5 ALTERNATIVES TO THE PROPOSED PROJECT

CEQA requires a description 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. Also required is an evaluation of the comparative merits of the alternatives (Title 14 CCR §15126.6(a)). An EIR is not required to consider every conceivable alternative to a project, but must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. CEQA further requires that the discussion of alternatives focus on those alternatives capable of eliminating any significant adverse environmental impacts or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly (Title 14 CCR §15126.6(b)).

Alternatives are compared to the proposed project on a relative basis. For example, where both the proposed project and an alternative would have a less than significant effect, one of the two might still have relatively less impact, and be relatively superior to the other. Alternatives are compared to the project as proposed in project plans. Mitigation measures presented in the EIR may reduce the impact of the proposed project but in the alternatives analysis the comparison is based on the unmitigated project. Following the description and discussion of each alternative, the merits of the alternatives are compared and ranked.

5.1 DEVELOPMENT OF PROJECT ALTERNATIVES

Alternatives developed during the environmental review process have been evaluated and screened so that only a reasonable range of alternatives are carried forward for detailed analysis. Those alternatives determined to be unreasonable are eliminated from further consideration. The following sections discuss the alternative development and screening process and identify those alternatives that would fulfill the purpose of and the need for the proposed project that are selected for further consideration in this document.

5.1.1 Relationship to Project Objectives

In accordance with the CEQA Section 15124(b), a statement of objectives sought by the proposed project should be clearly stated to aid the Lead Agency in developing a reasonable range of alternatives to evaluate in the EIR. These objectives are also utilized to aid decision makers in preparation of findings or statement of overriding considerations (Title 14 CCR § 15124 (b). The following objectives outline the underlying purpose of the proposed project and will be used to evaluate each of the three alternatives to the proposed project:

- Redevelop the existing vacant Paraiso Springs Resort into a world-class destination spa/resort hotel;
- Build a project that is consistent with the objectives and policies of the Central Salinas Valley Area Plan and the 1982 Monterey County General Plan;

- Develop a mission style resort that provides visitor-serving support for the Monterey County wine corridor honoring the historic connection to the Soledad Mission's use of the property as a vineyard and retreat;
- Proactively engage the services of local businesses in the construction and on-going operation of the resort;
- Work with Monterey County, local wineries, and other related businesses to promote the Monterey wine corridor as a destination for tourism;
- Provide a therapeutic environment for wellness treatment and education;
- Utilize the existing mineral hot springs and sweeping views of the Central Salinas Valley as key amenity features;
- Provide services and amenities for both overnight and day guests;
- Provide an economically sustainable combination of hotel units and timeshare units of varying sizes;
- Create long-term employment and economic (tax revenue) opportunities for Monterey County;
- Provide an onsite interpretive display of the history and events associated with the Paraiso Springs Resort;
- Develop and provide opportunities to reduce green house gas emissions through the provision of a shuttle service for employees and guests, and on-site programs such as the use of electric service vehicles, solar energy generation, energy efficient building design, use of Energy Star appliances and fixtures, etc. to the greatest extent feasible; and
- Retain 150 acres of the project site as natural open space that would accommodate hiking trails and landscaping, and preserve the existing habitat and natural landforms.

5.1.2 Alternatives Screening Process

Consistent and standardized criteria for establishing the reasonableness or feasibility of certain alternatives are typically applied. Among 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, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives (Title 14 CCR §15126.6(f) (1)). Among the factors that may be used to eliminate alternatives; (2) infeasibility; or (3) inability to avoid significant environmental impacts.

5.1.3 Alternatives Eliminated from Detailed Analysis

An "Alternative Site Location" was rejected because the Monterey County General Plan, Central Salinas Valley Area Plan, and Zoning Ordinance all contemplate a visitor serving use at this location, the historic use of the site has been for visitor serving purposes, and the applicant specifically purchased and seeks to develop this property because of the attraction of the hot springs. An alternative location would not meet the basic project objectives of utilizing the mineral hot springs developing a mission style resort that provides visitor-serving support for the Monterey County wine corridor or honoring the historic connection to the Soledad Mission's use of the property as a vineyard and retreat. There are no other locations within the Central Salinas Valley that includes natural mineral hot springs or that includes the historic use by the Soledad Mission. Therefore, the "Alternative Site Location" was eliminated from consideration.

5.1.4 Alternatives Selected for Detailed Analysis

Below is a qualitative analysis of two alternatives to the proposed project. This analysis is intended to provide a relative comparison between the proposed project and each individual project alternative. In several cases, the description of the impact may be the same under each scenario when compared to the CEQA thresholds of significance (i.e., both scenarios would result in a less than significant impact determination). However, the actual degree of impact may be slightly different under each scenario, and this relative difference is the basis for a conclusion of greater or lesser impacts.

This analysis will identify an environmentally superior alternative from among the two alternatives. The environmentally superior alternative is the alternative that would result in the fewest or least significant environmental impacts, while still achieving the basic objectives of the proposed project, as described during the planning effort.

The two alternatives evaluated include the following:

Alternative #1 - No Project Alternative

Alternative #2 –Valley Floor Alternative

The detailed analysis of each alternative as compared to the proposed project is presented below.

5.2 ANALYSIS OF PROJECT ALTERNATIVES

Analysis of the alternatives assumes that all applicable mitigation measures associated with the proposed project would be implemented with the alternatives, as appropriate. Nevertheless, 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 proposed project.

5.2.1 Alternative #1: No Project Alternative

CEQA stipulates that a "no project" alternative be evaluated along with its impacts. The "no project" alternative is the circumstance under which the project does not proceed. The "no project" alternative analysis must discuss the existing conditions, as well as what

would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services (Title 14 CCR §15126.6(e)). If disapproval would result in predictable actions by others, such as the proposal of some other project, the "no project" consequence should be discussed. In certain instances, the no project alternative means "no build" wherein the existing environmental setting is maintained. However, where failure to proceed with the proposed project would not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval. It should not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.

This DEIR describes the current environmental conditions at the project site. Under the "no project" alternative, the project site would remain unchanged, and no new development would occur. In general, the project site would continue to show the evidence of the past, with a few buildings that served the prior resort, including but not limited to the fifteen vernacular cabins, a changing room, a recreation room, indoor and outdoor baths, six mobile homes, a lodge, a workshop, a yurt compound, a miner's shack, and several small outbuildings. There would be no impacts to oak woodlands or other habitats. However, the "no project" alternative would not eliminate the potential for the site to be developed, because existing land use and zoning designations allows a visitor-serving use at this location.

Impact Analysis

Air Quality

Air quality impacts are primarily associated with vehicle emissions. Short-term air quality impacts are associated with construction activities (e.g., earthmoving vehicles) in comparison to the long-term impacts of guest and visitor traffic and stationary source emissions. No new short-term construction or long-term operational air quality emissions would occur with implementation of the no project alternative. Under the no project alternative, the project site would remain in its existing condition and would not experience an increase in short-term or long-term air quality emissions. Therefore, this alternative would have fewer impacts on air quality in relation to the proposed project.

Aesthetics

No changes to the aesthetic quality or visual character of the project site would occur under the no project alternative. Under this alternative, no new structures would be built at the project site. This would avoid the removal of as many as 191 trees and other vegetation, in addition to preventing moderate changes in topography within the project site from grading activities. In addition, under this alternative, no new sources of light and glare would be introduced at the project site. Although development of the project site is not expected to substantially degrade the existing visual quality or character of the project site or surrounding area; and although these impacts were found to be less than significant as described in Section 3.1, Aesthetics and Visual Resources, this alternative would have fewer impacts on aesthetics in comparison to the proposed project.

Biological Resources

The project site would remain in its current condition under the no project alternative. Existing plant and wildlife habitats, including the removal of oak trees and riparian vegetation would not occur under this alternative. As identified in Section 3.3, Biological Resources, biological resource impacts resulting from implementation of the proposed project can be mitigated to less than significant. However, because the no project alternative would result in no impact to biological resources, this alternative would have fewer impacts on biological resources compared to the proposed project.

Cultural Resources

The project site would remain in its current condition; no ground-disturbing activities would occur under the no project alternative. As such, there would be a significant reduction in the potential for the disturbance or destruction of archaeological or paleontological resources. However, as identified in Section 3.4, Cultural Resources, impacts to historic resources resulting from implementation of the proposed project cannot be mitigated to a less than significant level due to the removal of the nine individually significant Victorian-era cottages in 2003. The project applicant would still be required to obtain an "after the fact" demolition permit and address the illegal removal of these cottages. This may include measures similar to those identified in MM 3.4-1a through MM 3.4-1c, which includes, but is not limited to providing archival quality reproductions of historic archives of the project site; providing a grant of \$10,000 to assist with the cataloging, displaying and archiving of the resources; and design, and creation of full color brochure that describes the history of the project site that can be used in various locations in the Central Salinas Valley area. Even with implementation of these measures under the no project alternative, as these historic resources cannot be recreated, this would be considered a significant and unavoidable impact under the no project alternative and would result in no change in comparison to the proposed 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 liquefaction and landslides. The no project alternative would not result in the development of new structures within a seismically-active area that is susceptible to secondary seismic effects, and there would be no potential for short-term construction-related erosion. Therefore, no impacts would occur under this alternative. As identified in Section 3.6, Geology and Soils, with the incorporation of the recommended mitigation measures, the proposed project will result in a less than significant effect on geology and soils. However, since the no project alternative is viewed as having less impact than the proposed project with respect to geology and soils.

Hazards and Hazardous Materials

Under the no project alternative, the project site would remain undeveloped. In the shortterm, the no project alternative would not require earthmoving activities that could result in accidental spills or release of hazardous construction-related materials. However, structures located within the project site, which contain asbestos and lead would not be removed under this alternative. As identified in Section 3.6, Hazards and Hazardous Materials, the hazardous impacts would be considered less than significant. However, because the no project alternative would not result in additional hazardous materials use at the project site, this alternative would have fewer impacts to hazards and hazardous materials in comparison to the proposed project.

Hydrology and Water Quality

Under the no project alternative, the project site would remain undeveloped. In the shortterm, the no project alternative would not require earthmoving activities that would result in increased erosion and sedimentation. In the long-term, the no project alternative would not result in an increase in impervious surfaces and storm water runoff (i.e., rate, volume, pollutants, etc.) within the project site, nor a change to net demand on the project site. As identified in Section 3.8, Hydrology and Water Quality, the hydrology and water quality impacts of the proposed project would be mitigated to a less than significant level. However, because the no project alternative would not result in alterations to the drainage and water quality characteristics of the project site, this alternative would have fewer impacts to hydrology and water quality in comparison to the proposed project.

Land Use and Planning

Under the no project alternative, the proposed project would remain in its current condition. The project site would also continue to be designated for Commercial use under the *Monterey County General Plan and* Central Salinas Valley Area Plan (CSVAP), Commercial-Visitor Serving (VO) under the Monterey County Zoning Ordinance As identified in Section 3.9, Land Use and Planning, the proposed project would not result in significant neighborhood or related land use impacts on policies, plans or ordinances. It must be noted that Policy 28.1.1.1 of the Central Salinas Valley Area Plan specifically identifies Recreation and Visitor Serving uses as being allowed on the project site (Paraiso Property). It is unlikely that the no project alternative would eliminate development on the project site for an undetermined time, it would result in the same conclusions as the proposed project with respect to consistency with all other policies, plans or ordinances. Therefore, this alternative would result in similar land use impacts in comparison to the project.

<u>Noise</u>

Development creates short-term noise impacts from the operation of construction equipment and long-term noise impacts from increased vehicle traffic. Under the no project alternative, the project site would remain in its current condition. No noise from short-term construction or from long-term operational activities would occur; therefore, no noise impacts would result from this alternative. By implementing the mitigation measures set forth in Section 3.9, Noise, all impacts from short-term noise would be considered less than significant. However, because this alternative would not result in

development that would create increased traffic-related or other noise sources, the no project alternative would have fewer noise impacts in comparison to the proposed project.

Public Services and Utilities

Implementation of the no project alternative would not result in an increase in the need for public services such as law enforcement, fire services, libraries, and parks and recreation. As noted in Section 3.11, Public Services and Utilities, with the implementation of the mitigation measures, the proposed project would have a less than significant impact to public services and utilities. However, since the no project alternative would not result in an increase in demand for public services and utilities, this alternative would have fewer impacts in comparison to the proposed project.

Transportation and Traffic

No new buildings would be developed and, therefore, no additional vehicular trips would be generated by the proposed project under the no project alternative. The additional trips generated under the proposed project would contribute to additional traffic on Paraiso Springs Road, Clark Road, or River Road. However, since the no project alternative would not result in construction-related vehicle trips or add long-term operational traffic to the road network, this alternative would result in fewer impacts in comparison to the proposed project.

Conclusion

The no project alternative would result in fewer impacts in comparison to the proposed project, with the exception of cultural resources, where the level of impact would remain the same. However, the no project alternative would not meet the project objectives because it would not develop a mission style resort that provides visitor-serving support for the Monterey County wine corridor honoring the historic connection to the Soledad Mission's use of the property as a vineyard and retreat, provide an economically sustainable combination of hotel units and timeshare units of varying sizes, and provide a world class spa-resort in the Central Salinas Valley.

5.2.2 Alternative #2: Valley Floor Alternative

The valley floor alternative would eliminate the proposed development on slopes exceeding 30 percent. The objective of this alternative is to create better consistency with County policy related to development on slopes exceeding 30 percent, minimize retaining walls, and minimize the visibility of development on the site from surrounding area. This alternative would involve the following modifications to the site plan:

1. Redesign and relocate the parking area for the hamlet. Relocate parking spaces to areas along the entry road.

- 2. Redesign the parking area adjacent to the lots 21 and 22 such that the parking lot does not encroach into 30 percent slope. Some of these parking spaces will need to be relocated.
- 3. Relocate the timeshare condominium units on lots 21 and 22 from their current location long the top of the ridge in an area that requires encroachment onto 30 percent slopes to Indian Valley in the location of the single family lots. This alternative would remove the timeshare single family lots and replace them with the timeshare condominium units.
- 4. Remove the access road to the timeshare condominiums in lot 23. This proposed access road is along a very steep hillside. The timeshare condominiums on Lot 23 could either remain in that location with access along the path of the existing service road, or these units could be relocated to Indian Valley.

The result of these changes would be the retention of the 60 timeshare condominium units but the elimination of the 17 timeshare villa lots. The outcome would be removal of development at higher and more visible locations, and the removal of high retaining walls.

Impact Analysis

Air Quality

Emissions of airborne particulate matter are largely dependent on the amount of ground disturbance associated with site preparation activities. Therefore, slightly less particulate matter from short-term construction would occur under the valley floor alternative. In addition, the reduction of the number of parcels developed would correspondingly reduce construction exhaust emissions associated with construction activities. The elimination of timeshare units would reduce vehicular trips and long-term vehicular emissions generated by development within the project site. As such, fewer impacts to air quality would occur. With implementation of mitigation measures, as outlined in Section 3.3, Air Quality, impacts regarding air quality were found to be less than significant. However, this alternative would have fewer impacts on air quality relative to the proposed project.

Aesthetics

The smaller footprint under the valley floor alternative would result in fewer aesthetic changes to the project site. Fewer structures would be built; therefore, fewer trees and other vegetation would be removed, and fewer sources of light and glare would be introduced within the project site. It should also be noted that, as stated in Section 3.1, Aesthetics and Visual Resources, removal of trees must result in replacement ratio in accordance with Section 21.64.260 of the Monterey County Code. In addition, the valley floor alternative would avoid slopes greater than 30 percent particularly on lot #23 and on lots #18 and #19. Under the proposed project, the condominiums on lots #21 and #22 would be visible from Paraiso Springs Road. Relocation of these units off of this ridgeline would retain the existing aesthetic of the site when viewed from off site. These

lots would then remain as undeveloped open space and would be dedicated for scenic enjoyment for the remainder of the project site and those viewing the site from a distance. Implementation of the proposed project is not expected to substantially degrade the existing visual quality or character of the project site or surrounding area, and all impacts herein were found to be less than significant as outlined in Section 3.1: Aesthetics and Visual Resources. However, the valley floor alternative would have fewer impacts on aesthetics, light, and glare than the proposed project with a reduction in development and an emphasis on keeping development at lower elevations.

Biological Resources

The valley floor alternative would result in fewer timeshare units and the addition of additional open space. As such, there would be fewer disturbances to existing plant and wildlife habitats, including the removal of oak trees and other vegetation. As identified in Section 3.3, Biological Resources, biological resource impacts resulting from implementation of the proposed project can be mitigated to less than significant. However, because the valley floor alternative would result in less destruction or disturbance of biological resources, this alternative would have fewer impacts on biological resources in comparison to the proposed project.

Cultural Resources

The valley floor alternative would result in fewer timeshare units and the addition of additional open space. As such, there would be a reduction in the potential for the disturbance or destruction of archaeological or paleontological resources. However, as identified in Section 3.4, Cultural Resources, impacts to historic resources resulting from implementation of the proposed project cannot be mitigated to a less than significant level due to removal of the nine individually significant Victorian-era cottages in 2003. The project applicant would still be required to implement mitigation incorporated herein to reduce the impacts to historic resources. Even with implementation of these mitigation measures, as these historic resources cannot be recreated, this would continue to be a significant and unavoidable impact under the valley floor alternative and would result in no change in comparison to the proposed 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 liquefaction and landslides. The valley floor alternative would result in a smaller construction footprint and fewer timeshare units in comparison to the proposed project. The reduction in timeshare units would reduce exposure of persons and structures to seismic hazards. There would be a lower potential for short-term, construction related erosion to occur and, therefore, would have a lower potential to create adverse impacts. In addition, the additional open space would result in the permanent preservation of many of the steep slopes on the project site. This would reduce potential adverse impacts from long-term erosion hazards and landsliding. Therefore, fewer impacts would occur under this alternative. As identified in Section 3.6, Geology and Soils, with the incorporation of the recommended mitigation measures, the proposed project will have a less than significant

effect on geology and soils. However, the valley floor alternative would result in fewer buildings at the project site. As such, there would be fewer units within a seismic hazard area and less potential for short- and long-term erosion, this alternative is viewed as having less impact to geology and soils in comparison to the proposed project.

Hazards and Hazardous Materials

The valley floor alternative would result in fewer timeshare units and the dedication of additional open space. In the short-term, less earthmoving activities would take place that would result in accidental spills or release of hazardous construction-related materials. In the long-term, there would a slight reduction in the use of hazardous materials within the project site. As identified in Section 3.6, Hazards and Hazardous Materials, the hazardous impacts would be considered less than significant. However, because the valley floor alternative would result in less use of hazardous material and fewer incidents for accidental spills or release of hazardous construction-related materials, this alternative would have fewer impacts to hazards in comparison to the proposed project.

Surface Water Hydrology

The valley floor alternative would result in fewer timeshare units and the dedication of additional open space. Fewer impervious surfaces would be created, which would result in a lower potential for surface runoff resulting in lower storm water volume and velocity. In addition, the reduction in impervious surface coverage would increase the potential for natural groundwater recharge. As identified in Section 3.7, Surface Water Hydrology, the hydrology and water quality impacts of the proposed project would be mitigated to a less than significant level. However, because the valley floor alternative would result in fewer alterations to the drainage and water quality characteristics of the project site, this alternative would have fewer impacts to hydrology and water quality in comparison to the proposed project.

Land Use and Planning

As with the proposed project, the valley floor alternative is consistent with the current land use designation of the project site. As identified in Section 3.8, Land Use and Planning, the proposed project would not be inconsistent with policies, plans or ordinances. This alternative would eliminate development on 30 percent slopes which is consistent with the General Plan and Zoning Ordinance which discourages development on slopes in excess of 30 percent except in circumstances where there is no alternative and when placing development on slopes over 30 percent better achieves the objectives of the County. The alternative would also reduce the intensity of development on the project site resulting in the same conclusions as the proposed project with respect to consistency with all other policies, plans or ordinances. Therefore, this alternative would result in fewer land use impacts in comparison to the proposed project.

<u>Noise</u>

Development creates short-term noise impacts from the operation of construction equipment and long-term noise impacts from increased vehicle traffic. Under the valley

floor alternative, fewer timeshare units would be developed, and proportionally less noise from short-term construction or long-term operational activities would occur. As such, fewer noise impacts would occur. With the mitigation measures, as set forth in Section 3.9 Noise, all noise impacts from the proposed project were found to be less than significant. However, the valley floor alternative would have fewer noise impacts in comparison to the proposed project due to a reduction in vehicle trips to the project site.

Public Services and Utilities

The reduction of timeshare units would result in a corresponding lower demand for public services and utilities at the project site, including a slight reduction in the amount of calls to the Sheriff's office, a reduction in the demand for potable water, generation of wastewater, and the solid waste. This alternative is estimated to result in fewer calls for law enforcement services. As noted in Section 3.10, Public Services and Utilities, the proposed project would have a less than significant impact to public services. However, because the valley floor alternative would result in a slight reduction in demand for public services, this alternative would have less of an impact in comparison to the proposed project.

Transportation and Traffic

Implementation of the valley floor alternative would result in elimination of the proposed 17 timeshare villa lots. Hence, this alternative would result in a corresponding trip reduction in comparison to the proposed project operational trips. Therefore, because the valley floor alternative would reduce the generation of construction-related vehicle trips and long-term operational traffic, this alternative would have fewer transportation and circulation impacts in comparison to the proposed project.

Conclusion

The smaller foot print and fewer timeshare units proposed by the valley floor alternative would result in corresponding fewer impacts to all environmental issue areas with the exception of impacts to cultural resources, which would be similar to the proposed project. However, the valley floor alternative would result in 17 fewer timeshare units and, therefore would meet the proposed project objectives to a lesser degree compared to the proposed project. These objectives include development of 50 acres of the project site and providing an economically sustainable combination of hotel units and timeshare units of varying sizes.

5.2.3 Environmentally Preferable Alternative

CEQA Guidelines requires an EIR to identify an "environmentally superior alternative" (Title 14 CCR §15126(e) (2)). If the no project alternative is the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives.

Both of the alternatives would have fewer environmental impacts relative to the proposed project, with the no project alternative having the fewest, or no additional environmental

impacts at all. Table 5.1, Comparison of Project Alternatives to the Proposed Project, below, provides a summary of alternative impacts in comparison to the proposed project.

Environmental Category	Alternative #1 - No Project Alternative	Alternative #2 – Valley Floor Alternative
Aesthetics and Visual Resources	Less	Slightly Less
Air Quality	Less	Slightly Less
Biological Resources	Less	Slightly Less
Cultural Resources	Similar	Similar
Geology and Soils	Less	Slightly Less
Hazards and Hazardous Materials	Less	Slightly Less
Surface Water Hydrology	Less	Slightly Less
Land Use and Planning	Similar	Slightly Less
Noise	Less	Slightly Less
Public Services and Utilities	Less	Slightly Less
Transportation and Traffic	Less	Slightly Less
Consistency with Project Objectives	Less	Slightly Less
Source: EMC Planning Group 2013		

Table 5.1Comparison of Project Alternatives to the Proposed Project

As identified in Table 5-1, the no project alternative is the environmentally superior alternative, as the project site would remain in its existing condition, thereby avoiding any potentially adverse environmental impacts.

As stated above, if the no project alternative is environmentally superior, the EIR must also identify another environmentally superior alternative among the remaining alternatives. Based on this review, the valley floor alternative is considered the environmentally superior alternative. The reduced footprint, reduction in timeshare units, and increase in open space at the project site would correspondingly reduce the environmental impacts of the proposed project. Therefore, the valley floor alternative is the environmentally superior alternative.