

7 ALTERNATIVES TO THE PROJECT

The State CEQA Guidelines (Section 15126.6[a]) require an evaluation of “a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic project objectives but would avoid or substantially lessen any of the significant effects, and evaluate the comparative merits of the alternatives.” The purpose of the alternatives analysis is to determine whether a variation of the project would reduce or eliminate significant project impacts, within the basic framework of the objectives.

Thus, alternatives considered in an EIR should be feasible and should attain most of the basic project objectives. As described in Section 3.2, “Project Objectives,” in Chapter 3 of this EIR, the primary and fundamental objective of the California Health Care Facility project is to comply with the United States District Court order to provide, in an expeditious manner, constitutionally adequate medical and mental health care for California prison inmates. This objective will be met by the construction of medical and mental health facilities at key locations throughout California, including the project site.

As part of that overall goal, the proposed project is intended to achieve the following objectives:

- ▶ Locate the medical and mental health facility in a geographic area which effectively serves State prisons.
- ▶ Locate the medical and mental health care facility in proximity to a metropolitan area where there is access to a large employment base to serve the facility, including areas with potential training facilities.
- ▶ Locate the medical and mental health care facility on state-owned property with priority given to existing CDCR facilities.
- ▶ Size the facility to provide between 1,300 and 1,800 beds to achieve the most efficient and optimal patient care while ensuring a secure facility.
- ▶ Design the facility in a manner that is conducive to optimal care, including patient access to the diagnostic and treatment center, patient support areas, and outdoor areas.
- ▶ Provide a high level of security to protect the safety of the patients, correctional and medical staff and the surrounding community.

7.1 RANGE OF ALTERNATIVES CONSIDERED

The range of alternatives studied in the EIR is governed by the “rule of reason,” requiring evaluation of only those alternatives “necessary to permit a reasoned choice” (State CEQA Guidelines, Section 15126.6[f]). Further, an EIR “need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative” (State CEQA Guidelines, Section 15126.6[f][3]). The analysis should focus on alternatives that are feasible (i.e., that may be accomplished in a successful manner within a reasonable period of time) and that take economic, environmental, social, and technological factors into account. Alternatives that are remote or speculative need not be discussed. Furthermore, the alternatives analyzed for a project should focus on reducing or avoiding significant environmental impacts associated with the project as proposed.

The range of alternatives available for consideration in this EIR is narrow because of the unique nature of the project: All alternatives must provide health care for a large number of inmates. Further, the urgency of providing health care to stem the existing crisis has directed the project toward existing state land being used for correctional facilities; it would be more efficient, less disruptive, and more cost effective and, all other things being equal, it would result in less environmental impact to locate a facility of this type on a site already developed with correctional uses than on an undeveloped site. The built-in environmental benefit to siting a facility on land already dedicated to this use is obvious when such a site is compared to undeveloped sites where comparatively

large amounts of habitat and agricultural land would need to be converted for the facilities and their associated infrastructure. However, only a limited amount of state-owned, correctional-related property suitable for the project is available. Although CDCR operates prisons throughout California, few are located near urban areas with sufficient access to an employment pool and the services needed to operate a large medical facility. CPR requires several facilities and has explored all CDCR sites in California. All sites that meet project objectives and that have sufficient land are being explored for the seven facilities that CPR has determined are needed to provide a constitutional level of health care to inmates. There is already a deficiency of sites. In addition, because of the high demand for inmate beds, in 2007 CDCR was directed the California Legislature and Governor Arnold Schwarzenegger (under Assembly Bill [AB] 900 [Chapter 7, Statutes of 2007]) to build facilities for up to 16,000 beds, also on land already dedicated to correctional facilities. Consequently, no known alternative sites are available that would attain the basic project objectives. Examples of this process of eliminating alternatives are described below in Section 7.3, “Alternatives Considered but not Analyzed in Detail.”

The State CEQA Guidelines (Section 15126.6[e]) require that, among other alternatives, a “no-project” alternative be evaluated in comparison to the project and that it “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 the available infrastructure and community services.” Accordingly, a no-project alternative is analyzed in this DEIR.

7.2 SUMMARY OF ENVIRONMENTAL IMPACTS

The purpose of this section is to summarize the site-specific environmental impacts of the proposed project as identified and discussed in Chapter 4, “Environmental Setting, Thresholds of Significance, Environmental Impacts, and Mitigation Measures,” of this DEIR. Site-specific environmental constraints could result in significant environmental impacts, including visual impacts (light and glare); construction-related air quality and noise impacts; operational impacts related to traffic and circulation, air quality, noise, and biological resources; and other impacts, including contribution of greenhouse gases to global climate change. These impacts and their effects on the range of alternatives considered in this DEIR are discussed below. Impacts found to be less than significant without mitigation and sections that included only such impacts are not discussed below.

As discussed in Section 4.2, “Agricultural Resources,” the proposed project would develop the 70-acre cultivated field east of the closed Karl Holton Youth Correctional Facility. The site is considered significant farmland. The proposed project would result in a significant impact associated with the conversion of the significant farmland to nonagricultural, institutional land uses. Section 4.7, “Biological Resources,” of this EIR includes mitigation for raptor foraging habitat that requires conservation of such habitat, which would likely include farmland. Although this would offset some of the impact by preventing development of other farmland, the impact would remain significant and unavoidable. The project’s conversion of farmland would also contribute to cumulative impacts associated with conversion of farmland in the region by other approved projects; therefore, the project’s impact on agricultural resources would be cumulatively considerable.

As discussed in Section 4.3, “Traffic and Circulation,” the short-term construction-related trip generation would substantially increase traffic on the local roadway system resulting in significant impacts. Mitigation measures identified in Section 4.3 would reduce these impacts to a less-than-significant level. During project operation, under existing conditions, the proposed project would not exceed the City of Stockton’s (City’s) threshold (Level of Service [LOS] D or better) at any intersections or roadways in the project study area under existing conditions. With the development of other approved projects assumed, the proposed project would exceed the threshold at several local intersections; however, implementing mitigation measures identified in Section 4.3 would reduce these impacts to a less-than-significant level (however, if the City is not able to construct improvements in a timely manner, the impact would remain significant and unavoidable). Under cumulative conditions, which include substantial development in the region, the proposed project would substantially contribute to impacts at study intersections, local roadway segments, and on the freeway mainline; mitigation measures are available to reduce impacts at some, but not all affected areas, and the proposed project would result in a significant and

unavoidable impact. Because this cumulative impact would occur in conjunction with buildout of the *City of Stockton General Plan 2035* (City General Plan) (over the next 25+ years), the impact would also be cumulatively considerable.

As discussed in Section 4.4, “Air Quality,” the proposed project could generate construction-related and operational emissions of particulates and ozone precursors that would exceed the San Joaquin Valley Air Pollution Control District’s (SJVAPCD’s) significance thresholds. Mitigation measures in Section 4.4 would reduce the emissions of both of these criteria pollutants. Although the mitigation measures would reduce particulate emissions to a less-than-significant level, the impact of construction-related emissions of ozone precursors would remain significant and unavoidable. Operation of the proposed project would generate emissions of oxides of nitrogen (NO_x) that exceed SJVAPCD’s applicable threshold of 10 tons per year, and the proposed project would result in a significant impact. Mitigation measures in Section 4.4 require CPR to comply with SJVAPCD’s Rule 9510, “Indirect Source Review,” which would reduce NO_x emissions to a less-than-significant level through a combination of project-specific measures and payment of fees to implement regional programs. Regarding greenhouse gas (GHG) emissions, the proposed project would comply with Rule 9510 and would implement mitigation measures to reduce operational GHG emissions. However, based on the amount of GHGs that would be emitted, GHG emissions from the proposed project would be cumulatively considerable.

As discussed in Section 4.5, “Noise,” the proposed project could generate construction-related noise exceeding local noise standards at the few nearby residences. Mitigation is available to reduce construction-related noise impacts, but the impact would remain significant and unavoidable. In addition, although stationary sources associated with project operation would not generate substantial adverse noise effects, the project-related increase in traffic would result in substantial traffic noise at the few residences along Arch Road and Austin Road. This impact is likely significant and unavoidable because of the difficulty in retrofitting existing residences with features that would sufficiently reduce noise (e.g., masonry walls may be infeasible because they may cause unsafe traffic conditions by limiting sight distance).

As discussed in Section 4.6, “Hydrology and Water Quality,” the proposed project would result in ground disturbances associated with typical development activities. Existing vegetation would be removed, thereby increasing the potential for erosion. The project site is relatively flat with sparse vegetation, limiting the potential for additional erosion to occur as a result of construction activities. Under mitigation included in Section 4.6, CPR would prepare and implement a storm water pollution prevention plan designed to reduce potential impacts on surface-water quality through the construction and life of the project. The plan would include specific and detailed best management practices that would minimize the effects of construction-related pollutants and reduce significant water quality impacts to a less-than-significant level.

As discussed in Section 4.7, “Biological Resources,” project construction, including expansion of the existing detention/retention basin, could result in the take of several special-status species—pallid bat, Swainson’s hawk, burrowing owl (and other raptors), tricolored blackbird, giant garter snake, and western pond turtle—and the conversion of potential foraging habitat for Swainson’s hawk and burrowing owl. In addition, the operation of the proposed electrified fence could result in the death of an undetermined number of animals (mostly birds). CPR has proposed specific mitigation measures to reduce the potential take of these species. Mitigation is also included that would result in off-site conservation of foraging habitat. With implementation of recommended mitigation, this individual project impact would be reduced to a less-than-significant level.

As discussed in Section 4.8, “Cultural Resources,” the records searches for the project site and vicinity did not identify any recorded cultural or historical resources; consequently, the proposed project would not disturb any known cultural or historical resource. However, the proposed project could potentially disturb resources that have not yet been discovered. In addition, undiscovered human remains could be uncovered. The impact associated with disturbing undiscovered cultural resources and human remains would be significant. Mitigation measures

identified in Section 4.8, which require monitoring and appropriate action when such a resource is discovered, would reduce the impacts to a less-than-significant level.

As discussed in Section 4.9, “Geology and Paleontology,” the project site’s soils have a high clay content and are subject to development limitations associated with high shrink-swell potential, low permeability, and low bearing strength. Mitigation measures identified in Section 4.9 require that a soils report be prepared for engineering recommendations for individual building areas. Project construction could also result in soil erosion. Mitigation measures identified in Section 4.6, “Hydrology and Water Quality,” require preparation of a storm water pollution prevention plan, which would reduce erosion-related impacts. Finally, vertebrate fossils have been recovered near the project site and other recorded vertebrate fossil localities have been recorded throughout the San Joaquin Valley; therefore, additional similar fossil remains could be uncovered during construction-related earthmoving activities at the project site, which would be a significant impact. Mitigation measures identified in Section 4.9 include training construction workers to identify paleontological resources and taking appropriate action should such a resource be discovered. This mitigation measure would reduce the impact to a less-than-significant level.

As discussed in Section 4.10, “Hazards and Hazardous Materials,” soil contamination, likely associated with the former auto shop at the Karl Holton Youth Correctional Facility and with pesticide use, has been identified on the project site. Additionally, the existing structures proposed for demolition contain lead-based paint and asbestos-containing materials. Construction workers could be exposed to these contaminants and hazardous materials. Mitigation measures included in Section 4.10 require CPR to remediate the contaminated soils, analyze building materials before and during demolition, and comply with performance standards to minimize exposure when these materials are identified. Implementation of mitigation measures would reduce the impact to a less-than-significant level.

As discussed in Section 4.15, “Visual Resources,” the proposed project would add institutional development in an area currently dominated by institutional development and agriculture. Although the proposed project would result in less-than-significant impacts related to degradation of visual character, the project would result in substantial adverse effects related to nighttime light and glare. Mitigation measures are included in Section 4.15 to reduce this impact by requiring light shielding and diverting; however, substantial new lighting would be experienced at the few nearby residences, so the impact would remain significant and unavoidable.

The potential for the alternatives to avoid or reduce the project’s significant impacts was considered in the analysis of alternatives.

7.3 ALTERNATIVES CONSIDERED BUT NOT ANALYZED IN DETAIL

Section 15126.6(c) of the State CEQA Guidelines provides that an EIR “should also identify any alternatives that were considered by the lead agency but rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination.” Three alternatives, the “Off-Site Location Alternative,” the “Juvenile Corrections Facility Alternative,” and the “Karl Holton Rehabilitation Alternative” were dismissed from further analysis because they were determined to be infeasible.

7.3.1 OFF-SITE LOCATION ALTERNATIVE

Under the Off-Site Location Alternative, the Karl Holton Youth Correctional Facility at the NCYCC would remain unoccupied and the medical and mental health facilities would be located at an off-site prison site or other state-owned location. The facilities under this alternative were assumed to be the same size as those under the proposed project, which involves the construction of subacute medical and mental health facilities (1,734 beds and up to 3,000 staff members), support facilities, and associated infrastructure. The only difference assumed is the proposed location.

CPR has identified the need to construct new health care facilities with a total of approximately 5,000 beds for medical patients and 5,000 mental health patients in facilities throughout California, which would require approximately seven correctional health care facilities. This has resulted in a tremendous effort to identify available property appropriate to accommodate these medical and mental health care facilities.

CPR's site selection process for the new medical and mental health care facilities emphasized cost efficiency through two central criteria: (1) Sites had to be close to a sizable job base to ensure that qualified medical staff members and correctional officers could be recruited; and (2) sites had to be located near existing CDCR facilities on state-owned property to avoid the need to purchase land. These criteria, among several other development constraints—property size, access, utilities service and infrastructure, site constructability, and land use compatibility—substantially reduced the number of available sites. In fact, all sites that have been deemed feasible for construction of medical and mental health facilities and are owned by the state are currently identified for proposed future facilities. Therefore, an Off-Site Location Alternative is considered infeasible because all CDCR sites deemed appropriate to accommodate medical and mental health facilities are currently being pursued for such facilities.

7.3.2 JUVENILE CORRECTIONS FACILITY ALTERNATIVE

Under the Juvenile Corrections Facility Alternative, the project site would be developed with a use similar to the former Karl Holton Youth Correctional Facility, which currently occupies a portion of the project site. However, CPR, as lead agency, does not have any purview over the development of a correctional youth facility. In addition, the development of a correctional youth facility on the project site would not meet any of the project objectives, particularly the primary objectives associated with providing health care to inmates. Therefore, this alternative has been dismissed and will not be analyzed further in this DEIR.

7.3.3 KARL HOLTON REHABILITATION ALTERNATIVE

Under the Karl Holton Rehabilitation Alternative, the existing Karl Holton Youth Correctional Facilities would not be demolished and would rather be rehabilitated and retrofitted to provide sub-acute medical and mental health care services to inmates (similar to the proposed project). If all existing structures could be fully utilized, the proposed alternative would include 166,838 square feet (the same as the existing structures). Therefore, the Alternative would accommodate less than 14% of the proposed project's floor area (1.2 million square feet). Assuming a similar ratio of beds to the proposed project, the alternative would provide only 242 beds, which does not meet the project's objective for size (1,300 to 1,800 beds) and would not be large enough to feasibly serve the region. Therefore, this alternative has been dismissed and will not be analyzed further in this DEIR.

7.4 ALTERNATIVES CONSIDERED FOR DETAILED EVALUATION

The analysis presented below evaluates three alternatives to the project: the No Project (No Development) Alternative, a Reduced Footprint Alternative, and a Reduced Intensity Alternative. These alternatives were selected based on their ability to reduce or avoid the project's significant and significant and unavoidable impacts based on the constraints identified in Section 7.2, "Summary of Environmental Impacts." As discussed above under Section 7.1, "Range of Reasonable Alternatives," although the number of alternatives considered is relatively limited, the range of alternatives is reasonable given the nature of the project. Because the project's basic objectives involve developing correctional medical facilities, it would be infeasible to evaluate alternatives that are inconsistent with this objective, and the alternatives considered below are designed to reduce the impacts of the proposed project and provide a reasonable range for decision making.

7.4.1 No Project (No Development) Alternative

Under this alternative no actions would be taken at the project site. No development of the project site, including construction of medical or mental health facilities or associated structures or facilities, would occur. Although it is possible that an alternative correctional use would occur in the future given the high demand for correctional facilities throughout California, there are no proposals for doing so at the site, and it would be speculative to assume such an alternative.

Under this alternative, the mandate of the U.S. District Court to improve health care in the state prison system to meet Constitutional standards would not be met at the project site. CPR would be required to meet the need for the beds it would have provided at the NCYCC at another prison site or other state-owned site. Therefore, although this alternative may result in less environmental impact than the proposed project or other alternatives, because CPR has determined that developing correctional medical facilities is necessary to comply with the federal court mandate, this alternative would relocate the proposed beds and staff members to a different location, which would likely result in other unknown environmental impacts. Further, as described above, alternative sites that attain most of the project objectives are likely not available.

Consistent with CEQA requirements, this No Project (No Development) Alternative is evaluated in this DEIR. The No Project (No Development) Alternative would not meet the project's basic objective to comply with U.S. District Court orders to provide constitutionally adequate medical and mental health care facilities for inmates in California's prison system.

ENVIRONMENTAL ANALYSIS

Land Use and Planning

Under this alternative, a new correctional medical facility would not be developed and the project site would remain as it currently exists. No significant land use impacts were identified for the proposed project, so the No Project (No Development) Alternative would not reduce or avoid any significant land use impacts associated with the project, and impacts would be similar. *[Similar]*

Agricultural Resources

The No Project (No Development) Alternative would not convert any agricultural land to nonagricultural use. Therefore, the land (70 acres) on the east portion of the project site, which is considered for purposes of CEQA analysis as Important Farmland, would remain vacant and, presumably, cultivated. The proposed project would result in a significant impact from the conversion of this farmland into an institutional use; the No Project (No Development) Alternative would avoid this significant and cumulatively considerable impact. *[Less; eliminates significant impact]*

Traffic and Circulation

The No Project (No Development) Alternative would not develop any new facilities and would not result in any construction-related transportation impacts. This alternative would not generate any vehicle trips and as a result would not generate any new traffic. By comparison, project-related traffic would add traffic to existing roadways, degrading the LOS at several intersection locations and roadway segments to below the acceptable LOS D. Although mitigation measures would reduce these impacts in the near term, the impacts of the proposed project on intersections and roadway segments would remain significant and unavoidable under cumulative 2035 conditions and during construction. In addition, the proposed project would contribute to cumulatively considerable impacts on State Route 99 under 2035 conditions. Therefore, the No Project Alternative would avoid significant and cumulatively considerable impacts on intersection and roadway operations. Levels of service at these intersections and on the freeway would still be substantially degraded by the substantial cumulative

development planned in the city of Stockton, but the No Project (No Development) Alternative would not contribute an incremental impact to this effect. [*Less; eliminates significant impact*]

Air Quality and Climate

This alternative would not include any new development, and thus would not generate new construction-related or operational emissions of criteria air pollutants. Although the proposed project would result in less-than-significant operational impacts on air quality with implementation of mitigation measures, it would also result in significant and unavoidable construction-related emissions of ozone precursors. Therefore, the No Project (No Development) Alternative would eliminate development of the project, would result in less impact than the proposed project, and would avoid a significant impact. In addition, because the No Project (No Development) Alternative would not result in increased GHG emissions, this alternative would avoid a cumulatively considerable significant impact associated with the proposed project. [*Less; eliminates two significant impacts*]

Noise

This alternative would not involve the construction or operation of facilities and would therefore not generate any construction-related noise and would not increase traffic noise on local roadways. The proposed project, on the other hand, would result in a significant and unavoidable impact on the three residences along Austin Road associated with construction noise. In addition, increased traffic resulting from the proposed project would increase noise levels along Arch Road (which also has a few residences) and Austin Road and would exceed local noise thresholds. Therefore, the No Project (No Development) Alternative would avoid significant noise impacts. [*Less; eliminates significant impact*]

Hydrology and Water Quality

Under the No Project (No Development) Alternative no new construction would occur; therefore, this alternative would not result in construction-related releases of sediment and contaminants to nearby waterways. By comparison, the proposed project would include construction activities that could disturb on-site soils and result in the discharge of sediment, degrading water quality. However, mitigation recommended in the DEIR would reduce the impact of the proposed project to a less-than-significant level. Although project impacts would be less than significant, this alternative would not result in any discharge of sediment or contaminants; therefore, the water quality impacts of the No Project (No Development) Alternative would be less than those associated with the proposed project. [*Less, but no substantial reduction*]

Biological Resources

This No Project (No Development) Alternative would not include any development of the project site. Further, this alternative would not result in the construction of an electrified fence, which could result in adverse impacts on migratory birds. In addition to impacts related to the electrified fence, the proposed project would result in the potential for take of special-status species during construction, including the expansion of the existing detention/retention basin south of the project site. Furthermore, developing the project site would result in conversion of foraging habitat for raptors, including Swainson's hawk and potentially burrowing owl. However, these impacts would all be reduced to a less-than-significant level after implementation of recommended mitigation. [*Less, but no substantial reduction*]

Cultural Resources

This No Project (No Development) Alternative would not include any development of the project site and thus would not disturb any potentially undiscovered cultural resources on the site. By comparison, the proposed project would result in potentially significant impacts on undiscovered cultural resources as a result of construction activities. However, these impacts would be reduced to a less-than-significant level after implementation of recommended mitigation. Nonetheless, because the No Project (No Development) Alternative would avoid

potential impacts on undiscovered cultural resources, overall impacts would be less than those of the proposed project. *[Less, but no substantial reduction]*

Geology and Paleontology

The No Project (No Development) Alternative includes no construction activities and no development of structures. By contrast, the proposed project would result in significant impacts associated with construction-related soil erosion, development of structures on expansive soils, and the potential to uncover a paleontological resource. Although these impacts would be reduced to a less-than-significant level with implementation of mitigation measures, the No Project (No Development) Alternative would result in no impacts, and the level of impact would be somewhat less under this alternative than under the proposed project. *[Less, but no substantial reduction]*

Hazards and Hazardous Materials

The No Project (No Development) Alternative would not include any construction activities; consequently, none of the structures on the site would be demolished, nor would existing contaminated soil on the site be disturbed. The proposed project includes demolition of existing structures that contain hazardous materials such as lead-based paint and asbestos-containing materials, and could therefore expose construction workers to these materials. Contaminated soils on the site would also be remediated, which could expose workers to toxic substances. Although the proposed project includes mitigation measures to reduce this risk, the No Project (No Development) Alternative would not subject construction workers to the risks and would therefore slightly reduce the impact. However, the proposed project would result in the removal of soil contamination, an existing environmental impact, while the No Project (No Development) Alternative would allow the contaminated soils to remain on the site, which could eventually result in other environmental impacts, such as effects on groundwater. Because the No Project (No Development) Alternative would allow an existing environmental impact on the site to remain, this alternative would have a greater impact than the proposed project, which would remove the soil contamination. *[Greater]*

Population and Housing

No new staff members would be added to the project site under the No Project (No Development) Alternative. As a result, this alternative would not have any adverse effects on local and regional employment, population, or housing opportunities. By comparison, the proposed project would provide a substantial number of employment opportunities to the region (although a large number are expected to come from the local employment pool). Project-related population growth and associated demands for housing and employment opportunities would be mostly absorbed in growth already planned in the region and would not substantially increase demand for housing in any one area. Although the proposed project would not result in significant employment, population, and housing impacts, the No Project (No Development) Alternative would result in no impacts; therefore, impacts associated with population, employment, and housing would be somewhat less under this alternative. *[Less, but no substantial reduction]*

Public Services

Because no new facilities would be constructed under the No Project (No Development) Alternative, this alternative would not generate additional demand for public services; the proposed project, by comparison, would increase demand for services both at the site and throughout the region (because of the in-migration of a portion of the maximum number of 3,000 new employees). The impact of this increased demand would be less than significant due to the fact that new housing that has been developed in, and is currently being planned for, the region would accommodate the new staff, and these housing projects are required to pay impact fees and/or taxes that fund public services, including schools and fire and police protection. However, because the No Project (No Development) Alternative would not increase demand for public services (and consequently would result in no

impact), the overall impacts on public services would be somewhat less under the No Project (No Development) Alternative. *[Less, but no substantial reduction]*

Water Supply

The No Project (No Development) Alternative would not increase water demand at the project site. The increased demand associated with the proposed project is not expected to exceed available water supply. However, because the No Project (No Development) Alternative would not result in any increased demand, the impact of this alternative related to water supply would be somewhat less than the impact of the proposed project. *[Less, but no substantial reduction]*

Public Utilities

Because no new facilities would be constructed under the No Project (No Development) Alternative, no new utility connections, pipelines, or other facilities would be required. Therefore, this alternative would not require expansion of the existing detention facility. The proposed project would increase existing demand for wastewater treatment, storm drainage, electricity, and gas because of the development of approximately 1.2 million square feet of building area housing 1,734 beds and staffed by 2,400—3,000 employees. The resulting impact would not be significant, but because the No Project (No Development) Alternative would not increase the demand for utilities, and consequently would result in no impact, impacts on utilities would be less under this alternative than under the proposed project. *[Less, but no substantial reduction]*

Visual Resources

Under this alternative, the Karl Holton Youth Correctional Facility would remain vacant and no additional development would occur on the project site. No additional lighting would be required. By comparison, the proposed development of a correctional health care facility would add lighting to the area (although high-mast lighting is not proposed), which would result in a significant impact on nearby residences. Therefore, the No Project (No Development) Alternative would avoid a significant impact of the proposed project. However, because the existing vacant structures on the site would remain unoccupied and unmaintained, the eventual deterioration of these buildings could degrade the area's visual character. Although the No Project (No Development) Alternative would eliminate the light and glare impact resulting from the proposed project, other impacts related to degradation of visual character could occur. *[Less, eliminates significant impact]*

Conclusion

The No Project (No Development) Alternative would be environmentally superior to the proposed project with respect to agricultural resources; traffic and circulation; air quality; noise; hydrology and water quality; biological resources; cultural resources; geology and paleontology; population and housing; public services; water supply; public utilities; and visual resources. It would eliminate significant and unavoidable impacts associated with conversion of farmland, cumulative impacts on intersections and freeway mainline, construction-related traffic, construction-related emission of ozone precursors, construction-related and operational noise increases, and nighttime glare. It would be similar to the proposed project with respect to land use. This alternative would also result in greater impacts related to hazardous materials. Overall, this alternative would be environmentally superior to the proposed project. However, the No Project (No Development) Alternative would not attain any of the objectives of the project.

7.4.2 REDUCED FOOTPRINT ALTERNATIVE

The Reduced Footprint Alternative is intended to reduce certain significant and significant and unavoidable impacts of the proposed project. Significant project impacts would generally be visual impacts; construction-related traffic, air quality, and noise impacts; and operational traffic, air quality, and noise impacts. The Reduced Footprint Alternative would make the project more compact but would not change its capacity; the number of

beds and staff members and the floor area would be the same as under the proposed project (a Reduced Intensity Alternative that includes fewer beds and staff members is analyzed below). Under this alternative, the project footprint would be reduced by increasing building heights and the number of floors to accommodate the floor area requirements.

Under the Reduced Footprint Alternative, the entire medical health care facility would be located within the boundaries of the former Karl Holton Youth Correctional Facility. The vacant property east of the former youth facility, which comprises nearly half the site under the proposed project, would remain undeveloped. CPR would likely reduce the number of separate structures indicated on the proposed site plan by combining various programs and facilities, and building heights would increase from one to three story structures to as tall as eight stories (considering space needed to provide parking and recreation). Under the Reduced Footprint Alternative, access would likely be shared with the NCYCC facility (from Newcastle Road), as currently provided to the former Karl Holton Youth Correctional Facility.

This alternative would attain all project objectives; however exceeding three stories may be infeasible for a variety of reasons, including the following:

- ▶ One of the project objectives is to design facilities to optimize access to outdoor areas. This alternative would place the large majority of patients above the ground floor level and would therefore substantially limit easy access to outdoor areas.
- ▶ Vertical construction is considered less efficient from a programmatic perspective. For example, the diagnostic and treatment center and admissions and discharge area have certain design requirements related to program, security, and transportation needs. These might not be realized if the facilities are stacked higher than 3 stories.
- ▶ Structures exceeding three stories would have limited space on lower levels, which would greatly increase difficulty to house, treat, and transport patients of certain acuity levels.
- ▶ Construction costs grow exponentially as building height increases, due to changes in foundation design, seismic requirements, steel costs, and increased security measures.

ENVIRONMENTAL ANALYSIS

Land Use and Planning

Under this alternative, development of a new correctional medical facility would occur only on the portion of the project site currently occupied by the former Karl Holton Youth Correctional Facility. Like the proposed project, the Reduced Footprint Alternative would be consistent with the land use designations identified for the project site in both the City General Plan and the *San Joaquin County General Plan 2010* (County General Plan). No significant land use impacts were identified for the proposed project, so this alternative would not reduce or avoid any significant land use impacts associated with the project, and impacts would be similar. *[Similar]*

Agricultural Resources

The Reduced Footprint Alternative would develop only the portion of the project site currently occupied by the former Karl Holton Youth Correctional Facility. The land east of the Karl Holton facility, designated as Farmland of Local Importance, would remain undeveloped and, presumably, cultivated. The proposed project, by contrast would result in a significant impact from converting this farmland to an institutional use. Therefore, the Reduced Footprint Alternative would avoid a significant and cumulatively considerable impact on agricultural resources. *[Less; eliminates significant impact]*

Traffic and Circulation

Although the Reduced Footprint Alternative would reduce the size of the development area, the number of staff members and beds and the floor area of the necessary facilities would remain the same as under the proposed project. Although this alternative may require less grading and site preparation, the building phase of the project would likely increase because of the greater complexity of constructing multistory buildings. Therefore, short-term, construction-related traffic impacts would be similar. In addition, this alternative would require the same number of beds and staff members as the proposed project, the operational traffic impacts would be identical. Therefore, the Reduced Footprint Alternative would not reduce the significant and cumulatively considerable impacts of the proposed project on intersection operation. *[Similar]*

Air Quality and Climate

Although the footprint would be substantially smaller under the Reduced Footprint Alternative than under the proposed project, this alternative would include the same approximate building area (1.2 million square feet), the same number of beds (1,734), and the same number of employees (up to 3,000). The proposed project would result in less-than-significant operational air quality impacts with implementation of mitigation measures; however, it would also result in significant and unavoidable construction-related emissions of ozone precursors. Construction under the Reduced Footprint Alternative would disturb only about half as much ground area as construction under the proposed project. However, because the proposed project would exceed the threshold of significance substantially, the Reduced Footprint Alternative would not likely reduce emissions of ozone precursors below the threshold even with implementation of mitigation measures, and the impact would remain significant and unavoidable. In addition, because trip generation and energy consumption levels under this alternative would be similar to levels under the proposed project, this alternative would not result in a reduction of GHG emissions, and the impact related to global climate change would remain cumulatively considerable. *[Similar]*

Noise

Under the Reduced Footprint Alternative, development of a new correctional medical facility would occur only on the portion of the project site currently occupied by the former Karl Holton Youth Correctional Facility. Therefore, although operation of this alternative would be similar to operation of the proposed project, construction activities would occur farther from the sensitive receptors located east of the site on Austin Road. The proposed project would result in significant and unavoidable impact associated with construction noise. In addition, in the near term, increased traffic resulting from the proposed project would increase noise levels on local roadways enough that the noise levels at nearby sensitive receptors on Arch Road and Austin Road would exceed local noise thresholds. In addition, the proposed project would contribute to cumulatively considerable increases in noise levels on local roadways. Therefore, although the Reduced Footprint Alternative may avoid the construction-related impact, this alternative would not avoid the significant and cumulatively considerable impact associated with exposing sensitive receptors to increased roadway noise. *[Less; potentially eliminates one significant impact]*

Hydrology and Water Quality

The Reduced Footprint Alternative would develop only the portion of the project site currently occupied by the former Karl Holton Youth Correctional Facility. Both this alternative and the proposed project would result in construction activities that could disturb on-site soils and result in the discharge of sediment, degrading water quality. This alternative's reduced project site could result in a smaller disturbance area during construction and somewhat less stormwater runoff during operation (because impervious surface areas would be reduced). However, because mitigation measures are included in this DEIR that would reduce the impacts of the proposed project to a less-than-significant level, the impacts on water quality and hydrology associated with the proposed project and the Reduced Footprint Alternative would be similar. *[Similar]*

Biological Resources

Under this alternative, development of a new correctional medical facility would occur only on the portion of the project site currently occupied by the former Karl Holton Youth Correctional Facility. Because the Reduced Footprint Alternative would not develop the agricultural land east of the site, it would convert substantially fewer acres of Swainson's hawk foraging habitat into urban uses. The impacts of this alternative would be mostly similar to those of the proposed project for several reasons: Construction activities and duration under the proposed project and the Reduced Footprint Alternative would be similar; both would include an electrified fence, although the fence would not be as long under this alternative as under the proposed project; and both would require the detention facility to be expanded, although the expansion may be reduced under this alternative because the smaller site would generate less stormwater. However, because less Swainson's hawk foraging habitat would be converted under the Reduced Footprint Alternative than under the proposed project, this alternative would substantially reduce (even possibly avoid) this project impact. CPR would reduce the project's impact of converting Swainson's hawk foraging habitat to a less-than-significant level by purchasing land or participating in the *San Joaquin County Multi-Species Habitat Conservation and Open Space Plan*. Substantial reduction or avoidance of this impact under the Reduced Footprint Alternative would be environmentally superior to the mitigated impact, however, because habitat would be maintained on-site rather than mitigated off-site. Therefore, the impact of this alternative on biological resources would be somewhat less than that of the proposed project. *[Less, but no substantial reduction]*

Cultural Resources

The Reduced Footprint Alternative would develop only the portion of the project site currently occupied by the former Karl Holton Youth Correctional Facility. The proposed project would not adversely affect any known cultural resource. Although the footprint of the Reduced Footprint Alternative would be smaller than that of the proposed project, the potential for disturbance of unknown cultural resources would be generally similar, and implementation of mitigation measures would reduce impacts to a less-than-significant level. Therefore, the impacts of the Reduced Footprint Alternative and the proposed project on cultural resources would be similar. *[Similar]*

Geology and Paleontology

The Reduced Footprint Alternative would develop the correctional medical facilities on nearly one-half the site of the proposed project. The proposed project would result in significant impacts associated with construction-related soil erosion, development of structures on expansive soils, and the potential to uncover a paleontological resource. These impacts would be reduced to a less-than-significant level with implementation of mitigation measures. Although the Reduced Footprint Alternative would require less ground disturbance, the impacts would remain generally similar and would require the same mitigation. *[Similar]*

Hazards and Hazardous Materials

Like the proposed project, the Reduced Footprint Alternative would require demolition of the Karl Holton Youth Correctional Facility and remediation of on-site soil contamination. Project-related impacts associated with hazards and hazardous materials would be reduced to a less-than-significant level with implementation of mitigation measures. However, the increase in building height, if above 90 feet, could place the structures above the height limits requiring consideration related to flight paths associated with the Stockton Metropolitan Airport. This would require further review of the project for safety concerns by the Federal Aviation Association (FAA). Therefore, the Reduced Footprint Alternative could result in greater impacts than the proposed project. *[Greater]*

Population and Housing

Although the footprint would be substantially smaller under the Reduced Footprint Alternative than under the proposed project, this alternative would include the same approximate building area (1.2 million square feet), the same number of beds (1,734), and the same number of employees (up to 3,000). The proposed project would not result in significant impacts related to population, employment, and housing. The Reduced Footprint Alternative would result in similar impacts associated with a population increase and an increase in the demand for housing. *[Similar]*

Public Services

Although the footprint would be substantially smaller under the Reduced Footprint Alternative than under the proposed project, this alternative would include the same approximate building area (1.2 million square feet), the same number of beds (1,734), and the same number of employees (up to 3,000). The Reduced Footprint Alternative would therefore result in demands on public services similar to those of the proposed project because this alternative would result in nearly identical demand for school, police, fire, and emergency services, including increased demand caused by the substantial number of staff members who could relocate to the area. The increased demand generated by the proposed project would not result in significant impacts related to public services. Therefore, the impacts of the Reduced Footprint Alternative would be similar to those of the proposed project. *[Similar]*

Public Utilities

The Reduced Footprint Alternative would result in utility demands similar to those of the proposed project. This alternative would result in demand for electricity, natural gas, water, and wastewater services for the same number of patients and staff members as under the proposed project. It is anticipated that local utility agencies would be able to serve the new facilities under either this alternative or the proposed project without requiring the expansion or extension of additional services, the construction of which could result in potentially significant impacts. Therefore, the proposed project and this alternative would result in similar impacts related to public utilities. *[Similar]*

Water Supply

Because the Reduced Footprint Alternative would include the same approximate building area (1.2 million square feet), the same number of beds (1,734), and the same number of employees (up to 3,000) as the proposed project, this alternative would result in water demands similar to those of the project. The increased demand generated by the proposed project would not result in significant impacts related to inability to supply water to the project. The Reduced Footprint Alternative would result in similar impacts related to water supply. *[Similar]*

Visual Resources

Under the Reduced Footprint Alternative the same number of beds and staff members would be accommodated on approximately half of the existing project site (where the Karl Holton Youth Correctional Facility is located). This alternative would not develop the existing agricultural property on the east side of the site, and would consequently place structures farther away from the existing residences across Austin Road (considered to have moderately high visual sensitivity). However, the decrease in available property would require CPR to develop taller structures (up to eight stories). Therefore, although this alternative would place development farther from the nearby residences and would therefore reduce a significant impact related to nighttime light and glare, the new facility would be much more visible under this alternative than under the proposed project because of the increased height of the structures. The height and mass of the new facility, with its tall structures, would no longer appear consistent with the appearance of surrounding correctional uses or the industrial uses in the area. These structures would be the tallest in the vicinity. Similarly, the lighting required under this alternative, although farther from the nearest residences, could result in light and glare impacts depending on how the structures are lit

(both externally and internally) and glazed. Therefore, although this alternative would avoid the significant project impact related to nighttime glare, it could result in other significant visual impacts. *[Similar]*

Conclusion

The Reduced Footprint Alternative would be environmentally superior to the proposed project with respect to agricultural resources, air quality, noise, and biological resources. This alternative would avoid the significant impacts of the proposed project related to conversion of farmland and possibly also the impact related to construction noise. It would be similar to the proposed project with respect to impacts on land use; traffic and circulation; hydrology and water quality; cultural resources; geology and paleontology; hazards; population, employment, and housing; public services; public utilities; water supply; and visual resources. The Reduced Footprint Alternative would result in greater impacts associated with hazards and hazardous materials.

This alternative would attain most of the objectives of the project; however, the alternative would decrease availability of lower-level floor area which would substantially limit the ability to meet treatment goals; would result in substantial reduction to operational efficiencies; would limit housing for treating and transporting patients at certain acuity levels; and would result in increased construction costs.

7.4.3 REDUCED INTENSITY ALTERNATIVE

The Reduced Intensity Alternative is proposed to eliminate those significant and unavoidable impacts that would be a direct result of the size of the proposed facilities, the number of patients it would serve, and the number of people who would be employed at the project site. This alternative would provide roughly 25% fewer beds at the site than the proposed project, or 1,300 beds. All support structures and facilities would also be reduced because fewer services would be required to serve the reduced patient population. For purposes of this analysis, staffing levels are estimated to be reduced by 25%, resulting in the employment of approximately 2,250 new personnel.

For CPR to provide sufficient beds to meet the objectives of the project, this alternative would likely require CPR to enlarge other facilities. Specific impacts associated with such an expansion are not speculated in this discussion, because environmental analyses for the other sites are still in progress; however, these unknown impacts are generally acknowledged in the consideration of the environmentally superior alternative at the end of this chapter.

This alternative assumes that a construction footprint similar to that of the proposed project. However, if fewer beds were to be needed, it is also possible that the footprint could be commensurately reduced. If that were the case, in addition to the reduction in impacts described below, impacts would be reduced as described in the Reduced Footprint Alternative (less impacts on agricultural resources, air quality, noise, and biological resources).

Land Use and Planning

Under the Reduced Intensity Alternative, a new correctional medical facility would be developed on the project site, but with 25% fewer beds and staff members than under the proposed project. Like the proposed project, this alternative would be consistent with the land use designations identified for the project site in both the City General Plan and the County General Plan. No significant land use impacts were identified for the proposed project, so the Reduced Intensity Alternative would not reduce or avoid any significant land use impacts associated with the proposed project, and impacts would be similar. *[Similar]*

Agricultural Resources

The development footprint of the Reduced Intensity Alternative is identical to the footprint of the proposed project (but see the discussion in the description of this alternative for other considerations of the footprint). Both the proposed project and this alternative would result in the conversion of the farmland located east of the Karl

Holton Youth Correctional Facility. Because this farmland is designated as Farmland of Local Importance, both the proposed project and this alternative would result in significant and cumulatively considerable impacts on agricultural resources. Therefore, the Reduced Intensity Alternative would not avoid or reduce the project impact. *[Similar]*

Traffic and Circulation

The Reduced Intensity Alternative would include 25% fewer beds and staff members than the proposed project. The traffic impact analysis prepared by DKS Associates for the proposed project (DKS Associates 2008) included evaluation of a project alternative with 25% fewer staff members. The study indicated that, unlike the proposed project, the Reduced Intensity Alternative would not result in significant impacts on the intersection of Newcastle Road and Arch Road, although this impact would be mitigated under the proposed project to a less-than-significant level (the intersection improvements to Newcastle and Arch road would be fully funded by CPR). Under 2035 conditions, the Reduced Intensity Alternative would result in very similar impacts to intersections and roadways. Implementation of mitigation measures would reduce the impacts on the project driveway and Austin Road; however, the impact on the intersections of Arch Road and SR 99 Northbound/Southbound Access, Arch Road and Austin Road, as well as the impact on the Arch Road and Austin Road study roadway segments would remain significant and unavoidable under 2035 conditions for both the proposed project and the Reduced Intensity Alternative. Therefore, this alternative would not reduce or avoid the individually significant and cumulatively considerable impact on intersection operation and would result in similar impacts. *[Similar]*

Air Quality and Climate

Although the Reduced Intensity Alternative would be located within the same project footprint as the proposed project, this alternative assumes 25% fewer beds and staff members than the proposed project, thereby providing 1,300 beds and employing 2,250 new personnel (as opposed to 1,734 beds and up to 3,000 employees under the proposed project). The proposed project would result in less-than-significant operational air quality impacts with implementation of mitigation measures; however, the proposed project would also result in significant and unavoidable construction-related emissions of ozone precursors. Therefore, although the Reduced Intensity Alternative would result in a lower level of operational emissions than the proposed project, because the proposed project would result in less-than-significant operational emissions with implementation of mitigation, this alternative would result in operational air quality impacts similar to those of the proposed project. Additionally, because this alternative shares the proposed footprint, the construction-related emissions would also be similar and the alternative would not avoid the proposed project's significant construction-related impacts associated with ozone precursors. Although this alternative would reduce GHG emissions relative to the proposed project, it would still consume a substantial amount of energy and would generate a substantial number of vehicle trips; therefore, the Reduced Intensity Alternative would reduce project impacts associated with global climate change, but would not avoid the cumulatively considerable significant impact. It should also be noted that this alternative would require additional beds and staff members at other sites, which would make up the difference in GHG emissions and, consequently, the cumulative impacts related to global climate change. *[Less, but no substantial reduction]*

Noise

Under the Reduced Intensity Alternative, a new correctional medical facility would be developed on the project site, but with 25% fewer beds and staff members than under the proposed project. Therefore, although construction activities associated with this alternative would be similar to those of the proposed project, traffic would be substantially less with the operation of the alternative than under the proposed project. The proposed project would result in significant and unavoidable impact associated with construction noise. In addition, in the near term, increased traffic from the proposed project would increase noise levels on local roadways enough that the noise levels at the few residences on Arch Road and Austin Road would exceed local noise thresholds. In addition, the proposed project would contribute to cumulatively considerable increases in noise levels on local

roadways. Therefore, although the Reduced Intensity Alternative may somewhat reduce the near-term noise increase on local roadways, this alternative would still contribute to the cumulatively considerable exposure to sensitive receptors to increased roadway noise, and it would not avoid the significant impact of the proposed project associated with short-term construction noise. *[Less; but no substantial reduction]*

Hydrology and Water Quality

The Reduced Intensity Alternative and the proposed project share the same approximate development footprint. Construction activities under both this alternative and the proposed project could disturb on-site soils and result in the discharge of sediment, degrading water quality. Because mitigation measures are included in this DEIR that would reduce these impacts to a less-than-significant level, the impacts on water quality and hydrology associated with the proposed project and the Reduced Intensity Alternative would be similar. *[Similar]*

Biological Resources

The proposed development footprint of the Reduced Intensity Alternative does not differ from that of the proposed project. Both the proposed project and this alternative would result in the conversion of Swainson's hawk foraging habitat located east of the Karl Holton Youth Correctional Facility, as well as construction-related take and disturbance of habitat of special-status species associated with expansion of the detention/retention basin. Furthermore, both the proposed project and the Reduced Intensity Alternative would include an electrified fence, which could result in the take of protected bird species. Implementation of mitigation measures would reduce these impacts to a less-than-significant level; therefore, the impacts would be similar. *[Similar]*

Cultural Resources

The Reduced Intensity Alternative and the proposed project share the same approximate development footprint. Therefore, like the proposed project, this alternative would not result in significant impacts on known cultural resources. In addition, the alternative, like the proposed project, would result in the potential for impacts on undiscovered cultural resources, which would be mitigated to a less-than-significant level. Therefore, the Reduced Intensity Alternative would result in impacts similar to those of the proposed project. *[Similar]*

Geology and Paleontology

The Reduced Intensity Alternative includes the same development area as the proposed project. The proposed project would result in significant impacts from construction-related soil erosion, development of structures on expansive soils, and the potential to uncover a paleontological resource. These impacts would be reduced to a less-than-significant level with implementation of mitigation measures. Impacts associated with the Reduced Intensity Alternative would be similar to impacts of the proposed project and would require the same mitigation. *[Similar]*

Hazards and Hazardous Materials

Like the proposed project, the Reduced Intensity Alternative would require demolition of the Karl Holton Youth Correctional Facility and remediation of on-site soil contamination. Project-related impacts associated with hazards and hazardous materials would be reduced to a less-than-significant level with implementation of mitigation measures. Because the hazardous building materials and soil contamination are associated with the former Karl Holton Youth Correctional Facility, the Reduced Intensity Alternative and the proposed project would result in similar impacts. *[Similar]*

Population and Housing

This alternative assumes 25% fewer beds and staff members than the proposed project, thereby providing 1,300 beds and employing 2,250 new personnel (as opposed to 1,734 beds and up to 3,000 staff members for the

proposed project). All support structures and facilities would also be somewhat reduced because fewer services would be required to serve the reduced patient population. This DEIR concludes that the proposed project would not result in a substantial population increase or a substantial increase in the demand for housing, and that the project would result in less-than-significant impacts associated with population and housing. Although the Reduced Intensity Alternative would include 25% fewer staff members than the proposed project and would result in less population increase and less demand for housing, because the project would not result in a significant impact related to population and housing, the proposed project and this alternative would generally result in similar impacts. *[Similar]*

Public Services

Under this alternative, a new correctional medical facility would be developed on the project site, but with 25% fewer beds and staff members than under the proposed project. The proposed project would not result in a substantial increase in demand for schools or police and fire protection services, Although the Reduced Intensity Alternative would include 25% fewer staff members than the proposed project and would result in less population increase and less demand for public services, because the project would not result in a significant impact related to population and housing, the proposed project and this alternative would generally result in similar impacts. *[Similar]*

Water Supply

The Reduced Intensity Alternative would include 25% fewer beds and staff members than the proposed project and would consequently require less potable water. The increased demand generated by the proposed project would not result in significant impacts related to inability to supply water to the project. Therefore, this alternative and the proposed project would result in similar impacts related to water supply. *[Similar]*

Public Utilities

Because a reduced number of facilities would be constructed under the Reduced Intensity Alternative relative to the proposed project, overall demands for utility services would be reduced. However, this DEIR concludes that the proposed project would not result in significant impacts related to increased demand for utilities. Therefore, although the Reduced Intensity Alternative would result in less demand, because of the 25% reduction in beds and staffing, the impacts related to utilities would be generally similar to those of the proposed project. *[Similar]*

Visual Resources

Approximately 25% fewer beds and staff members would be accommodated on the existing project site under this alternative than under the proposed project. The Reduced Intensity Alternative would require fewer (or smaller) structures than the proposed project, the heights of the structures would be similar, and the alternative's lighting would be substantially similar to that used by the proposed project. Visually, the Reduced Intensity Alternative would closely resemble the proposed project and the impacts would be very similar. *[Similar]*

Conclusion

The Reduced Intensity Alternative would be environmentally superior to the proposed project with respect to air quality, traffic, and noise because it would generate fewer trips. This alternative would not avoid any of the significant impacts of the proposed project. It would be similar to the proposed project with respect to land use; agricultural resources; traffic and circulation; hydrology and water quality; biological resources; cultural resources; geology and paleontology; hazards and hazardous materials; population and housing; public services; public utilities; water supply; and visual resources. If combined with a reduced footprint, this alternative could also reduce impacts on agricultural resources, biological resources, and construction-related air quality and noise.

However, the Reduced Intensity Alternative would result in the need to place additional beds and staff members elsewhere, which would likely result in increased impacts at the site of one of the other facilities CPR is evaluating. Because the locations of these beds and staff members are unknown, these impacts cannot be determined.

7.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The No Project (No Development) Alternative would be environmentally superior to the proposed project with respect to all environmental issues except land use and hazards and hazardous materials. Although the No Project (No Development) Alternative would result in greater impacts related to hazards and hazardous materials (because the on-site soil contamination would not be remediated), this alternative would avoid project-related significant impacts associated with conversion of farmland, construction-related traffic impacts, cumulative impacts on intersections and roadway segments and mainline freeway, cumulative impacts related to climate change, construction-related and operational air quality impacts, and impacts related to nighttime light and glare. Overall, the No Project (No Development) Alternative would be environmentally superior to the proposed project. However, this alternative would not attain any of the objectives of the project.

The Reduced Footprint Alternative would be environmentally superior to the proposed project with respect to agricultural resources, air quality, noise, and biological resources. This alternative would avoid the significant impacts of the proposed project related to conversion of farmland and could avoid the impact from construction noise. It would be similar to the proposed project with respect to land use; climate change; traffic and circulation; hydrology and water quality; cultural resources; geology and paleontology; population and housing; public services; public utilities; water supply; and visual resources. This alternative would result in greater impacts related to hazards and hazardous materials. The Reduced Footprint Alternative would attain some of the objectives of the project; however, the alternative would not attain other important objectives because of the decreased availability of lower-level floor area which would be inconsistent with the project objective of optimizing access to outdoor areas; the substantial reduction to operational efficiencies; the limitations for housing, treating, and transporting patients at certain acuity levels; and the increased construction costs.

The Reduced Intensity Alternative would be environmentally superior to the proposed project with respect to air quality (including climate change) and noise. This alternative would not avoid any of the significant impacts of the proposed project. It would be similar to the proposed project with respect to land use; agricultural resources; traffic and circulation; hydrology and water quality; biological resources; cultural resources; geology and paleontology; hazards and hazardous materials; population and housing; public services; public utilities; water supply; and visual resources. If combined with a reduced footprint, the Reduced Intensity Alternative could also reduce impacts on agricultural resources, biological resources, and construction-related air quality and noise. However, this alternative would result in the need to place additional beds and staff members elsewhere, which would likely result in off-site impacts. Because the locations of these beds and staff members are unknown, these impacts cannot be determined.

Out of all alternatives evaluated the No Project (No Development) Alternative would be the environmentally superior alternative, and the Reduced Footprint Alternative would be the environmentally superior development alternative. CEQA requires (CCR §15126.6(e)(2)) that if the environmentally superior alternative is the No Project alternative, another environmentally superior alternative shall be identified among the other alternatives. Although both the Reduced Footprint Alternative and the Reduced Intensity Alternative are environmentally superior to the proposed project, the Reduced Footprint Alternative is environmentally superior among the alternatives (aside from No Project) because, unlike the Reduced Intensity Alternative, it would avoid at least one significant and unavoidable impact associated with the proposed project.