

20.1 CEQA Requirements

CEQA Guidelines section 15126.6(a) requires a description of a range of reasonable alternatives to the proposed project, or to the location of the project, which could feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. It also requires an evaluation of the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project, but must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation.

CEQA Guidelines section 15126.6(b) further requires that the discussion of alternatives focus on those alternatives capable of eliminating any significant adverse environmental impacts or reducing them to a level of insignificance, even if these alternatives would impede to some degree the attainment of the project objectives or would be more costly. CEQA Guidelines section 15126.6(a), states in part:

“Alternatives to the Proposed Project. 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”.

“Significant impacts” here are impacts that have been identified as unavoidable. The degree to which an alternative lessens the number of significant impacts that are already reduced to less than significant through implementation of mitigation measures is a secondary consideration.

The EIR must present enough information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.

CEQA Guidelines section 15126.6(c) states in part that an EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the determination. 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.

20.2 Project Objectives and Significant Impacts

As discussed above, alternatives must be able to meet most of the basic objectives of the project. Further, the selection of alternatives should take into consideration those that prioritize avoiding or substantially lessening any of the significant unavoidable effects of the project where feasible. Avoiding or substantially lessening the significant mitigable impacts of the project is a benefit but secondary to the focus on doing so for significant unavoidable impacts. To provide context for these considerations, the proposed project objectives and significant unavoidable and significant mitigable impacts of the project are identified below.

Objectives

The underlying purpose of the project is to provide guidance for developing the Town Center site consistent with the vision in the McKinleyville Community Plan and the Humboldt County General Plan. The project objectives identify in Section 4.1, Project Objectives are reiterated here as follows:

1. Establish a unique identity for McKinleyville through developing a viable town center that serves as a community focal point and provides a center for social/community interaction.
2. Develop an area of mixed land uses which encourages bicycle and pedestrian travel, yet allows for convenient and safe automobile access.
3. Permit mixed-use categories of zoning, including higher density housing, in concert with retail commercial uses and shopfronts, and an abundance and variety of open spaces.
4. Offer opportunities for developing a full range of commercial uses including a grocery store, shops, department store, hardware home supply, movie complex, laundromat, and restaurants; office space and medical and dental clinic; town green for athletic and civic events, civic buildings and a library; high density residential and mixed use residential above commercial uses; farmers market; child care facilities; and art galleries.
5. Focus on community scale needs without drive-thru restaurants and no large “big-box” department stores, with store design that avoids the look of giant retail department stores.
6. Identify design alternatives for Central Avenue which ease pedestrian and bicycle traffic, including traffic calming measures.

7. Promote safe, accessible and human scale residential and commercial areas where people of all ages can work and play.
8. Promote development of pedestrian-oriented neighborhoods and commercial areas.
9. Develop appropriate design review standards consistent and compatible with the overall principles, objectives and policies of the entire Humboldt County General Plan.
10. Include mixed-use categories of zoning, including higher density housing above retail commercial uses and shopfronts designed to include an abundance and variety of open spaces, such as urban parks, courtyards and gardens, with a connected system of pedestrian walkways, alleys and streets.
11. Design intersections and streets within the Town Center to facilitate pedestrian movement, provide bicycle connections to commercial areas and transit stops, and provide transit stops with shelter for pedestrians and provisions for secure bicycle storage.
12. Protect natural land forms by minimizing alteration caused by cutting, filling, grading or clearing.
13. Screen or soften the visual impact of new development through the use of landscaping and promote use of species common to the area and known fire resistant plants.

Significant Impacts of the Project

Significant Unavoidable Impacts

- Traffic noise impacts on existing, off-site sensitive residential receptors located along the segment of Railroad Drive between McKinleyville Avenue and Central Avenue, and the segment of Railroad Drive east of Central Avenue.

Significant Mitigable Impacts

- Exposure of existing off-site, and future on-site sensitive receptors to toxic air contaminants from construction equipment;
- Exposure of existing off-site, and future on-site sensitive receptors to toxic air contaminants from transportation sources from future projects constructed within the site that generate 10,000 or more vehicle trips per day;
- Loss of up to 15 special-status plant species with potential to occur on the site;
- Loss of three special-status wildlife species;
- Loss of nesting migratory birds and raptors;
- Loss or damage to federally- and state-protected wetlands or waters of the U.S.;
- Loss or damage to riparian habitat or other sensitive natural community (Coastal Dune Willow - Sitka Willow - Douglas Spiraea Thickets Shrubland Alliance);
- Damage to or loss of unknown cultural resources;

- Generation of GHGs;
- Conflict with a plan for reducing GHGs;
- Generation of noise during construction;
- Exposure of future on-site sensitive receptors to traffic noise; and
- Exposure of existing off-site, and future on-site sensitive receptors to noise from future on-site commercial use stationary noise sources.

20.3 Alternatives Considered but Rejected

Alternative Project Location

CEQA Guidelines section 15126.6(f)(2) identifies considerations for evaluating an alternative project location. Among these are whether any of the significant effects of the project would be avoided or substantially lessened and whether feasible alternative locations exist. Feasibility is described in section 15126.6(f)(1) and includes factors such as site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.

The proposed project is a development implementation tool being proposed by the County consistent with policies in the Community Plan and the General Plan that call for developing a Town Center in McKinleyville. The Town Center is illustrated in both documents in the location being proposed by the County. The location was selected because it is centrally located in McKinleyville and readily accessible; contains sufficient vacant and redevelopable land to accommodate mixed uses at development intensities that would meet the vision and policy objectives for creating the Town Center; would have indirect economic benefit for the existing adjacent commercial core of McKinleyville; and is an infill site adjacent to the existing commercial core and near community facilities, including Pierson Park, that would result in reduced VMT, air emission and GHG emissions impacts relative to non-central locations.

Other project locations were considered. A 16-acre site located at the southwest corner of the School Road/Central Avenue intersection was one such site. Its relatively small size, the fact that it has already recently been redeveloped, and the fact that it is less centrally located resulted in it not being further considered as an alternative project site.

For the reasons summarized above, an alternative location was not further investigated.

Q-Zone Regulation Modifications to Eliminate Residential, Office or Retail Uses

The County considered project alternatives that would narrow the range of permitted uses at the site. This alternative would eliminate one or more of the planned residential, commercial, and office uses as a means to reduce vehicle trip volumes and VMT as a means to lessen or avoid the significant unavoidable air quality and traffic noise impacts.

This alternative concept was rejected for several reasons. First, it would not implement the project objective and General Plan and Community Plan vision for the Town Center as a vibrant, mixed use focal point to the same degree as would retaining a full mix of land uses. Reducing land use diversity would potentially limit uses and activities that would draw the community to the Town Center site. Second, if residential use were to be removed, a key population driver for supporting the existing commercial core of McKinleyville and supporting future commercial uses within site would be lost, thereby reducing the economic feasibility of developing the Town Center. Third, CEQA Guidelines Section 15041(c) states:

With respect to a project which includes housing development, a Lead Agency or Responsible Agency, shall not reduce the proposed number of housing units as a mitigation measure or alternative to lessen a particular significant effect on the environment if that agency determines that there is another feasible, specific mitigation measure or alternative that would provide a comparable lessening of the significant effect.

This directive clearly states that eliminating residential use as part of this alternative should not be considered if possible. Lastly, to the extent to which the use type(s) selected for elimination could be expected to develop on multiple, less centrally-located sites in McKinleyville or elsewhere in the County, VMT and associated air quality and GHG impacts could actually worsen, as the benefit of reducing vehicle trips and vehicle trip length by placing mixed use development on a centrally located infill site would be reduced.

Sound Walls and/or Quiet Pavement to Avoid Traffic Noise Impacts on Railroad Avenue

Traffic noise on Railroad Drive could unavoidably impact existing single-family homes and apartment uses located on the north and south sides of the segment of Railroad Drive between McKinleyville Avenue and Central Avenue, and single-family and multi-family uses on the north side of the segment of Railroad Drive located east of Central Avenue. As described in Section 11.0, Noise, noise-attenuation options including soundwalls and quiet pavement were considered as possible options to reduce noise exposure at the receptors. However, soundwalls were determined to be infeasible due to uncertainty about whether private property owners would permit constructing soundwalls on their properties and due to the reduced effectiveness

of non-continuous soundwalls that would be needed only in limited, specific locations. Quiet pavement was also determined to be infeasible due to the operational costs of maintaining this material over time.

For these reasons, a traffic noise attenuation alternative was rejected for further consideration.

Open Space

Some residents in McKinleyville have recommended that the project site be protected as open space. This would require that the County rezone the project site from its current commercial and residential zoning classifications to a classification that enables permanent open space.

This alternative was rejected for further consideration for several reasons. First, it would not be consistent with the primary project objective of developing a vibrant, mixed use community focal point as represented in General Plan and Community Plan vision and policies. Second, as noted above in the Alternative Project Location discussion, it would be challenging to implement the vision and policies at an alternative site, were one to be available, without worsening the significant unavoidable air quality impact of the proposed project, as well as potentially worsening GHG, and potentially other environmental impacts of the proposed project.

For these reasons, further consideration of an open space alternative was rejected.

20.4 Alternatives Considered

The following alternatives to the project are considered:

- Alternative 1: No Project – Development Consistent with Existing Humboldt County Zoning for the Project Site; and
- Alternative 2: Reduced Project Scale.

CEQA Guidelines section 15126.6 (e) requires the “No Project” alternative be evaluated along with its impacts. The “No Project” alternative analysis must discuss the existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

The approach for defining and evaluating other possible project alternatives takes into consideration the extent to which an alternative reduces one or more significant unavoidable impacts of the project to less than significant versus lessening the significance of an impact that is already reduced to less than significant by implementation of mitigation measures. This “priority” on avoiding significant unavoidable impacts is based on CEQA Guidelines section 15126.6(a), which states in part:

“Alternatives to the Proposed Project. 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”.

“Significant impacts” here are impacts that have been identified as unavoidable. The degree to which an alternative avoids or lessens significant impacts that are already reduced to less than significant through implementation of mitigation measures is a secondary consideration in identifying alternatives to evaluate in detail.

Alternative 2 was defined based on its ability to substantially lessen or avoid a significant unavoidable impact and to lessen the significance of significant, mitigable impacts. The descriptions of each alternative identify the significant impacts which each alternative is intended to avoid or substantially lessen.

The alternatives are described below, along with analysis of how each has potential to avoid or substantially lessen significant impacts associated with the proposed project.

Alternative 1: No Project - Development Consistent with Humboldt County Zoning for the Project Site

As noted previously, the required no project alternative analysis must discuss what would be reasonably expected to occur in the foreseeable future if the proposed project were not approved, based on current plans and consistent with available infrastructure and community services. In the case of the Town Center site, development under current zoning for the project site constitutes development conditions that could reasonably be expected to occur were the proposed rezoning action and Q-Zone regulations not approved by the County.

Alternative Description

As described in Section 3.1, the County identified the potential development types, intensities, and development capacity that could occur under existing zoning for the site. Several zoning classifications currently apply to the site. Residential (R-3) and commercial (C-2) are the two developed use zoning classifications that apply, with zoning for many parcels modified by one of several modifying zoning overlays. Refer back to Figure 3-6, Existing Zoning, for the zoning classifications and associated modifying overlay zones. Residential and commercial zoning development capacity is summarized in [Table 3-1, Existing Zoning and Development Capacity](#). Residential building capacity is estimated at 1,736 units, while commercial/mixed use development capacity is estimated at 2,550 units and 628,980 square feet of commercial building square footage. Total residential capacity is 4,286 units.

Relative to development capacity projected for the proposed project as identified in Table 4-1, the no project alternative would allow for 1,636 more residential units (38 percent increase), approximately the same amount of commercial building square footage, and 271,000 square feet less office building capacity.

Under existing zoning, many of the site design features included in the Q-Zone regulations would not inherently be incorporated into future development. Among these include road diet/traffic calming features on Central Avenue through the site, extensive trail/pedestrian/bicycle improvements, requirements for a transit center, etc.

No Project Alternative Attainment of Project Objectives

In the absence of information about how the project site might develop under existing zoning, the potential for this alternative to attain many of the project objectives cannot be determined. However, on its face, the no project alternative would not meet several fundamental project objectives that call for developing the site with mixed uses, including non-residential uses with residential units above. Mixed use neighborhoods often are characterized as being more vibrant than neighborhoods with a more limited diversity of land uses. To this extent, the no project alternative may not as effectively meet the County's vision for the Town Center site to develop into a vibrant focal point of the community.

No Project Alternative Impacts Comparison

This analysis identifies potential impacts associated with this alternative and compares the impacts to the significant unavoidable impacts and the significant, mitigable impacts of the proposed project.

Air Quality

The County would likely require that new development under the no project alternative include similar alternative transportation mode features (bike and pedestrian network improvements, and transit improvements), and could readily require a prohibition on wood burning stoves as is required for the proposed project. Under these assumptions, the no project alternative could, like the proposed project, be determined consistent with the air quality plan, provided the same mitigation measure required of the proposed project is also be required for the no project alternative. Therefore, the no project alternative would also have a less-than-significant impact from conflict with the air quality plan – the no project and proposed project effect would be similar.

Evaluating criteria emission air quality impacts for a plan project such as the proposed project is a function of understanding base year VMT generated from a project site and base service population within that site and understanding the same variables for the plan buildout year, as described in Section 5.4. While both base year variables are known, buildout year VMT under existing zoning is not known. Thus, a quantitative analysis of criteria air emission impacts under the no project alternative cannot be made.

VMT from the proposed project is influenced by its potential to capture internal vehicle trips due to the diversity of land uses proposed and the robust proposed pedestrian and bicycle network. Under the no project alternative, land use diversity could be similar to the proposed project, as the no project alternative also would allow for a mix of residential, commercial and office development. Consequently, the level of internal vehicle trip capture could be similar to the proposed project, but would need to be evaluated in detail. Under the no project alternative, the site would accommodate a 38 percent greater population, so vehicle trip volume and VMT from this use would increase. Conversely, less commercial/office building capacity would result in lower trip volumes and VMT from these use types. Qualitatively, these factors may result in the no project alternative having similar VMT as the proposed project, but detailed modeling would be required to confirm this possibility. It is possible, but uncertain, that the no project alternative would have a higher service population than the proposed project. Employee number would drop, but the net population increase could exceed the number of lost jobs.

Given uncertainty about how the no project alternative compares to the proposed project across VMT and service population and the ratio between the two, it is conservatively assumed that the no project alternative would also have a significant, unavoidable criteria air emissions impact due to its similar large scale.

Health risks from construction activities would likely be similar to the proposed project, as both would result in construction activities in similar locations.

Biological Resources

Like the proposed project, the no project alternative would likely result in all vacant areas west of Central Avenue eventually being developed. Most of the site's sensitive biological resources (special status species, wetlands, sensitive communities) are located in this area. While the no project alternative may not explicitly result in preservation of land for wetland restoration as is the case for the proposed project, all wetland areas must nevertheless be protected or mitigated for. Based on these factors, biological resource impacts under the no project alternative are expected to be similar to the proposed project, and less than significant with mitigation measures.

Cultural Resources

Like the proposed project, the no project alternative would likely result in all vacant areas west of Central Avenue being developed. It is in these areas that unknown cultural resources, if present, are likely to be disturbed or damaged during construction activities. With a similar footprint of vacant land disturbance, the no project alternative is likely to have similar cultural resources impacts as the proposed project, with impacts being less than significant with conformance to General Plan policies and standards.

Energy

The no project alternative would result in demand for the same types of energy (electricity, natural gas, and vehicle fuel energy) as would the proposed project. The relative total demand for electricity and transportation fuel has not been calculated, but is not a notable factor in qualitatively determining the significance of energy impacts. As described in Section 9.0, Greenhouse Gases, mitigation for the proposed project regarding prohibition on natural gas use, would also likely apply to the no project alternative.

The energy demand from the no project alternative would not be wasteful, as all new residential and retail development must comply with state regulations for energy efficiency and conservation as promulgated in the California Building Energy Efficiency Standards and California Green Building Code. Further, energy demand from the no project alternative would not be unnecessary, as such development would implement the County's growth vision as identified in the General Plan, thereby providing critically needed housing development capacity and services and employment to meet demand from population growth.

For the reasons noted, the no project alternative energy effects would be similar to those of the proposed project and less than significant.

Greenhouse Gases

Under the BAAQMD guidance used to evaluate the significance of GHG impacts, the volume of GHG emissions produced by a land use project is no longer a measure of the significance of its GHG impacts – significance is based on conformance with specified performance standards. The most variable of these performance standards is whether or not the VMT impacts of a project are significant and unavoidable. If so, the project GHG impact would also be significant and unavoidable.

As described in the discussion of cumulative air quality impacts above, it is possible that VMT for the no project alternative would be similar to the proposed project. However, in the absence of detailed traffic modeling, this conclusion cannot be verified. Nevertheless, the VMT/capita for the proposed project is about 50 percent below the threshold of significance for 2,650 units of residential development as presented in Table 13-1. At about 4,300 residential units, residential development capacity for the no project alternative would be 38 percent higher than the proposed project. Residential development capacity differences cannot be directly correlated to differences in VMT because the land use character of the no project alternative could change the travel behavior of its resident population relative to that of the proposed project. However, at a broad level, the assumption here is that VMT for the no project alternative may also be less than significant given that the site is an urban infill location and facilities to promote alternative modes of travel would likely be required by the County. Other GHG performance standards related to EV infrastructure and prohibition of natural gas use would likely be required as mitigation for the no project alternative, as they are for the proposed project.

For the reasons noted above, it is assumed that the GHG impacts of the no project alternative would be similar to those of the proposed project and less than significant with mitigation.

Hydrology and Water Quality

Like the proposed project, the no project alternative would provide the opportunity for all vacant areas within the site being to be developed and opportunity for existing developed sites to be redeveloped. Consequently, the no project alternative would have the same potential to result in increased storm water runoff, localized flood hazards, and water quality degradation during construction and operations. These potential impacts of the proposed project are reduced to less than significant through required compliance of new development with uniformly applied development policies and regulations that address water quality and storm water management described in Section 10.0, Hydrology and Water Quality.

Future development under the no project alternative would be required to comply with the same uniformly applied storm water and water quality management policies and regulations as would the proposed project. Therefore, the hydrology and water quality impacts of the no project alternative would be similar to those of the proposed project and would be less than significant.

Noise

Construction noise intensity, distribution and duration would likely be similar to the proposed project as development could occur throughout the site, with a likely focus on existing vacant areas. Consequently, the no project alternative would likely have similar construction noise impacts as the proposed project, which would be less than significant with mitigation.

The proposed project would result in a significant unavoidable impact from exposing existing sensitive receptors along Railroad Drive to increased traffic noise. Forecast traffic noise intensity is largely a function of the relatively increase in traffic volume on a roadway created by the proposed project under project buildout conditions. Using a generalized trip generation rate of 6.0 trips per day for a multifamily unit (based on information from the Institute of Traffic Engineers), the no project alternative would generate about 9,800 more vehicle trips per day than the proposed project residential use (6.0 trips/unit x 1,636 units). Trip volumes from non-residential uses would decline under the no project alternative. If it is assumed, as an example, that the reduction in building square footage applies to office uses, trip volume from this use would decline. Trip rates for office uses are highly variable. Assuming a trip rate of about 11.5 trips/1,000 square feet of building area (a representation of average office use trip rate), the no project alternative could reduce trip generation by about 3,116 trips per day. However, in the absence of detailed modeling using a specific land use mix under a no project alternative, this reduction is uncertain. Further, the distribution of trips onto the local road network would likely be different under the no project alternative than for the proposed project. In this context, and

to be conservative, it is assumed that the no project alternative could result in a similar number of vehicle trips on local roadways, including Railroad Drive, such that this alternative would have a similar significant unavoidable impact on existing receptors to the proposed project.

Potential exposure of future on-site sensitive receptors located along Central Avenue within the site to traffic noise would be significant, but mitigable for the proposed project. The no project alternative has the same potential to locate noise sensitive receptors along Central Avenue. Consequently, the no project alternative impact would be similar to the proposed project impact and would be less than significant with mitigation.

Retail/commercial/office development capacity for the no project alternative would be lower than for the proposed project. Therefore, the no project alternative potential to result in stationary noise impacts on sensitive receptors would be reduced relative to the proposed project and would be less than significant with mitigation.

Public Services

The no project alternative would likely increase demand for police and fire service response due to its substantially higher population capacity. Similarly, it would generate a significant increase in school-age children relative to the proposed project. Relative to the proposed project, these factors could result in an increased need for public service providers to construct new facilities to accommodate the increase in demand. Consequently, the potential for impacts resulting from the need to construct new facilities would likely be greater for the no project alternative than for the proposed project.

Transportation

As noted in cumulative impact discussions for air quality, GHG, and noise above, it is uncertain whether the no project alternative could generate more VMT/capita and/or VMT/employee per day than the proposed project. Detailed modeling would be required to determine whether the land use and VMT changes would give rise to a significant VMT impact that does not exist for the proposed project. However, given that VMT/capita and VMT/employee for the proposed project are significantly below the respective thresholds of significance, VMT impacts of the no project alternative are also likely to be less than significant. Impacts of the no project alternative are, therefore, assumed to be similar to the proposed project.

Water Demand

The MCS D calculates water demand on a per capita basis. The proposed project would generate demand for about 440,784 gallons per day with a resident population of 6,122. The no project alternative would increase population by about 3,800 relative to the proposed project. Water demand is; therefore, likely to increase with the no project alternative. Though the MCS D has indicated that it has the capacity to acquire additional water supply, the no project alternative is considered to have a more adverse effect on water supply availability than the proposed

project due to its potential to result in greater demand and potential that such added demand could trigger the need for the MCSD to construct new water supply infrastructure. Therefore, this alternative has greater potential to result in impacts associated with constructing such infrastructure than would the proposed project.

Wastewater

Per the methodology for estimating wastewater generation described in Table 15-1, Wastewater Generation, the residential component of the no project alternative would generate about 0.17 mgd more wastewater per day than the proposed project. If it is assumed for discussion purposes that the 271,000 square feet of building capacity eliminated with the no project alternative is comprised of office use, wastewater generation could decline by about 0.39 to 0.53 mgd per day. Thus, wastewater generation under the no project could decline. Though the proposed project would have a less-than-significant impact from the need to construct new wastewater facilities, the no project alternative could have a beneficial effect by reducing that potential over time.

Aesthetics

Development under the no project alternative would be subject to applied General Plan, Community Plan, Humboldt County Code, and Q-Zone policies and regulations as would the proposed project. Therefore, the no project alternative would have no greater conflict with regulations governing scenic quality than would the proposed project. However, the no project alternative would differ from the proposed project in one significant way. Building heights of up to 70 feet are allowed within the site under current zoning. Under the proposed Q-Zone regulations, building height would be limited to 40 feet. This notable difference could result in the no project alternative having a greater adverse effect on a scenic vista than the proposed project.

Geology and Soils

Like the proposed project, the no project alternative would provide the opportunity for all vacant areas within the site to be developed. Consequently, the no project alternative would have the same potential to result in exposure to geologic hazards as would the proposed project. These potential impacts of the proposed project are reduced to less than significant through required compliance of new development with uniformly applied General Plan and Community Plan policies and state and local regulations, particularly those in the California Building Code, that address geologic hazards. Consequently, the no project alternative and proposed project would have similar geology and soils impacts, with both being less than significant.

Hazards and Hazardous Materials

The no project alternative would result in no greater potential to cause accidental release of hazardous materials than would the proposed project, as residential uses are not commonly sources of notable hazardous materials and associated public safety impacts. No greater risk from release of hazardous materials from sites already contaminated with such material would occur since the no project alternative is assumed to require disturbance of the same vacant areas of the site as assumed for the proposed project. Hazardous materials risks from future commercial/offices uses would decline since development capacity for these uses would decline. The no project alternative would have similar or lower hazardous materials impacts as the proposed project, with its impacts also being less than significant.

The no project alternative could have increased hazards from airport operations. This results from permissible building heights that are 30 feet higher than for the proposed project. However, its impacts would be reduced to less than significant through required conformance of future development to airport land use plan policies and standards.

Parks and Recreation

Demand for parkland would increase under the no project alternative because its population capacity would be about 3,800 people greater than the proposed project. At a parkland demand ratio of 3.0 acres of parkland per 1,000 population, parkland demand would increase by about 11.5 acres. To the extent that this demand increase could trigger the need to construct new park facilities, the no project alternative could have greater adverse parks related impacts than the proposed project.

Alternative 2: Reduced Project Scale

Alternative Description

This alternative would retain the project site boundaries, but reduce development capacity for each of the proposed mixed uses by 20 percent. This would be achieved by incrementally reducing residential development density and incrementally reducing non-residential development intensity. The purpose of the alternative is to substantially lessen or avoid the significant unavoidable traffic noise impact and to lessen a range of significant, mitigable impacts that are not related to the size of the development footprint. [Table 20-1, Reduced Project Scale Development Capacity](#), shows the development capacity that would be permitted with this alternative and the change from development capacity for the proposed project.

Table 20-1 Reduced Project Scale Development Capacity

Land Use	Proposed Project Capacity ¹	Reduced Scale Capacity ²	Change
Multi-family Residential	2,650	1,880	<770>
Retail/Commercial	632,800	506,240 Building Square Feet	<126,560 Building Square Feet>
Office	271,200	216,960 Building Square Feet	<54,240 Building Square Feet>
Total		1,880 Dwelling Units 723,200 Building Square Feet	<770 Dwelling Units> <180,800 Building Square Feet>

SOURCE: Humboldt County Planning Department 2024, EMC Planning Group 2024

NOTE:

1. From Table 4-1
2. Proposed Project Capacity x 0.8

A range of other larger percentage reductions in development capacity were considered. The County recognizes that at higher percentage reductions, impacts would be further lessened. The County selected 20 percent for several reasons. To support the economic viability of the Town Center and to support the indirect economic benefits the project would have for the existing commercial core, further reductions in development would, in turn, have diminishing economic returns/project feasibility. Based on traffic analysis considerations, at a greater than 20 percent reduction, internal trip capture between uses begins to decline, thereby eroding the reduced trip generation and VMT function of this alternative. Further, as noted above in the discussion of the Q-Zone Regulation Modifications to Eliminate Residential, Office or Retail Uses alternative that was rejected for future consideration, reducing residential development capacity as part of an alternative should be avoided where possible. The County determined that reducing residential capacity as part of the reduced scale alternative should be minimized, but is warranted given that residential use vehicle trip generation is a substantial contributor to the significant unavoidable traffic noise impact this alternative is, in part, designed to substantially lessen or avoid.

Reduced Scale Alternative Attainment of Objectives

The reduced scale alternative would provide for the same mix of land uses and similar opportunities to create a vibrant community focal point that offers a range of commercial and office end uses as would the proposed project. At present, the potential demand for high density residential, commercial, and office uses within the Town Center is unknown. Consequently, it is unknown if and when the development capacity offered by proposed project would be absorbed. However, at a modest reduction in development capacity, the reduced

scale alternative likely has greater potential to build out in a shorter timeframe than would the proposed project. This may be of benefit for meeting the vision for Town Center in a shorter timeframe.

It is assumed that the reduced scale alternative would develop under the same Q-Zone regulations as currently proposed by the County, such that key Town Center design features, including extensive bicycle, pedestrian and transportation improvements would be included and key natural resource management requirements would be retained.

With the considerations noted above, the reduced scale alternative would substantially meet the project objectives.

Reduced Scale Alternative Impacts Comparison

This analysis identifies potential impacts associated with this alternative and compares the impacts to the significant unavoidable impacts and the significant, mitigable impacts of the proposed project.

Air Quality

Vehicle trip volume and VMT from this alternative would be reduced relative to the proposed project. This would have the effect of reducing criteria emissions volumes relative to the proposed project. This would be a beneficial effect of this alternative even though its impact would also be less than significant. Impact significance from this alternative would be similar to the proposed project.

Biological Resources

This alternative would result in the same potential to develop vacant areas within the project site that contain the most sensitive biological resources. Therefore, biological resources impacts would be similar to the proposed project.

Cultural Resources

This alternative would result in the same potential to develop vacant areas within the project site that could contain unknown, buried cultural resources. Therefore, cultural resources impacts would be similar to the proposed project.

Energy

This alternative would reduce energy demand relative to the proposed project – a beneficial effect. From an impact significance perspective, this alternative would have similar impacts as the proposed project because impacts from both would be less than significant.

Greenhouse Gases

This alternative would reduce GHG emissions relative to the proposed project due to reduced VMT. This is a beneficial effect. From an impact significance perspective, this alternative would have similar impacts as the proposed project because impacts from both would be less than significant with mitigation.

Hydrology and Water Quality

This alternative would result in the same potential to develop vacant areas within the project site for which storm water and water quality effects would be most notable. Potential water quality impacts related to construction and post-construction development operations would be similar to the proposed project as impacts would be less than significant with required conformance to uniformly applied development regulations.

Noise

With reduced vehicle trip generation, this alternative would result in reduced traffic noise. If it is assumed that trip distribution for this alternative would be similar to the proposed project, a 20 percent reduction in trip volume would reduce traffic noise on local roadways by about 1 dB (Walter Van Groningen, email message, October 2, 2024). The significant unavoidable traffic noise impacts on the segment of Railroad Drive between McKinleyville Avenue and Central Avenue result from the proposed project contributing traffic that raises noise levels by 5 dB. At 4 dB or lower, this impact could be avoided given the criteria for determining the significance of traffic noise changes. Therefore, this alternative could avoid this significant unavoidable impact. With this alternative, the traffic noise increase on Railroad Drive east of Central Avenue could decline from 7 dB to 6 dB – the impact on this segment would remain significant and unavoidable, but would be lessened.

Potential traffic noise impacts on future on-site noise receptors would be lessened relative to the proposed project, as traffic volumes on Central Avenue would decline, but would remain less-than-significant with mitigation. The no project alternative impact would be similar to the proposed project.

Potential stationary noise impacts of this alternative would likely be lessened because development potential for non-residential uses that could be sources of stationary noise would decline. Its environmental impact would be lessened relative to the proposed project.

Public Services

With reduced development capacity, this alternative would reduce demand for fire and police protection services. To the extent that the proposed project could contribute to the demand for new fire and police protection facilities, as would be the case for fire protection, this alternative would potentially slightly reduce potential impacts from the need to construct new facilities.

Neither affected school district has stated that the proposed project would trigger the need to construct or install new facilities to accommodate new students residing within the site. It is unknown at this time, and speculative to assume, that the project would contribute to the need to construct new facilities over time as the site builds out. Regardless, this alternative would reduce the potential need to construct facilities over time given it would generate fewer school-age children.

Transportation

While the VMT impacts of the project were found to be less than significant, this alternative would further reduce VMT. This would be a beneficial effect of this alternative even though its impact would also be less than significant. Its environmental impact would be similar to the proposed project.

Water Demand

The proposed project would have no impact from water supply availability perspective. This alternative would reduce water demand by 20 percent. This is a beneficial effect from a water resources perspective, with this alternative also having no impact regarding water supply availability. Its environmental impact would be similar to the proposed project.

Wastewater

The proposed project would have a less-than-significant impact a wastewater treatment capacity/facility construction needs perspective. The impact is deemed less than significant because the project could contribute to the need to construct new treatment capacity, with the impacts of a future capacity expansion project to be evaluated in a future, separate CEQA document once the improvement project is defined by the MCSD. This alternative would reduce water demand by 20 percent. This is a beneficial effect from a water resources perspective, with this alternative also having a less-than-significant impact regarding construction impacts for a future treatment plant expansion. Its environmental impact would be similar to the proposed project.

Aesthetics

Like the proposed project, development under the reduced scale alternative would be subject to review under the same uniformly applied General Plan, Community Plan, Humboldt County Code, and Q-Zone policies and regulations as would the proposed project. Therefore, this alternative would have no greater conflict with regulations governing scenic quality than would the proposed project. Its aesthetics impacts would be less than significant and similar to the proposed project.

Geology and Soils

Like the proposed project, the reduced scale alternative would provide the opportunity for all vacant areas within the site to be developed. Consequently, this alternative would have the same potential to result in exposure to geologic hazards as would the proposed project. These potential impacts of the proposed project are reduced to less than significant through required compliance of new development with uniformly applied General Plan and Community Plan policies and state and local regulations, particularly those in the California Building Code, that address geologic hazards. Consequently, the reduced scale alternative and proposed project would have similar geology and soils impacts, with both being less than significant.

Hazards and Hazardous Materials

The reduced scale alternative could result in an incremental reduction in potential to cause accidental release of hazardous materials than would the proposed project given its lower development capacity, particularly for commercial uses. No reduced risk from release of hazardous materials from sites already contaminated with such material would occur since this alternative is assumed to require disturbance of the same vacant areas of the site as assumed for the proposed project. The reduced scale alternative would have reduced potential for hazardous materials impacts relative to the proposed project, with its impacts also being less than significant.

Parks and Recreation

Demand for parkland would decrease under the reduced scale alternative because its population capacity would decrease by about 1,800 (700 dwelling units x 2.31 persons per household) relative to the proposed project. At a parkland demand ratio of 3.0 acres of parkland per 1,000 population, parkland demand would decrease 5.4 acres. To the extent that this demand decrease could reduce the need to construct new park facilities, the reduced scale alternative could have reduced adverse parks related impacts relative to the proposed project.

20.5 Comparison of Alternatives

Pursuant to CEQA Guidelines section 15126.6(a), an EIR must evaluate the comparative merits of the alternatives. The significance of effects of the alternatives relative to the proposed project are summarized [Table 20-2, Comparison of Alternatives Impacts to Proposed Project Impacts](#). The table includes information on whether the alternatives have potential to lessen or avoid the significant and unavoidable and/or significant mitigable impacts of the proposed project, or whether the alternatives have a similar or greater impact than the proposed project. The table does not include impacts found to be less than significant as identified in this EIR, as the key function of evaluating alternatives is to avoid or lessen only the potentially significant and significant impacts of the project.

Table 20-2 Comparison of Alternatives Impacts to Proposed Project Impacts

Environmental Impact	Proposed Project	Alternative 1 No Project	Alternative 2 Reduced Scale
Conflict with Applicable Air Quality Plan	LTSM	LTSM Same as Proposed Project	LTSM Same as Proposed Project
Exposure of existing off-site, and future on-site sensitive receptors to toxic air contaminants from construction equipment	LTSM	LTSM Same as Proposed Project	LTSM Same as Proposed Project
Loss of special-status plant species with potential to occur on the site	LTSM	LTSM Same as Proposed Project	LTSM Same as Proposed Project
Loss of special-status wildlife species	LTSM	LTSM Same as Proposed Project	LTSM Same as Proposed Project
Loss of nesting migratory birds and raptors	LTSM	LTSM Same as Proposed Project	LTSM Same as Proposed Project
Loss or damage to federal- and state-protected wetlands or waters of the U.S.	LTSM	LTSM Same as Proposed Project	LTSM Same as Proposed Project
Loss or damage to riparian habitat/other sensitive natural community (Coastal Dune Willow - Sitka Willow - Douglas Spiraea Thickets Shrubland Alliance)	LTSM	LTSM Same as Proposed Project	LTSM Same as Proposed Project
Generation of GHGs	LTSM	LTSM Same as Proposed Project	LTSM Impact Lessened
Conflict with a Plan for Reducing GHGs	LTSM	LTSM Same as Proposed Project	LTSM Impact Lessened
Traffic noise impacts on existing, off-site sensitive residential receptors on Railroad Drive between McKinleyville Avenue and Central Avenue, and Railroad Drive east of Central Avenue	SU	SU	LTS (Railroad west of Central) Impact Avoided SU (Railroad east of Central) Impact Lessened
Exposure of future on-site receptors along Central Avenue to traffic noise	LTSM	LTSM Same as Proposed Project	LTSM Impact
Exposure of existing off-site, and future on-site sensitive receptors to noise from future on-site commercial use stationary noise sources	LTSM	LTSM Impact Lessened	LTSM Impact Lessened
Project Objectives Met?	Met	Met to Lesser Degree than Proposed Project	Met

NOTE: LTSM – Less-Than-Significant with Mitigation; SU – Significant and Unavoidable

20.6 Environmentally Superior Alternative

Alternative 2, Reduced Project Scale, is the environmentally superior alternative. It would avoid the significant unavoidable traffic noise impact on receptors on a segment of Railroad Drive, and lessen other significant, mitigatable impacts of the proposed project. The reduced scale alternative would also meet the fundamental project objectives.

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