6 Alternatives

As required by Section 15126.6(a) of the State CEQA Guidelines, this EIR examines alternatives to the proposed project that could feasibly achieve most of the basic project objectives, but would avoid or substantially lessen the project's significant environmental effects.

In identifying suitable alternatives, potential alternatives must be reviewed to determine whether they:

- Can avoid or substantially reduce significant environmental effects;
- Can attain most of the basic project objectives;
- Are potentially feasible; and
- Are reasonable and realistic.

Sections 15126.6(a) through (f) of the CEQA Guidelines provide the following additional guidance 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.
- An EIR is not required to consider alternatives that are infeasible. The term "feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological and legal factors.
- The EIR must focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project.
- The alternatives discussed should be ones that offer substantial environmental advantages over the proposed project.
- The EIR should briefly describe the rationale for selecting the alternatives to be discussed, as well as any alternatives that the lead agency considered but rejected.
- The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project.
- The alternatives analysis discussed must be reasonable, and selected to foster informed decision-making and public participation. An EIR need not consider an alternative where the effect cannot reasonably be ascertained or where the implementation is remote or speculative, because unrealistic alternatives do not contribute to a useful analysis.

Consistent with the above parameters, included in this analysis are the CEQA-required "No Project" Alternative, as well as one additional alternative to the proposed project. The alternatives were selected for analysis because they are potentially feasible and may be able to reduce one or more of the significant adverse impacts associated with the proposed project. The alternatives are listed and summarized below, and subsequently discussed in greater detail within the impact analysis for each alternative:

- Alternative 1: No Project
- Alternative 2: Reduced Project

In conducting the alternatives analysis, as discussed previously, consideration must be given as to how, and to what extent, an alternative can meet the project's basic objectives. The objectives for the project, as listed in Section 2.0, *Project Description*, are as follows:

1. To develop a new retail center anchored by a specialty grocery store and complementary commercial uses to provide the local trade area with shopping alternatives in a high-quality shopping environment
2. To divert to the project shopping trips from Carmel Village, Carmel Valley, Carmel Highlands and Big Sur Coast currently destined for Monterey and Pacific Grove for shopping at Whole Foods, Trader Joe's and other specialty grocers
3. To contribute to the local economy through new capital investment, the creation of new employment opportunities, and the expansion of the County's tax revenues
4. To develop full-service retail uses near regional roadway and highway facilities, and near other commercial uses, to minimize travel lengths and utilize existing infrastructure to the maximum extent possible
5. To implement the County of Monterey General Plan
6. Implement a high-quality architectural design that improves the overall aesthetics of the project site and surrounding area

6.1 Alternative Considered but Rejected

The following alternative was considered but eliminated from further discussion for the reasons given below.

Section 15126.6 of the State CEQA Guidelines states that:

> "An EIR shall describe 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, and evaluate the comparative merits of the 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. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason."

Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. 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). An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.

6.1.1 Alternative Location

The California Supreme Court, in Citizens of Goleta Valley v. Board of Supervisors (1990), indicated that a discussion of alternative sites is needed if the project "may be feasibly accomplished in a successful manner considering the economic, environmental, social, and technological factors involved" at another site. Several criteria form the basis of whether alternative sites need to be considered in detail. These criteria take the form of the following questions:

- Could the size and other characteristics of another site physically accommodate the project?
- Is another site reasonably available for acquisition?
- Is the timing of carrying out development on an alternative site reasonable for the applicant?
- Is the project economically feasible on another site?
- What are the land use designation(s) of alternative sites?
- Does the lead agency have jurisdiction over alternative sites? and
- Are there any social, technological, or other factors which may make the consideration of alternative sites infeasible?

Site characteristics that could support a project that meets the project objectives include: appropriate size to accommodate an economically viable retail center; commercial use designation; and availability of appropriate urban services and characteristics, including relatively level terrain, available utilities, and existing roads. Alternative sites designated for agriculture, open space, resource conservation, and residential uses were rejected from consideration because retail development is not envisioned on these parcels under the Monterey County General Plan or the CVMP.

Figure 44 shows the existing commercial and retail zoning districts within approximately one mile of the project site. While there are properties in the project site vicinity envisioned for retail and commercial development under the CVMP and zoned for such uses, as shown on Figure 44, these parcels have been developed and are no longer vacant. Specifically, parcels north of the project site are designated as planned commercial use in the CVMP and zoned for commercial uses, but these parcels have been largely developed with the existing Carmel Rancho Shopping Center. Property zoned for commercial and retail uses south of the site, across Rio Road, are developed with the existing Crossroads Shopping Center.

The commercial and retail zoning district shown on Figure 44 west of Highway 1 is zoned visitor serving commercial uses. With a conditional permit, the zoning code allows for "retail stores and offices accessory to visitor serving uses." This may or may not include the proposed specialty market and other retail uses. Nonetheless, this site is developed with residential uses and a hotel. As shown of Figure 44, there are no other parcels within approximately one mile of the project site that are zoned for commercial or retail uses. The nearest parcels in the City of Carmel-by-the-Sea that are zoned for commercial uses are located north of 7th Avenue, which is approximately 1.2 miles from the project site. These parcels are in the central area of the City and already developed. Additionally, the project applicant does not own an additional property that could accommodate the retail development as currently proposed. Therefore, for the aforementioned reasons, an alternative site was not analyzed further.

Figure 44 Proximate Commercial and Retail Zoning Districts

Imagery provided by Google and its licensors © 2017. Additional data provided by Monterey County, 2016.

Fig X Nearby Commercial Zoning

6.2 Alternative 1: No Project Alternative

6.2.1 Description

The No Project Alternative assumes that the proposed project is not implemented, and that the project site remains in its current vacant state. Existing uses on the project site, including a section of the parking lot for an adjacent lodging/inn use, two wells, utility connections, and an existing above-ground propane tank and shed building located in the northern portion of the site, would remain and continued to be used at their current intensity or level. Although the project applicant could propose some other form of development on the site, or sell the property and that future owner could propose development, it would be speculative to attempt to analyze such unplanned or proposed development, which itself would require separate CEQA review, in this alternatives analysis.

6.2.2 Impacts

Aesthetics

The proposed project would not be implemented under the No Project Alternative, and the project site would remain in its current vacant state. Existing uses on the project site, including a section of the parking lot for an adjacent lodging/inn use, two wells, utility connections, and an existing above-ground propane tank and shed building located in the northern portion of the site, would remain and continued to be used at their current intensity or level. As existing uses, their continuation on the project site would not change the visual setting or appearance of the site or the larger landscape or viewshed that it is situated in. This alternative would have no impacts to aesthetics, which would be a lesser level of impact compared to the proposed project.

Agriculture and Forestry

As described in Section 4.9.2, *Agriculture and Forestry*, the project site is not zoned for agricultural use or identified as Important Farmland pursuant to the Farmland Mapping and Monitoring Program. Although woodland is present on the project site, it does not meet legal definitions of forestry resources, as described in Section 4.9.2, *Agriculture and Forestry*. As such, neither this alternative nor the proposed project would have impacts on agriculture and forestry resources.

Air Quality

As shown in Table 10 in Section 4.1, *Air Quality*, construction of the proposed project would generate between 0.2 and 99.9 pounds per day of emissions, depending on pollutant. The proposed project would not be constructed under implementation of the No Project Alternative, and this alternative would not generate construction-related emissions. Because the proposed project would not be constructed, the project site would remain vacant and operational emissions associated with the proposed project would not be generated. As shown in Table 11, as many as 0.3 to 136.8 pounds per day of operational emissions would be avoided, depending on the specific pollutant. The No Project Alternative would have no impacts on air quality, which would be a lesser level of impact compared to the proposed project.

Biological Resources

As described in Section 4.2, *Biological Resources*, construction of the proposed project would have potentially significant but mitigable impacts to special status species and habitat, including California red-legged frog and nesting migratory birds. The No Project Alternative would not involve construction of the proposed project or the associated ground disturbance. Thus, potentially significant but mitigable impacts to special status species and habitat would not occur under this alternative. Because the proposed project would not be constructed and the project site would remain vacant in its current state, removal of trees onsite would not be required under implementation of this alternative. The No Project Alternative would have no impact on biological resources, which would be a lesser level of impact compared to the proposed project.

Climate Change

As shown in Table 16 in Section 4.3, *Climate Change*, construction and operation of the proposed project would generate combined annual GHG emissions of 4,503.3 MT CO_2e, when construction emissions are amortized over operations. The No Project Alternative would not involve construction of the proposed project or its subsequent operation. Thus, the GHG emissions presented in Table 17 would not occur under this alternative. Because the No Project Alternative would not generate new sources of GHG emissions, it would have no impact on climate change. The potentially significant impacts on climate change that would occur under the proposed project would be avoided. Mitigation would not be required.

Cultural and Paleontological Resources

The No Project Alternative would not involve construction of the proposed project or any of the associated ground disturbance or excavation activities. Thus, the No Project Alternative would have no potential to unearth and impact previously unidentified or unknown paleontological and archaeological resources, as well as tribal cultural resources. The potentially significant but mitigable impacts of the proposed project would be avoided entirely. Impacts would be reduced when compared to the proposed project because this alternative would have no impacts. Mitigation would not be required which would be a lesser level of impact compared to the proposed project.

Geology and Soils

The No Project Alternative would not involve construction or ground disturbance that would otherwise expose and loosen soils and increase the potential for erosion. The No Project Alternative would not include the construction of new structures in areas subject to earthquakes or seismic ground shaking. Additionally, the potentially significant but mitigable impacts of the proposed project associated with locating structures in an area subject to soil liquefaction would be avoided under implementation of the No Project Alternative, without any mitigation requirements. Thus, compared to the proposed project, impacts would be substantially reduced because the No Project Alternative would have no impacts on geology or soils.

Hazards/Hazardous Materials

The proposed project would not be implemented under the No Project Alternative, and the project site would remain in its current vacant state. The transport, storage, and use of hazardous materials associated with retail and commercial uses, such as paints and solvents, would be avoided under this alternative. Additionally, the temporary use and storage of hazardous petroleum substances

required for project construction equipment, such as motor oil and diesel fuel, would be avoided under this alternative. The No Project Alternative would have no impact related to hazards and hazardous materials, which would be a lesser level impact compared to the proposed project.

Hydrology and Water Quality

The No Project Alternative would not involve project construction activities that would loosen and expose soils and otherwise increase the potential for soil erosion and sedimentation. The No Project Alternative would not create new or additional impervious surfaces on the project site, because the proposed project would not be constructed. This would reduce the amount of stormwater runoff potentially generated from the project site. Stormwater runoff, as well as infiltration of precipitation on the project site, would continue at existing levels because the existing site conditions would not be modified under this alternative. Thus, because the No Project Alternative would not increase impervious surfaces and associated urban stormwater runoff, and would not increase the potential for sedimentation for ground disturbing activities, it would have no impacts on hydrology and water quality. The potentially significant but mitigable impacts of the proposed project would be avoided.

Land Use and Planning

The proposed project would not be implemented under the No Project Alternative, and the project site would remain in its current vacant state. No changes in current land uses or planned land uses would occur under implementation of this alternative.

CVMP Policy CV-3.11 states that the County shall discourage the removal of healthy native oak trees in the CVMP area, and that a permit shall be required for the removal of any trees. This alternative would not remove any trees and therefore would not require tree removal permits, as with the proposed project. Additionally, the proposed project would have several impacts related to increased vehicles trips that could conflict with policies related to transportation and traffic circulation. This alternative would not generate any new traffic trips, and related impacts that are potentially inconsistent with policies and plans would be avoided. This would be reduced impact compared to the proposed project, as described in Section 4.9.10, *Land Use and Planning*.

Mineral Resources

As described in Section 4.9.11, *Mineral Resources*, the project site is not used for mineral extraction. The project site is not mapped as containing important mineral resources. As such, neither this alternative nor the proposed project would have impacts on mineral resources.

Noise

The No Project Alternative would not require the use of heavy construction equipment on the project site. Additionally, because the proposed project would not be constructed and the site would remain in its current vacant condition, operational noise generated by the project, which would primarily be traffic generated from retail uses, would be avoided under this alternative. The No Project Alternative would not impact existing ambient noise levels at sensitive receptor sites. Impacts would be reduced compared to the proposed project because this alternative would have no impacts on noise. Mitigation would not be required.

Population and Housing

The proposed project would not be implemented under the No Project Alternative, and the project site would remain in its current vacant state. Existing uses on the site, including the parking lot for an adjacent lodging/inn use, two wells, utility connections, and an existing above-ground propane tank and shed building located in the northern portion of the site would remain and continued to be used at their current intensity or level. However, these uses do not have the potential to generate population growth or require new housing or displacement of existing housing or people. Thus, the No Project Alternative would have no impacts to population and housing. As described in Section 4.9.13, *Population and Housing*, the proposed would also have no impacts to population and housing. Accordingly, impacts would be the same regardless of the potential implementation of this alternative or the proposed project.

Public Services

As described in Section 4.9.14, *Public Services*, the proposed project could increase the number of emergency calls to the area, but at levels not expected to significantly impact fire or ambulance services. The proposed project would not be implemented under the No Project Alternative, and the project site would remain in its current vacant state. This alternative would not increase emergency calls to the area and which would be a lesser level of impact compared to the proposed project.

Recreation

The project site would remain in its current vacant state under this alternative. This alternative would have no impact on recreation, similar to the proposed project.

Transportation and Circulation

As described in Section 4.8, *Transportation and Circulation*, operation of the proposed project would generate an estimated 3,883 daily vehicle trips. The proposed project would not be constructed or operated under this alternative, and therefore none of these traffic trips would be generated. The potentially significant and unavoidable impacts to that would result from this additional traffic under the proposed project would not occur under the No Project Alternative. This alternative would have no impacts on transportation and circulation.

Utilities and Service Systems

As described in Section 4.9.17, *Utilities and Service Systems*, the proposed project would result in less than significant impacts related to increased solid waste disposal at Monterey Peninsula Landfill. The proposed project would not be implemented under the No Project Alternative, and the project site would remain in its current vacant state. New sources of solid waste would not be created under this alternative, and the amount of waste disposal at the Monterey Peninsula Landfill would not increase. Thus, the impacts of the proposed project related to solid waste and landfill capacity would be avoided under this alternative.

Increased demand for water supply and wastewater treatment that would from development and operation of new commercial and retail uses on the project site would be avoided under this alternative, because the site would remain its current vacant state. Compared to the proposed project, impacts would be reduced because the No Project Alternative would have no impact on utilities and service systems.

6.3 Alternative 2: Reduced Project Alternative

6.3.1 Description

This alternative would reduce the total square footage of retail development on the project site compared to the proposed project. Under the Reduced Project Alternative, a total of approximately 31,500 square feet of retail development would be constructed, which would be 10,810 square feet less, or an approximately 26 percent reduction of retail space than the proposed project. It is standard practice for retail shopping centers to include at least one anchor store because anchor stores are used to drive the business of the smaller retailers in the shopping center. Additionally, development of a new retail center anchored by a specialty grocery store is one of the project objectives. Thus, it is assumed that under this alternative the larger market building would be constructed as an anchor, but its total size would be reduced to 21,000 square feet[3]. The proposed 8,335 square foot building identified as "Store A" would also be constructed, but would be reduced to 5,000 square feet. The building identified as "Store B" would not be constructed under this alternative. The location of the market building and the "Store A" building on the project site would shift south approximately 50 feet, partially into the area where "Store B" would be constructed under the proposed project. The "Store C" building would not be modified under this alternative compared to the proposed project. A comparison of the square footage of each building under the Reduced Project Alternative and the proposed project is provided in Table 52.

Table 52 Reduced Project Alternative – Retail Space Comparison

Building	Reduced Project Alternative Size (sf)	Proposed Project Size (sf)
Market (grocery)	21,000	23,000
Store A	5,000	8,335
Store B (southeast)	0	5,475
Store C	5,000	5,000
Farm Sheds (2)	500 (250 sf each)	500 (250 sf each)
Gross Leasable Area	**31,500**	**42,310**

Under this alternative, all of the proposed utility connections, including their location, capacity, and size, would be the same as the proposed project. Primary access to the project site would be via a reconfigured traffic-signal controlled intersection at Rio Road and Crossroads Boulevard, which would be the same as the proposed project. This alternative would also include the same three secondary access points to the project site as the proposed project.

It is assumed that all buildings constructed under this alternative would house the same types of retail uses that would be housed under the proposed project. According to the Monterey County Municipal Code (Section 21.58.040), general retail uses require one parking space be provided for every 250 square feet of retail development. As shown in Table 52, approximately 31,500 square feet of retail development would be constructed, which would require approximately 126 parking spaces pursuant to the Monterey County Municipal Code. This would be 58 fewer parking spaces

[3] It is anticipated that the market would be a maximum of 23,000 square feet under the proposed project, but could also be larger or smaller, depending on final plans and tenant needs.

than would be constructed under the proposed project, reducing the overall size of the asphalt parking area on the project site by an estimated 9,396 square feet.

The reduction in building number and size and associated parking area would reduce the overall footprint of the project compared to the proposed project. As described above, the market store and the "Store A" building would be shifted toward the south of their location under the proposed project, which would also shift parking south. A larger area in the northern part of the site, where native woodland is located, would remain undisturbed and undeveloped under this alternative.

6.3.2 Impacts

Aesthetics

As described in Section 4.9.1, *Aesthetics*, Highway 1 is an officially designated State Scenic Highway and the tops of trees and woodland habitat on the project site are visible from the highway. This alternative would likely require removal of fewer of these trees and less woodland habitat compared to the proposed project because the project footprint would be smaller, shifted south on the site, away from the woodland habitat in the northern area of the site. However, this alternative would also require removal of some trees and woodland habitat. Because this alternative would require smaller parking areas, it would also require less exterior lighting on the site, which would reduce impacts from light and glare compared to the proposed project. Impacts would be slightly less than the proposed project and would be less than significant without mitigation required.

Agriculture and Forestry

As described in Section 4.9.2, *Agriculture and Forestry*, the project site is not zoned for agricultural use or identified as Farmland. Although woodland is present on the project site, it does not meet legal definitions of forestry resources, as described in Section 4.9.2, *Agriculture and Forestry*. As such, neither this alternative nor the proposed project would have impacts on agriculture and forestry resources.

Air Quality

As described in Section 4.1, *Air Quality*, air emissions associated with the construction and operation of the proposed project would not exceed applicable MBARD thresholds. Implementation of the Reduced Project Alternative would result in less construction activity overall. Thus, construction of the Reduced Project Alternative would require less time to complete and delivery of fewer materials than the proposed project, which would reduce construction emissions. The Reduced Project Alternative would reduce the retail building space on site by approximately 26 percent, and less asphalt paving because fewer parking spaces would be required. Thus, construction of the Reduced Project Alternative would reduce construction emissions commensurately.

As described in the traffic study (Appendix G), trip generation rates published by the Institute of Transportation Engineers (ITE) Trip Generation Manual, 9th Edition (2012) were used to estimate the trips that will be generated by the proposed project. These rates are based on 91.77 vehicle trips per each 1,000 square feet of shopping center developed. Using this rate, the Reduced Project Alternative would generate 2,891 daily vehicles trips. This would be 992 fewer daily vehicles trips than the proposed project, an approximately 26 percent reduction. Operational emissions, particularly vehicle exhaust emissions, would commensurately reduce under this alternative. Thus, construction and operation emissions would be less than the proposed project and also below applicable MBARD thresholds. Impacts would be less than significant.

Biological Resources

This alternative would require removal of fewer native trees compared to the proposed project because the total overall size of the project footprint would be reduced and would shift south on the project site, leaving more of the woodland habitat in the north part of the site undeveloped. Accordingly, this would also reduce disturbance or removal of habitat for nesting migratory birds. Because fewer trees would be removed and potentially slightly less nesting bird habitat impacted, impacts would be slightly reduced compared to the proposed project. However, as described in Section 4.2, *Biological Resources*, sensitive species could potentially occur throughout the entire project site, and would not be limited to only woodland habitat. As a result, this alternative would also have potential to impact special status species. Impacts would be less than significant with implementation of Mitigation Measures B-1(a) through B-1(c) and B-2. Compared to the proposed project, impacts would be slightly reduced.

Climate Change

Implementation of the Reduced Project Alternative would result in the construction of 10,810 square feet less commercial space than the proposed project, as well as fewer parking spaces. Thus, construction of the Reduced Project Alternative would require less time to complete and delivery of fewer materials than the proposed project, which would slightly reduce construction-related GHG emissions. The Reduced Project Alternative would reduce the retail building space on site by approximately 26 percent, and less asphalt paving because fewer parking spaces would be required. Thus, construction of the Reduced Project Alternative would reduce construction emissions commensurately.

The Reduced Project Alternative would generate 992 fewer daily vehicle trips than the proposed project during operation, which would be an approximately 26 percent reduction in daily trips. The reduction in daily vehicles trips would result in fewer GHG emissions from mobile sources than the proposed project. As shown in Table 17 in Section 4.3, *Climate Change*, the proposed project would generate 4,018.6 MT CO_2e of mobile emissions annually. It is reasonable to assume that a 26 percent in daily trips would reduce mobile emissions commensurately by approximately 26 percent, resulting in approximately 2,973.8 MT CO_2e annually. Additionally, GHG emissions from energy sources would be slightly less compared to the proposed project because the total interior building space on site would be reduced by approximately 26 percent and would be smaller and require less lighting and less energy to heat or cool. Because the Reduced Project Alternative would have slightly fewer GHG emissions compared to the proposed project, it would have a slightly less incremental impact on global climate change. However, similar to the proposed project, GHG emissions would exceed SLOAPCD's adopted threshold of 1,150 MT CO_2e per year and efficiency threshold of 4.9 MT CO_2e per year. Thus, similar to the proposed project, Mitigation Measure CC-1 would be required for this alternative to reduced GHG emissions. With implementation of mitigation, impacts would be less than significant.

Cultural and Paleontological Resources

The Reduced Project Alternative would include grading and excavation for construction of development on the project site, similar to the proposed project. Thus, this alternative would have potential to uncover and potentially impact previously unidentified or unknown paleontological, archaeological, and tribal cultural resources. The potential for encountering these types of resources could be reduced because the project footprint would be smaller and require less ground disturbance than the proposed project. If resources are uncovered and not properly protected,

impacts would be potentially significant but mitigable, similar to the proposed project. All of the cultural Mitigation Measures required for the proposed project would be required for the Reduced Project Alternative. With mitigation, impacts would be less than significant.

Geology and Soils

Construction of the Reduced Project Alternative would disturb more than one acre and would require implementation of a SWPPP and associated BMPs to reduce the potential for erosion and sedimentation during construction. Additionally, the overall project footprint would be reduced compared to the proposed project, resulting in less construction disturbance. With implementation of the required SWPPP and BMPs, and less ground disturbance required for construction, the potential for erosion and soil loss during construction activities would be reduced compared to the proposed project.

As described above, the Reduced Project Alternative would reduce the amount of impervious parking lot surfaces constructed on the project site by approximately 9,396 square feet compared to the proposed project. Thus, more pervious areas would be retained on the project site. The additional pervious area would allow for more infiltration of precipitation, which would reduce the volume of stormwater runoff from the site during operations compared to the proposed project. As a result, the potential for erosion and soil loss from stormwater runoff during operations would be slightly less than the proposed project. Impacts would be less than significant.

The Reduced Project Alternative would include construction of new structures in areas subject to seismic ground shaking and soil liquefaction. This alternative would include construction of one less building and reduce the size of two other buildings compared to the proposed project. Because two buildings would be smaller, there maximum allowable occupancy would also be reduced commensurately, reducing the number of people that could be exposed to risk of loss or injury from these geological hazards. However, the risk of these hazards would not be avoided completely, and the potentially significant but mitigable impacts of the proposed project associated with locating structures in an area subject to soil liquefaction would also occur under this alternative.

Overall, the Reduced Project Alternative would have a slightly reduced impact on geology and soils than the proposed project because slightly less soil would be disturbed during construction and fewer impervious surfaces would be created, thus reducing the potential for erosion and soil loss. Additionally, less structural space and people would be exposed to liquefaction hazards compared to the proposed project. However, similar to the proposed project, impacts of this alternative would be potentially significant but mitigable. All of the geology and soils Mitigation Measures required for the proposed project would be required for the Reduced Project Alternative.

Hazards/Hazardous Materials

This alternative would require the routine transport, storage, and use of hazardous materials associated with retail and commercial uses, such as paints and solvents, similar to the proposed project. Impacts would be less than significant with mandatory compliance with U.S. EPA and U.S. DOT laws and regulations that require tracking and managing the safe interstate transportation of hazardous materials and waste. Similar to the proposed project, this alternative would have no other impacts related to hazards or hazardous materials.

Hydrology and Water Quality

Construction of the Reduced Project Alternative would require less surface disturbance because less building space and fewer parking spaces would be constructed compared to the proposed project. However, construction of this alternative would disturb soils and increase the potential for soil erosion and sedimentation compared to existing conditions. Construction activities would disturb more than one acre and would require implementation of a SWPPP and associated BMPs to reduce the potential for erosion and sedimentation during construction, similar to the proposed project. The SWPPP must also contain measures to clean or prevent leaks or spills of construction equipment fluids, such as motor oil or diesel. With implementation of the required SWPPP and BMPs, and less ground disturbance, the potential for adverse water quality impacts from erosion or contaminants from equipment would be slightly less under the Reduced Project Alternative compared to the proposed project.

As described above, compared to the proposed project, this alternative would require 9,396 square feet less of impervious surfaces to be constructed on the project site because fewer parking spaces would be required. Although this would be less than the proposed project, the additional impervious surface that would be added to the site would have the potential to alter drainage patterns and the volume of stormwater runoff generated on the project site. The potential for contamination of runoff with urban contaminants, such as oil and grease from the parking lot surface would also occur under this alternative.

Similar to the proposed project, the Reduced Project Alternative would place commercial structures within 100-year flood hazard area. Because the structures would be smaller under this alternative, fewer people would be present onsite and exposed to the risk of flood.

This alternative would result in fewer commercial and retail uses on the project site compared to the proposed project. As such, this alternative would generate less demand for water. As shown in Table 23 in Section 4.6, *Hydrology and Water Quality*, estimated water demand for the proposed project would be up to 7.18 AFY. Using the same water use factors and assumptions shown in Table 23, the estimated water demand of the Reduced Project Alternative would be 5.35 AFY, a reduction of approximately 25 percent. Similar to the proposed project, prior to issuance of a building permit by the County, the applicant would be required to obtain a Water Permit from MPWMD per Rule 23. Impacts would be reduced when compared to the proposed project and would remain less than significant.

Impacts would be similar to the proposed project and potentially significant but mitigable. All of the hydrology and water quality Mitigation Measures required for the proposed project would be required for the Reduced Project Alternative.

Land Use and Planning

Although less commercial space and parking area would be constructed under this alternative, it would require removal of some native oak trees on the project site. Similar to the proposed project, a tree removal permit would be require to ensure consistency with CVMP Policy CV-3.11, which discourages the removal of native oak trees and requires a permit. This alternative would generate approximately 26 percent fewer daily vehicle trips compared to the proposed project, but would not avoid significant and unavoidable impacts to transportation and circulation that would result from new traffic trips generated under the proposed project. As described in Section 4.9.10, *Land Use*, these significant and unavoidable impacts may potentially conflict with one or more policies or plans. Also similar to the proposed project, this alternative would not divide a community or conflict

with habitat conservation plans or natural community conservation plans. Overall, impacts would be approximately the same as the proposed project. Mitigation is not required.

Mineral Resources

As described in Section 4.9.11, *Mineral Resources*, the project site is not used for mineral extraction. The project site is not mapped as containing important mineral resources. As such, neither this alternative nor the proposed project would have impacts on mineral resources.

Noise

Construction of the Reduced Project Alternative would require similar equipment to the equipment required for the proposed project. Thus, noise levels generated from construction equipment would be the same under the Reduced Project Alternative. However, because less commercial space would be constructed compared to the proposed project, the duration of construction noise impacts would be shortened. The Reduced Project Alternative would generate 992 fewer daily vehicle trips than the proposed project during operation. The reduction in daily vehicles trips would result in less traffic-related noise during operation. Impacts would be less than the proposed project and less than significant. However, this alternative would increase cumulative traffic noise on Rio Road to the west of Highway 1, and cumulative impacts would be significant, comparable to the proposed project.

Population and Housing

This alternative would develop the project site with commercial and retail uses, and similar to the proposed project, would not involve the construction of new housing or displacement of existing housing or people. One less retail building would be constructed under this alternative compared to the proposed project, and as a result the employment opportunities may be reduced. However, as described in Section 4.9.13, *Population and Housing*, employment at proposed uses on the project site would be filled primarily from the existing regional work force, and not result in substantial population growth. Thus, similar to the proposed project, this alternative would have no impacts to population and housing.

Public Services

As described in Section 4.9.14, *Public Services*, the proposed project could increase the number of emergency calls to the area, but at levels not expected to significantly impact fire or ambulance services. Because one less building would be constructed on the project site and two buildings would be smaller under this alternative, maximum allowable occupancy on the site would be reduced commensurately. Because fewer people would be on site during operations, the potential for increases in the number of emergency calls would decrease slightly compared to the proposed project. Furthermore, the demand for public services under this alternative would not require new or expanded facilities; therefore, it would not result in substantial adverse physical impacts associated with the provision of or need for new or physically altered government facilities. Impacts would be less than significant.

Recreation

This alternative would develop the project site with the same types of retail and commercial uses as the proposed project. As described in Section 4.9.15, *Recreation*, these uses would not generate new population growth or consequential increased demand on recreational facilities. The

construction of recreational facilities or uses is not included under this alternative. Thus, similar to the proposed project, this alternative would have no impacts to recreation.

Transportation and Circulation

Based on the trip generation rate used for the proposed project, the Reduced Project Alternative 2 would generate 2,891 daily vehicle trips. This would be 992 fewer daily vehicles trips than the proposed project, a 26 percent reduction. Approximately 23 fewer AM peak hour trips and 86 fewer PM peak hour trips would generated under this alternative. Because fewer trips would be added to study area intersections and roadway segments, impacts would be reduced when compared to the proposed project. However, similar to the proposed project, trips generated under this alternative would result in potentially significant and unavoidable impacts to traffic and circulation. All of the Mitigation Measures required for to mitigate traffic impacts of the proposed project, as described in Section 4.8, *Transportation and Circulation*, would also be required under this alternative.

Utilities and Service Systems

As described above, compared to the proposed project, this alternative would require 9,396 square feet less of impervious surfaces to be constructed on the project site because fewer parking spaces would be required. Thus, there would be more surface on the project site for precipitation to infiltrate and result in reduced volumes of stormwater runoff. Thus, while this alternative would increase the volume of stormwater conveyed to existing storm drain systems, it would be less than the proposed project. As described above in the hydrology and water quality discussion, this alternative would also create less demand for water supply compared to the proposed project.

Less solid waste would be generated during both construction and operation compared to the proposed project, because commercial and retail space would be reduced. Thus, compared to the proposed project, this alternative would result in less solid waste disposal at the Monterey Peninsula Landfill.

Overall, this alternative would generate less demand on existing utilities and service systems compared to the proposed project, and impacts would be slightly less. Impacts would be less than significant and not require mitigation.

6.4 Environmentally Superior Alternative

CEQA requires the identification of the environmentally superior alternative among the options studied. The environmentally superior alternative must be an alternative to the proposed project that reduces some of the environmental impacts of the proposed project, regardless of the financial costs associated with this alternative. Identification of the environmentally superior alternative is an informational procedure and the alternative identified as the environmentally superior alternative may not be that which best meets the goals or needs of the proposed project.

Based on the analysis above, the No Project Alternative would be the environmentally superior alternative as it would either avoid or lessen the severity of all significant impacts of the proposed project. When the “no project” alternative is determined to be environmentally superior, CEQA *Guidelines* also requires identification of the environmentally superior alternative among the development options. Thus, the other alternative evaluated in this EIR, the Reduced Project Alternative, is determined to be the environmentally superior alternative. Table 53 compares the impact classification across each alternative considered.

Table 53 Impact Comparison of Alternatives

Issue	Proposed Project	Alternative 1: No Project	Alternative 2: Reduced Project
Aesthetics	=	+	+
Agriculture and Forestry	=	=	=
Air Quality	=	+	+
Biological Resources	=	+	+
Climate Change	=	+	+
Cultural and Paleontological Resources	=	+	=
Geology and Soils	=	+	+
Hazards/Hazardous Materials	=	+	=
Hydrology and Water Quality	=	+	=
Land Use Planning	=	+	=
Mineral Resources	=	=	=
Noise	=	+	+
Population and Housing	=	=	=
Public Services	=	+	=
Recreation	=	=	=
Transportation and Circulation	=	+	+
Utilities and Service Systems	=	+	+
Overall	=	+	+

+ Superior to the proposed project (reduced level of impact)

- Inferior to the proposed project (increased level of impact)

= Similar or same level of impact to the proposed project

The Reduced Project Alternative is determined to be the environmentally superior alternative because it would have reduced impacts to eight issue areas compared to the proposed project, as shown in Table 53. Additionally, the Reduced Project Alternative would not have any impacts that are more severe or greater than the proposed project. Impacts would be reduced primarily due to the reduction in buildout and development of the project site compared to the proposed project. However, although this alternative would reduce daily vehicles trips by approximately 26 percent compared to the proposed project, the significant and unavoidable impacts to greenhouse gases, noise, and transportation and circulation related to increased vehicle trips would not be avoided.

This Reduced Project Alternative would also meet all of the project objectives, as listed in Section 2.0, Project Description. For example, this alternative would develop a new retail center anchored by a specialty grocery store with complementary commercial uses, would locate a specialty market closer to the Carmel area and Big Sur Coast, and would be consistent with the County's General Plan. One objective of the project is to create new employment opportunities and expand the County's tax revenue. The Reduced Project Alternative would accomplish this objective as well, but would create fewer employment opportunities and tax revenue compared to the proposed project.