

6 ALTERNATIVES

6.1 INTRODUCTION

The State CEQA Guidelines (CEQA §15126.6(a)) state that an EIR shall include a discussion of a reasonable range of alternatives to the proposed project and their comparative merits “which would feasibly attain most of the basic objectives of the project.” The selection of alternatives is to be guided by the provision of reasonable choices, and the promotion of informed decision-making and informed public participation. An EIR need not evaluate alternatives that would have effects that cannot be determined, or for which implementation would be remote and speculative.

Among the alternatives to be addressed, the State CEQA Guidelines (CEQA §§15126.6(e)(1), 15126.6(e)(2)) state that the EIR shall evaluate the No Project Alternative, and identify an “environmentally superior” alternative based on the comparative analysis among project alternatives (but not including the No Project Alternative). The discussion of alternatives is intended to focus on those alternatives that are capable of avoiding any significant environmental impacts or reducing them to a level of “less than significant.” Such alternatives should be discussed, even if they “would impede to some degree the attainment of the project objectives, or would be more costly” (CEQA §15126.6(b)).

6.2 ALTERNATIVES CONSIDERED

As described under Section 2.5, Methodology and Assumptions for the EIR Analysis, in Chapter 2, Project Description, the project analyzed in this Revised Draft EIR was based on the theoretical maximum density and intensity of land use that could be developed in the Specific Plan area with the policies in the proposed Specific Plan. This theoretical maximum intensity scenario is referred to as the “Specific Plan” in the remainder of the document, but will be referred to as the “Proposed Project” in this chapter to distinguish it from the alternative development scenarios for the Specific Plan. The alternatives to the Proposed Project were designed with the intent of reducing the potential environmental impacts that could result from development of the Specific Plan area while still meeting the basic objectives of the City. Alternative locations were not considered because the primary purpose of the Specific Plan is to conduct land use planning for the Specific Plan area in order to allow for future redevelopment. Instead, the following three alternatives, which differ by the density, intensity, and pattern of land uses, were considered:

- < *The No Project Alternative* is required by CEQA. Under this alternative, no specific plan would be adopted. The Specific Plan area would be developed to the extent permitted by the General Plan. Additional 28 multi-family apartments and 24,961 square feet of retail use would be permitted in Subarea 1, and another 4,500 square feet of retail use would be permitted in Subarea 2. Subarea 3 would remain much as it is today.
- < *The Low Density Alternative* would consist of a specific plan that is designed to enable development within the Specific Plan area at residential and commercial retail densities

considerably lower than anticipated under the Proposed Project, while meeting the City's objectives for a mix of land uses and including a community center, hotel/inn, and a mix of housing types.

- < *The Residential Focus Alternative* would consist of a specific plan that is designed to maximize residential development within the Specific Plan area by providing for residential densities somewhat higher than anticipated under the Proposed Project while reducing the intensity of commercial uses permitted. Similar to the Proposed Project, this alternative does not include a community center.

Table 6-1 shows the land use types and intensities assumed for each of the Specific Plan subareas for the Proposed Project and each of the three alternatives. Following is a comparison of the alternatives with the theoretical maximum development of the Specific Plan, as well as an evaluation of the alternatives.

6.3 NO PROJECT ALTERNATIVE

This alternative is intended to meet the requirements of the State CEQA Guidelines (CEQA §15126.6(e)), which require a description and analysis of a “no project” alternative, the purpose of which is to permit comparison of the impacts of approving versus not approving the proposed project. When, as in this case, the project is the adoption of a new plan and the revision of an existing land use plan, the no project alternative will be the continuation of the existing plan into the future.

Under the No Project Alternative, it is assumed that the Specific Plan would not be adopted and that only development permitted under the General Plan and the Larkspur Downtown Specific Plan would take place. Subarea 1 contains a parking lot and open space, which may be redeveloped with more intense land uses. Subarea 2 is presently almost fully used at the maximum permitted allowed intensity. The Larkspur General Plan states that development proposals will be considered only after a specific plan is completed for the Downtown area. The Larkspur Downtown Specific Plan, which was adopted in 1992, would allow up to 29,941 square feet of new commercial and 28 multi-family residential units in Subarea 1, as well as 4,500 square feet of retail use in Subarea 2. For the purpose of environmental analysis, it is assumed that Subarea 1 and Subarea 2 would be developed to the maximum intensity permitted by the General Plan and the Larkspur Downtown Specific Plan.

Subarea 3 is developed with more marginal commercial and parking uses. This subarea is underused and would likely be redeveloped eventually. The Larkspur General Plan requires the adoption of a specific plan before the Niven Property (Subarea 3) can be developed in any use other than nursery; therefore, in the absence of a specific plan, it is assumed that the existing wholesale, commercial, and vacant lands on that parcel would remain basically unchanged.

**Table 6-1
Land Use Types, Intensities, and Trip Generation (P.M. Peak Hour) by Specific Plan Subarea and Alternative**

Site	Land Use	Proposed Project		No Project Alternative		Low Density Alternative		Residential Focus Alternative	
		Intensity of Use	Trips Generated	Intensity of Use	Trips Generated	Intensity of Use	Trips Generated	Intensity of Use	Trips Generated
<i>Subarea 1</i>	Multifamily Apartments	0 units	0	28 units	21	12 units	7	44 units	33
	Retail	46,565 sq. ft.	121	24,961 sq. ft.	65	9,900 sq. ft.	26	12,000 sq. ft.	31
	Hotel	36 rooms	22	0 rooms	0	20 rooms	12	30 rooms	18
<i>Subarea 2</i>	Multifamily Apartments	19 units	14	0 units	0	0 units	0	46 units	35
	Retail	4,500 sq. ft.	12	4,500 sq. ft.	12	4,500 sq. ft.	12	0 sq. ft.	0
<i>Subarea 3</i>	Retail	0 sq. ft.	0	0 sq. ft.	0	0 sq. ft.	0	0 sq. ft.	0
	Large Single-Family	28 homes	42	0 homes	0	30 homes	46	32 homes	49
	Standard Single-Family	7 homes	8	0 homes	0	10 homes	10	11 homes	11
	Cottage Unit	23 units	17	0 units	0	5 units	4	35 units	27
	Multifamily Apartments	27 units	20	0 units	0	0 units	0	27 units	20
	Community Center	0 sq. ft.	0	0 sq. ft.	0	10,000 sq. ft.	18	0 sq. ft.	0
<i>Subtotal—Residential</i>		104 units	101	28 units	21	57 units	67	195 units	175
<i>Subtotal—Retail</i>		51,065 sq. ft.	133	29,461 sq. ft.	77	14,400 sq. ft.	38	12,000 sq. ft.	31
<i>Subtotal—Hotel</i>		36 rooms	22	0 rooms	0	20 rooms	12	30 rooms	18
<i>Subtotal—Community Center</i>		0 sq. ft.	0	0 sq. ft.	0	10,000 sq. ft.	18	0 sq. ft.	0
<i>Total</i>			256		98		135		224
Notes: Trip Generation rates based on Institute of Transportation Engineers 1997 and Wilbur Smith Associates 2003. sq. ft. = square feet									

LAND USE AND PLANNING

Existing land use designations within the Specific Plan area would remain unchanged under the No Project Alternative. As with to the Proposed Project, the No Project Alternative would not be inconsistent with the General Plan.

POPULATION AND HOUSING

Development under the No Project Alternative would result in the construction of up to 28 new housing units within the Specific Plan area. Assuming an average of two persons per household, the estimated population increase would be approximately 56 residents, or less than 1% of the city's total population. Similar to the Proposed Project, this does not represent significant population growth. The No Project Alternative would be less effective than the Proposed Project in helping the City to meet its regional fair-share affordable housing obligation because the No Project Alternative would allow fewer multi-family housing units. However, the 28 units could be affordable housing and may meet the Larkspur General Plan Housing Section's requirement that 10% of the housing units provided be affordable. This is not considered an environmental effect. However, implementation of this alternative would contribute to increased development pressure for affordable housing on the limited number of sites in Larkspur remaining available for development.

GEOLOGY AND SOILS

Similar to the Proposed Project, development under the No Project Alternative would result in potential damage to foundations and other structures from soil compressibility and secondary consolidation settlement. Damage to underground utilities caused by corrosive soils and the potential for shallow groundwater to result in unsafe conditions for construction workers would be the same. The potential for soil erosion during and after construction to add to the sediment load of Larkspur Creek would be reduced because of the lack of development in Subarea 3. The project-specific impacts could be reduced to a less-than-significant level through the implementation of mitigation measures identified in Section 4.3, Geology and Soils.

HYDROLOGY AND WATER QUALITY

Stormwater drainage facilities at the East Ward Street culvert and the culvert at the northeastern corner of Subarea 3 under Doherty Drive are insufficient under existing conditions. Without implementation of the Specific Plan, policies calling for the improvement of existing onsite and adjacent inadequate storm drainage facilities would not be implemented; thus existing localized flooding conditions would continue. However, without development of Subarea 3, the existing drainage patterns would not be modified, the amount of impervious surfaces would not be increased, and incidences of localized flooding would not be exacerbated. Because Subarea 1 and Subarea 2 have already been developed and paved, drainage pattern and the amount of runoff would be similar to existing conditions. Dewatering activities conducted during construction in the Specific Plan area would be more limited than

under the Proposed Project; this would reduce the potential for temporary lowering of the groundwater table, with an associated increase in salinity and potential for transport of pollutants to the groundwater table. Less sediment would be generated from grading, and less runoff carrying vehicle-associated pollutants from construction and ongoing activities would be generated. As such, the potential water quality impacts on surface and groundwater sources would be less severe. However, mitigation is available to reduce hydrology and water quality impacts to less-than-significant levels.

BIOLOGICAL RESOURCES

Existing biological resources found on the Niven property (Specific Plan Subarea 3) would remain undisturbed under the No Project Alternative. Potential impacts on Larkspur Creek and associated sensitive habitat, including degradation of water quality and tidal wetland vegetation during grading, construction, and occupancy of site development, would occur to a much smaller extent because no development would occur near the banks of the creek.

AIR QUALITY

The No Project Alternative is consistent with the Larkspur General Plan assumptions for development of the site and would not conflict with the CAP. With less residential and commercial development than anticipated under the Proposed Project, fewer vehicle trips would be generated and the volume of traffic-related air pollutants would be reduced. Construction of fewer homes would result in fewer fireplaces that could potentially contribute to significant exceedances of ROG levels. Potential construction-related air quality impacts under the No Project Alternative would be less than those under the Proposed Project because fewer acres of land would be graded and developed. Because no development would occur in Subarea 3 under the No Project Alternative, reduced potential for disturbance of older buildings or site soils that may contain lead or asbestos, which could pose a health threat when entrained into the atmosphere would occur. Nonetheless, these impacts could be reduced to a less-than-significant level through the implementation of mitigation measures identified in Section 4.6, Air Quality.

TRAFFIC AND CIRCULATION

In the absence of development under the Specific Plan, traffic along local roadways would be expected to increase, although not to the same extent as would be anticipated with development of the Specific Plan area. Under existing conditions, the intersections at King Street/Magnolia Avenue and Doherty Drive/Riviera Circle would be expected to operate at levels of service “D” or worse during at least one peak hour (Table 6-2) (see 4.7, Traffic and Circulation). The intersections at East Ward Street/Magnolia Avenue, King Street/Magnolia Avenue, Doherty Drive/Larkspur Plaza, Doherty Drive/Piper Park, Doherty Drive/Riviera Circle, Fifer Avenue/Tamal Vista Boulevard and Wornum Drive/Tamal Vista Boulevard would be expected to operate at unacceptable levels of service (LOS E or worse for signalized intersections and LOS D or worse for unsignalized intersections) during one or both peak hours under future cumulative conditions with no new development in the Specific Plan area

aside from those already allowed by the General Plan and the Larkspur Downtown Specific Plan (i.e., no redevelopment of the nursery in Subarea 3).

Table 6-2 Intersection Levels of Service: Proposed Project Versus No Project Alternative								
Intersections	Existing Plus Cumulative Plus Proposed Project				Existing Plus Cumulative Plus No Project Alternative			
	A.M. Peak Hour		P.M. Peak Hour		A.M. Peak Hour		P.M. Peak Hour	
	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay
1. Bon Air Road/Magnolia Avenue	B	9.3	B	11.6	B	9.3	B	11.4
2. Doherty Drive/Magnolia Avenue	B	12.7	C	18.0	B	12.1	B	14.4
3. East Ward Street/Magnolia Avenue	F	**	F	**	F	**	F	**
4. King Street/Magnolia Avenue	E	34.5	F	**	E	30.9	F	**
5. Doherty Drive/Larkspur Plaza	B	6.9	B	9.1	F	52.2	E	43.2
6. Doherty Drive/Piper Park***	D	25.8	D	21.8	D	24.1	C	19.6
7. Doherty Drive/Riviera Circle	E	40.0	E	44.9	E	36.6	E	41.1
8. Lucky Drive/Doherty Drive	C	14.6	B	9.5	C	12.8	B	9.2
9. Lucky Drive/Fifer Avenue	C	12.2	C	15.5	C	12.1	C	14.1
10. Fifer Avenue/Tamal Vista Boulevard	C	24.4	F	74.4	C	23.5	E	57.1
11. Wornum Drive/Tamal Vista Boulevard****	D	26.3	F	81.2	C	25.1	F	70.5
12. Wornum Drive/Redwood Highway	B	8.5	B	12.8	B	8.4	B	12.6
13. 101 Northbound On-ramp/Industrial	B	5.6	C	18.1	B	5.6	C	17.8
Notes: Delay is in average seconds per vehicle LOS = Level of Service ** = exceeds 120 seconds delay *** = Assumes no improvement to Doherty Drive/Piper Park intersection would be implemented under both the Proposed Project Alternative and the No Project Alternative. **** = The improvement to the intersection of Wornum Drive/Tamal Vista Boulevard has been under construction and may be completed by the end of 2003. Bold = unacceptable operations								

According to Section 18.15.010 of the City’s Municipal Code, the City Council anticipates future development to cumulatively generate a substantial increase over existing levels of traffic within the city. This increase in traffic will result in traffic volumes that exceed the capacity of the existing city-wide transportation system to provide acceptable levels of service. Without the Specific Plan, traffic and circulation improvements supported by the City’s TIF would still occur, and they would improve LOS to acceptable levels. However, with limited new development in the Specific Plan area under the No Project Alternative, development-related fees that could be used to help fund these intersection improvements would be reduced as compared to the Proposed Project. Without the adoption of the Specific Plan, improvements at Doherty Drive/Larkspur Plaza (which are not scheduled for TIF funding) that would occur under the Proposed Project may not be funded and developed. As such, the existing unacceptable LOS at this intersection would persist under the No Project alternative. As with the Proposed Project, all significant traffic impacts of the No Project Alternative would be

mitigable to less-than-significant levels with implementation of improvements funded by the City's TIF, with the exception of Doherty Drive/Larkspur Plaza (which are not scheduled for TIF funding) under the No Project Alternative. Also, as described in Section 4.7, Traffic and Circulation, level of service impacts at Doherty Drive/Piper Park would be significant and unavoidable if the City, because traffic volumes at the intersection are low, chooses not to install a traffic signal, as stated in Mitigation Measure 4.7-12, under both the Proposed Project Alternative and the No Project Alternative.

In the absence of additional development that would be permitted under the Proposed Project, funding for bikeway and trail improvements adjacent to the Specific Plan Subarea 3 may not be available and these improvements may not be developed.

NOISE

The potential for construction-related noise impacts under the No Project Alternative would be less than that under the Proposed Project, because no development would occur in Subarea 3. The potential for incompatibility of noise sensitive residential land uses and commercial uses would be slightly different. Compared to the Proposed Project, there would be more multifamily apartment units but less retail and hotel square footage in Subarea 1; in Subarea 2, there would be less residential development but similar square footage of commercial uses. Overall, there would be less development under the No Project Alternative, allowing more flexibility in the land area available to design the development sites such that noise sensitive uses can be buffered from operational noises. Because no new development in Subarea 3 would occur under this alternative, the potential for noise incompatibility impacts in Subarea 3 would be substantially reduced. With less traffic-generated than under the Proposed Project (3,338 daily trips), the No Project Alternative (1,402 daily trips) would produce less traffic-related noise and vibration. As with the Proposed Project, these impacts could be reduced to a less-than-significant level through the implementation of mitigation measures identified in Section 4.8, Noise.

PUBLIC SERVICES AND UTILITIES

Fewer homes would be built within the Specific Plan area under the No Project Alternative and there would be less commercial development than anticipated under the Proposed Project; therefore, fewer children would need to be accommodated at local schools (11 students in grades K-8 and 6 students in grades 9-12 under the No Project Alternative), and fewer new residents would be expected to use local parks and recreational facilities. In either instance, no new school or recreational facilities would be needed to adequately serve new residents coming from the Specific Plan area. Demands for police and fire protection would be less under the No Project Alternative than under the Proposed Project, but in either case, no new police, fire, or emergency medical facilities would need to be built. Demand for water, wastewater, and solid waste services would be slightly lower. No extension of utility infrastructure to serve Subarea 3 would be needed under this alternative, and thus the No Project Alternative would be expected to have fewer environmental effects than under the Proposed Project. Existing

onsite and adjacent storm drainage facilities are inadequate; under the No Project Alternative, no policy would be adopted to require the upgrade of stormwater drainage facilities.

VISUAL QUALITY AND AESTHETICS

The change in the existing visual character of the Specific Plan area under the No Project Alternative would be reduced as compared to the Proposed Project. Development consistent with either alternative would result in a change in visual character from existing conditions; however, no change in visual character of Subarea 3 would occur under the No Project Alternative. No formally identified scenic vistas were identified within the Specific Plan area. Onsite scenic resources in Subarea 1, including the two historic railroad structures, would be protected by policies the Larkspur Downtown Specific Plan. Similar policies in the Specific Plan would protect these visual resources under the Proposed Project. Numerous policies in these two specific plans related to building design and design elements would ensure continued protection of the visual quality of central Larkspur under either alternative.

The No Project Alternative would be expected to generate less light and glare than the Proposed Project due to the lack of new development in Subarea 3. Nonetheless, new sources of light or glare under either alternative would not be regarded as substantial within the context of the surrounding urban uses.

HISTORICAL, CULTURAL, AND ARCHAEOLOGICAL RESOURCES

Larkspur Downtown Specific Plan policies provide for the retention of existing historic railroad structures and associated right-of-way and the American Legion hall. Thus no destruction or degradation of the value of historic structures would be expected. In the absence of new development in the Subarea 3 under the No Project Alternative, it is unlikely that intact portions of known and any previously unidentified cultural resources would be disturbed and there would be no potential for construction activities to damage features. Significant and unavoidable cultural resources impacts would be avoided.

HAZARDS AND HAZARDOUS MATERIALS

The potential for exposure to hazardous materials in the Specific Plan area would exist equally under all of the alternatives except the No Project Alternative. Construction involving excavation, fill, pilings, or dewatering could expose construction workers to MTBE from contact with groundwater, and the public could be exposed to contaminated groundwater during dewatering. Contaminated groundwater pumped from the presently isolated groundwater table and disposed into storm drains could result in contamination of surface waters. However, the risk of exposure is the least under the No Project Alternative, since no development would occur in Subarea 3. Because no demolition activities would occur in Subarea 3, potential impacts related to the release of lead-based paint, asbestos, soil contaminants, and broken glass would be eliminated under the No Project Alternative. However, these impacts are mitigable to less-than-significant levels under the Proposed Project.

6.4 LOW DENSITY ALTERNATIVE

This alternative would enable the development of the Specific Plan area at considerably lower residential and commercial densities than anticipated under the Proposed Project, with a higher proportion of detached, single-family homes and less clustering of housing units. Under this alternative, Subarea 1 could support up to 12 multifamily apartment units, including up to six new multifamily apartment units above commercial uses. Subarea 1 could also support 9,900 square feet of new retail development and a smaller, 20-room hotel. An additional 4,500 square feet of retail development is assumed to be developed in Subarea 2, but no residential units would be developed in this subarea. Subarea 3 would support 45 residential units and a 10,000-square-foot community center. The residential unit mix in this subarea under the Low Density Alternative is composed of 30 large single-family homes, 10 standard single-family homes, five cottage homes, and no multifamily apartment units. All Specific Plan policies and standards are assumed to remain as proposed. All Specific Plan policies and requirements related to the maintenance of adequate creek setbacks, the preservation of historic structures, and the development of parks and a community-oriented open space would remain in force under this alternative.

LAND USE AND PLANNING

Existing land uses in the Specific Plan area would change substantially under the Low Density Alternative, but the uses anticipated would be compatible with existing adjacent uses. As with the Proposed Project, implementation of the Low Density Alternative would be inconsistent with the City's existing park dedication ordinance (in that no park or recreation facility has been designated within the Specific Plan area in the Larkspur General Plan) and with the Larkspur General Plan's pedestrian and bicycle circulation policies. These inconsistencies could be remedied by amending the Larkspur General Plan to incorporate specific references to a park or other recreational facilities within the Specific Plan area, and to show the new bikeways. Amendments to the General Plan land use diagram would also be required to change the existing land use designations assigned to the Specific Plan area in order to require lower land use densities and intensities under this alternative.

POPULATION AND HOUSING

Development under the Low Density Alternative would result in the construction of up to 57 new housing units within the Specific Plan area. Assuming an average of two persons per household, the estimated population increase would be approximately 114 residents, or less than 1% of the city's total population. Similar to the Proposed Project, this does not represent significant population growth. The Low Density Alternative would be less effective than the Proposed Project in helping the City to meet its regional fair-share housing obligation. The Larkspur General Plan Housing Element requires that 10% of the 57 housing units provided in the Specific Plan area be affordable. The 12 multi-family housing units in Subarea 1 would be permitted meeting the 10% affordable housing requirement. The affordable housing site option in Subarea 3 reflected in Specific Plan Land Use Policy 23 (Total Market Rate Units) would not be exercised under this alternative and no affordable housing would be developed

in Subarea 3 in the future. This is not considered an environmental effect. Implementation of this alternative would contribute to increased development pressure for affordable housing on the limited number of sites in Larkspur remaining available for development.

GEOLOGY AND SOILS

Similar to the Proposed Project, development under the Low Density Alternative would result in exposure to potential damage to foundations and other structures from soil compressibility and secondary consolidation settlement. Damage to underground utilities caused by corrosive soils, the potential for soil erosion during and after construction to add to the sediment load of Larkspur Creek, and the potential for shallow groundwater to result in unsafe conditions for construction workers would be the same. The project-specific impacts could be reduced to less-than-significant levels through the implementation of mitigation measures identified in Section 4.3, Geology and Soils.

HYDROLOGY AND WATER QUALITY

The range of conditions represented by development of the Low Density Alternative would be expected to be the same as those anticipated for the Proposed Project with respect to hydrology and water quality impacts. Impacts found to be less than significant include flooding. Potentially significant impacts, including exacerbation of presently inadequate capacity of the local drainage system, would be corrected with implementation of measures called for in the Specific Plan. Grading and construction activities could result in erosion and transport of pollutants and sediment to Larkspur Creek. This impact would be of the same or similar magnitude as under the Proposed Project because the same amount of land would be graded, the amount of land converted to impervious surfaces would be approximately the same, and the type of development would be similar in terms of pollutants generated that could affect water quality. Construction dewatering activities could temporarily lower the groundwater table, resulting in an associated increase in salinity and potentially causing the accidental transport of pollutants to groundwater. This alternative development scenario would be required to comply with regulatory requirements and processes described in Section 4.4, Hydrology and Water Quality, and the mitigation measures described in that section would reduce impacts to less-than-significant levels, as under the Proposed Project.

BIOLOGICAL RESOURCES

The area developed under the Low Density Alternative would be the same as the Proposed Project and effects on biological resources would be similar. Those impacts found to be less than significant, including loss of habitat and migratory corridors for common plant and wildlife species, would be the same. Potentially significant impacts, including direct and indirect effects on sensitive salt and brackish marsh habitat and associated sensitive species downstream and along Larkspur Creek, could be mitigated to a less-than-significant level with application of Specific Plan policies and adoption of the mitigation measures described in Section 4.5, Biological Resources.

AIR QUALITY

The Low Density Alternative is consistent with the Larkspur General Plan assumptions for development of the site and would not conflict with the CAP. With less residential and commercial development than anticipated under the Proposed Project, fewer vehicle trips would be generated and the volume of traffic-related air pollutants would be reduced. Construction of fewer homes would result in fewer fireplaces that could potentially contribute to significant exceedances of ROG levels. Potential construction-related air quality impacts under the Low Density Alternative would be similar to those under the Proposed Project because the same amount of acreage would be graded and developed. Redevelopment of Subarea 3 under either alternative would cause the same potential for disturbance of older buildings or site soils that may contain lead or asbestos, which could pose a health threat when entrained into the atmosphere. These impacts could be reduced to a less-than-significant level through the implementation of mitigation measures identified in Section 4.6, Air Quality.

TRAFFIC AND CIRCULATION

The Low Density Alternative would be expected to generate an estimated 1,626 daily vehicle trips, with 90 in the a.m. peak hour and 135 in the p.m. peak hour (see Table 6-1). Table 6-3 provides a comparison of the projected future cumulative effects associated with traffic generated under the Low Density Alternative to those associated with the implementation of the Proposed Project under the same set of assumptions. The five intersections identified as operating unacceptably under the Cumulative Plus Proposed Project conditions (East Ward Street/Magnolia Avenue, King Street/Magnolia Avenue, Doherty Drive/Riviera Circle, Fifer Avenue/Tamal Vista Boulevard, and Wornum Drive/Tamal Vista Boulevard) would continue to operate unacceptably under the Low Density Alternative, but generally with lower average vehicle delay. Implementation of the mitigation measures identified in Section 4.7, Traffic and Circulation, would reduce the traffic-related impacts associated with this alternative to a less-than-significant level. However, as described in Section 4.7, Traffic and Circulation, level of service at Doherty Drive/Piper Park would exceed the City's standards under the Existing Plus Cumulative (No Specific Plan) scenario, which assumes no improvements at this intersection would be made. Any contribution of traffic volumes to this intersection under cumulative conditions would worsen the level of service at this intersection. As shown in Table 6-3, if the improvements to this intersection, as described in Mitigation Measure 4.7-13, were made, then the LOS would be within the acceptable standards and the impact would be less than significant. However, if the City, because traffic volumes at the intersection are low, chooses not to install a traffic signal at this intersection, as stated in Mitigation Measure 4.7-13, then the impact at this intersection would be significant and unavoidable under both the Proposed Project Alternative and the Low Density Alternative.

NOISE

The potential for construction-related noise impacts under the Low Density Alternative would be similar to the Proposed Project, as the same land areas would be graded and developed. The potential for incompatibility of noise sensitive residential land uses and commercial uses

would be slightly different. Compared to the Proposed Project, there would be more multifamily apartment units but less retail and hotel square footage in Subarea 1; in Subarea 2, there would be less residential development but similar square footage of commercial uses. Overall, there would be less development under the Low Density Alternative, allowing more flexibility in the land area available to design the development sites such that noise sensitive uses can be buffered from operational noises. Noise sensitive residential uses in Subarea 3 may potentially be subject to more compatibility impacts under the Low Density Alternative than under the Proposed Project because this alternative includes a community center, which would potentially generate noise from vehicles entering and exiting the parking area and from any outdoor activity areas such as children’s play areas, tennis courts, or a pool. With less traffic-generated than under the Proposed Project (3,338 daily trips), the Low Density Alternative (1,626 daily trips) would produce less traffic-related noise and vibration. As with the Proposed Project, these impacts could be reduced to a less-than-significant level through the implementation of mitigation measures identified in Section 4.8, Noise.

Intersections	Existing Plus Cumulative Plus Proposed Project				Existing Plus Cumulative Plus Low Density Alternative			
	AM Peak Hour		PM Peak Hour Hour		AM Peak Hour		PM Peak Hour Hour	
	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay
1. Bon Air Road/Magnolia Avenue	B	9.3	B	11.6	B	9.3	B	8.4
2. Doherty Drive/Magnolia Avenue	B	12.7	C	18.0	B	12.3	B	14.6
3. East Ward Street/Magnolia Avenue	F	**	F	**	F	**	F	**
4. King Street/Magnolia Avenue	E	34.5	F	**	E	33.1	F	**
5. Doherty Drive/Larkspur Plaza	B	6.9	B	9.1	B	5.3	B	8.1
6. Doherty Drive/Piper Park ⁽¹⁾	D¹	25.8	D¹	21.8	C¹	12.2	C¹	17.3
7. Doherty Drive/Riviera Circle	E	40.0	E	44.9	E	42.7	D	21.9
8. Lucky Drive/Doherty Drive	C	14.6	B	9.5	C	17.4	C	10.0
9. Lucky Drive/Fifer Avenue	C	12.2	C	15.5	C	0.5	C	1.0
10. Fifer Ave/Tamal Vista Boulevard	C	24.4	F	74.4	D	26.4	E	55.2
11. Wornum Drive/Tamal Vista Boulevard***	D	26.3	F	81.2	D	25.4	F	**
12. Wornum Drive/Redwood Highway	B	8.5	B	12.8	B	9.2	C	18.0
13. 101 NB On Ramp/Industrial	B	5.6	C	18.1	B	5.5	C	22.2

Notes:
 Delay is in average seconds per vehicle
 LOS = Level of Service
 ** = Exceeds 120 seconds delay
 *** = The improvement to the intersection of Wornum Drive/Tamal Vista Boulevard has been under construction and may be completed by the end of 2003.
¹ Assumes Doherty Drive/Piper Park Improvement would be implemented for Low Density Alternative but not under Proposed Project.

PUBLIC SERVICES AND UTILITIES

Fewer homes would be built within the Specific Plan area under the Low Density Alternative, and there would be less commercial development than anticipated under the Proposed Project; therefore, fewer children would need to be accommodated at local schools (22 students in grades K-8 and 11 students in grades 9-12 under the Low Density Alternative), and fewer new residents would be expected to use local parks and recreational facilities. In either instance, no new school or recreational facilities would be needed to adequately serve new residents coming from the Specific Plan area. Demands for police and fire protection would be somewhat less under the Low Density Alternative than under the Proposed Project, but either case, no new police, fire, or emergency medical facilities would need to be built. Demand for water, wastewater, and solid waste services would be slightly lower. Depending on the ultimate placement of structures, the extension of utility infrastructure to serve the Specific Plan area under this alternative would be expected to have environmental effects similar to those expected under the Proposed Project. Existing onsite and adjacent storm drainage facilities are inadequate. As with the Proposed Project, Specific Plan policies and mitigation requiring improvement to the existing inadequate storm drainage system would apply equally to all alternatives.

VISUAL QUALITY AND AESTHETICS

The change in the existing visual character of the Specific Plan area under the Low Density Alternative would be similar to that of the Proposed Project. Development consistent with either alternative would result in a change in visual character from the existing conditions to a visual character consistent with surrounding development. No formally identified scenic vistas were identified within the Specific Plan area. Onsite scenic resources including the two historic railroad structures, heritage trees, and scenic values of Larkspur Creek would be protected equally by Specific Plan policies. Numerous Specific Plan policies related to building design and design elements would ensure continued protection of the visual quality of central Larkspur.

The Low Density Alternative includes development of a community center on a portion of the Niven property, which would provide an additional public space with a view of Mt. Tamalpais. The Low Density Alternative might be expected to generate less light and glare than the Proposed Project. Depending on the site design, the less intensive nature of the development would provide more opportunity for landscaping and shielding of parking areas and security lighting, although this level of light or glare would not be regarded as substantial within the context of the surrounding urban uses.

HISTORICAL, CULTURAL, AND ARCHAEOLOGICAL RESOURCES

Development in the Specific Plan area consistent with the Low Density Alternative could result in disturbance of, damage to, or alteration or destruction of intact portions of known and any previously unidentified archaeological resources located onsite. As described in Section 4.11, Historical, Cultural, and Archaeological Resources, Specific Plan policies provide for the

retention of existing historic railroad structures and associated right-of-way and the American Legion hall. However, the structures associated with the former nursery in Subarea 3, which appear to be eligible for listing on the CRHR, would be demolished, and construction activities in this subarea could also result in inadvertent uncovering of human remains. With implementation of Mitigation Measure 4.11-2a, destruction of the prehistoric site CA-MRN-68 and potentially undiscovered features related to the Bickerstaff ranch and adobe or the Fremont encampment would be avoided of any of the alternatives. However, implementation of any of the development alternatives would result in the loss of the Niven Nursery. Mitigation measures identified in Section 4.11 would reduce the potential impacts; however, even with the completion of appropriate documentation before demolition, the impact related to the destruction of the Niven Nursery would remain significant and unavoidable. The loss of the Nivens Nursery contributes to the cumulative loss of cultural resources in the region because of past, present, and future destruction of cultural resources (e.g., potential demolition of historic structures associated with developments occurring elsewhere in the city). As such, development in the Specific Plan area would contribute to a cumulative impact.

HAZARDS AND HAZARDOUS MATERIALS

The potential for exposure to hazardous materials within the Specific Plan area would be similar to that of the Proposed Project. Construction involving excavation, fill, pilings, or dewatering could expose construction workers to MTBE from contact with groundwater, and the public could be exposed to contaminated groundwater during dewatering. Contaminated groundwater pumped from the presently isolated groundwater table and disposed into storm drains could result in contamination of surface waters. Demolition of structures in Subarea 3 could result in release to the environment through air, water, or soil of materials containing lead-based paint and asbestos. A physical hazard also exists in this subarea from demolished building materials such as broken glass. Contaminated soils located in Subarea 3 containing metals, chlorinated pesticides, and petroleum hydrocarbons could be released during remediation. Development would occur on sites that formerly contained hazardous materials. As with the Proposed Project, the remediation efforts and mitigation measures identified in Section 4.12, Hazards and Hazardous Materials, could be expected to reduce these potential impacts to a less-than-significant level.

6.5 RESIDENTIAL FOCUS ALTERNATIVE

The Residential Focus Alternative would allow development of the Specific Plan area at a higher residential density than would the Proposed Project, with a higher proportion of attached, multifamily homes and greater clustering of housing units (see Table 6-1). Commercial density would be lower. Under the Residential Focus Alternative, Subarea 1 would support up to 44 multifamily apartment units, 12,000 square feet of commercial uses, and a 30-room hotel. Subarea 2 would be redeveloped with 46 multifamily apartment units. Subarea 3 would contain 32 large single-family homes, 11 standard single-family homes, 35 cottage homes, and 27 multifamily units. Similar to the Proposed Project, a community center is not included in this scenario. All Specific Plan related policies and standards are assumed to remain as proposed, and all Specific Plan policies and requirements related to the maintenance

of adequate creek setbacks, the preservation of historic structures, and the development of parks and a community-oriented open space would remain in force under this alternative.

LAND USE AND PLANNING

Existing land uses in the Specific Plan area would change substantially under the Residential Focus Alternative, but the uses would be compatible with existing adjacent uses. As with the Proposed Project, implementation of the Residential Focus Alternative would be inconsistent with the City's existing park dedication ordinance (in that a park or recreation facility has not been designated within the Specific Plan area in the Larkspur General Plan) and with the Larkspur General Plan's pedestrian and bicycle circulation policies. These inconsistencies could be remedied by amending the Larkspur General Plan to incorporate specific references to a park or other recreational facilities within the Specific Plan area and to show the new bikeways. Amendments to the General Plan land use diagram would also be required to change the existing land use designations assigned to the Specific Plan area in order to allow for higher land use densities and intensities under this alternative.

POPULATION AND HOUSING

Development under the Residential Focus Alternative would result in the construction of up to 195 new housing units within the Specific Plan area. Assuming an average of two persons per household, the estimated population increase would be approximately 390 new residents, or approximately 3.2% of the city's total population. This would be 126 more residents than the Proposed Project, but would still not represent significant population growth. The Residential Focus Alternative would be more effective than the Proposed Project in helping the City to meet its regional fair-share housing obligation. This alternative reflects a housing type that would allow affordable housing consistent with Specific Plan Land Use Policy 23 (Total Market Rate Units). This is not considered an environmental effect; provision of these affordable units would contribute to the stock of housing, including affordable housing. Therefore, it could reduce development pressure on the limited number of sites in Larkspur remaining available for development.

GEOLOGY AND SOILS

Similar to the Proposed Project, development under the Residential Focus Alternative would result in exposure to potential damage to foundations and other structures from soil compressibility and secondary consolidation settlement. Damage to underground utilities caused by corrosive soils, the potential for soil erosion during and after construction to add to the sediment load of Larkspur Creek, and the potential for shallow groundwater to result in unsafe conditions for construction workers would be the same. As with the Proposed Project, the impacts could be reduced to a less-than-significant level through the implementation of mitigation measures identified in Section 4.3, Geology and Soils.

HYDROLOGY AND WATER QUALITY

Hydrology and water quality impacts of the Residential Focus Alternative would be similar to those of the Proposed Project. Impacts found to be less than significant include flooding. Potentially significant impacts, including exacerbation of presently inadequate capacity of the local drainage system, would be corrected with mitigation requiring implementation of measures called for in the Specific Plan. Grading and construction activities could result in erosion and transport of pollutants and sediment to Larkspur Creek. This impact would be of the same magnitude because the same amount of land would be graded, the amount of land converted to impervious surfaces would be approximately the same, and the type of development is similar in terms of pollutants generated that could affect water quality. Construction dewatering activities could temporarily lower the groundwater table, resulting in an associated increase in salinity and potentially causing the accidental transport of pollutants within the groundwater table. As with the Proposed Project, this alternative development scenario would be required to comply with regulatory requirements and processes described in Section 4.4, Hydrology and Water Quality, and the mitigation measures described in that section.

BIOLOGICAL RESOURCES

The area developed under the Residential Focus Alternative would be the same as the Proposed Project, and effects on biological resources would be similar. Those impacts found to be less than significant, including loss of habitat and migratory corridors for common plant and wildlife species, would be the same. Potentially significant impacts, including direct and indirect effects on sensitive salt and brackish marsh habitat and associated sensitive species downstream and along Larkspur Creek, could be mitigated to a less-than-significant level with application of Specific Plan policies and adoption of the mitigation measures described in Section 4.5, Biological Resources.

AIR QUALITY

The Residential Focus Alternative is consistent with the General Plan assumptions for development of the site and would not conflict with the CAP. The mix of higher residential development and less commercial development proposed under this alternative would result in generation of fewer vehicle trips and the volume of traffic-related air pollutants would be less than under the Proposed Project. Construction of more homes would result in more fireplaces that could potentially contribute to significant exceedances of ROG levels. Because more residential units are proposed in this alternative than the Proposed Project, the severity of this potentially significant impact is also greater under this alternative. Potential construction-related air quality impacts would be similar under all development scenarios because the same amount of acreage would be graded and developed. Redevelopment of Subarea 3 under all development scenarios would cause the same potential for disturbance of older buildings or site soils, which may contain lead or asbestos that could pose a health threat when entrained into the atmosphere. These impacts could be reduced to a less-than-

significant level through the implementation of mitigation measures identified in Section 4.6, Air Quality.

TRAFFIC AND CIRCULATION

As indicated in Table 6-1, the Residential Focus Alternative would generate an estimated 2,716 daily vehicle trips, with 158 in the a.m. peak hour and 237 in the p.m. peak hour. Table 6-4 provides a comparison of the projected future cumulative level of service effects associated with traffic generated under the Residential Focus Alternative to those associated with the implementation of the Proposed Project under the same set of assumptions. Five of the six intersections identified as operating unacceptably under the Existing Plus Cumulative Plus Proposed Project conditions (East Ward Street/Magnolia Avenue, King Street/Magnolia Avenue, Doherty Drive/Piper Park, Doherty Drive/Riviera Circle, Fifer Avenue/Tamal Vista Boulevard, and Wornum Drive/Tamal Vista Boulevard) would continue to operate unacceptably under the Residential Focus Alternative, but generally with greater average vehicle delay. The intersection LOS of Doherty Drive/Piper Park would not deteriorate to unacceptable levels under the Residential Focus Alternative if intersection improvements are made. Implementation of the mitigation measures identified in Section 4.7, Traffic and Circulation, would reduce the traffic-related impacts associated with this alternative to a less-than-significant level. However, as described in Section 4.7, Traffic and Circulation, level of service at Doherty Drive/Piper Park would exceed the City's standards under the Existing Plus Cumulative (No Specific Plan) scenario, which assumes no improvements at this intersection would be made. Any contribution of traffic volumes to this intersection under cumulative conditions would worsen the level of service at this intersection. Thus the impact at this intersection would be significant and unavoidable under both the Proposed Project Alternative and the Residential Focus Alternative if the City, because traffic volumes at the intersection are low, chooses not to install a traffic signal at this intersection, as stated in Mitigation Measure 4.7-13.

NOISE

The potential for construction-related noise impacts under the Residential Focus Alternative would be similar to the Proposed Project, as the same amount of land would be graded and developed. The potential for incompatibility of noise sensitive residential land uses and commercial uses would be slightly different. In Subarea 1 there would be more multifamily apartment units and less retail and hotel/motel square footage, which may permit more flexibility in the land area available to design the site such that noise sensitive uses are protected. With the Residential Focus Alternative (2,716 new daily trips) generating less traffic than under the Proposed Project, this alternative would produce less traffic-related noise and vibration. As with the Proposed Project, the noise impacts could be reduced to less-than-significant levels through the implementation of mitigation measures identified in Section 4.8, Noise.

Intersections	Existing Plus Cumulative Plus Proposed Project				Existing Plus Cumulative Plus Residential Focus			
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay
1. Bon Air Road/Magnolia Avenue	B	9.3	B	11.6	B	9.6	B	8.5
2. Doherty Drive/Magnolia Avenue	B	12.7	C	18.0	B	12.6	C	16.1
3. East Ward Street/Magnolia Avenue	F	**	F	**	F	**	F	**
4. King Street/Magnolia Avenue	E	34.5	F	**	E	35.3	F	**
5. Doherty Drive/Larkspur Plaza	B	6.9	B	9.1	B	5.6	B	10.2
6. Doherty Drive/Piper Park ¹	D¹	25.8	D¹	21.8	C ¹	12.6	C ¹	18.4
7. Doherty Drive/Riviera Circle	E	40.0	E	44.9	F	46.0	D	24.8
8. Lucky Drive/Doherty Drive	C	14.6	B	9.5	C	18.0	C	10.4
9. Lucky Drive/Fifer Avenue	C	12.2	C	15.5	C	0.5	C	1.0
10. Fifer Avenue/Tamal Vista Boulevard	C	24.4	F	74.4	D	26.9	F	60.3
11. Wornum Drive/Tamal Vista Boulevard	D	26.3	F	81.2	D	25.8	F	**
12. Wornum Drive/Redwood Hwy	B	8.5	B	12.8	B	9.2	C	18.0
13. 101 NB On Ramp/Industrial	B	5.6	C	18.1	B	5.5	C	22.6

Notes:
 Delay is in average seconds per vehicle
 LOS = Level of Service
 ** = Exceeds 120 seconds delay
¹ Assumes implementation of improvement of Doherty Drive/Piper Park intersection for Residential Focus Alternative but not for Proposed Project.

PUBLIC SERVICES AND UTILITIES

More homes and less commercial development would be built within the Specific Plan area under the Residential Focus Alternative as compared to the Proposed Project. Therefore, more children would need to be accommodated at local schools (74 students in grades K-8 and 39 students in grades 9-12 under the Residential Focus Alternative), and more new residents would be expected to use local parks and recreational facilities. In either instance, no new school or recreational facilities would be needed to adequately serve new residents coming from the Specific Plan area. Demands for police and fire protection would be somewhat greater under the Residential Focus Alternative than under the Proposed Project, but in either case, no new police, fire, or emergency medical facilities would need to be built. Demand for water, wastewater, and solid waste services would be slightly higher, but services are expected to be adequate. Depending on the ultimate placement of structures, the extension of utility infrastructure to serve the Specific Plan area under this alternative would be expected to have environmental effects similar to those expected under the Proposed Project. Existing onsite and adjacent storm drainage facilities are inadequate. Specific Plan policies and mitigation

requiring improvement to the existing inadequate storm drainage system would apply equally to all alternatives.

VISUAL QUALITY AND AESTHETICS

The change in the existing visual character of the Specific Plan area under the Residential Focus Alternative would be similar to the Proposed Project. Development consistent with either alternative would result in a change in visual character from the existing conditions to a visual character consistent with surrounding development. No formally identified scenic vistas were identified within the Specific Plan area. Onsite scenic resources including the two historic railroad structures, heritage trees, and scenic values of Larkspur Creek would be protected equally by Specific Plan policies. Numerous Specific Plan policies related to building design and design elements would ensure continued protection of the visual quality of central Larkspur. The Residential Focus Alternative would generate light and glare like the Proposed Project; however, the higher proportion of attached, multifamily homes and greater clustering of housing units would provide more opportunity for landscaping to be used to shield parking areas and security lighting. In any case, this level of light or glare would not be regarded as substantial within the context of the surrounding urban uses.

HISTORICAL, CULTURAL, AND ARCHAEOLOGICAL RESOURCES

Development within the Specific Plan area consistent with the Residential Focus Alternative could result in disturbance of, damage to, or alteration or destruction of intact portions of known and any previously unidentified archaeological resources located onsite. As described in Section 4.11, Historical, Cultural, and Archaeological Resources, Specific Plan policies provide for the retention of existing historic railroad structures and associated right-of-way and the American Legion hall. However, the structures associated with the former nursery in Subarea 3 that appear to be eligible for listing on the CRHR would be demolished, and construction activities in this subarea could result in inadvertent uncovering of human remains. Implementation of any of the development alternatives would avoid in the loss of prehistoric site CA-MRN-68, and potentially undiscovered features related to the Bickerstaff ranch and adobe or the Fremont encampment, with implementation of mitigation measures. However, development in the Specific Plan area would result in the loss of the Nivens Nursery. Mitigation measures identified in Section 4.11 would reduce this potential impact; however, even with the completion of appropriate documentation before demolition, this impact would remain significant and unavoidable and would contribute to cumulative losses of cultural resources throughout the region.

HAZARDS AND HAZARDOUS MATERIALS

The potential for exposure to hazardous materials within the Specific Plan area would be similar to the Proposed Project. Construction involving excavation, fill, pilings, or dewatering could expose construction workers to MTBE from contact with groundwater, and the public could be exposed to contaminated groundwater during dewatering. Contaminated groundwater pumped from the presently isolated groundwater table and disposed into storm

drains could result in contamination of surface waters. Demolition of structures in Subarea 3 could result in release to the environment through the air, water, or soil of materials containing lead-based paint and asbestos. A physical hazard also exists in this subarea from demolished building materials such as broken glass. Contaminated soils located in Subarea 3 containing metals, chlorinated pesticides, and petroleum hydrocarbons could be released during remediation. Development would occur on sites that formerly contained hazardous materials. The remediation efforts and mitigation measures identified in Section 4.12, Hazards and Hazardous Materials, could be expected to reduce these potential impacts to a less-than-significant level.

6.6 COMPARISON OF PROPOSED PROJECT AND ALTERNATIVES

In an effort to identify the “environmentally superior” alternative, the environmental impacts associated with each of the alternatives described above were compared with those of the Proposed Project (see Table 6-5).

LAND USE AND PLANNING

Existing land uses in the Subarea 3 would remain basically unchanged under the No Project Alternative, but would change substantially under the Proposed Project, the Low Density Alternative, or the Residential Focus Alternative. In each instance, however, the uses anticipated would be compatible with existing adjacent uses. Land use impacts are similar under each alternative and less than significant.

POPULATION AND HOUSING

The increase in the number of housing units or in the local population under the No Project Alternative would be the smallest. The level of residential development possible under the Proposed Project could vary within the range of uses and densities permitted for each parcel, with the development of up to 132 new residential units possible (and a population increase estimated at 264). Development under the Low Density Alternative would result in up to 57 new housing units (and a population increase estimated at 114). Development under the Residential Focus Alternative would result in the construction of up to 195 new housing units (and a population increase estimated at 390). As the number of housing units to be developed under each alternative increases, the alternatives that result in more residential units would have the benefit of making greater contributions toward providing the City’s “fair share” of the regional housing need, including affordable housing. Population and housing impacts are similar under each alternative and less than significant.

GEOLOGY AND SOILS

Implementation of the Proposed Project and any of the alternatives would result in the exposure of additional people to potential seismic hazards. Potential construction-related erosion impacts, potential soil compressibility impacts, the potential for secondary consolidation settlement, and potential impacts related to corrosive soils and shallow

groundwater would be similar for the Proposed Project, the Low Density Alternative, and the Residential Focus Alternative because the same amount of land would be redeveloped. Under the No Project Alternative, Subarea 3 would not be redeveloped and thus would avoid these potential impacts in Subarea 3. Geology and soils impacts would be mitigable to less-than-significant levels under any alternative

HYDROLOGY AND WATER QUALITY

The Low Density Alternative and the Residential Focus Alternative would have similar impacts on hydrology and water quality as the Proposed Project. Because no new development would occur in Subarea 3 under the No Project alternative, no development adjacent to the creek would occur and no changes in existing hydrologic conditions in the Subarea 3 would occur. In any case, development under the Proposed Project or any of alternatives would be required to comply with regulatory requirements and processes and implement the mitigation measures described in Section 4.4, Hydrology and Water Quality. Such compliance would mitigate any potential hydrology and water quality impacts to a less-than-significant level.

BIOLOGICAL RESOURCES

Biological resources in Subarea 3 would remain undisturbed under the No Project Alternative. Potential development-related effects on plants and wildlife (e.g., displacement of deer) in the Specific Plan area would be similar (but less than significant) under either the Proposed Project, the Low Density Alternative, or the Residential Focus Alternative, because Subarea 3 would be developed under the Proposed Project, the Low Density Alternative, and the Residential Focus Alternative.

AIR QUALITY

Potential construction-related air quality impacts would be similar under the Proposed Project, the Low Density Alternative, and the Residential Focus Alternative, but would be lower under the No Project Alternative due to the absence of construction activities in Subarea 3. For all alternatives, the potential impacts could be reduced to a less-than-significant level. The generation of traffic-related air pollutants would be greatest under the Proposed Project, although the total volume of criteria pollutants generated would be considered less than significant under any of the alternatives. The impact related to wood stove-generated ROG would be greater with more residential development; thus the Residential Focus would have the greatest impact, followed by the Proposed Project, the Low Density Alternative, and then the No Project Alternative. This impact could be mitigated to a less-than-significant level.

TRAFFIC AND CIRCULATION

Five of six intersections identified as operating unacceptably under the Existing Plus Cumulative Plus Proposed Project conditions (East Ward Street/Magnolia Avenue, King Street/Magnolia Avenue, Doherty Drive/Riviera Circle, Fifer Avenue/Tamal Vista Boulevard, and Wornum Drive/Tamal Vista Boulevard) would continue to operate unacceptably under either the Low Density Alternative or the Residential Focus Alternative, but generally with

shorter or longer average vehicle delay. LOS of Doherty Drive/Piper Park would operate at acceptable levels under the Low Density Alternative or the Residential Focus Alternative. Implementation of the mitigation measures identified in Section 4.7, Traffic and Circulation, would reduce the traffic-related impacts to a less-than-significant level under the Proposed Project and these two alternatives.

All six intersections that would operate at unacceptable LOS under the Proposed Project would also operate at unacceptable LOS under the No Project Alternative, with the exception of the intersection of Doherty Drive/Piper Park, which would have acceptable LOS during the p.m. peak hour under the No Project alternative. However, the intersection of Doherty Drive/Larkspur Plaza would be expected to operate at unacceptable levels under the No Project alternative due to the absence of Specific Plan-related intersection improvements. Furthermore, without the proposed roadway improvements that would be implemented as mitigation measures under the Proposed Project or the other two alternatives, these intersections may continue to operate at unacceptable LOS with the addition of traffic volume under the No Project Alternative. Without the mitigation measures that would be implemented as a part of the Specific Plan, the No Project Alternative would result in worse LOS and delays at these two intersections than under the Proposed Project, Low Density Alternative, and Residential Focus Alternative. Over all, however, the No Project Alternative would generate less traffic and cause the least amount of delay in the study area.

However, as described in Section 4.7, Traffic and Circulation, level of service at Doherty Drive/Piper Park would exceed the City's standards under the Existing Plus Cumulative (No Specific Plan) scenario, which assumes no improvements at this intersection would be made. Any contribution of traffic volumes to this intersection under cumulative conditions would worsen the level of service at this intersection. Thus the impact at this intersection would be significant and unavoidable under all of the alternatives if the City, because traffic volumes at the intersection are low, chooses not to install a traffic signal at this intersection, as stated in Mitigation Measure 4.7-13.

NOISE

Noise impacts associated with the No Project Alternative would be expected to be less than those associated with the Proposed Project and the other two alternatives because there would be less new development in the Specific Plan area to contribute new noise sources (particularly during construction activity). The potential for construction-related noise impacts would be similar under the Proposed Project, Low Density Alternative, and Residential Focus Alternative but less under the No Project Alternative due to the absence of construction activities in Subarea 3; for all alternatives, these impacts could be reduced to less-than-significant levels. With the most traffic generated, the Residential Focus Alternative would produce the greatest volume of traffic-related noise and/or vibration, although this would not be regarded as significant for any of the alternatives.

PUBLIC SERVICES AND UTILITIES

For the Proposed Project and the three alternatives, effects on the local schools would be a function of the number of residential units built, with the greatest impacts associated with the Residential Focus Alternative. In any case, no new school or recreational facilities would be needed to adequately serve new residents coming from the Specific Plan area. Demands for police and fire protection would be somewhat greater with development of the Specific Plan area, but no new police or fire protection facilities would need to be built under the Proposed Project or any of the alternatives. Demand for water, wastewater, and solid waste services would be higher with more development; however, these services are expected to be sufficient for all alternatives.

VISUAL QUALITY AND AESTHETICS

The change in the existing visual character of the Subareas 1 and 2 would be similar under all of the alternatives. For Subarea 3, the change in visual character would also be similar under the Proposed Project, Low Density Alternative, and Residential Focus Alternative, whereas there would be no change in visual character of Subarea 3 under the No Project Alternative. No formally identified scenic vistas would be blocked in any case, and onsite scenic resources would be protected. The Residential Focus Alternative could be expected to generate more light or glare than the Proposed Project, the Low Density Alternative, or the No Project Alternative, although this increased level of light or glare would not be regarded as substantial within the context of the surrounding urban uses.

HISTORICAL, CULTURAL, AND ARCHAEOLOGICAL RESOURCES

In the absence of new development in the Subarea 3 under the No Project Alternative, it is unlikely that any previously unidentified cultural resources would be disturbed, and existing, unused structures in Specific Plan Subarea 3 would continue to deteriorate. Structures that appear to be eligible for listing on the CRHR would be expected to be demolished before development under the Proposed Project, Low Density Alternative, and Residential Focus Alternative; even with the completion of appropriate documentation before demolition, this impact would remain significant and unavoidable. The existing railroad structures and the associated open space would be retained under the Proposed Project and all of the alternatives. The possibility of discovering unknown archaeological resources or human remains during construction activity would be similar under the Proposed Project, Low Density Alternative, and Residential Focus Alternative; the potential for the occurrence of this impact, which would be less than significant after mitigation, would be lowest under the No Project Alternative due to the absence of construction activities in Subarea 3.

HAZARDS AND HAZARDOUS MATERIALS

The potential for exposure to hazardous materials in the Specific Plan area would exist under the Proposed Project and all of the alternatives. The risk is lowest under the No Project Alternative due to the absence of construction activities in Subarea 3. For the Proposed Project

and all alternatives, the remediation efforts and mitigation measures described in Section 4.12, Hazards and Hazardous Materials, would reduce this potential impact to a less-than-significant level.

6.7 EVALUATION OF ALTERNATIVES

The State CEQA Guidelines require identification of an “environmentally superior alternative other than the no project alternative” from among the proposed project and the alternatives evaluated.

Table 6-5 identifies whether each of the three alternatives would have “greater,” “less,” or “similar” impacts as the proposed project for each of the 12 environmental issues evaluated in this EIR. The No Project Alternative would not have greater impacts than the proposed project in any of the issue areas, less impacts in nine issue areas, and similar impacts in three. The Low Density Alternative would not have greater impacts than the proposed project in any of the issue areas, less impacts in two, and similar impacts in ten. The Residential Focus Alternative would have greater impacts than the proposed project in one issue area, less impacts in two, and similar impacts in nine.

Based solely on the listing of lesser and greater impacts as identified in Table 6-5 the No Project Alternative would appear to be the environmentally superior alternative, and all significant and unavoidable of the Proposed Project would be avoided in the No Project Alternative. Also this alternative would have the least number of impacts, and some potentially significant impacts would be less severe under this alternative (i.e., intersection LOS).

The Residential Focus Alternative would have less impacts than the Proposed Project, with the exception of air quality (i.e., wood stove-generated ROG). Overall, it would have less impact than the Proposed Project, but more impacts than the Low Density and the No Project alternatives. Also, the Residential Focus Alternative would not avoid any of the significant unavoidable impacts.

The Low Density Alternative would have less impacts but would not avoid any of the significant unavoidable impacts of the Proposed Project. Compared to the other alternatives, the Low Density Alternative would have the lowest numbers of significant impacts and less severe impacts, with the exception of the No Project Alternative.

Of the alternatives, the No Project Alternative is identified as the environmentally superior Alternative. However, as mentioned above, CEQA does not permit the identification of the No Project Alternative as the environmentally superior alternative. Therefore, given that the Low Density Alternative would have the highest ratio of less to greater impacts among the alternatives and has lesser impacts than the Proposed Project, it is identified as the environmentally superior alternative.

**Table 6-5
Comparison of Project and Alternatives**

Environmental Issues	Specific Plan	Alternatives		
		No Project Alternative	Lower Density Alternative	Higher Density Alternative
Land Use and Planning	LTS	Similar	Similar	Similar
Housing and Population	LTS	Similar*	Similar*	Similar
Geology and Soils	PS/LTS	Less	Similar	Similar
Hydrology and Water Quality	PS/LTS	Less	Similar	Similar
Biological Resources	PS/LTS	Less	Similar	Similar
Air Quality	PS/LTS	Less	Similar	Greater
Traffic and Circulation	PS/LTS	Less***	Less	Less**
Noise	PS/LTS	Less	Less	Less
Public Services and Utilities	LTS	Similar	Similar	Similar
Visual Quality and Aesthetics	LTS	Less	Similar	Similar
Historical, Cultural and Archaeological	SU	Less	Similar	Similar
Hazards and Hazardous Materials	PS/LTS	Less	Similar	Similar
Totals				
Greater Impacts		0	0	1
Less Impacts		9	2	2
Similar Impacts		3	10	9

LTS = Less than Significant Impact (no mitigation required)
 PS/LTS = Less than Significant after Mitigation
 SU = Significant and Unavoidable Impact (no mitigation available to reduce the impact to a less-than significant level)

* Although not an environmental impact, the No Project and Low Density Alternatives would contribute less to assisting the City in meeting its “fair share” of the regional housing need, and would not add to the supply of housing that might *be* available for those in the local work force.

** May be SU if City chooses not to install signal at Doherty Drive/Piper Park because of low traffic volumes.

*** May be SU if no improvements are implemented at Doherty Drive/Piper Park.