,000 sf, and no office uses would be developed. Under this alternative, the 250,000 sf hotel/conference facility would be the same as described under the Proposed Project. All of the other components would be the same as the Proposed

Project. Eliminating the office component would mean that approximately 7 acres less of the project site would be developed with structures, but it is assumed this area would be developed for parking.

Therefore, Phase 1 would include construction of a racetrack, a 192,000 sf Finish Line Pavilion, dining facilities and temporary housing for jockeys and grooms, horse barns and associated service facilities, the same as the Proposed Project. Phase 2 would include a 250,000 sf, 240 room hotel/conference facility, and approximately 616,000 sf of retail uses (including restaurants, theatres, and regional specialty retail), a reduction of 264,000 sf compared to the Proposed Project.

Comparative Environmental Effects

Impacts Identified as either being the Same or Similar to the Proposed Project

Under Alternative 3, a majority of the project site would be developed and would result in similar impacts resulting from the change in visual character as the Proposed Project and Alternative 2. Impacts caused by construction activities, including an increase in air pollutants and noise from construction equipment, would essentially be the same as the Proposed Project because the site would be disturbed. Impacts due to the loss of undeveloped land, which include impacts to biological resources, cultural resources, and loss of Prime Farmland would be similar to those presented for the Proposed Project because for all practical purposes a majority of the site would be developed. Alternative 3 would result in similar impacts to drainage because the entire site would be developed with some type of impervious surface.

The Proposed Project contemplates a variety of special events that could bring as many as 15,000 people to the site and in some instances up to 50,000 people. The types of special events discussed include outdoor concerts and large horse racing events which would increase ambient noise levels in and around the site. Under this alternative, the project would continue to host special events, which could include outdoor concerts with up to 15,000 people and large horse racing events up to 50,000 people. Therefore, it is anticipated that noise associated with operation of this alternative would be very similar to the Proposed Project and Mitigation Measure 4.8-2 which addresses speakers and hours of operation would likely also be required for this alternative.

As discussed under the Proposed Project there could be hazards associated with project construction and potential public safety concerns associated with public events. Under this alternative, the types of hazards associated with project construction would essentially be the same as the project. Impacts associated with public safety and emergency evacuation would also be similar to the Proposed Project because essentially the same types of uses would occur and the same types of public events would be held. It is likely Mitigation Measure 4.5-3(b) would also be required under this alternative to address emergency response protocols.

Impacts Identified as Being Less Severe than the Proposed Project

Under this alternative, impacts to transportation and circulation would be reduced because of the decreased intensity of office and retail use. Under this Smaller Phase 3 Alternative, some of the impacts identified as being significant and unavoidable under the project would be avoided. Alternative 3 would avoid the significant and unavoidable impact at North First Street/West A Street under existing plus Phase 1 and 2 conditions (100 percent race attendance) (Impact 4.10-1) and would reduce the severity of the impacts identified at North First Street and Dorset Drive as well as the westbound ramp onto I-80

from Pedrick Road. However, impacts identified at North First Street/Dorset Drive and access onto the ramps at I-80 would remain significant and unavoidable with the Proposed Project would remain significant and unavoidable even after the reduction in Phase 2 retail use.

Due to the reduction in retail use, impacts identified under the Proposed Project associated with an increase in air pollutants due to an increase in vehicle traffic would be somewhat less severe under this alternative because fewer cars would be traveling to and from the site.

Under the Proposed Project there would be an increase in demand for police and fire services as well as solid waste disposal. Impacts to fire and police services would be similar to the Proposed Project because the site would be developed with essentially the same land uses. However, because less retail space and no office space would be developed it is anticipated there could be a slight decrease in demand for police and fire services because overall fewer people would be accessing the site and the uses would be less intense than the Proposed Project. The amount of solid waste and wastewater generated, and water demanded, would also be slightly less compared to the Proposed Project because overall less building space would be developed, as shown in Table 6-5.

Table 6-5
Alternative 3 Impact Comparison

	Alternative 3	Proposed Project
Solid Waste	2,750 tons/year	3,300 tons/yr
Water	686 AFY	702 AFY
Wastewater	0.18 mgd ¹	0.25 mgd
Air Quality ²		
ROG	238 lbs/day	305 lbs/day
NO _x	319 lbs/day	409 lbs/day
PM ₁₀	307 lbs/day	391 lbs/day
CO	3,021 lbs/day	3,848 lbs/day

Notes:

1. Assumes a 30 percent reduction in wastewater associated with the 30 percent reduction in retail square footage.

2. The air quality modeling assesses peak daily emissions of criteria pollutants during a large event.

Source: EIP Associates, 2005.

Overall, development of the project site under Alternative 3 would result in impacts that are similar in severity to what was identified under the Proposed Project because the uses are essentially the same with only a small reduction in retail and office use. In addition, a majority of the project site would be disturbed through development. However, under this alternative some impacts would be considered less intense than the project due to the reduction in retail and office space. Table 6- provides a comparison of the Proposed Project and Alternative 3.

Relationship of the Smaller Phase 2 Alternative to the Project Objectives

Alternative 3 would achieve the majority of City’s project objectives by creating diverse employment opportunities, a local entertainment venue, shopping and hotel facilities, and resulting in a project that would appeal to Dixon and the region as a whole. Alternative 3 also provides a landmark use that would

draw additional development within the NQSP and uses the site's proximity to I-80. The alternative would eliminate office uses, which would conflict slightly with the City's third goal, to create a development with retail, office, hotel/conference, and entertainment uses. The reduction in retail use would not conflict with any City goals.

Reducing the size of Phase 2 would still meet many of the applicant's project objectives, primarily to place a horserace track at the specified location. Reducing the retail by 30 percent and eliminating the office component, however, would reduce the number of employment opportunities generated by Phase 2 and could lessen the regional draw of a large scale retail facility, in contrast to the applicant's stated goals.

Alternative 4, Off-Site Alternative

The Off-Site Alternative would be located within the 477+/- acre Southwest Dixon Specific Plan (SWDSP) area (see Figure 6-1). The SWDSP area is located in the southern portion of the City of Dixon bordered by I-80 to the west, W. Dixon A Street to the north, residential neighborhoods and Pitt School Road to the east, and undeveloped agricultural land to the south. The SWDSP calls for developing a mix of residential, commercial and employment uses. The SWDSP area is located within the City of Dixon adjacent to I-80 in an area that has similar constraints as the Proposed Project site including undeveloped agricultural land, lack of infrastructure, and the need to re-build the I-80 interchange to accommodate future planned growth. The project applicant does not own this site and would need to purchase the site under this alternative. The availability of the land is not known at this time.

This alternative would include the same uses and acreages as the Proposed Project in a different location. Under this alternative, 260 acres in the western portion of the plan area would be developed; the remaining 217 acres on the site would be developed consistent with the SWDSP.

Comparative Environmental Effects

Under the Off-Site Alternative, the site would be visible from I-80, as shown in Figure 6-1. The majority of the site is currently in agricultural production and is designated as Prime Farmland.¹ The agricultural land provides good foraging habitat for Swainson's Hawk and other raptors, similar to the NQSP site. Because the site is flat and receives sheet flow drainage from the north, drainage is an issue for this site.

The interchange serving the SWDSP is not designed to accommodate the amount of traffic the project would generate. The interchange is not currently capable of accommodating the land uses planned by the SWDSP, either. Construction of the Proposed Project would likely trigger the need for interchange improvements. The Proposed Project, located in the NQSP and served by two interchanges, would not require interchange improvements until Phase 2. Additional new impacts incurred with Alternative 4 include impacts to I-80, I-80/Pitt School Road and I-80/Midway Road interchanges, Batvia Road (a two-lane rural roadway that would likely require spot widenings and pavement rehabilitation to serve the project), and local intersection and neighborhood impacts (West A Street, Pitt School Road, West H Street, and Stratford Avenue).

1 Southwest Dixon Specific Plan, March 2003, page 1-6.

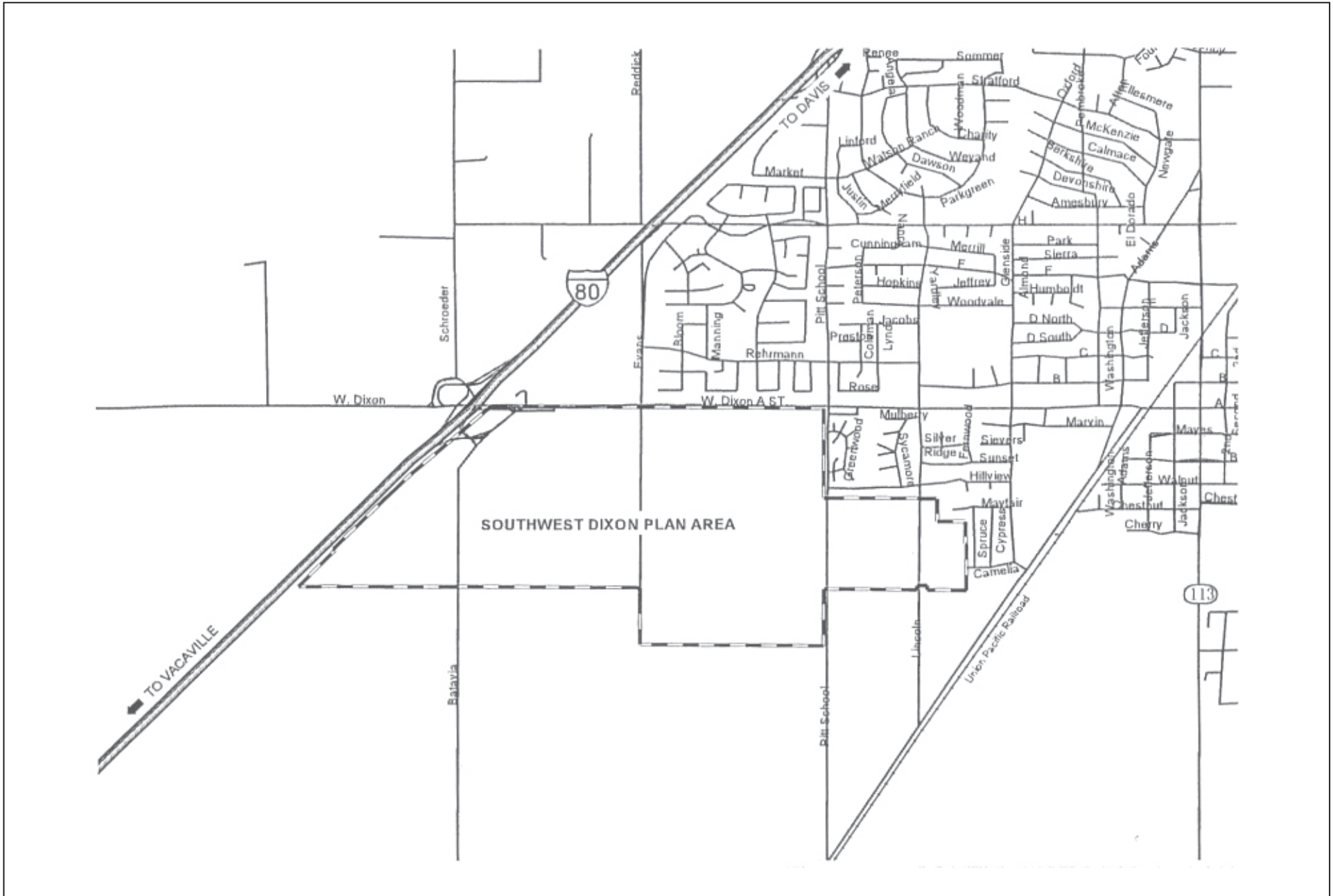


FIGURE 6-1
Southwest Dixon Plan Area

10811-00 **Source:** U.S. Census Tiger 2002 Data

Not to Scale



Dreyfuss & Blackford

Under Alternative 4, the following traffic impacts would be avoided. The alternative project location would result in fewer trips through downtown Dixon, likely avoiding the significant and unavoidable impact to the North First Street/West A Street intersection. In addition, the alternative project location would not increase the number of at-grade railroad crossings, or create an incompatibility between farming equipment and vehicles. Impacts to the I-80/Pedrick Road and I-80/North First Street/Curry Road interchanges, Pedrick Road, and North First Street would be avoided, but replaced by impacts to the I-80/West A Street interchange and West A Street and Pitt School Road.

Development in the SWDSP would result in very similar impacts to those identified under the Proposed Project because the site characteristics are very similar to the NQSP location and full development would occur. New issues that could occur on the SWDSP site include conflicts with Williamson Act contracts, and the potential loss of historic resources. The 2003 Southwest Dixon Specific Plan DEIR identified one or more structures on site that may be considered historic. Drainage related impacts could be more severe on the SWDSP site because it receives sheet flow from the north under existing conditions. Impacts associated with noise and air quality could affect different sensitive receptors but would not substantially change. All other impacts would be the same as those identified for the Proposed Project, including services and utilities, because the demand generated would remain unchanged.

Relationship of the Off-Site Alternative to the Project Objectives

Alternative 4 would achieve the City's objectives to provide the uses included in the Proposed Project – a shopping venue, local entertainment, and employment opportunities. The alternative site is also located near I-80. The project applicant does not own this site and it is presumably not for sale at this time. However, Alternative 4 would fail to achieve the City's stated objectives to place such a development within the NQSP.

The Off-Site Alternative would meet many of the project applicant's project objectives. Under this alternative, the site would develop with all uses planned for the Proposed Project and would obtain all objectives related to providing economic opportunity and state of the art horseracing facilities. The Off-Site Alternative would fail to meet all objectives specifically related to developing within the NQSP area and to site the project in proximity to two I-80 interchanges. The alternative would also fail to place an employment generating use in an area designated by the Dixon General Plan as a major employment center. However, a majority of the applicant's project objectives would be met under this alternative.

Environmentally Superior Alternative

An EIR is required to identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. Section 15126.6 (e)(2) of the CEQA Guidelines requires that an environmentally superior alternative be designated and states that if the environmentally superior alternative is the No Project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

From the alternatives evaluated for the Dixon Downs project, the environmentally superior alternative would be Alternative 1 – the No Project/No Development alternative. This alternative would avoid all significant impacts associated with the Proposed Project. However, in accordance with the CEQA Guidelines, an environmentally superior alternative must also be selected from the remaining alternatives – Alternatives 2, 3, or 4. Alternative 3 – the Smaller Phase 2 Alternative – would reduce the severity of

impacts to air quality, public services, transportation, water, and wastewater. All other impacts would be similar to the Proposed Project. Therefore, Alternative 3 would be the environmentally superior alternative. In addition, the Smaller Phase 2 Alternative meets nearly all of the City's objectives and most of the project applicant's objectives.