

6 ALTERNATIVES TO THE PROPOSED PROJECT

CEQA Guidelines (Section 15126.6[a]) require an evaluation of “a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic project objectives but would avoid or substantially lessen any of the significant effects, and evaluate the comparative merits of the alternatives.” The purpose of the alternatives analysis is to determine whether or not a variation of the project would reduce, or eliminate, significant project impacts, within the basic framework of the objectives.

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

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

- ▶ Locate the medical and mental health care facility in a geographic area which effectively serves state prison inmates.
- ▶ Locate the medical and mental health care facility in proximity to a metropolitan area where there is access to a large employment base to serve the facility, including areas with potential training facilities ample medical professionals.
- ▶ Locate the medical and mental health care facility on state-owned property with priority given to existing CDCR facilities.
- ▶ Size the facilities to provide between 1,300 and 1,800 beds to achieve space effective and efficient patient care while ensuring a secure facility.
- ▶ Design the facilities in a manner that is conducive to safe, effective, and efficient care, including patient access to the diagnostic and treatment center, patient support areas, and natural light.
- ▶ Provide a high level of security to protect the safety of the patients, correctional and medical staff, and surrounding community.
- ▶ Improve existing health care facilities at RJDCF in order to meet the constitutional standards for health care.

6.1 RANGE OF ALTERNATIVES CONSIDERED

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

The range of alternatives available for consideration in this Draft EIR is affected by the unique nature of the project (i.e., all alternatives must provide a health care facility for a large number of inmates). In addition, the urgency of providing health care to stem the existing crisis has directed the project toward using existing state land with correctional facilities; it is more efficient, less disruptive, and more cost-effective to site a facility of this nature and would result in fewer environmental impacts (all things being equal) on a site already developed with correctional uses than on an undeveloped site. The environmental benefit built in to locating a facility on land already dedicated to this use is obvious when compared to an undeveloped site where comparatively large amounts of habitat and agricultural land would need to be converted for the facilities and their associated infrastructure. However, there is a limited availability of State-owned property that would be sufficient for the project. Although CDCR operates prisons throughout California, few are located in proximity to urban areas with sufficient access to an employment pool and the services needed to operate a large medical facility. To provide the number of patient beds needed, the CPR requires several facilities and has explored all CDCR sites in California. All sites that meet project objectives and that have sufficient land are being explored for the seven facilities that CPR has determined are needed to provide adequate access to health care for inmates. There is already a deficiency of sites. Added to this, due to high demand for inmate beds, CDCR was directed last year by the Legislature and Governor (under AB 900) to build facilities for up to 16,000 beds, on land already dedicated to correctional facilities. Consequently, there are no known alternative sites available that would attain the basic project objectives. Examples of this process of eliminating alternatives are described below under “Alternatives Considered but not Analyzed in Detail.”

CEQA Guidelines (Section 15126.6[e]) require that, among other alternatives, a “no-project” alternative be evaluated in comparison to the project and that it “discuss the existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with the available infrastructure and community services.” Accordingly, a no project alternative is analyzed in this Draft EIR.

6.2 SUMMARY OF ENVIRONMENTAL IMPACTS

The purpose of this section is to summarize the site-specific environmental impacts, as identified and discussed in Chapter 4, Environmental Setting, Thresholds of Significance, Environmental Impacts, and Mitigation Measures, of this Draft EIR. Site-specific environmental constraints, including construction-related traffic, air and noise, hydrological, biological, and geological impacts, and the potential for hazardous material exposure could result in significant or potentially significant environmental impacts. These constraints and their effects on the range of alternatives considered in this Draft EIR are discussed below.

As discussed in Section 4.3 Traffic and Circulation, traffic associated with the proposed project would exceed level of service thresholds of significance at four local roadway intersections in the project study area and six Caltrans intersections during construction, creating a significant and unavoidable impact. Near term analysis of baseline traffic conditions in 2015 plus project-generated traffic at signalized intersections in the project study area showed that all signalized intersections would operate at an acceptable LOS during the AM, Midday, and PM peak hours. However, project-generated traffic would result in potentially significant impacts to three unsignalized intersections in the study area in the near term. Implementation of mitigation measures identified in Section 4.3, however, would reduce these impacts to a less than significant level.

As discussed in Section 4.4, Air Quality, the proposed project would generate construction-related emissions of particulate matter (PM₁₀) and ozone precursors (ROG, NO_x, and CO) that would exceed significance thresholds. Mitigation measures in Section 4.4 would reduce PM₁₀ and PM_{2.5} emissions to below a level of significance. Although the mitigation measures would reduce particulate emissions to a less than significant level, the construction-related emission of ozone precursors would remain significant and unavoidable after implementation of mitigation measures. Regarding greenhouse gas emissions (GHG), the project would need to produce 30 percent less GHG emissions than under “business as usual” circumstances to attain the efficiency targets that would help the State attain AB 32 goals. However, based on the amount of GHG that would be emitted by the project, GHG emissions would exceed this amount and would be cumulatively considerable.

As discussed in Section 4.5, Noise, the proposed project would result in significant short-term noise and vibration impacts during construction activities. It would also increase long-term on-site noise due to the introduction of stationary noise sources including mechanical HVAC equipment and emergency electrical generators. Mitigation is provided to reduce both construction- and operation-related noise impacts to a less than significant level.

As discussed in Section 4.6, Hydrology and Water Quality, the project would result in surface disturbance through soil removal, trenching, pipe installation, grading, and revegetation. Because of increased exposed surfaces and soil disturbance activities, the potential for erosion and sedimentation would increase during the rainy season. Proposed project construction activities that are implemented without mitigation could violate water quality

standards or cause direct harm to aquatic organisms. The CPR will prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) designed to reduce potential impacts to surface water quality through the construction and life of the project. The SWPPP will include specific and detailed best management practices (BMPs) that would mitigate significant impacts from construction-related pollutants to a less than significant level. To minimize any potential impact related to on- and off-site flooding as a result of the proposed project, CPR will prepare a hydrology study that assesses drainage patterns and potential downstream flooding impacts including increased flow rates and volume and flood potential, and will design facilities to ensure that post-project runoff does not increase compared to existing conditions.

As discussed in Section 4.7, Biological Resources, project construction could result in potentially significant, direct impacts to burrowing owls, the black-tailed jackrabbit, California gnatcatcher, loggerhead shrike, and other avian species. It would also cause potentially significant, indirect noise- and construction-related impacts to adjacent habitat areas. In addition, the operation of the proposed electrified perimeter fence could result in mortalities of wildlife (mostly avian species). There is also the potential for impacts to a drainage feature that may be covered under the jurisdiction of resource agencies and noise impacts related to the proposed relocation of the firing range. The CPR has proposed specific mitigation measures to reduce the potential impacts to biological resources. With implementation of the recommended mitigation measures, these impacts would be reduced to a less than significant level.

As discussed in Section 4.9, Geology and Paleontology, the project site is located on the Otay Formation, which has produced extremely important vertebrate fossil remains and is assigned high paleontological resource sensitivity. Due to the high resource potential assigned to the Otay Formation, the proposed project would have a potentially significant impact on paleontological resources; therefore mitigation is required. Mitigation measures identified in Section 4.9 require that the CPR have a paleontologist on-site at all times during excavation to monitor construction and who would be available on an on-call basis throughout the life of the project. In the event that any discovery is made, the paleontologist will conduct or supervise recovery and curation tasks to reduce impacts to a less than significant level.

As discussed in Section 4.10, Hazards and Hazardous Materials, the proposed project appears on several lists of hazardous materials sites, including those compiled pursuant to Government Code Section 65962.5 related to potential contamination from former USTs, the current firing range, an area formerly utilized as a bombing range, and the former dry cleaning facility. In addition, the proposed project would likely involve the transportation, use and/or disposal of hazardous materials, such as the use of equipment that contains hazardous materials, or the transportation of excavated soil containing contaminants from the areas that have been identified on-site as being contaminated or that are likely to be contaminated. Construction workers could be exposed to these contaminants and hazardous materials. Mitigation measures included in Section 4.10 require use of controls to limit exposure,

compliance with the Emergency Preparedness Plan, and remediation of the contaminated soils, as well as use of electromagnetic induction (EMI) technologies to detect unexploded ordnance under the supervision of the appropriate military authorities. After implementation of mitigation measures, the impact would be less than significant.

As discussed in Section 4.13, Water Supply, the average inmate domestic demand unit is assumed to be 100 gpd per patient, based on existing actual average use per inmate; however, if even more effective water savings devices are implemented in the health care facility, actual use is likely to be less than this assumption. The highest amount of potable water resources that the proposed project will consume would average approximately 167,000 gpd or 61 million gallons per year. The proposed project is not expected to increase the amount of water demand on-site beyond what is currently used and planned for on the property in OWD's (the supplier's) most recent UWMP. Therefore, it is expected that the project would not impact the ability of OWD to deliver water supply to the project or other customers. However, because the effectiveness of the water conservation measures currently being implemented by CDCR at RJDCF have not been fully evaluated in practice, there remains a possibility that the project could cause a net increase in potable water consumption on site, resulting in a significant impact. Mitigation measures are designed to ensure that the proposed project will not cause a net increase in water within the Otay Water District, and would be implemented only if needed (if water use after the project is greater than pre-water conservation water use at RJDCF, i.e., current conditions).

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

6.3 ALTERNATIVES CONSIDERED BUT NOT ANALYZED IN DETAIL

State CEQA Guidelines Section 15126.6(c) provides that an EIR "should also identify any alternatives that were considered by the lead agency but rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination." Two alternatives, the "Off-site Location Alternative" and the "North Mesa Alternative," were dismissed from further analysis due to the infeasibility of these alternatives.

6.3.1 OFF-SITE LOCATION ALTERNATIVE

Under the Off-site Location Alternative, the project site would remain unoccupied, and the medical and mental health care facility would be located at an undetermined off-site prison site or other State-owned location. This alternative was assumed to be sized consistent with the proposed project, which involves the construction of a sub-acute medical and mental health facility (1,500 beds and up to 1,600 staff), support facilities, and associated infrastructure. The firing range would not need to be relocated.

The CPR has identified the need to construct new health care facilities that, in total, will provide approximately 5,000 medical and 5,000 mental health patient beds, which would require approximately seven correctional health care facilities based on size requirements. This has resulted in a tremendous effort to identify available property appropriate to accommodate these medical and mental health care facilities.

The CPR's site selection process for the new medical and mental health care facilities emphasized cost efficiency through two central criteria: (1) sites should be close to a sizable job base to ensure an ability to recruit qualified staff, including medical staff and correctional officers; and (2) sites need to be located near existing CDCR facilities on State-owned property to avoid the need to purchase land and to allow the efficient consideration of the land use. These criteria, among several other development constraints including property size, access, utilities service and infrastructure, site constructability, and land use compatibility, substantially reduce the number of available sites. In fact, all CDCR sites that have been deemed feasible for construction of medical and mental health facilities are currently identified for proposed future facilities. Other facilities could be identified in the future, but so far they have not emerged in spite of a statewide search. Therefore, the Off-site Location Alternative for the proposed health care facility at RJDCF is considered infeasible because all CDCR sites deemed appropriate to accommodate medical and mental health facilities are currently being evaluated for the location of such facilities.

6.3.2 NORTH MESA ALTERNATIVE

Under the North Mesa Alternative, the proposed health care facility would be located on a portion of undeveloped CDCR land north of the existing secured perimeter at the site where the proposed firing range would be relocated under the proposed project. This lot is located on a relatively flat mesa adjacent to a drainage containing riparian habitat. To the west, this currently undeveloped lot is adjacent to the Otay Mesa Open Space Preserve. This alternative was assumed to have the same number of beds (1,500) and the same number of added staff (up to 1,600), but with a smaller footprint than the proposed project. As such, the facility would need to be built with structures that are higher than three stories.

The North Mesa Alternative would not substantially reduce the significant impacts of the project associated with noise, geology and paleontology, biological resources, traffic, or hazardous materials. Furthermore, the site has less land area and would result in additional impacts to riparian habitat associated with the drainage that bisects the site, as well as the potential biological impacts associated with the adjacency of the Otay Mesa Open Space Preserve. Due to the smaller site size, there are no options available to redesign the facility in a manner that would avoid the drainage or proximity to off-site areas. The riparian habitat-containing drainage would be required to be filled, resulting in significant impacts, and the close proximity to the preserve would likely interfere with construction staging and the facility itself. Therefore, this alternative is not considered further in this analysis.

6.3.3 EXISTING FACILITY AS HEALTH CARE FACILITY

The Existing Facility Alternative would involve implementation of the renovations and improvements to the existing health care facilities at RJDCF that are described as part of the proposed project (Section 3.4.2). While this alternative would improve the efficiency of the provision of health care facilities at RJDCF, the facilities would still continue to be insufficient to meet the constitutional standards to provide medical and mental health care services to inmates. If all existing structures could be improved to operate at a maximum capacity, this alternative would still have a substantial shortage of beds and treatment facilities, thereby not meeting the project's objective for facility that could serve the region (1,300 to 1,800 beds). Therefore, this alternative has been dismissed and will not be analyzed further in this Draft EIR.

6.4 ALTERNATIVES CONSIDERED FOR EVALUATION

The analysis presented below evaluates three alternatives to the proposed project: No Project (No Development) Alternative, Reduced Footprint Alternative, and a Reduced Intensity Alternative. These alternatives were selected based on their ability to reduce or avoid the project's significant, and significant and unavoidable impacts based on the analysis presented in Section 4.0. Although the number of alternatives considered is relatively limited, given the nature of the project, the range of alternatives is reasonable. Because the basic objectives of the project involve correctional uses, it would be infeasible to evaluate alternatives that are inconsistent with these objectives, and the alternatives considered herein are designed to reduce the impacts of the project and provide a reasonable range for decision making.

6.4.1 NO PROJECT (NO DEVELOPMENT) ALTERNATIVE

Under this alternative, no actions would be taken at the project site. No development of the project site, including construction of medical or mental health facilities or associated structures or facilities would take place, nor would the rehabilitation or replacement of existing facilities at RJDCF occur. Under this alternative, the mandate of the U.S. District Court to provide sufficient correctional health care facilities would not be met at the project site, and the California prison health care system would remain constitutionally inadequate. CPR would be required to meet its needs for the beds it would have provided at RJDCF at another prison site or other State-owned site. This alternative may result in less environmental impact than the proposed project or other alternatives. However, because CPR is mandated by the federal court to improve medical care for inmates and has determined it needs to develop correctional medical facilities to do so, this alternative would only serve to relocate project to a different location, which would likely result in other unknown environmental impacts. Further, as described above, alternative sites that attain most of the project objectives are likely not available.

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

ENVIRONMENTAL ANALYSIS

Land Use and Planning

Under this alternative, development of a new health care facility would not occur and the project site would remain as it currently exists. No significant land use impacts were identified for the project, so this alternative would not reduce or avoid any significant land use impacts associated with the project and impacts would be similar. *[Similar]*

Aesthetics and Visual Resources

Under this alternative, the open space to the east of the existing facilities would remain vacant and the firing range would not be relocated to the north mesa area. No additional site lighting would be required, and skyglow would not increase compared to existing conditions. By comparison, the proposed development of a correctional health care facility would add more lighting to the area, but the impact would be less than significant. *[Less, but no substantial reduction]*

Traffic and Circulation

This No Project (No Development) Alternative would not develop any new facilities and would not result in any construction-related transportation impacts. This alternative would not increase the number of employees at RJDCF and as a result would not generate any new traffic. By comparison, project-related traffic would add traffic to existing roadways, degrading four intersections from an acceptable LOS to a LOS below D. The No Project Alternative would avoid any increase in roadway traffic; therefore, no traffic impacts would occur. *[Less; eliminates significant and unavoidable impact]*

Air Quality

This alternative would not include any new development and thus would not generate new construction or operations-related air emissions. The proposed project would result in significant and unavoidable project impacts related to construction emissions. Because the No Project Alternative would not generate any increased construction or operational emissions, this alternative would avoid the increase in overall regional operational emissions and would avoid the project's significant and unavoidable construction-related air quality impact. In addition, because the No Project Alternative would not result in increased GHG emissions, this alternative would

avoid a cumulatively considerable significant impact associated with the proposed project. *[Less; eliminates significant and unavoidable construction impact, and a cumulatively considerable operations impact]*

Noise

This alternative would not involve the introduction of mechanical HVAC equipment and emergency electrical generators that would be used during operations at the new facility. Although mitigation would reduce on-site stationary noise sources associated with the support and operation of the facility, this alternative would avoid the proposed project's operations-related noise impacts. *[Less]*

Hydrology and Water Quality

Under the No Project (No Development) Alternative, no new construction would occur; therefore, there would be no potential construction-related releases of sediment and contaminants to nearby drainages. By comparison, the proposed project would result in construction activities that could disturb on-site soils and result in the discharge of sediment, potentially degrading water quality. However, mitigation recommended in the Draft EIR would reduce the project's impact to a less than significant level. Although project impacts would be less than significant, the No Project Alternative would result in no discharge of sediment or contaminants; therefore, this alternative's water quality impacts are considered less than those associated with the project. *[Less, but no substantial reduction]*

Biological Resources

This No Project (No Development) Alternative would not include any development of the project site. Furthermore, this alternative would not result in the construction of an electrified fence, which could result in adverse impacts to migratory bird populations. In addition to impacts related to the electrified fence, the proposed project would result in a potentially significant impact on several sensitive wildlife species. Furthermore, development of the project site would result in conversion of sensitive habitat and an indirect impact to adjacent habitat. However, these impacts would be reduced to less than significant levels after implementation of recommended mitigation. This alternative would avoid all impacts to biological resources. *[Less, avoids significant but mitigated impacts]*

Cultural Resources

This No Project (No Development) Alternative would not include any development of the project site, and would not disturb any potentially undiscovered cultural resources on the site. By comparison, the proposed project would not cause substantial adverse change in the significance of a unique resource or disturb any human remains as a result of project construction or operation activities. However, because this alternative would avoid potential

impacts to undiscovered cultural resources, overall impacts would be less than the project. [*Less, but no substantial reduction*]

Geology, Paleontology, and Mineral Resources

The No Project (No Development) Alternative includes no construction activities and no development of structures. The proposed project would result in significant impacts associated with the potential to uncover a paleontological resource in the Otay Formation. Although these impacts are reduced to a less than significant level with implementation of mitigation measures, the No Project (No Development) Alternative would result in no impacts. [*Less, but no substantial reduction*]

Hazards and Hazardous Materials

The No Project (No Development) Alternative would not include any construction activities and would consequently not result in the demolition of any on-site structures or the disturbance of existing contaminated soil on the site. The proposed project would likely involve the transportation, use and/or disposal of hazardous materials or soil containing contaminants. The proposed project also includes the use of hazardous materials during construction and operation. Although the proposed project includes mitigation measures to reduce this risk, the No Project Alternative would involve no risk to construction workers. [*Less, but no substantial reduction*]

Employment, Population, and Housing

Under this alternative, no new staff would be added to the project site. As a result, this alternative would not have any adverse effects on local and regional employment, population, or housing opportunities. By comparison, the proposed project would not add a substantial number of employees to the region (between 1,300 and 1,600 new employees). Project-related population growth and associated demands for housing and employment opportunities would be mostly absorbed in growth projections of regional and local communities and would not substantially increase demand for housing in any one area. Therefore, although the proposed project would not result in significant employment, population, and housing impacts, the No Project (No Development) Alternative would result in no impacts; therefore, the less than significant impacts associated with population and housing would be avoided under the alternative. [*Less, but no substantial reduction*]

Public Services

Because no new facilities would be constructed under the No Project (No Development) Alternative, no additional demand for public services would occur; whereas the proposed project would increase demand for services both at the site and throughout the region (due to the addition of up to 1,600 staff). Although the project's increased demands for public services would not result in significant impacts to these resources, because

the No Project (No Development) Alternative would result in no increased demand for public services (and consequently no impact), the overall public service impacts would be somewhat less under this alternative. [*Less, but no substantial reduction*]

Water Supply

The No Project (No Development) Alternative would not increase water demand at the project site. The proposed project's increased demand would be reduced to below a level of significance through conservation measures to be installed at RJDCF and other potential measures. By comparison, the No Project (No Development) Alternative would result in a reduction in demand on site because many of the conservation features at RJDCF will be installed without the project. [*Less*]

Utilities

Because no new facilities would be constructed under the No Project (No Development) Alternative, no new utility connections, pipelines, or other facilities would be required. In addition, the proposed project would not increase existing demand for wastewater treatment, storm drainage, electricity, and gas. The proposed project would increase demand for these utilities, due to the development of building area housing 1,500 beds and staffing of up to 1,600 employees, although the impacts would not be considered significant. Although the project would not result in a significant impact, because the No Project (No Development) Alternative would result in no increased demand for utilities, and consequently there would be no impact. [*Less*]

Conclusion

The No Project (No Development) Alternative would be environmentally superior to the proposed project with respect to the following issues: noise, hydrology, biological resources, cultural resources, geological resources, hazardous materials, employment and population, public services, water supply, and utilities. It would eliminate significant and unavoidable impacts associated with traffic and construction-related emission of ozone precursors. It would be similar to the project with respect to land use and visual resources. Overall, this alternative is environmentally superior to the proposed project.

This alternative would not attain any of the objectives of the project.

6.4.2 REDUCED FOOTPRINT ALTERNATIVE

The Reduced Footprint Alternative is intended to reduce certain significant impacts of the project by constructing a facility over three stories high, which would reduce the overall disturbance footprint of the project. Significant impacts associated with the project would generally be operations-related noise impacts; paleontological resource sensitivity impacts; and transport, use, and disposal of hazardous materials. The Reduced Footprint Alternative

makes the project more compact by 25 percent, but would not change its capacity; the number of beds, staff, and floor area remains consistent with the proposed project (a Reduced Intensity Alternative that includes fewer beds and staff is analyzed below). The proposed improvements and renovations to existing facilities would still occur. Under this alternative, the project footprint would be reduced by exceeding three stories to accommodate the floor area requirements.

Under the Reduced Footprint Alternative, the medical health care facility would be located in the same vacant area that the proposed project site would utilize. The existing firing range would not need to be relocated to the opposite side of the CDCR property. The number of separate structures indicated on the proposed site plan would likely be reduced by combining various programs and facilities, and building height would be increased from three stories to possibly four or five stories.

This alternative would attain all project objectives; however, combining separate uses into multiple-story structures may decrease the operational effectiveness of the alternative compared to the proposed project, which could result in patient management issues. In addition, the compact layout, increased building height, and shared access could also result in operational safety and security issues that may not meet CDCR standard programs and protocols.

ENVIRONMENTAL ANALYSIS

Land Use and Planning

Under this alternative, development of a new health care facility would occur only on a portion of the proposed project site. Like the proposed project, the Reduced Footprint Alternative would be consistent with the land use designations identified for the project site in both the City and County General Plans. No significant land use impacts were identified for the project, so this alternative would not reduce or avoid any significant land use impacts associated with the project, and impacts would be similar. *[Similar]*

Aesthetics and Visual Resources

Under this alternative, the same number of beds and staff would be accommodated on approximately one half of the existing project site. The alternative facility would most likely be more visible due to the increased height of the structures. Rather than maintaining height and mass similar to the existing structures, the much taller structures might not appear consistent with the surrounding correctional uses in the area. The alternative could result in visual impacts; however, it is unlikely that these impacts would be considerably different than those associated with the proposed project. *[Greater, but no substantial increase]*

Traffic and Circulation

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

Air Quality

Although the footprint of the Reduced Footprint Alternative would be substantially smaller than under the proposed project, the alternative would include the same approximate building area, the same number of beds (1,500), and the same number of staff (up to 1,600). The proposed project would result in less than significant operational air quality impacts with implementation of mitigation measures; however, the project would result in significant and unavoidable construction-related emissions of ozone precursors. While the Reduced Footprint Alternative would result in nearly half the ground disturbance required by construction, because the threshold of significance is exceeded under the proposed project, even with implementation of mitigation measures, the Reduced Footprint Alternative would not likely reduce the emission of ozone precursors below the threshold, and the impact would remain significant and unavoidable. *[Similar]*

Noise

Under this alternative, development of a new health care facility would occur only on a portion of the project site currently proposed. The proposed project would result in a significant impact associated with long-term on-site noise from operation of stationary sources, including mechanical HVAC equipment and emergency electrical generators. With mitigation, these impacts would be reduced to less than significant. The Reduced Footprint Alternative would not reduce the number of beds or level of activity and therefore would not avoid the significant impact associated with operations. *[Similar]*

Hydrology and Water Quality

The Reduced Footprint Alternative would place development only on a portion of the project site currently proposed. Both the alternative and the proposed project would result in construction activities that could disturb on-site soils and potentially result in the discharge of sediment, degrading water quality. This alternative's reduced project site could result in a smaller disturbance area during construction and somewhat less stormwater runoff during operation (due to reduced impervious surface area). Therefore, water quality and hydrology-related

impacts associated with the alternative would be reduced compared to the proposed project. *[Less, but no substantial reduction]*

Biological Resources

Under this alternative, development of a new health care facility would occur only on a portion of the project site currently proposed. Therefore, the alternative would convert fewer acres of habitat to urban uses. Although the alternative would, for the most part, result in similar impacts compared to the proposed project because both require similar construction activities and duration, both include an electrified fence (although the alternative's fence would not be as long as under the proposed project), and both require the expansion of the facility (although the expansion required for the alternative may be reduced, due to the decreased volume of stormwater required for the smaller site), the reduced acreage of habitat conversion would reduce the proposed project's impact.

Additionally, noise impacts to sensitive species potentially located in a drainage adjacent to the proposed firing range would be avoided. Although the proposed project's conversion of sensitive habitat would be reduced to a less than significant level through mitigation, the alternative's substantial reduction or avoidance of this impact would be environmentally superior to the mitigated impact, since habitat would be maintained on-site rather than potentially mitigated off-site; therefore, this alternative's impact to biological resources would be less compared to the proposed project. *[Less, but no substantial reduction]*

Cultural Resources

The Reduced Footprint Alternative would place development only on the portion of the project site currently proposed. The proposed project would not impact any known cultural resources. Because the footprint of the Reduced Footprint alternative is smaller than the project, the potential for disturbance of unknown cultural resources is proportionally reduced. Therefore, the impacts to cultural resources are lesser than the proposed project. *[Less, but no substantial reduction]*

Geology and Paleontology

The Reduced Footprint Alternative includes development of the correctional medical facilities on nearly three quarters of the proposed project site. The proposed project would result in significant impacts associated with potential to uncover a paleontological resource. This impact is reduced to a less than significant level with implementation of mitigation measures. Although the Reduced Footprint Alternative would require less ground disturbance and the impacts would be reduced but the potential to encounter paleontological resources would still remain the same and would require the same mitigation. *[Similar]*

Hazards and Hazardous Materials

This alternative would avoid the need to demolish the existing firing range and relocate to another site on the property. This would eliminate the need for remediation related to lead, and reduce the potential for contamination. Similar to the proposed project, the Reduced Footprint Alternative would involve the transportation, use, and/or disposal of hazardous materials. Project-related impacts associated with hazards and hazardous materials are reduced to a less than significant level with implementation of mitigation measures.

[Less, but no substantial reduction]

Employment, Population, and Housing

Although the footprint of the Reduced Footprint Alternative would be substantially smaller than under the proposed project, the alternative would include the same approximate building area (1 million square feet), the same number of beds (1,500) and the same number of staff (up to 1,600). The proposed project would not result in significant impacts related to population and housing. The alternative would result in similar impacts associated with population increase and increase in the demand for housing. *[Similar]*

Public Services

Although the footprint of the Reduced Footprint Alternative would be substantially smaller than under the proposed project, the alternative would include the same approximate building area, the same number of beds (1,500) and the same number of staff (up to 1,600). The Reduced Footprint Alternative would therefore result in similar public service demands compared to the proposed project including demand for school, police, fire, and emergency services. The increased demand generated by the proposed project would not result in significant impacts related to public services. Therefore the impacts of the alternative would be similar to the proposed project. *[Similar]*

Water Supply

Because the Reduced Footprint Alternative includes the same approximate building area (one million square feet), the same number of beds (1,500), and the same number of staff (up to 1,600) as the proposed project, the alternative would result in similar water demands compared to the project. The increased demand generated by the proposed project could result in significant impacts related to water supply to the project, but the impacts can be mitigated with offsetting measures. The alternative would result in similar impacts related to water supply.

[Similar]

Utilities

The Reduced Footprint Alternative would result in similar utility demands compared to the project. This alternative would result in demand for electricity and natural gas, and water and wastewater services for the same

number of inmates, patients and staff. Similar to the proposed project, it is anticipated that local utility agencies would be able to serve this alternative without requiring the expansion or extension of additional services the construction of which could result in potentially significant impacts. Therefore, the project and the alternative would result in similar impacts related to utilities. *[Similar]*

Conclusion

The Reduced Footprint Alternative would be environmentally superior to the project with respect to biological resources and hydrology and water quality. It would be similar to the project with respect to land use, visual resources, traffic and circulation, air quality, noise, cultural resources, geology and paleontology, hazards and hazardous materials, employment, population and housing, public services, water supply, and utilities.

This alternative would attain the objectives of the project; however, it could result in operational inefficiencies at the project site that would result in safety and security operations that do not meet CDCR's standard programs and protocol.

6.4.3 REDUCED INTENSITY ALTERNATIVE

The Reduced Intensity Alternative is proposed to eliminate those significant and unavoidable impacts that would be a direct result of the size of the proposed facility, the number of patients it serves, and the number of people employed at the project site. This alternative assumes that the proposed project would reduce beds by approximately 25 percent, thereby providing only 1,125 beds at the site. All support structures and facilities would also be reduced because fewer services would be required to serve the reduced patient population. The proposed improvements and renovations to existing facilities would still occur. For purposes of this analysis, staffing levels are assumed to be reduced by 25 percent, resulting in the employment of between 975 and 1,400 new personnel.

In order to provide sufficient beds to meet the objectives of the proposed project, it is important to note that this alternative would likely require that other CPR proposed facilities be enlarged. Specific impacts associated with such an expansion are not speculated in this discussion, as environmental analyses of the other sites are still in progress; however, these unknown impacts are, in a general sense, acknowledged in the consideration of the environmentally superior alternative at the end of this section.

This alternative assumes that a similar footprint to the project would be constructed. However, if fewer beds are needed, it is also possible that the footprint could be commensurately reduced. If that was the case, in addition to the reductions in impacts described below, a reduction in impacts as described in the Reduced Footprint Alternative (fewer impacts to air quality, noise biology, paleontology, and cultural resources) would result.

Land Use and Planning

Under this alternative, development of a new health care facility would occur on the project site but with 25 percent fewer beds and staff than the proposed project. Like the proposed project, the Reduced Intensity Alternative would be consistent with the land use designations identified for the project site in both the City and County General Plans. No significant land use impacts were identified for the project, so this alternative would not reduce or avoid any significant land use impacts associated with the project, and impacts would be similar.

[Similar]

Aesthetics and Visual Resources

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

Traffic and Circulation

The Reduced Intensity Alternative would include 25 percent fewer beds and staff than the proposed project. The operational impact of the proposed project is less than significant after mitigation. With 25 percent fewer staff, the operational impact of this alternative would still have a less than significant impact to traffic. The Reduced Intensity Alternative would not change the operational impact to traffic, nor reduce or avoid the significant impact to intersection operation and, therefore, would result in similar impacts. *[Similar]*

Air Quality and Climate

This alternative would be located within the same project footprint as the proposed project, and assumes 25 percent fewer beds and staff than the proposed project, thereby providing 1,125 beds and employing up to 1,200 new personnel (as opposed to 1,500 beds and 1,600 staff proposed for the project). The proposed project would result in less than significant operational air quality impacts with implementation of mitigation measures; however, the project would result in significant and unavoidable construction-related emissions of ozone precursors. Therefore, while the alternative would result in less operational emissions than the proposed project, because the proposed project would result in less than significant operational emissions with implementation of mitigation, the alternative would result in similar operational air quality impacts to the proposed project.

Additionally, because the alternative has the same footprint, the construction-related emissions would also be similar and the alternative would not avoid the project's significant construction-related impacts associated with ozone precursors. The alternative would result in lower GHG emissions than the proposed project. However, the alternative would still consume a substantial amount of energy and would generate a substantial number of

vehicle trips, leading to a substantial increase in GHG emissions relative to the existing conditions. Therefore, the alternative would reduce project impacts associated with global climate change, but would not avoid the cumulatively considerable significant impact. [*Less, but no substantial reduction*]

Noise

Under this alternative, development of a new health care facility would occur on the project site but with 25 percent fewer beds and staff than the proposed project. Therefore, long-term on-site noise levels from operation of stationary sources associated with the alternative would be similar to the proposed project, which would be mitigated to a less than significant level. In the near term, construction noise generation associated with construction of new buildings and support facilities and construction-related traffic noise to off-site residences adjacent to Otay Mesa Road would not exceed limits stated in applicable regulations and guidelines. Therefore, the Reduced Intensity Alternative would result in similar impacts. [*Similar*]

Hydrology and Water Quality

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

Biological Resources

The development footprint of the Reduced Intensity Alternative does not differ from the proposed project. Both the project and the alternative would result in construction-related take and disturbance of habitat of special status species. Furthermore, both the project and the alternative would include an electrified fence, which could result in the take of protected bird species. Implementation of mitigation measures would reduce these impacts to a less than significant level; therefore, the impacts are similar. [*Similar*]

Cultural Resources

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

Geology, Soils, and Paleontological Resources

The Reduced Intensity Alternative includes the same development area as the project site. The proposed project would result in significant impacts associated with potential to uncover a paleontological resource. These impacts would be reduced to a less than significant level with implementation of mitigation measures. Impacts associated with the Reduced Intensity Alternative would be similar and would require the same mitigation. *[Similar]*

Hazards and Hazardous Materials

Similar to the proposed project, the Reduced Intensity Alternative would require the transportation, use, and/or disposal of hazardous materials. Project-related impacts associated with hazards and hazardous materials would be reduced to a less than significant level with implementation of mitigation measures. Because the hazardous building materials and soil contamination would not differ with a reduction in the number of beds and staff, the Reduced Intensity Alternative would result in similar impacts. *[Similar]*

Employment, Population, and Housing

This alternative assumes 25 percent fewer beds and staff than the project, thereby providing 1,125 beds and employing up to 1,200 new personnel (as opposed to 1,500 beds and up to 1,600 staff proposed for the project). This Draft EIR concludes that the proposed project would not result in a substantial population increase or a substantial increase in the demand for housing and that the project would result in less than significant impacts associated with population and housing. The alternative would include 25 percent fewer staff and therefore would further reduce the proposed project's less than significant impact. *[Less, but no substantial reduction]*

Public Services

Under this alternative, development of a new health care facility would occur on the project site but with 25 percent fewer beds and staff than the proposed project. The proposed project would not result in a substantial increase in demand for police or fire protection services, or the demand for additional staff. As the Reduced Intensity Alternative would include 25 percent fewer staff than the proposed project the alternative would consequently result in less demand for public services, and would further reduce the impact on services. *[Less, but no substantial reduction]*

Water Supply

The Reduced Intensity Alternative would include 25 percent fewer beds and staff than the proposed project and would consequently require less potable water. The demand generated by the proposed project would result in significant impacts related to water supply to the project, which would be mitigated below a level of significance. Therefore, this alternative would reduce the proposed project's impacts related to water supply. *[Less, but no substantial reduction]*

Utilities

Because a reduced number of facilities would be constructed under the Reduced Intensity Alternative, overall demand for utility services would be reduced. This Draft EIR concludes that the proposed project would not result in significant impacts related to increased demand for utilities and would not require the construction of new water or wastewater treatment facilities or expansion of existing facilities, nor would it create demand for energy service that would require additional construction. Therefore, although the Reduced Intensity Alternative would result in less demand due to the 25 percent reduction in beds and staffing, the impacts related to utilities would be generally similar to those of the proposed project. *[Similar]*

Conclusion

The Reduced Intensity Alternative would be environmentally superior to the proposed project with respect to construction-related air quality impacts and water supply. It would not eliminate significant and unavoidable impacts associated with the proposed project. This alternative would be similar to the project with respect to land use, visual resources, construction-related traffic, noise, hydrology and water quality, biological resources, cultural resources, geologic and paleontologic resources, hazardous material exposure, population and housing, public services, and utilities. Overall, this alternative is slightly environmentally superior to the proposed project. While this alternative may meet some or all of the project's objectives, it would require that 375 patient beds be located at an alternate CPR facility, which would likely result in increased impacts at the site of one of the other facilities CPR is evaluating. Because the locations of these beds and staff members are unknown, these impacts cannot be determined.

6.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The No Project (No Development) Alternative would be environmentally superior to the proposed as it would avoid all the significant, significant and unavoidable, and less than significant impacts of the proposed project. However, this alternative would not attain any of the objectives of the project. Furthermore, CEQA requires that if the no project alternative is the environmentally superior alternative, an additional environmentally superior alternative must be identified from the other alternatives considered.

Of the two other alternatives considered, the Reduced Intensity Alternative would be the environmentally superior alternative. Although the Reduced Footprint Alternative would reduce the proposed project's impacts with respect to biological resources and water supply, it would be similar to the project with respect to land use and planning, visual resources, traffic and circulation, air quality, noise, hydrology and water quality, cultural resources, geology and paleontology, hazards and hazardous materials, population and housing, public services, and utilities. This alternative would attain the objectives of the project; however, it could result in operational

inefficiencies at the project site that would result in safety and security operations that do not meet CDCR's standard programs and protocol.

The Reduced Intensity Alternative would be environmentally superior to the project because it would reduce all of the proposed projects impacts except those related to biological, cultural, and paleontological resources and hazards. If combined with a reduced footprint, this alternative could also reduce impacts to biological resources, paleontological resources, and water supply. However, the alternative would not avoid any of the proposed project's significant impacts. It would be similar to the project with respect to land use, visual resources, traffic, noise, hydrology, biological resources, cultural resources, geology and paleontology, hazardous materials, employment and population, public services, and utilities. The alternative would result in the need to place additional beds and staff at another CPR facility, which would likely result in off-site impacts. Because the location(s) of an alternate facility is unknown, these impacts cannot be determined.

The No Project (No Development) Alternative is the overall environmentally superior alternative of all alternatives evaluated, and the Reduced Intensity Alternative is the environmentally superior development alternative.

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