6.0 ALTERNATIVES TO THE PROPOSED PROJECT

As mandated by § 15126.6 of State CEQA Guidelines, an EIR must describe and consider a reasonable range of alternatives to the proposed project. More specifically, § 15126.6(f) of the CEQA Guidelines requires that an EIR include a discussion of a "range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project." Section 15126.6(f) further states that the "range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." Thus, the following discussion focuses on those alternatives capable of eliminating or reducing the level of significance of one or more of the environmental impacts of the project, even if the alternative would impede to some degree the attainment of some of the project objectives, or would be more costly. Alternatives considered may result in new impacts that would not result from the proposed project.

Among the factors that may be used to eliminate alternatives from detailed consideration is the failure of the alternative to meet the basic project objectives, its infeasibility, or its inability to avoid significant environmental impacts. In accordance with § 15126.6(f)(1) of the State CEQA Guidelines, the factors that may be taken into account when addressing the feasibility of alternatives are: site suitability, economic viability, availability of infrastructure, General Plan consistency or other plan or regulatory limitations; jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site. CEQA Guidelines § 15126(d) states, in part, that the significant effects of alternatives may be discussed, but "in less detail than the significant effects of the project as proposed."

Other alternatives for the EGSP area were previously analyzed in the *FORA Reuse Plan EIR* (FORA EIR). Those alternatives were composed of alternatives carried forward from the *Fort Ord Disposal and Reuse Final Environmental Impact Statement* (Army FEIS). The *Fort Ord Reuse Plan* (Reuse Plan) originally proposed several uses for the East Garrison District: a Mixed-Use Urban Village and Employment Center as well as a Police Officer Training Center that included an emergency vehicle operations course, a leadership reaction course, and a practice shooting range. The alternative analyzed in the Reuse Plan and adopted by FORA designated the EGSP area as a Mixed-Use Urban Village and Employment Center and other public and institutional uses. The proposed project differs from the GPA by proposing less intense land uses in the East Garrison area.

The project alternatives evaluated in this section are:

- Offsite Alternative - Parker Flats
- No Project/No Development Alternative (No Development Alternative)
- No Project/Development Under the Existing General Plan Alternative (No Project Alternative)
- Avoidance of Historic Structures Alternative (Avoidance Alternative)
- Reduced Density Alternative

Two No Project Alternatives are considered: the No Project/No Development Alternative and the No Project/Development Under the Existing General Plan. When the project is the continuation of an existing land use or regulatory plan or policy, the No Project Alternative can be the continuation of the existing plan or policy. Thus, the projected impacts would be compared to the impacts that would

occur under the existing plan, in this case the current MCGP. In addition to the No Project/Development Under the Existing General Plan, this analysis includes the No Project/No Development. This analysis is provided to contrast the impacts of the project against the continuation of existing conditions on the project site (vacant military base).

In developing the alternatives to be addressed in this section, consideration was given to their ability to meet most of the basic objectives of the proposed project. The Department of Defense has legislative mandates to implement base reuse goals and objectives, which are included in the project objectives, and which have been stated in the Army FEIS and FORA FEIR. The East Garrison Specific Plan (EGSP) goals are as follows:

- Consistent with FORA FEIR, the project would provide for the reuse and development of the base area in ways that enhance the economy and quality of life of the Monterey Bay community.
- Consistent with the Army FEIS, the project would provide for the transition of the FFO to civilian use.
- Ensure new development pays for 100 percent of infrastructure and services needed to support the new community.
- Establish mechanisms for maintaining and operating private infrastructure.
- Design efficient infrastructure systems that minimize impacts on the environment.
- Assist the Redevelopment Agency in obtaining the available property to implement its redevelopment plan.
- Allow the creation of much needed housing in the community.
- Create a mixed-income community with a range of housing opportunities across the spectrum.
- Target development areas where impacts on the environment will be avoided or minimized.
- Create a compact, efficient community with a minimal footprint.
- Integrate the surrounding native habitats into the open spaces within the community.
- Create buffers around the community that help transition from a native habitat/ecosystem to an urban habitat/ecosystem.
- Encourage multi-modal transportation opportunities, especially bicycle, pedestrian, and transit by providing a compact mix of uses, small blocks, interconnected streets, sidewalks, and traffic calming measures, such as traffic circles and buildouts.
- Reduce groundwater consumption with water reclamation programs, drought-tolerant landscaping, and groundwater recharge efforts.
- Support all provisions of the *Installation-Wide Multispecies Habitat Management Plan for Former Fort Ord* (HMP) (April 1997), as amended.

- Collaborate with Monterey-Salinas Transit (MST) and CSUMB to assure the entire community is well served with transit.
- Minimize the amount of impervious surfaces by minimizing the widths of streets.
- Create a diverse mixed-income community with a full spectrum of life cycle housing opportunities.
- Celebrate the history of the site by reusing existing buildings and structures where feasible.
- Create a destination for artists to imbue the entire community with creative spirit.

This analysis will identify an Environmentally Superior Alternative from among the five alternatives. The Environmentally Superior Alternative is the alternative that would result in the fewest or least significant environmental impacts, while still achieving the project objectives, as described during the planning effort.

Analysis of the alternatives assumes that all applicable mitigation measures associated with the project will be implemented with the appropriate alternatives. However, applicable mitigation measures may be scaled to reduce or avoid potential impacts associated with the alternative under consideration and may not precisely match those identified for the EGSP project.

6.1 OFFSITE ALTERNATIVE: PARKER FLATS

According to the CEQA Guidelines, only locations that would avoid or substantially lessen any of the significant environmental effects need to be evaluated in the EIR. If the Lead Agency determines that no feasible alternative locations exist, it must disclose the reasons for the conclusion in the EIR. In accordance with CEQA, the County of Monterey considered alternative locations at which the EGSP project could be implemented. An evaluation of the existing land use patterns and site characteristics within the former Fort Ord (FFO) determined that the Parker Flats site would be the most suitable to accommodate a mixed-use urban village development. Under the Reuse Plan (June 1997), Parker Flats was planned to be developed as a Residential District in an area that encompasses 946 acres southwest of the EGSP project site. Specifically, Fort Ord Reuse Authority (FORA) originally designated the Parker Flats Residential District to accommodate a residential community with up to 3,184 residential units on 520 acres, including one acre of neighborhood-serving and retail commercial uses; 194-acres of visitor serving uses (potentially including hotel and golf course development); and 231 acres of open space.

However, other land use considerations will ultimately guide development at Parker Flats, specifically, the HMP for Fort Ord. The HMP for the FFO establishes a habitat conservation area, corridor system, and parcel-specific land use categories, in addition to outlining management requirements for all lands within the FFO. As described in Section 4.7, Biological Resources, FORA and the County of Monterey submitted modifications to the original HMP boundaries to the U.S. Army and U.S. Fish and Wildlife Service that were subsequently approved. The approved modifications allow residential and commercial development at the project site on an additional 210 acres of oak woodland, maritime chaparral, and grassland communities that would have been preserved under the original HMP. In exchange, the amendments to the habitat reserve set aside over 450 acres of land to support biotic communities at Parker Flats that were previously designated for

development. Modifications to the original HMP resulted in a net gain of approximately 240 acres of preserved habitat.

Implementation of this alternative would result in the development of the Parker Flats Residential District in whole or in part and would conflict with the approved modifications to the HMP. This alternative would result in development of 1,470 residential units, 75,000 square feet (sq ft) of commercial land use, 11,000 sq ft of public and institutional land use, 100,000 sq ft of artist/cultural/educational space, and 50 acres of open space (including approximately 12 acres of improved parks and trails) on a total of 244 acres of the 946-acre Parker Flats site.

In addition to being inconsistent with relevant plans and policies, such as the current HMP, development of the proposed project at the Parker Flats site would reduce some, but not all, of the project-related significant impacts. Since this alternative would generate the same number of daily vehicle trips, it would not reduce the significant traffic impacts discussed in Section 4.4, Transportation and Circulation, nor the significant and unavoidable air quality impacts discussed in Section 4.5, Air Quality. More importantly, the Parker Flats site has been heavily impacted with Munitions and Explosives of Concern (e.g., unexploded ordnance). While remediation efforts have been conducted on portions of Parker Flats, the Army cannot guarantee that all unexploded ordinance and hazardous materials have been remediated. Additionally, remediation activities have not occurred to the extent that eliminates the hazard or reduces it to a level that would allow transfer to the County of Monterey. In addition, under this alternative no rehabilitation of historic structures would occur; thereby, leading to eventual dilapidation of historic structures. This impact could be avoided by the mothballing of historic structures; however, those actions are not planned for at this time. All other impacts, such as those associated with seismic hazards (geology and soils); erosion and increased storm water runoff (hydrology and water quality); increased noise emissions (noise); alteration of views and aesthetic character, and increased light and glare (aesthetics); increased affordable housing and employment (population, housing, and employment); and extensions/upgrades of utilizes and demand for services (public services and utilities) would be of similar type and scale as discussed within the individual environmental topics, presented in Section 4, Environmental Impact Analysis.

However, due to hazardous conditions associated with unexploded ordinance, lack of knowledge on clean-up timing, and inconsistency with the HMP, this alternative is not considered a feasible alternative that could be reasonably implemented; therefore, the Offsite Alternative is being eliminated from further consideration. No further evaluation of this alternative regarding individual environmental issues will be presented within this section.

6.2 NO PROJECT/NO DEVELOPMENT ALTERNATIVE

This DSEIR describes the current environmental conditions at the project site. Under the No Project/No Development Alternative (No Development Alternative), the entire project site would remain unchanged and no new development would occur. In general, the EGSP project area would continue to exist as a vacated military base. The existing buildings would remain in a state of dilapidation and no rehabilitation of these structures or associated infrastructure would occur.

6.2.1 Impact Analysis

LAND USE AND RELATED PLANNING PROGRAMS

The No Development Alternative is not consistent with the policies of the 1982 *Monterey County General Plan* (MCGP), and other related planning programs such as regional plans and policies, County ordinances, and buildings standards. As identified in Section 4.1, Land Use and Related Planning Programs, no significant neighborhood or related planning or policy impacts are anticipated with implementation of the EGSP project. Continuation of existing onsite uses, under this alternative, would not result in the development of the project site as intended under the MCGP. The MCGP designates the project site as Planned Development Mixed Use District. Leaving the project site in its current condition would undermine the MCGP's goals of guiding growth to appropriate areas, such as the FFO. This would result in a significant impact on land use plans and policies. This alternative would hinder the County's ability to meet its share of Association of Monterey Bay Area Governments' (AMBAG) Regional Housing Needs Allocation housing need and would be inconsistent with the County's Housing Element. Therefore, this alternative could result in greater land use plan and related planning program impacts in comparison to the proposed EGSP project by pushing needed housing to yet unidentified areas.

GEOLOGY AND SOILS

The project site is subject to earthquakes and seismic ground shaking. In addition, the project site may be subject to secondary seismic effects, such as densification and landslides in bluff areas. The No Development Alternative would not result in the development of new structures within a seismically active area, which is susceptible to secondary seismic effects. Therefore, no impacts would occur under this alternative. As identified in Section 4.2, Geology and Soils, with the incorporation of recommended mitigation measures, the EGSP project will have a less than significant effect on geology and soils. The No Development Alternative would result in no new buildings or residents at the proposed project site. Since there would be fewer residents within a seismic hazard area, this alternative is viewed as having less impact to geology and soils than the EGSP project.

HYDROLOGY AND WATER QUALITY

In the short-term, the No Development Alternative would not require earth-moving activities that would result in increased erosion and sedimentation or accidental spills or releases of hazardous construction-related materials. In the long-term, the No Development Alternative would not result in an increase in impervious surfaces and storm water runoff (i.e., rate, volume, pollutants, etc.) in the project area. The EGSP project includes two detention basins and one retention basin to control storm water in compliance with the Monterey County Water Resources Agency (MCWRA) post-development peak storm water flow requirements. As identified in Section 4.3, Hydrology and Water Quality, the hydrology and water quality impacts of the EGSP project will be mitigated to levels considered less than significant. However, since the No Development Alternative would not result in alterations to the drainage and water quality characteristics of the site (i.e., pre-development levels), this alternative is considered to have less impact to hydrology and water quality in relation to the proposed project.

TRANSPORTATION AND CIRCULATION

Currently, five intersections and five roadway segments within the project area operate at an unacceptable level of service (LOS). The proposed EGSP project will result in generating 13,690 additional daily vehicle trips. These additional trips will further deteriorate these intersections and

roadway segments and cause two additional roadway segments to operate at an unacceptable LOS. Since the mitigation measures required to mitigate project-related impacts are not currently included on the FORA Capital Improvement Plan (CIP), their implementation is unsure and project-related impacts will be significant and unavoidable. The No Development Alternative would not contribute to the generation of any additional traffic, and therefore, would not affect the LOS at intersections and roadway segments, or result in construction-related vehicle trips. Therefore, the No Development Alternative would not result in additional traffic generation. However, implementation of the No Project alternative will not help to solve the existing unacceptable traffic levels of service, and it may result in increased pressures to develop greenfields in the county. This alternative is considered to have less impact to transportation and circulation in comparison to the EGSP project.

AIR QUALITY

Air quality impacts are primarily associated with vehicle emissions. Air quality impacts in the short-term are associated with construction activities (e.g., earthmoving vehicles) in comparison to resident and visitor traffic and stationary source emissions that occur in long-term. No new short-term construction or long-term operational air quality emissions would occur as a result of the No Development Alternative. As identified in Section 4.5, Air Quality, the proposed EGSP project will result in significant and unavoidable short- and long-term air quality impacts. The No Development Alternative would not result in development that would create increased air emissions; thus, the No Development Alternative is considered to have less impact to air quality in relation to the proposed project.

NOISE

Primarily, development creates short-term noise impacts through the operation of construction equipment and long-term noise impacts through increased vehicle traffic, in addition to stationary sources such as mechanical equipment associated with residential and commercial uses. The No Development Alternative would not result in any of the short-term construction or long-term operational phase noise impacts associated with the EGSP project. As identified in Section 4.6, Noise, the EGSP project's noise impacts can be mitigated to a level considered less than significant. However, since this alternative would not result in development that would create increased traffic-related or other noise sources; the No Development Alternative is considered to have less noise impact than the proposed project.

BIOLOGICAL RESOURCES

Past military operations at FFO have altered the native plant communities throughout much of the project site. Additionally, the project site itself is one of the areas of FFO that has been developed with structures and ancillary facilities such as roadways and utilities to serve the base. Regardless of past operations and disturbance of the site, development of the proposed project will result in removing 53 acres of oak woodland and 38 acres of oak savannah, in addition to impacting other vegetation communities, including grassland, maritime chaparral, coastal scrub, and ruderal communities and habitat for endangered and sensitive species (e.g., sand gilia, California Tiger Salamander, etc.). As identified in Section 4.7, Biological Resources, biological resource impacts resulting from implementation of the EGSP can be mitigated to less than significant. Moreover, the proposed project will retain approximately 50 acres as open space. However, since the No Development Alternative would result in no impact to biological resources, this alternative is considered to have less impact to biological resources than the proposed project.

CULTURAL RESOURCES

Thirty-four buildings on the EGSP site have been determined to be contributing elements to a historic district considered eligible for listing on the National Register of Historic Places (NRHP). Project implementation will result in retention of 23 of the buildings and the demolition of the remaining 11 buildings. As identified in Section 4.8, Cultural Resources, impacts to cultural resources resulting from the EGSP are significant and unavoidable. Project implementation will cause the overall loss of integrity of the historic district through the removal of contributing structures and infill development. The No Development Alternative would not result in the demolition of any structures or any infill development; however, the No Development Alternative would also not rehabilitate any onsite structures and therefore would result in the eventual dilapidation and collapse of all 34 structures. This alternative would have similar impacts to cultural resources as the proposed EGSP project due to the eventual dilapidation of historic structures.

AESTHETICS

Implementation of the No Development Alternative would result in no new development. Therefore, no alteration of the existing visual and aesthetic character of the site or project area would occur. The EGSP project would not cause a significant adverse effect on the aesthetic character of the site or surrounding area, although it will alter viewsheds and introduce new sources of light and glare into the project area. Although historic structures associated with the vacated military base under the No Development Alternative would be retained, no rehabilitation of historic structures would occur under this alternative, resulting in the continued dilapidation and eventual loss of the structures. Therefore, impacts under the No Development Alternative would be similar, although slightly less than the EGSP project.

POPULATION, HOUSING, AND EMPLOYMENT

The proposed project will result in construction of 1,470 residential units, including 280 affordable housing units. In addition, implementation of the EGSP is anticipated to introduce 4,337 persons and 380 jobs into the project vicinity, which is within the parameters of AMBAG's population forecasts for the project area. As identified in Section 4.10, Population, Housing, and Employment, the EGSP project will not result in any significant population, housing, and employment impacts. Implementation of the No Development Alternative would not result in the construction of housing in the community, including the construction of 280 affordable housing units; therefore, the No Development Alternative would result in an even greater shortage of market-rate and housing available for low to moderate-income persons. Moreover, the EGSP has been designed, in accordance with the Reuse Plan and the MCGP, to include employment opportunities within the project site itself. Additionally, the project is in close proximity to large employment centers on the former base, such as California State University of Monterey Bay (CSUMB) and University of California Monterey Bay Education, Science, and Technology Center (UCMBEST) to help offset the impact of jobs lost as a result of the closure of FFO. Therefore, in addition to the lack of affordable housing and the absence of employment, the No Development Alternative would result in greater population, housing, and employment impacts in comparison to the proposed EGSP project.

PUBLIC SERVICES AND UTILITIES

The No Development Alternative would not require the extension and/or upgrades of utilities, such as water and wastewater facilities, to the site. Moreover, the No Development Alternative would not result in generating a greater demand for public services such as police, fire, schools, etc. As noted in Section 4.11, Public Services and Utilities, with the implementation of mitigation measures, the

EGSP project is considered to have a less than significant impact to public services and utilities. However, the No Development Alternative would not result in an increase in demand for these utilities or services; therefore, this alternative is considered to have less impact to public services and utilities in relation to the EGSP project.

HAZARDOUS MATERIALS

As noted in Section 4.12, Hazardous Materials, although various hazardous materials were stored, released, and disposed of at FFO during its use by the Army, all known, potentially hazardous sites and toxic conditions within the project area were remediated, or have been identified as requiring further removal of potentially hazardous materials (e.g., clay pigeon fragments). However, project implementation will result in the demolition of structures that contain asbestos and lead based paints (LBP) and there is the potential for discovery and disturbance of previously unknown hazardous materials during construction activities. As identified in Section 4.12, Hazardous Materials, mitigation measures have been identified to reduce impacts associated with asbestos and LBPs to less than significant. The No Project Alternative would not result in the demolition of any structures or earth moving activities that would result in unearthing unknown hazardous wastes. Additionally, as discussed in Section 4.12, Hazardous Materials, once the project is operational, typical household hazardous materials will be used onsite, such as janitorial products, solvents, paints, herbicides, and pesticides. If not properly disposed of, such materials may pose a risk. The No Development Alternative would not result in the use of any such items. The No Development Alternative is considered to use fewer, if any, hazardous materials than the EGSP project.

6.2.2 Conclusions

The No Development Alternative would result in fewer impacts to geology and soils; hydrology and water quality; transportation and circulation; air quality; noise; biological resources; public services and utilities; and hazardous materials impacts in comparison to the EGSP project. However, this alternative would have greater land use and related planning programs, and population, housing, and employment impacts. Impacts to aesthetics and cultural resources would be similar to the EGSP project due to the eventual dilapidation and loss of historic structures. Under the No Development Alternative, the site would remain in its present state primarily supporting vacated military structures and undeveloped open space. This alternative would not meet the project objectives of creating a diverse mixed-income community with a full range of housing opportunities, celebrating the history of the site by renovating and reusing existing buildings and structures where feasible, and creating a destination for artists that imbues the entire community with a creative spirit. Additionally, the No Development Alternative would likely force future development into previously undeveloped areas; thereby resulting in sprawl and would not use existing infrastructure at the project site, instead requiring the construction of new infrastructure on a previously undeveloped area.

6.3 NO PROJECT/DEVELOPMENT UNDER THE EXISTING GENERAL PLAN

The No Project/Development Under the Existing General Plan Alternative (No Project Alternative) would allow for development of 609,840 sq ft of Business Park/Light Industrial use, 217,800 sq ft of Office/Research and Development (R&D), and 54,461 sq ft of Convenience/Specialty Retail use. This amount of development as allowed under the existing General Plan is greater than the amount under the proposed project. This would result in an increase of 696,101 sq ft of non-residential uses (e.g., commercial, retail, institutional, cultural, and educational) within the project area in comparison to the proposed EGSP project. Of the total 882,101 sq ft of non-residential space, 272,500 sq ft is designated for commercial and office space restricted to a 0.2 floor area ratio. Other land uses

proposed under the EGSP such as the 1,470 residential units and 50 acres of open space (including approximately 12 acres of improved parks and trails) are allowed under the current General Plan on the 244-acre project site. Thus, the No Project Alternative would result in an intensification of the proposed developable space. This alternative would differ from the proposed project by not including General Plan Amendments (GPA) to Commercial Land Use Policy A-1 or Policy 26.1.9.

6.3.1 Impact Analysis

LAND USE AND RELATED PLANNING PROGRAMS

Similar to the proposed EGSP project, implementation of this alternative would result in intensification of land uses at the project site itself and within the project area. The increase in development intensity assumed for this alternative would occur within the same development envelope as the EGSP project. Thus, the increase is expected to result in similar land use impacts as the project. However, unlike the proposed project which requires a GPA and rezoning to accommodate implementation of the EGSP, a GPA would not be required under the No Project Alternative. The No Project Alternative would result in the same impacts regarding consistency with the County plans, policies, ordinances, building standards, and other related regional planning programs as the project. With the exception of the GPA, this alternative would result in similar land use and related planning program impacts as that of the EGSP project.

GEOLOGY AND SOILS

The project site is subject to earthquakes and seismic ground shaking. In addition, the project site may be subject to secondary seismic effects, such as densification and landslides in bluff areas. In comparison to the proposed EGSP project, the No Project Alternative would result in increasing development in a seismically active area, which is susceptible to secondary seismic effects. As with the proposed project, this alternative would be subject to the Uniform Building Code (UBC). As identified in Section 4.2, Geology and Soils, with the incorporation of the recommended mitigation measures, the proposed project is considered to have less than significant effects on geology and soils. For the No Project Alternative, the same mitigation measures would reduce impacts to geology and soils to a less than significant level. However, since the No Project Alternative results in introducing more development within a seismic hazard area, this alternative is considered to have greater impacts to geology and soil in comparison to the proposed project.

HYDROLOGY AND WATER QUALITY

The No Project Alternative would result in an incremental increase in hydrology and water quality impacts. More specifically, in the short-term, construction of this alternative may require more earth moving activities due to the increase in proposed land uses resulting in slightly more soil erosion, in addition to the higher probability of construction-related spills of hazardous materials. Additionally, due to the increase in land uses, the No Project Alternative is likely to result in a greater amount of impervious surfaces, increasing the rate and volume of storm water runoff and storm water pollutants in the project area. As with the proposed EGSP project, this alternative would be required to construct two detention basins and one retention basin, comply with the MCWRA peak storm water flow requirements, and implement mitigation measures identified in Section 4.3, Hydrology and Water Quality. The results of mitigation would be to reduce hydrology and water quality impacts to less than significant levels. As the No Project Alternative may result in an increase in erosion and more grading in the short-term, and an increase in impervious surfaces affecting long-term operation of the project, this alternative is considered to have greater hydrology and water quality impacts in relation to the EGSP project.

TRANSPORTATION AND CIRCULATION

Implementation of the EGSP project will add 13,690 daily vehicle trips to the project area roadways, resulting in additional impacts to five intersections and five roadway segments that currently operate at an unacceptable LOS. Two additional roadway segments that currently operate at an acceptable LOS without the project will also be affected by the EGSP. As identified in Section 4.4, Transportation and Circulation, the mitigation measures required to mitigate project-related impacts are not currently included on the FORA CIP, their implementation is unsure and project-related impacts will be significant and unavoidable. The increase in development associated with the No Project Alternative would result in generating more daily short-term construction and long-term operational vehicle trips than the proposed project. Since the No Project Alternative would result in additional vehicle trips to project roadways, this alternative is considered to have greater effect on transportation and circulation in comparison to the EGSP project.

AIR QUALITY

Air quality impacts in the short-term are associated with construction activities (e.g., earthmoving vehicles) in comparison to resident and visitor traffic and stationary source emissions that occur in long-term. The No Project Alternative would have similar short-term air quality impacts to the proposed EGSP project and, therefore, would be subject to the mitigation measures outlined in Section 4.5, Air Quality. Similar to the proposed project, implementation of mitigation measures would not reduce short-term air quality impacts to less than significant levels. In the long-term, this alternative would result in an increase in vehicle trips; thus, an increase in vehicle emissions, in addition to emissions associated with an increase in onsite stationary sources. Similar to the EGSP project, this alternative would result in significant and unavoidable air quality impacts. Since the No Project Alternative would result in more vehicle trips, it is considered to have greater impacts to air quality than the EGSP project.

NOISE

Similar to air quality impacts, noise impacts are primarily associated with vehicle trips and occur in both the short-term and the long-term. The No Project Alternative would result in similar short-term noise impacts as the proposed EGSP project and would be subject to mitigation measures outlined in Section 4.6, Noise. Mitigation would reduce short-term noise impacts to less than significant levels. As previously discussed, the No Project Alternative would result in generating a greater number of vehicle trips than the proposed project thereby increasing noise levels near local streets. Moreover, the increase in non-residential uses may result in a greater amount of stationary source emissions (associated with mechanical equipment). As with short-term noise impacts, the long-term noise impacts under the No Project Alternative can be mitigated to less than significant levels. However, since the No Project Alternative would result in a greater number of vehicle trips and stationary source emissions and, thus, increase noise generation; this alternative is considered to have more impacts to noise in relation to the proposed project.

BIOLOGICAL RESOURCES

The No Project Alternative allows for an additional 696,101 sq ft of development on the 244-acre project site compared to the EGSP. This alternative would not preclude the implementation of the approved boundary modifications to the HMP. The boundary modifications allow for development of an additional 210 acres at the EGSP site that would have been preserved under the original HMP in exchange for preservation of an additional 450 acres at Parker Flats. Overall, this results in a net gain of some 240 acres of habitat. Additionally, this alternative would result in development

intensification within the existing 244-acre development footprint proposed under the EGSP. The site is already one of the few areas of FFO that has been developed with structures and ancillary facilities such as roadways and utilities. As with the proposed project, this alternative would require implementation of mitigation measures identified in Section 4.7, Biological Resources. Therefore, this alternative is considered to have similar impacts to biological resources in relation to the proposed project.

CULTURAL RESOURCES

Implementation of the EGSP will result in retention of 23 buildings and demolition of 11 buildings that contribute to an historic district considered eligible for listing on the NRHP. The No Project Alternative would also result in the demolition of 11 historic buildings and has the potential to affect additional structures to accommodate the increased development intensity. Moreover, this alternative may result in a greater amount of infill development within the eligible historic district. Additionally, the lot pattern proposed by the project mimics the old tent cities. The No Project Alternative would be unlikely to provide that pattern due to the size of the structures. As identified in Section 4.8, Cultural Resources, the EGSP project's potential impacts to cultural resources are significant and unavoidable. The No Project Alternative may result in greater impacts to cultural resources since it will result in more development; therefore, this alternative is considered to have a greater impact to cultural resources in comparison to the proposed project.

AESTHETICS

The No Project Alternative will have similar aesthetic impacts (e.g., alteration of views and aesthetic character, increased light and glare, etc.) as those described in Section 4.9, Aesthetics. While the No Project Alternative would result in 696,101 sq ft of non-residential development, it is likely that development intensification will occur in the less visible core area of the project site as opposed to the perimeters (e.g., bluff area in the eastern portion of site). The perimeters of the EGSP project were designed to act as buffers between the project and the undeveloped areas to the north and east of the site. Thus, views into the project site from the surrounding areas will be similar to those identified under implementation of the EGSP. However, increased development intensity under the No Project Alternative would result in additional sources of light and glare. In comparison to the EGSP project, the additional light and glare will be negligible since it could supplement the sources already generated from development associated with the EGSP project. Therefore, this alternative is considered to have similar effects on aesthetics in relation to the proposed project.

POPULATION, HOUSING, AND EMPLOYMENT

As with the proposed EGSP project, the No Project Alternative would result in introducing 1,470 residential units, including 280 affordable units for low to moderate income households. Moreover, the No Project Alternative would not introduce any additional residential development. Similar to the proposed project the No Project Alternative is expected to introduce 4,337 persons and 380 jobs onsite, an increase of people and jobs that is within the parameters of AMBAG's population forecasts for the project area. The additional 696,101 sq ft of non-residential development associated with this alternative may require recruitment of employees from outside of the project area; thus, it could indirectly induce additional development in the surrounding area. Like the EGSP project, the No Project Alternative is considered to have a less than significant impact on population, housing, and employment since it fosters the goal of achieving a jobs-to-housing balance at the FFO and meets the County's affordable housing requirements. Overall, the No Project Alternative is considered to have similar impacts to population, housing and employment as the proposed project.

PUBLIC SERVICES AND UTILITIES

Similar to the EGSP project, implementation of the No Project Alternative would require upgrades and/or extension of existing utilities such as water and wastewater facilities. Moreover, the No Project Alternative would result in generating a greater demand for public services such as police, fire, schools, water supply, etc., which could be potentially significant and unavoidable. Similar to the proposed project, the No Project Alternative would be required to implement mitigation measures identified in Section 4.11, Public Services and Utilities, to reduce the alternative's impacts to a less than significant level. Since the No Project Alternative would result in more development in comparison to the EGSP project, it is considered to have greater impacts on public service and utilities than the proposed project.

HAZARDOUS MATERIALS

As noted in Section 4.12, Hazardous Materials, although various hazardous materials were stored, released, and disposed of at FFO during its use by the Army, all known, potentially hazardous sites and toxic conditions within the project area were remediated, or have been identified as requiring further removal of potentially hazardous materials (e.g., clay pigeon fragments). However, project implementation will result in the demolition of structures that contain asbestos and LBP, and there is the potential for discovery and disturbance of previously unknown hazardous materials during construction activities. As identified in Section 4.12, Hazardous Materials, mitigation measures have been identified to reduce impacts associated with asbestos and LBPs to less than significant. Due to the increased development intensity associated with the No Project Alternative, there is the likelihood of demolition of a greater number of structures. Therefore, the No Project Alternative would have a slightly greater impact to hazardous materials during construction. Additionally, the No Project Alternative would result in a slight increase in the use of hazardous materials, such as janitorial products and solvents, in the long-term. Overall, this alternative is considered to have greater impacts on hazardous materials than the proposed project.

6.3.2 Conclusions

In relation to the EGSP project, the No Project Alternative would result in an increase in impacts to geology and soils, and hydrology and water quality due to increases in earthmoving and construction activities. Impacts to transportation and circulation, air quality, and noise would increase due to additional vehicle trips. Additionally, impacts to cultural resources; public services and utilities; and hazardous materials would increase under the No Project Alternative due to increased development and population residing on the project site. It would result in similar impacts to land use and related planning programs, biological resources, aesthetics, as well as population, housing, and employment. This alternative would meet many of the project's objectives; however, impacts associated with the No Project Alternative would be greater than the proposed project and, therefore, it is not considered a superior alternative.

6.4 AVOIDANCE OF HISTORIC STRUCTURES ALTERNATIVE

As discussed in Section 4.8, Cultural Resources, demolition of 11 of the 34 contributing structures under the proposed EGSP results in a major loss of historic resources, adverse change to the setting of the NRHP eligible historic district, and destruction of the district's integrity. Additionally, construction of a large number of new structures between the historic district's contributing elements changes the military character of the setting and dramatically increases the density of the built environment. The Avoidance of Historic Structures Alternative (Avoidance Alternative) would not result in the demolition of the 11 historic structures or the infill development within the NRHP

eligible historic district. Since this alternative would not allow infill development within the historic district, this alternative would also result in a reduction in development intensity on the project site. However, under this alternative none of the historic structures would be renovated, resulting in dilapidation and eventual loss of those structures. Although, it is possible that preservation options for the historic structures (such as mothballing) would preserve the structures, no such measures are proposed at this time. The reduction in development would result in the elimination of 442 dwelling units in the Phase 3 Arts District, which includes approximately 65 live/work residential units (see Cultural Resources Section 4.8, Exhibit 4.8-1).

6.4.1 Impact Analysis

LAND USE AND RELATED PLANNING PROGRAMS

Although this alternative would reduce the intensity and amount of developable acreage onsite, it would result in the same land use impacts associated with established neighborhoods. However, this alternative may result in reduction of all or a portion of the 442 dwelling units proposed for development within the Arts District. The Avoidance Alternative is expected to be consistent with most County plans, policies, ordinances, building standards, and related regional planning programs.

GEOLOGY AND SOILS

The project site is subject to earthquakes and seismic ground shaking. In addition, the project site may be subject to secondary seismic effects such as densification and landslides in bluff areas. Overall, in relation to groundshaking and seismic activity, the Avoidance Alternative would be subject to similar impacts as those of the proposed project. As with the proposed project, this alternative would be subject to the Uniform Building Code (UBC) and the mitigation measures identified in Section 4.2, Geology and Soils, to reduce impacts to less than significant. However, this alternative would place fewer persons and structures in an area known to be seismically active; thus, this alternative is considered to have less impacts to geology and soils in comparison to the EGSP project.

HYDROLOGY AND WATER QUALITY

According to the EGSP, the relatively flat topography of the Arts District within Phase 3 will only require minor amounts of grading. Therefore, although this alternative would result in a reduction in onsite development, it would not result in a substantial decrease in earthmoving activities. However, the decrease in overall development intensity, under this alternative, would reduce the amount of impervious surfaces and storm water runoff within the project area thereby, decreasing the rate, volume and storm water pollutants onsite. Similar to the proposed project, the Avoidance Alternative would be required to implement mitigation measures identified in Section 4.3, Hydrology and Water Quality and comply with the MCWRA requirements regarding post-development peak storm water flows to reduce impacts to a less than significant level. As the Avoidance Alternative would, in general, result in less grading and onsite impervious surfaces, implementing this alternative would result in less impact to hydrology and water quality compared to the proposed project.

TRANSPORTATION AND CIRCULATION

The Avoidance Alternative would generate fewer daily vehicle trips than the EGSP project. As identified in Section 4.4, Transportation and Circulation, there are five intersections and five roadway segments that operate at unacceptable LOS under existing conditions. As with the proposed project, these roadway intersections and segments would continue to operate at an unacceptable LOS with implementation of this alternative. Moreover, the Avoidance Alternative would result in reducing,

but not eliminating, impacts to the two additional roadway segments that would operate at an unacceptable LOS under project conditions. As with the EGSP project, mitigation measures required to mitigate project-related impacts are not currently included on the FORA CIP, their implementation is unsure and project-related impacts will be significant and unavoidable. Although the Avoidance Alternative would generate less traffic than the proposed project, it would also generate less funding to mitigate impacts of traffic and this impact would be similar to the proposed project.

AIR QUALITY

Air emissions would be incrementally reduced with the decrease in earthmoving activities, long-term vehicle trips, and reduction in stationary sources resulting from the reduction in development intensity under the Avoidance Alternative. As indicated previously, the EGSP project would result in significant and unavoidable air quality impacts. As noted in the Traffic Impact Analysis (see Appendix E), the residential component of the EGSP project accounts for 46 percent of the vehicle trips. The Avoidance Alternative would result in reduction of 442 dwelling units. Reduction in the number of dwelling units would generate significantly less traffic than other uses on the project site. Thus, this alternative would not eliminate the significant and unavoidable air quality impacts that would occur under the proposed project. However, since this alternative would generate less air quality emissions, it is considered to have less impact to air quality in comparison to the EGSP project.

NOISE

Under the Avoidance Alternative, construction-related noise would be less than that generated by the proposed project because of the reduced intensity of development. Although this alternative would result in a slight decrease in operational (long-term) traffic, thereby decreasing noise levels near local streets, it is unlikely that the decrease would be substantial enough to avoid all noise-related impacts. Additionally, stationary noise sources (i.e., mechanical equipment) associated with remaining non-residential uses would continue under this alternative. With the inclusion of the mitigation measures identified in Section 4.6, Noise, noise impacts associated with this alternative and the proposed project would be reduced to less than significant. Since this alternative would result in fewer vehicle trips, this alternative is considered to have less impact to noise than the EGSP project.

BIOLOGICAL RESOURCES

The Avoidance Alternative would result in a reduction of development within the Arts District. This area currently supports over 34 concrete and wood buildings and structures as well as foundations, sidewalks, retaining walls, and other remnants of the site's military past. Thus, similar to the proposed EGSP project, this portion of the site contains minimal biological resources and is considered developed. Therefore, implementation of this alternative would not reduce impacts to biological resources that would occur under the EGSP. Mitigation measures identified in Section 4.7, Biological Resources, would be required to reduce impacts to biological resources associated with the EGSP project to a less than significant level. Thus, with the incorporation of these measures, the Avoidance Alternative would result in similar biological resources impacts in relation to the EGSP project.

CULTURAL RESOURCES

As noted in Section 4.8, Cultural Resources, implementation of the proposed project will result in demolition of 11 of the 34 structures that contribute to the NRHP eligible historic district. Demolition of these structures would result in a major loss of historic resources, adverse change to the

setting of the historic district, and the loss of historic integrity. Thus, demolition of the 11 buildings contributes to a substantial adverse impact to the historic district.

In addition, the proposed project will introduce numerous new buildings into the NRHP eligible historic district. Construction of a large number of new structures between the contributing elements of the historic district changes the military character of the setting and dramatically increases the density of the built environment. The majority of the proposed EGSP buildings would be multi-storied and sheathed in a variety of newer materials unlike the historic district buildings, that are single-story, concrete buildings with red tile roofs. The amount of infill allowed within the historic district would result in a substantial and adverse change to both the historic setting and integrity.

The Avoidance Alternative would retain the 11 structures proposed for demolition as well as avoiding infill construction between the structures within the historic district. However, the Avoidance Alternative would not result in the rehabilitation of historic buildings, eventually resulting in their dilapidation and would have impacts similar to, or greater than, to the EGSP project.

AESTHETICS

Implementation of the Avoidance Alternative would result in a decrease in the number of acres developed, in addition to reducing the overall level of intensification onsite and in the project area. As identified in Section 4.9, Aesthetics, alterations to Calvary Bluff along the southeastern portion of the project site will be visible from the Salinas Valley. Proposed development along the bluff includes development associated with the Phase 3 Arts District. The Avoidance Alternative would not result in intensification of the existing development in this portion of the project site. Moreover, although minimal, reduction in overall development intensity will decrease the amount of light and glare emanating from the project site. As noted in Section 4.9, Aesthetics, project design features will serve as a buffer between dense urban development and the agricultural lands north of the project. However, since the Avoidance Alternative would not result in the rehabilitation of historic structures and would result in eventual dilapidation of these structures, this alternative would have similar impacts to aesthetic resources in relation to the EGSP project.

POPULATION, HOUSING, AND EMPLOYMENT

Similar to the EGSP project, the Avoidance Alternative is within the parameters of AMBAG's population forecasts for the project area. The Avoidance Alternative would result in reducing the number of residential units and subsequently the number of persons within the project area. Additionally, this alternative would result in the reduction of 442 dwelling units that would serve to meet the project's affordable housing, artist's housing, and jobs-to-housing balance goals. As noted in Section 4.10, Population, Housing, and Employment, the proposed project will not have an impact upon population, housing, and employment. Since the Avoidance Alternative would result in less affordable housing and employment opportunities, this alternative is considered to have a greater impact to population, housing, and employment in comparison to the EGSP project.

PUBLIC SERVICES AND UTILITIES

Similar to the EGSP project, the Avoidance Alternative would require upgrades and/or extensions of utilities such as water and wastewater facilities and would increase demands on services such as police, fire, schools, etc. In comparison to the proposed project, reduction in development intensity under this alternative would result in an incremental decrease in the demand for public services, but may require similar upgrades and extensions of utilities. As identified in Section 4.11, Public Services and Utilities, the project's impact to public services and utilities will be mitigated to a level

considered less than significant. However, since the Avoidance Alternative would not generate as great a demand for public services and utilities, this alternative is considered to have fewer impacts on public service and utilities in comparison to the EGSP project.

HAZARDOUS MATERIALS

As noted in Section 4.12, Hazardous Materials, various hazardous materials were stored, released and disposed of at FFO during its use by the Army. All known, potentially hazardous sites and toxic conditions within the project area have been remediated, or identified as requiring further removal of potentially hazardous materials (e.g., clay pigeon fragments). Demolition of onsite structures will possibly result in the release of asbestos and LBPs. In Section 4.12, Hazardous Materials, mitigation measures were identified which would reduce impacts associated with asbestos and LBPs to less than significant. Since the Avoidance Alternative would not result in the demolition of the onsite structures, there would be a marked reduction in release of such substances in comparison to the EGSP project. Similar to the EGSP project, implementation of this alternative will result in the use of common household items such as janitorial products, paints, herbicides, pesticides, solvents, etc.; however, use of such items would not be considered a significant impact. The Avoidance Alternative would result in a slight reduction in development in comparison to the proposed project and therefore, would result in a slight decrease in the use of common household hazardous materials. As such, there would be fewer hazardous materials entering the local landfills and less potential for improper disposal of hazardous wastes. Therefore, the Avoidance Alternative is considered to have less impact to hazardous materials than the proposed project.

6.4.2 Conclusion

When compared to the EGSP project, the Avoidance Alternative would result in fewer impacts to geology and soils, and hydrology and water quality due to reduced amounts of development in the Arts District. Impacts to transportation and circulation, air quality, and noise would be incrementally decreased due to the reduction in live-work units under this alternative. Additionally, retention of historic buildings in the Arts District would have similar impacts to cultural resources and reduced development along the ridgeline would reduce impacts to aesthetics. The reduction in dwelling units would incrementally reduce impacts to public services and utilities. Retention of buildings in the Arts District would decrease the probability of release of hazardous materials to the atmosphere; however, the people could still be exposed to hazardous materials remaining in older buildings. This alternative would have similar impacts on biological resources as the EGSP project. The proposed project would also result in greater impacts to land use and related planning programs and population. In addition, the Avoidance Alternative would not meet the project's objectives of creating a diverse mixed-income community with a full range of housing opportunities, celebrating the history of the site by reusing existing buildings and structures, and creating a destination for artists that imbues the entire community with creative spirit.

6.5 REDUCED DENSITY ALTERNATIVE

The Reduced Density Alternative would result in a 50 percent reduction in the proposed development on the project site and would be implemented within the same development envelope as that of the EGSP project. Therefore, this alternative would result in 735 residential units, 37,500 sq ft of commercial, 5,500 sq ft of public and institutional use, 50,000 sq ft of artist/cultural/educational space, and 50 acres of open space (including approximately 12 acres of improved parks and trails) on the 244-acre project site.

6.5.1 Impact Analysis

LAND USE AND RELATED PLANNING PROGRAMS

This alternative would result in a reduction of 735 market-rate residential units and 140 low-to-moderate income housing units, as well as a reduction of 93,000 sq ft of commercial, public, institutional, and artist/cultural/educational space. Although this alternative would reduce the intensity, it would result in the same land use impacts relating to established neighborhoods. Additionally, this alternative would hinder the County's ability to meet its share of housing need as determined by AMBAG's Regional Housing Needs Allocation and to fulfill the County's Housing Element strategy for meeting that need. The alternative would result in the same conclusions as the proposed EGSP with respect to consistency with all other County plans, policies, ordinances, building standards, and other related regional planning programs, and would result in less than significant impacts. Under this alternative, there would be no need for one of the GPA text amendments, as proposed as part of the EGSP project. This alternative would have greater land use and related planning program impacts in comparison to the proposed project. Additionally, the Reduced Density Alternative would not be consistent with the Reuse Plan, which specifies that more intense development should occur in the areas of the FFO that have been previously developed.

GEOLOGY AND SOILS

Similar to the EGSP project, the Reduced Density Alternative would be required to adhere to the provisions of the UBC and mitigation measures presented in Section 4.2, Geology and Soils. The impacts to geology and soil associated with implementation of the Reduced Density Alternative would be incrementally decreased, proportional to the reduction in land disturbance and number of habitable onsite structures. The result would be fewer residents located in seismic hazard areas subject to strong groundshaking and other secondary seismic effects. Impacts to geology and soils associated with the EGSP project can be mitigated to a level considered less than significant. However, due to the Reduced Density Alternative's decrease in onsite development, this alternative is considered to have fewer geology and soils impacts in comparison to the proposed project.

HYDROLOGY AND WATER QUALITY

Although the Reduced Density Alternative would result in a reduction of onsite development intensity, it would not result in a significant reduction in earthmoving activities during construction. However, the decrease in overall development intensity, under this alternative, would reduce the amount of impervious surfaces and storm water runoff in the project area; thereby decreasing rate, volume, and storm water pollutants onsite in the long-term. The proposed project and the Reduced Density Alternative would both be required to implement mitigation measures identified in Section 4.3, Hydrology and Water Quality, and comply with MCWRA requirements regarding post development peak storm water flows to reduce impacts to less than significant. The development envelope under the Reduced Density Alternative would be the same, but this alternative would result in incrementally less onsite impervious surfaces and would result in fewer impacts to hydrology and water quality compared to the proposed project.

TRANSPORTATION AND CIRCULATION

The Reduced Density Alternative would generate 50 percent fewer daily vehicle trips than the proposed EGSP project. The proposed project would result in 13,690 daily vehicle trips whereas the alternative's reduction in development would result in generating 6,845 daily vehicle trips. There are five intersections and five roadway segments currently operating at an unacceptable LOS. Similar to the proposed project, the Reduced Density Alternative would incrementally add to the unacceptable

LOS at these intersections and roadway segments. However, the Reduced Density Alternative would result in incrementally less impact to two additional roadway segments that the EGSP project would cause to operate at an unacceptable LOS. Since the mitigation measures required to mitigate project-related impacts are not currently included on the FORA CIP, EGSP project-related impacts will be significant and unavoidable. However, the Reduced Density Alternative would result in fewer vehicle trips and, therefore, is considered to have fewer impacts on transportation and circulation in than the EGSP project.

AIR QUALITY

As indicated previously, the Reduced Density Alternative would occur within the same development envelope as the EGSP project. Therefore, similar short-term construction activities under this alternative would occur, resulting in similar generation of vehicle emissions. However, long-term emissions associated with vehicle trips and stationary sources (i.e., non-residential uses) would be incrementally decreased under the Reduced Density Alternative. In the long-term, at project build-out, the EGSP project will exceed criteria pollutant emission thresholds (e.g., PM_{10}, CO, NOx) resulting in a significant and unavoidable impact to air quality. A decrease in development intensity by 50 percent under the Reduced Density Alternative would reduce air quality impacts to less than significant. Therefore, since the Reduced Density Alternative would generate less air quality emissions and eliminate the significant unavoidable impact to air quality, this alternative is considered to have less effect on air quality in relation to the proposed project.

NOISE

In comparison to the EGSP project, construction-related noise is expected to be similar because the Reduced Density Alternative would require the same developable area. Like the proposed project, this alternative would be required to adhere to mitigation measures that limit construction hours, as identified in Section 4.6, Noise. Project-related long-term noise impacts associated with vehicle trips and stationary sources (i.e., mechanical equipment) are considered less than significant under the EGSP; however, mitigation may be required depending on the location and orientation of residential units. Due to the reduction in long-term vehicle trips and decrease in square footage of stationary sources, the Reduced Density Alternative would result in less noise impact. Dependent upon the configuration of land uses, mitigation may be required to assure that noise levels do not exceed the established County standards for exterior and interior noise levels. The Reduced Density Alternative is considered to have less impact to noise in comparison to the proposed EGSP.

BIOLOGICAL RESOURCES

This alternative would result in development intensification within the same 244-acre development footprint proposed under the EGSP. The project site itself is one of the few areas of FFO that has been developed with structures and ancillary facilities such as roadways and utilities. As with the proposed project, this alternative would require implementation of mitigation measures identified in Section 4.7, Biological Resources. Therefore, this alternative is considered to have similar impacts to biological resources in relation to the proposed project.

CULTURAL RESOURCES

The Reduced Density Alternative would not preclude development from occurring within the NRHP eligible historic district, nor would it disallow the demolition of some, if not all of the 11 historic district contributing buildings. Therefore, it is expected that this alternative may also result in significant unavoidable impacts to cultural resources, albeit on a potentially slightly lesser scale.

However, since the Reduced Density Alternative would not eliminate the significant unavoidable impacts, it is considered to have similar effects on cultural resources in relation to the EGSP project.

AESTHETICS

Project implementation will result in altering the visual characteristics of the project area; however, no significant aesthetic impacts are anticipated with implementation of the EGSP. Changes in the visual appearance of the project site will be most prominent along Calvary Bluff and the project's perimeter adjacent to surrounding views to the north and east. The Reduced Development Alternative would not preclude development in these areas. Thus, the Reduced Development Alternative would alter views into the project area but on a slightly lesser scale. In comparison to the proposed project, this alternative would result in a slight decrease in glare and nighttime lighting. Therefore, the Reduced Density Alternative is considered to have a marginally smaller impact on aesthetic resources in comparison to the EGSP project.

POPULATION, HOUSING, AND EMPLOYMENT

The Reduced Density Alternative would result in introducing approximately 2,168 persons and 735 residential units into the project area. Conversely, the proposed EGSP project will result in introducing 4,337 persons and 1,470 residential units into the project area. This alternative and the proposed project are both within the parameters of AMBAG's population forecasts for the project area. As noted in Section 4.10, Population, Housing, and Employment, the EGSP project will not have a significant impact upon population, housing and employment. Comparatively, the Reduced Density Alternative would reduce the number of housing units, including very low to moderate-income residential units assuming 20 percent of the units were dedicated to affordable housing and would be inconsistent with the Housing Element strategy for meeting the County's regional housing needs share. In addition, the Reduced Density Alternative will further affect the jobs-to-housing balance by eliminating residential units in an area that is in close proximity to major employment centers (CSUMB and UCMBEST). Therefore, the Reduced Density Alternative is considered to have a greater impact on population, housing, and employment in comparison to the proposed project.

PUBLIC SERVICES AND UTILITIES

Similar to the proposed EGSP project, the Reduced Density Alternative would require upgrades and/or extensions of utilities such as water and wastewater facilities. In comparison to the proposed project, the Reduced Density Alternative would result in an incremental decrease in demand for public services such as police, fire, schools, etc. However, as identified in Section 4.11, Public Services and Utilities, the proposed project's public services and utilities impacts will be mitigated to a level that is considered less than significant. Since the Reduced Density Alternative would not generate as great a demand for public services and utilities, this alternative is considered to have fewer impacts on public services and utilities in comparison to the EGSP project.

HAZARDOUS MATERIALS

As noted in Section 4.12, Hazardous Materials, various hazardous materials were stored, released, and disposed at FFO during its use by the Army. All known, potentially hazardous, sites and toxic conditions within the project area have been remediated, or identified as needing further remediation through removal of potentially hazardous materials (e.g., clay pigeon fragments). However, project implementation will result in demolition of structures containing asbestos and LBP; thus, there is a potential for these substances to be released into the environment during demolition and construction activities. Since the Reduced Density Alternative would demolish site structures, it has the potential

to result in release of hazardous substances at the same levels as the EGSP. Similar to the EGSP project, implementation of this alternative will result in the use of common household items such as janitorial products, paints, herbicides, pesticides, solvents, etc.; however, use of such items is not considered a significant impact. The Reduced Density Alternative would result in a reduction in development in comparison to the proposed project, which in turn, would result in a decrease in the use of common household hazardous materials. As such, there would be fewer hazardous materials entering the local landfill and less potential for improper disposal of hazardous wastes. Therefore, the Reduced Density Alternative is considered to have less hazardous materials impacts in comparison to the proposed project.

6.5.2 Conclusions

When compared to the proposed EGSP project, the Reduced Density Alternative would result in less impacts to geology and soils; hydrology and water quality; transportation and circulation air quality; noise; aesthetics; public service and utilities; and hazardous materials. Both the Reduced Density Alternative and the proposed project would have similar land use, biological, and cultural resources impacts. The Reduced Density Alternative would result in greater population, housing, and employment impacts. Furthermore, the Reduced Density Alternative would eliminate project-related significant and unavoidable air quality impacts but not the significant and unavoidable cultural resource impacts. The Reduced Density Alternative would achieve some of the project objectives. However, due to reduction in development intensity, it would not be feasible for this alternative to fully create a mixed-income community with a range of housing opportunities or provide the full spectrum of life cycle and mixed-income housing opportunities, and could possibly result in less affordable housing due to larger lot sizes and scarcity of housing throughout the County. Moreover, this alternative would not create a compact, efficient community with a minimal footprint or establish a destination for artists to imbue the entire community with creative spirit. For purposes of analysis, the Reduced Density Alternative considered that the amount of development housing to be exactly half that of the proposed project. Development at such a rate would be unlikely with the Reduced Density Alternative since it may not provide the needed amount of market rate housing to make it financially feasible for the applicant to develop 140 of the 735 residential units for very low to moderate income housing and install the necessary infrastructure to and within the site. Therefore, this alternative does not meet the objective of creating a public/private partnership that is financially feasible and fiscally responsible.

Additionally, the Reuse Plan specifies that more intense development should occur in the areas of the FFO that have been previously developed. The East Garrison of FFO is one of the few areas of the base that was developed by the military, so it is logical that more intense development should occur within this area to allow more pristine areas to remain minimally developed or undeveloped. That is the intent of the Reuse Plan, HMP, and Land Swap Assessment. Moreover, the EGSP has been designed to include employment opportunities within the project site itself and to be in close proximity to larger employment centers on the former base, such as CSUMB and UCMBEST. To help offset the impact of the jobs lost as a result of the closure of FFO, the Reuse Plan established a policy of creating a jobs-to-housing balance at FFO. New housing in FFO would first serve employees at new jobs created by the Reuse Plan. The Reduced Density Alternative eliminates 735 residential units adjacent to major employment centers, making it difficult to achieve such a goal.

6.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires the identification of an environmentally superior alternative. If the "No Project" alternative is determined to be the environmentally superior alternative, CEQA requires that the EIR identify an environmentally superior alternative among the other alternatives (State CEQA Guidelines § 15126.6(e)). The identification of the environmentally superior alternative results from a comparison of impacts that would result from each alternative, as shown in Table 6-1. This table presents a comparative evaluation of the ability of each alternative to avoid or substantially reduce any significant impact of the project. The table shows the level of significance after mitigation for each significant impact of the project.

Table 6-1: Summary of Environmental Consequences of Project Alternatives

	No Development Alternative	No Project Alternative	Avoidance Alternative	Reduced Density Alternative
Land Use	+	Ø	+	Ø
Geology and Soils	–	+	–	–
Hydrology and Water Quality	–	+	–	–
Transportation and Circulation	–	+	Ø	–
Air Quality	–	+	–	–
Noise	–	+	–	–
Biological Resources	–	Ø	Ø	Ø
Cultural Resources	–	+	Ø	Ø
Aesthetics	Ø	Ø	Ø	–
Population, Housing, and Employment	+	Ø	+	+
Public Services and Utilities	–	+	–	–
Hazards and Hazardous Materials	–	+	–	–

+ = Impact greater than Project.
Ø = Impact similar to Project.
– = Impact less than Project.

Based on this analysis, the Reduced Density Alternative is considered the environmentally superior alternative. However, although this alternative is determined to be environmentally superior to the proposed project, it would not result in the creation of a financially feasible project and would fail to fulfill housing needs in the County in providing adequate types and number of housing units. The Reduced Density Alternative would not create a compact, efficient community with a minimal footprint. This alternative is inconsistent with the Reuse Plan and MCGP and would fail to obtain the objectives of the EGSP project.