4.1 GENERAL CEQA REQUIREMENTS

CEQA requires that a reasonable range of alternatives to the proposed project be described and considered within an EIR. The alternatives considered should represent scenarios that could feasibly attain most of the basic objectives of the project, but will avoid or substantially lessen any of the significant environmental effects. The purpose of this process is to provide decision makers and the public with a discussion of viable development options, and to document that other options to the proposal were considered within the application process (CEQA Guidelines, Section 15126.6).

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environmental impacts that would otherwise occur. Where a lead agency has determined that, even after the adoption of all feasible mitigation measures, a project as proposed will still cause significant environmental effects that cannot be substantially lessened or avoided, the agency, prior to approving the project as mitigated, must first determine whether, with respect to such impacts, there remain any project alternatives that are both environmentally superior and feasible within the meaning of CEQA.

CEQA provides the following guidelines for discussing project alternatives:

- An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation (§15126.6(a)).

- An EIR is not required to consider alternatives, which are infeasible (§15126.6(a)).

- 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 (§15126.6(b)).

- 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 (§15126.6(c)).

- The EIR should briefly describe the rationale for selecting the alternatives to be discussed (§15126.6(c)).

- The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project (§15126.6(d)).

4.2 RELATIONSHIP TO THE PROJECT

A project's objectives provide an important benchmark in conducting the comparative alternatives analysis and the feasibility of each. As discussed above, an alternative is only meaningful for consideration if it can meet the basic objectives of the project as proposed.

The primary objective is to secure approval for a Combined Development Permit to subdivide 344 acres into 17 residential lots ranging in size from 5.1 acres to 24.3 acres, with a 180-acre remainder parcel. The project applicant's objective, with its reduced density proposal (17 lots as opposed to 67 lots), is to maximize preservation of the property in its natural state in harmony with the limited residential development. In furtherance of that objective, the applicant has previously committed to donate approximately 154 acres of the remainder parcel to the County of Monterey as an expansion of the adjacent Toro Park.

4.3 PROJECT ALTERNATIVES

As identified within various sections of this EIR, the proposed project would result in significant and unavoidable traffic and would have a significant an unavoidable cumulative impact to traffic. All other impacts identified in the EIR can be mitigated to a less than significant level with the adoption of mitigation measures as specified within this DEIR. Notwithstanding, this alternatives discussion briefly identifies and examines a range of alternatives as developed that would reduce significant environmental effects:

- **Alternative 1 – No Project/No Development Alternative**
- **Alternative 2 – Modified Subdivision Design 'A' Alternative**
- **Alternative 3 – Modified Subdivision Design 'B' Alternative**

Environmental impacts associated with each of the three alternatives are compared with impacts resulting from the proposed project. The impact level of the alternative as compared to the project (less, similar, or greater) is noted in parentheses at the beginning of each comparison. **Table 4-1** at the conclusion of this section provides a summary. This Section also includes identification of the "environmentally superior" alternative.

ALTERNATIVE ANALYSIS

Alternative 1 – No Project/No Development

CEQA Guidelines Section 15126.6(e)(3) requires that a 'No Project/No Development Alternative' be evaluated as part of an EIR, proceeding along one of two lines: the project site remaining in its existing undeveloped state or development of the project site under existing underlying land use designations. The 'No Project/No Development Alternative' considers the comparative environmental effects of not approving the proposed project, with the site remaining in its current grazing land state. The *Monterey County General*

Plan designates the project site as 'Rural Density Residential' and 'Low Density Residential,' which would potentially allow development of approximately 67 residential units on the project site, as opposed to the 17 residential proposed by the project applicant. This scenario would increase development on the project site, which would result in greater environmental impacts than the proposed project. Since the purpose of analyzing alternatives is to try to reduce significant impacts, we analyzed the 'No Project/No Development' alternative.

The impacts associated with the 'No Project/No Development' alternative are discussed below:

Comparative Analysis

Aesthetics and Visual Resources (less). Under the 'No Project/No Development Alternative' there would be no visual change to the project site. The vacant project site currently used for grazing would remain undeveloped and would be preserved in its existing condition. No oak trees would be removed and no structures would be built on the project site. Therefore, the 'No Project/No Development Alternative' would result in less impact to aesthetics and visual resources than the proposed project.

Air Quality (less). The potential short-term air quality impact that would result from construction of the proposed project would be eliminated. Therefore, the 'No Project/No Development Alternative' would result in less air quality impacts than the proposed project.

Biological Resources (less). The potential temporary disturbance and permanent loss of special status plant and wildlife species and sensitive habitats would be eliminated under the 'No Project/No Development Alternative.' Therefore, there would be less of an impact on biological resources under this alternative.

Cultural Resources (less). The potential impact to cultural or archaeological resources resulting from eventual site construction would not occur under this alternative, since the site would remain relatively undisturbed under the 'No Project/No Development Alternative.' Therefore, this alternative would result in less of an impact to cultural resources than the proposed project.

Geology and Soils (less). The potential significant impacts associated with slope failure, weak surface soils, and erosion would be reduced because the site would remain relatively undisturbed and no structures would be built on the project site. Therefore, the 'No Project/No Development Alternative' would result in less geology, geotechnical and soils impacts than the proposed project.

Groundwater Resources and Hydrogeology (less). The potential impacts on the El Toro Groundwater Basin, nearby wells, and water quality would be eliminated under the 'No Project/No Development Alternative' because there would not be an increased demand on

groundwater resources. Therefore, the 'No Project/No Development Alternative' would result in less impacts to the groundwater basin than the proposed project.

Surface Water Hydrology and Water Quality (less). The 'No Project/No Development Alternative' would essentially eliminate the potential drainage flow and surface water quality impacts associated with the proposed project. Therefore, the 'No Project/No Development Alternative' would result in less surface water hydrology and water quality impacts than the proposed project.

Land Use, Population and Housing (greater). The 'No Project/No Development Alternative' would eliminate development of rural residential units and therefore would be inconsistent with the *Monterey County General Plan*, which designates the project site a 'rural residential'. Therefore, the 'No Project/No Development Alternative' would result in greater range of impacts to land use, population and housing than the proposed project.

Public Services and Utilities (similar or greater). The increase in demand on law enforcement, fire protection services, and other public services would not occur under the 'No Project/No Development Alternative'. This alternative would also eliminate the need for new utilities or expansion of existing utility facilities. However, the 'No Project/No Development Alternative' would eliminate the dedication of 154-acres of the remainder parcel to the Monterey County Parks Department. Therefore, the 'No Project/No Development Alternative' would result in similar or greater impacts to public service and utilities than the proposed project.

Transportation and Circulation (less). The significant impacts of increased traffic within the vicinity of the project site would not occur under this alternative. Therefore, the 'No Project/No Development Alternative' would result in less traffic impacts than the proposed project.

Noise (less). The 'No Project/No Development Alternative' would eliminate the potentially significant short-term impact of noise generated by construction activities. Therefore, the 'No Project/No Development Alternative' would result in less noise impacts than the proposed project.

The 'No Project/No Development Alternative' does not meet any of the proposed project objectives.

Alternative 2 – Modified Subdivision Design 'A'

This alternative modifies the design of the proposed project to include two inclusionary units on the project site, as shown in **Figure 4-1, Modified Subdivision Design 'A.'** The applicable *Inclusionary Housing Ordinance* requires developers to contribute 15 percent of the new residential lots or units as low- and moderate-income units. The proposed project complies with the *Inclusionary Housing Ordinance* through payment of in-lieu fees. This alternative would comply with the *Inclusionary Housing Ordinance* by

INSERT Figure 4-1, Modified Subdivision Design 'A'

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providing the low- and moderate- income units on the project site instead of paying an in-lieu fees. Lot #17 would be divided into two lots, decreasing the size from 14.98 acres to 11.77 acres and creating Parcel A for the two inclusionary units, which would encompass 3.21 acres. The two inclusionary units would be a duplex style with a common wall, and built in conjunction with rest of the proposed project. Although the residential density on Parcel A would not be in accordance with the rural density residential zoning of 5.1 acres per dwelling unit, it would be in accordance with the low density residential zoning requirement of one acre per dwelling unit. The proposed project includes a 12-foot wide driveway, which would provide access to the inclusionary units under this alternative. The project applicant would pay an in-lieu fee for the remaining 0.55 unit inclusionary housing requirement. The original home site proposed on Lot #17 would be relocated to the northeast as shown in **Figure 4-1, Modified Subdivision Design 'A'** and a separate driveway from Meyer Road would provide access to this new home site.

Comparative Analysis

Aesthetics and Visual Resources (greater). The 'Modified Subdivision Design 'A' Alternative' would increase the amount of development on the project site by two residential units with the construction of two inclusionary housing units on Parcel A. The inclusionary units on Parcel A would not effect aesthetics and visual resources more or less than the proposed project since the units would be built in the same location as the original home site. However, the relocated home site on Lot #17 would be in an area with dense oak woodland and require removal of additional oak trees. Removal of additional oak trees would decrease the visual resources on the project site. Therefore, the 'Modified Subdivision Design 'A' Alternative' would have a greater impact to aesthetics and visual resources than the proposed project.

Air Quality (greater). The potentially significant short-term air quality impacts that would result from construction of the proposed project, and the long-term operational air quality emissions from an increase in the number of vehicles traveling to the project site would be increased under this alternative. This alternative would increase the number of residential units constructed on the project site and subsequently increase the number of vehicles traveling to and from the project site. Therefore, the 'Modified Subdivision Design 'A' Alternative' would have a greater impact on air quality than the proposed project.

Biological Resources (greater). The potential temporary disturbance and permanent loss of special status plant and wildlife species and sensitive habitats would be increased under the 'Modified Subdivision Design 'A' Alternative' due to an increased area of disturbance and additional removal of oak trees. Therefore, there would be a greater impact on biological resources under this alternative.

Cultural Resources (similar). The potential impact to cultural or archaeological resources resulting from eventual site construction would increase under this alternative, since more area would be disturbed under the 'Modified Subdivision Design 'A' Alternative'. However, mitigation in the environmental analysis would ensure that impacts to

undiscovered cultural resources would be reduced to a less than significant impact. Therefore, the 'Modified Subdivision Design 'A' Alternative' would result in a similar impact to cultural resources than the proposed project.

Geology and Soils (similar). The potential significant impacts associated with slope failure, weak surface soils, and erosion would continue to exist under the 'Modified Subdivision Design 'A' Alternative.' However, the proposed project as mitigated by **MM 3.5-2** would require the placement of the building envelope on the south side of ridge and would restrict development on the north facing slope of Lot #17. With the implementation of mitigation proposed herein, 'Modified Subdivision Design 'A' Alternative' would result in similar impacts to geology, geotechnical and soils as the proposed project.

Groundwater Resources and Hydrogeology (greater). The potential impacts on the El Toro Groundwater Basin, nearby wells, and water quality would be increased under the 'Modified Subdivision Design 'A' Alternative' as this alternative would increase the demand by approximately on groundwater resources. Based on a water use demand factor of 0.75 AFY per residence, conservatively the increased water demand would be approximately 1.5 AFY and would not exceed the existing water surplus in the San Benancio Gulch subarea. However, the increase water demand may affect cumulative development in other subareas that are interconnected. Therefore, the 'Modified Subdivision Design 'A' Alternative' would result in a greater impact on groundwater resources and hydrogeology than the proposed project.

Surface Water Hydrology and Water Quality (slightly greater). The 'Modified Subdivision Design 'A' Alternative' would slightly increase the potential drainage flow and surface water quality impacts associated with the proposed project by increasing the amount of impervious surfaces and development on the project site. Therefore, the 'Modified Subdivision Design 'A' Alternative' would result in a greater impact on surface water hydrology and water quality than the proposed project.

Land Use, Population and Housing (similar). The 'Modified Subdivision Design 'A' Alternative' would increase the number of residential units on the project site and provide for inclusionary housing on site. This density would be consistent with the *Monterey County General Plan*. The population would also increase under this alternative but would remain within the projected forecasts and would be consistent with Chapter 18.40.020 of the Monterey County Code, which is the most current *Monterey County Inclusionary Housing Ordinance*. Therefore, the 'Modified Subdivision Design 'A' Alternative' would result in a similar land use, population and housing impacts than the proposed project.

Public Services and Utilities (slightly greater). The slightly increase in demand on law enforcement, fire protection services, and other public services would be slightly increased under the 'Modified Subdivision Design 'A' Alternative'. This alternative would also increase the need for new utilities or expansion of existing utility facilities. Therefore, the 'Modified Subdivision Design 'A' Alternative' would result in a slightly greater impact on public service and utility than the proposed project.

Transportation and Circulation (greater). The significant impacts of increased traffic within the vicinity of the project site would be increased under the 'Modified Subdivision Design 'A' Alternative'. The addition of two inclusionary units on the project site would increase the amount of trips generated on State Route 68, as well as Meyer Road and San Benancio Road. Therefore, the 'Modified Subdivision Design 'A' Alternative' would result in greater traffic impacts than the proposed project.

Noise (greater). The 'Modified Subdivision Design 'A' Alternative' would slightly increase the potentially significant short-term impact of noise generated by construction activities. Therefore, the 'Modified Subdivision Design 'A' Alternative' would result in greater noise impacts than the proposed project.

The 'Modified Subdivision Design 'A' Alternative' meets all of the proposed project objectives. Therefore, the 'Modified Subdivision Design 'A' Alternative' would be **consistent** with the proposed project objectives.

Alternative 3 – Modified Subdivision Design 'B'

This alternative is similar to the proposed project but would eliminate development of four residential units on the project site within Lots #11, #13, #14, and #15 and designate these lots as "scenic easements." As shown in **Figure 3.5-3, Geologic Site Map**, the proposed home sites on Lots #11, #13, #14, and #15 are downslope from existing landslide deposits and scarp. Eliminating development on these lots would reduce disturbance of soil and exposure of people and structures to the hazards associated with slope failures. In addition, eliminating development on these four lots would decrease the density of development on the project site. A decrease in density would generate fewer trips on surrounding roadways and State Route 68, which is currently operating at an unacceptable level of service. A decrease in density would also indirectly reduce noise and air quality emissions.

Comparative Analysis

Aesthetics and Visual Resources (less). The 'Modified Subdivision Design 'B' Alternative' would decrease the amount of development on the project site by four residential units by placing a scenic easement on those lots. Eliminating development on Lots #11, #13, #14 and #15 would reduce the number of structures potentially visible from State Route 68. Therefore, the 'Modified Subdivision Design 'B' Alternative' would have less impact to aesthetics and visual resources than the proposed project.

Air Quality (less). The potentially significant short-term air quality impacts that would result from construction of the proposed project, and the long-term operational air quality emissions would be decreased under this alternative. This alternative would decrease the number of residential units constructed on the project site and subsequently decrease the number of vehicles traveling to and from the project site, which would reduce, long-term

operational emissions. Therefore, the 'Modified Subdivision Design 'B' Alternative' would have less impact on air quality than the proposed project.

Biological Resources (less). The temporary disturbance and potential loss of special status plant and wildlife species and sensitive habitats would be decreased under the 'Modified Subdivision Design 'B' Alternative' due to decreased area of disturbance. Based on the *Biological Assessment* there would be a reduction in the amount of chamise chaparral removed. Therefore, there would be less impact on biological resources under this alternative.

Cultural Resources (similar). The potential impact to cultural or archaeological resources resulting from eventual site construction would decrease under this alternative, since less area would be disturbed under the 'Modified Subdivision Design 'B' Alternative'. However, mitigation in the environmental analysis would ensure that impacts to undiscovered cultural resources would be reduced to a less than significant impact. Therefore, the 'Modified Subdivision Design 'B' Alternative' would result in a similar impact to cultural resources than the proposed project.

Geology and Soils (less). The potentially significant impacts associated with slope failure, weak surface soils, and erosion would decrease under the 'Modified Subdivision Design 'B' Alternative' due to a decrease in area of disturbance on the project site. Lots #11, #13, #14, and #15 are downslope from existing landslide deposits and scarp. Mitigation for the proposed project has been provided to reduce the exposure of people and structures to the hazards associated with landslides on these lots to a less than significant level. However, eliminating development on Lots #11, #13, #14, and #15 would further reduce the potential exposure of people and structures to the hazards of landslide movement on these lots. Under the 'Modified Subdivision Design 'B' Alternative' debris flow walls would still be required on these lots in order to protect the roadway from potential debris flows. Therefore, the 'Modified Subdivision Design 'B' Alternative' would result in less impact to geology, geotechnical and soils than the proposed project.

Groundwater Resources and Hydrogeology (less). The potential impacts on the El Toro Groundwater Basin, nearby wells, and water quality would be decreased under the 'Modified Subdivision Design 'B' Alternative'. Mitigation for the proposed project has been provided to reduce impacts to groundwater resources and hydrogeology to a less than significant level. The decrease in residential units associated with this alternative would decrease the demand on groundwater resources. Therefore, the 'Modified Subdivision Design 'B' Alternative' would result in less impact on groundwater resources and hydrogeology than the proposed project.

Surface Water Hydrology and Water Quality (less). The 'Modified Subdivision Design 'B' Alternative' would decrease the potential drainage flow and surface water quality impacts associated with the proposed project by decreasing the amount of impervious surfaces and development on the project site. Therefore, the 'Modified Subdivision Design 'B'

Alternative' would result in less impact on surface water hydrology and water quality than the proposed project.

Land Use, Population and Housing (similar). The 'Modified Subdivision Design 'B' Alternative' would decrease the number of residential units on the project site. Although this alternative would provide housing the density would be reduced from the proposed project's average density of 9.64 acres per unit to 12.61 acres per unit under this alternative. This would be consistent with the *Monterey County General Plan* but would provide less housing opportunities within the County. Therefore, the 'Modified Subdivision Design 'B' Alternative' would result in a similar land use, population and housing impacts than the proposed project.

Public Services and Utilities (less). The increase in demand on law enforcement, fire protection services, and other public services would be slightly decreased under the 'Modified Subdivision Design 'B' Alternative'. This alternative would also decrease the need for new utilities or expansion of existing utility facilities. Therefore, the 'Modified Subdivision Design 'B' Alternative' would result in less impact on public service and utility than the proposed project.

Transportation and Circulation (less). The significant impacts of increased traffic within the vicinity of the project site would decrease under the 'Modified Subdivision Design 'B' Alternative'. This alternative would reduce the density of development on the project site by four units, which would result in the generation of approximately 38 fewer trips on State Route 68 than the proposed project. Therefore, the 'Modified Subdivision Design 'B' Alternative' would result in less traffic impacts than the proposed project.

Noise (less). The 'Modified Subdivision Design 'B' Alternative' would slightly decrease the potentially significant short-term impact of noise generated by construction activities and noise generated by traffic. Therefore, the 'Modified Subdivision Design 'B' Alternative' would result in less noise impacts than the proposed project.

The 'Modified Subdivision Design 'B' Alternative' would not meet the applicant's objective of developing a 17-unit subdivision. Therefore, the 'Modified Subdivision Design 'B' Alternative' would be **less consistent** with the proposed project objectives than the proposed project.

4.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines Section 15126.6(e)(2) requires that the environmentally superior alternative be identified. If the environmentally superior alternative is the "No Project" Alternative, the EIR shall also identify an environmentally superior alternative among other alternatives. In this case, Alternative 3, "Modified Subdivision Design 'B'" represents the environmentally superior alternative because, as determined from the above analysis, all impacts would be reduced relative to the proposed project. However, this alternative does not meet all of the proposed project objectives. **Table 4-1, Comparison of Project**

Alternatives to the Proposed Project compares each considered alternative with the proposed project.

TABLE 4-1
COMPARISON OF PROJECT ALTERNATIVES TO THE PROPOSED PROJECT

Environmental Category	Alternative #1 No Project/Development	Alternative #2 Modified Subdivision Design 'A'	Alternative #3 Modified Subdivision Design 'B'
Aesthetics and Visual Resources	Less	Greater	Less
Air Quality	Less	Greater	Less
Biological Resources	Less	Greater	Less
Cultural Resources	Less	Similar	Similar
Geology, Geotechnical, and Soils	Less	Similar	Less
Groundwater Resources and Hydrogeology	Less	Greater	Less
Surface Water Hydrology and Water Quality	Less	Slightly Greater	Less
Land Use, Population and Housing	Greater	Similar	Similar
Public Services and Utilities	Similar or Greater	Slightly Greater	Less
Transportation and Circulation	Less	Greater	Less
Noise	Less	Greater	Less
Consistency with Project Objectives	Less Consistent	Consistent	Less Consistent

Greater = Impacts greater than those identified for the proposed project would result.
Less = Impacts less than those identified for the proposed project would result.
Similar = Impacts similar to those identified for the proposed project would result.
Consistent = Alternative would be consistent with Project Objectives.
Less Consistent = Alternative would be less consistent with Project Objectives.