

5. Alternatives to the Proposed Project

5.1 INTRODUCTION

The following discussion is intended to inform the public and decision makers of feasible alternatives to the proposed project that would avoid or substantially lessen any significant effects of the proposed project.

The CEQA Guidelines set forth the intent and extent of alternatives analysis to be provided in an EIR. Section 15126.6(a) of the CEQA Guidelines states that:

An EIR shall describe a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

The alternatives evaluated in this Draft EIR were developed consistent with Section 15126.6(b) of the CEQA Guidelines, which states that:

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

Section 15126.6(c) of the State CEQA Guidelines states:

The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

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5.2 OVERVIEW OF PROJECT ALTERNATIVES

The alternatives to the proposed project are described below:

- **No Project Alternative.** Under the No Project Alternative, the proposed Plan would not be adopted, the future Regional Park would not be developed, and the project site would remain largely in its existing use, with the exception that the remediation activities planned by the United States Navy would occur. The site may still be used as grazing land, as it is currently, but would largely remain unutilized and closed to the public. The East Bay Regional Park District (District) would not manage the project site. It is expected that the City would pursue utilizing the site for mitigation for the Area Plan (and the Specific Plan). However, because the future Regional Park would not be developed, the site would not be placed under a restrictive covenant pursuant to the Biological Opinion,¹ and it is therefore possible that the project site could be made available for urban development.
- **Limited Footprint Alternative.** Under Limited Footprint Alternative, proposed Plan would be amended such that future Regional Park uses would be scaled back to focus the intensity of use in the previously developed areas of the project site. North of Bailey Road, proposed facilities and trails within the western portion of the site would be maintained. South of Bailey Road, the inner loop of proposed trails would be maintained, but the trails and roadways extending out from this loop and South Park Road would not be developed. Under this alternative, areas where features or improvements of the proposed Plan would not be constructed would be left in their existing conditions undisturbed. Under this alternative, the park would accommodate fewer visitors and fewer employees, and would provide less programming. With its smaller footprint, it is unknown whether the future park would be created and managed by the District. It is assumed that this alternative would adhere to the Biological Opinion within the park area; however, the portions of the project site that would not be included in a future park would not be managed to the same level as they would be under the proposed project.

5.3 ALTERNATIVES CONSIDERED AND REJECTED AS BEING INFEASIBLE

As described above, Section 15126.6(c) of the State CEQA Guidelines requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process, and briefly explain the reasons underlying the lead agency's determination. Section 15126.6(c) provides that among the factors that may be used to eliminate alternatives from detailed consideration in and EIR are (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. The following is a discussion of alternatives that were considered and rejected, along with the reasons they were not included in the analysis.

¹ On May 30, 2017, the United States Fish and Wildlife Service issued a Biological Opinion for the Transfer and Redevelopment of the Former Concord Naval Weapons Station Project, including the East Bay Regional Park District's proposed development of a Regional Park, which is the designated conservation area for the Concord Reuse Project Area Plan.

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5.3.1 EXPANDED PARK FACILITIES ALTERNATIVE

Based on park uses and facilities requested by some members of the public, the District considered an alternative in which the future Regional Park would include active recreational uses (such as ball fields, a disc course, a playground, equestrian facilities, and/or a splash pad), as well as more developed park facilities (more public buildings and/or more educational/interpretive facilities). However, this alternative was removed from further consideration because it may conflict with the Biological Opinion, which was issued by the United States Fish and Wildlife Service in 2017 and with which the future Regional Park shall comply as the designated conservation area for the City's Area Plan. The proposed Plan has been developed in compliance with the Biological Opinion, and an alternative that involves an expansion of the developed areas of the future Regional Park may not adequately account for the biological resource constraints of the project site and would be expected to increase rather than decrease the physical impacts of the proposed project.

5.3.2 OFF-SITE ALTERNATIVE

Section 15126.6(f)(2) of the CEQA Guidelines states that "The key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location." The District considered whether any alternative locations are available for the creation of a park that would achieve the basic objectives of the proposed project. The project site is unique as a large (over 2,500-acre) site that is accessible via public transit and adjacent to urban neighborhoods, and no other similar open space areas are available in the Bay Area that would provide this combination of size, characteristics, and ability to achieve the objectives of the project. Developing a park the size of the future Regional Park in a location not accessible by transit would result in greater traffic impacts, vehicle miles traveled, and associated impacts (e.g., air quality, greenhouse gas [GHG], and noise impacts).

5.4 OBJECTIVES ASSESSMENT

As stated above, the range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the proposed project. The proposed project addresses planned recreation facilities and conservation areas, where those land uses should be located, how those land uses may be accessed and connected, and how development of those uses should be managed so as to minimize impacts and maximize benefits to visitors and will seek to accomplish the following objectives:

- **Biological Resources.** Develop and manage the Regional Park for the protection, enhancement, and restoration of natural resources.
- **Cultural and Historic Resources.** Develop and manage the Regional Park to benefit the overall landscape character of the parklands and specific cultural and historic resources.
- **Circulation and Trails.** Develop and manage the Regional Park to complete gaps in regional trails networks, provide a range of recreational trails throughout the Regional Park, and facilitate and encourage multi-modal access to the site (e.g., bike, pedestrian, vehicular, public transit).

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- **Recreation and Education Facilities.** Develop and manage recreational and educational facilities that offer a range of opportunities to experience the unique natural, cultural, social, and military history of the CNWS and the Central Contra Costa County region.
- **Interpretive Facilities.** Establish a historical interpretation program and visitor center in partnership with the National Park Service, Friends of Port Chicago, and others which honors the veterans who served at the CNWS, conveys the significance of the events at Port Chicago, provides displays on the history of Concord and the Diablo Valley region, and facilitates access to the National Park Service's Port Chicago Naval Magazine National Memorial.

5.4.1 NO PROJECT ALTERNATIVE

The No Project Alternative would not adopt the proposed Plan, would not develop a future park on the project site, and would not ensure that the project site would be managed and maintained to protect, enhance, restore, or benefit biological, historical, or cultural resources. Therefore, the No Project Alternative would not meet any of the project objectives.

5.4.2 LIMITED FOOTPRINT ALTERNATIVE

Under Limited Footprint Alternative, the proposed Plan would be adopted and a smaller park would be developed. Therefore, some of the proposed recreational, educational, and interpretive facilities would be provided. In addition, park areas would be managed to protect biological, historical, and cultural resources. However, the District would not manage the portions of the project site that would not be included in the park, so it is unknown how those areas would be managed to protect biological, historical, and cultural resources. Therefore, this alternative would only partially achieve all of the project objectives.

5.5 IMPACT ASSESSMENT

The alternatives analysis assumes that all applicable mitigation measures recommended for the proposed project would apply to each alternative. The following analysis compares the potentially significant environmental impacts of each alternative with those of the project-related impacts for each of the environmental topics analyzed in detail in Chapter 4, Environmental Evaluation, of this Draft EIR. The impacts of each alternative are classified as a substantial deterioration, slight deterioration, similar impact, slight improvement, or substantial improvement to the level of impacts associated with the proposed project. Table 5-1 below, summarizes the relative impacts of each of the alternatives compared to the proposed project.

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TABLE 5-1 COMPARISON OF IMPACTS FROM PROJECT ALTERNATIVES AND THE PROPOSED PROJECT

Topic	Proposed Project ^a	No Project Alternative	Limited Footprint Alternative
Aesthetics	LTS	<	<
Air Quality	LTS	=	=
Biological Resources	LTS/M	<	=
Cultural Resources and Tribal Cultural Resources	LTS/M	>	=
Energy	LTS	=	=
Geology and Soils	LTS/M	>	=
Greenhouse Gas Emissions	LTS	<	=
Hazards and Hazardous Materials	LTS	<	=
Hydrology and Water Quality	LTS/M	>	=
Land Use and Planning	LTS	<<	<<
Noise	LTS	=	=
Population and Housing	LTS	=	=
Public Services and Recreation	LTS	<	<
Transportation and Traffic	LTS/M	>	=
Utilities and Service Systems	LTS/M	>	>
Wildfire	LTS	<	>

a. The impacts listed in this column represent the highest significance determination for each respective threshold.
 LTS Less than Significant << Substantial deterioration in comparison to the proposed project
 LTS/M Less than Significant with Mitigation < Slight deterioration in comparison to the proposed project
 = Similar impacts in comparison to the proposed project
 > Slight improvement in comparison to the proposed project
 >> Substantial improvement in comparison to the proposed project

5.5.1 NO PROJECT ALTERNATIVE

Pursuant to CEQA Guidelines Section 15126.6(e)(1), the No Project Alternative is required as part of the “reasonable range of alternatives” to allow decision makers to compare the impacts of approving the proposed project with the impacts of taking no action or not approving the proposed project. Per CEQA Guidelines Section 15126.6(e)(3)(C), the District, acting as the lead agency, should analyze the impacts of the No Project Alternative by projecting what would reasonably be expected to occur in the foreseeable future if the proposed Plan were not approved, based on current plans.

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Under the No Project Alternative, the District anticipates that the future Regional Park would not be developed and the project site would remain largely in its existing use, with the exception that the remediation activities planned by the United States Navy would occur. Because the future Regional Park would not be developed, the District would not manage the project site. It is expected that the City would pursue utilizing the site for mitigation for the Area Plan (and the Specific Plan). However, under this alternative, because a future Regional Park would not be developed, the site would not be placed under a restrictive covenant pursuant to the Biological Opinion, and it is therefore possible that the project site could be made available for urban development. This alternatives analysis does not speculate as to what urban uses may occur at the project site, and assumes that the site would remain its current, largely vacant, use. The site may still be used as grazing land, as it is currently, but would largely remain unutilized and closed to the public. The potential environmental impacts associated with the No Project Alternative when compared to the proposed project are described below.

5.5.1.1 AESTHETICS

As described in Chapter 4.1, Aesthetics, of this Draft EIR, the proposed project would result in less-than-significant impacts and no mitigation measures are required.

The Concord, Pittsburg, and Contra Costa County General Plans do not designate scenic vistas or roads in the project vicinity, and there are no officially designated scenic highways within the project site or vicinity. Under the No Project Alternative, no new structures would be built that could block scenic vistas, damage scenic resources, degrade the existing visual character of the project site, or introduce new sources of light and glare. However, the No Project Alternative would not involve the strategies proposed by the proposed project to further the protection of scenic resources in the project vicinity. These strategies include removing unutilized utility lines and infrastructure that obstructs long-range views and/or detracts from the character of this site, installing native vegetation and utilizing the existing topography would be used to frame views and screen undesirable features, and reducing the overall road density within the hills and focusing recreation and staging units in the lower elevations of the site. Therefore, views within and across the project site would be of a lower visual quality than under the proposed project. This alternative would also provide fewer opportunities for the public to enjoy scenic areas of the project site and access scenic overlooks. Overall, this alternative would represent a *slight deterioration* in comparison to the proposed project.

5.5.1.2 AIR QUALITY

As described in Chapter 4.2, Air Quality, of this Draft EIR, the proposed project would result in less-than-significant impacts and no mitigation measures are required.

Under the No Project Alternative, no new structures would be built and no site preparation activities would occur that could generate construction-related emissions. In addition, the future Regional Park would not be developed, and thus no operational emissions would be generated. Overall, neither the No Project Alternative nor the proposed project would result in significant air quality impacts. Therefore, the No Project Alternative would be *similar* to the proposed project.

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5.5.1.3 BIOLOGICAL RESOURCES

As discussed in Chapter 4.3, Biological Resources, of this Draft EIR, the proposed project would result in several significant-but-mitigable impacts. Mitigation measures would require surveys, buffers, relocation, avoidance, alternative roosts, and the implementation of management prescriptions to ensure that impacts would be reduced to less-than-significant levels.

Under the No Project Alternative, no new structures would be built and no site preparation activities would occur on the project site. Therefore, the No Project Alternative would not have the potential to disturb existing California annual grassland, habitat for on-site animal species, foraging land for golden eagles, or bat roosts. Unlike the proposed project, the No Project Alternative would not involve the removal of any trees. In addition, because the No Project Alternative would not open up the project site for public access, this alternative would not result in the potential for western pond turtles, Alameda whipsnake, or coast horned lizards to be inadvertently harmed by vehicle or foot traffic. Therefore, the No Project Alternative would avoid these significant-but-mitigable impacts that would occur under the proposed project. However, the No Project Alternative would not involve the management prescriptions contained in the proposed Plan, such as monitoring, managing, and enhancing breeding habitat, and controlling the spread of non-invasive plant species.

Neither the proposed project nor the No Project Alternative would result in impacts to riparian habitat or interfere with wildlife movement.

Although the No Project Alternative would avoid several of the significant-but-mitigable impacts of the proposed project, under the No Project Alternative it is unknown how the use of the project site as mitigation would be implemented if the District does not manage the land and it is possible that the site would not be preserved in compliance with the Biological Opinion. Therefore, overall the No Project Alternative would represent a *slight deterioration* in comparison to the proposed project.

5.5.1.4 CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES

As described in Chapter 4.4, Cultural Resources and Tribal Cultural Resources, of this Draft EIR, the proposed project would result in three significant-but-mitigable impacts. Mitigation measures would require preconstruction training, monitoring, and inadvertent discovery procedures to ensure that impacts would be reduced to less-than-significant levels.

Under the No Project Alternative, no new structures would be built and no site preparation activities would occur on the project site. Therefore, this alternative would not have the potential to result in the accidental discovery of buried cultural resources.

None of the buildings or structures in the project site are eligible for listing in either the National or California Registers. Therefore, neither the No Project Alternative nor the proposed project would have the potential to cause a substantial adverse change in the significance of a historical resource.

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Overall, because the No Project Alternative would avoid the significant-but-mitigable impacts of the proposed project, this alternative would represent a *slight improvement* in comparison to the proposed project.

5.5.1.5 ENERGY

As described in Chapter 4.5, Energy, of this Draft EIR, the proposed project would result in less-than-significant impacts and no mitigation measures are required.

Under the No Project Alternative, the construction of new structures as well as site preparation activities would not occur. Therefore, there would be no energy consumption related to construction vehicles and equipment, bound energy in construction materials, and electricity use for electricity-powered equipment. In addition, the future Regional Park would not be developed, and thus no operational energy consumption would be generated.

Overall, neither the No Project Alternative nor the proposed project would result in significant air quality impacts. Therefore, the No Project Alternative would be *similar* to the proposed project.

5.5.1.6 GEOLOGY AND SOILS

As described in Chapter 4.6, Geology and Soils, of this Draft EIR, the proposed project would result in one significant-but-mitigable impact to paleontological resources.

Under the No Project Alternative, no new structures would be built and the project site would not be opened to the public. Thus, no people or structures would be exposed to geologic hazards. Neither the proposed project nor the No Project Alternative would exacerbate existing geologic hazards, result in substantial soil erosion, or involve soils incapable of supporting the use of septic tanks or alternative wastewater disposal systems.

Under the No Project Alternative, no new structures would be built and no site preparation activities would occur on the project site. Therefore, this alternative would not have the potential to result in the accidental discovery of buried paleontological resources.

Overall, because the No Project Alternative would avoid the significant-but-mitigable impacts of the proposed project, this alternative would represent a *slight improvement* in comparison to the proposed project.

5.5.1.7 GREENHOUSE GAS EMISSIONS

As described in Chapter 4.7, Greenhouse Gas Emissions, of this Draft EIR, the proposed project would result in less-than-significant impacts and no mitigation measures are required.

Under the No Project Alternative, no new structures would be built and no site preparation activities would occur that could generate construction-related GHG emissions. In addition, the future Regional Park would not be developed, and thus no operational emissions would be generated.

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The No Project Alternative would not implement the open space and conservation strategy envisioned in the City's Area Plan, which is identified by the Association of Bay Area Governments (ABAG) as a Planned Development Area (PDA). While the proposed project is not within a PDA, the future Regional Park was envisioned as a key piece within the Area Plan development, balancing the planned adjacent development and providing partial mitigation for impacts of the City's development under the Area Plan. Therefore, the No Project Alternative may hinder the City's ability to achieve the sustainable vision for the Bay Area outlined by ABAG and Metropolitan Transportation Commission (MTC) in the Plan Bay Area 2040. As such, the No Project Alternative would represent a *slight deterioration* in comparison to the proposed project.

5.5.1.8 HAZARDS AND HAZARDOUS MATERIALS

As discussed in Chapter 4.8, Hazards and Hazardous Materials, of this Draft EIR, the proposed project would result in less-than-significant impacts and no mitigation measures are required.

As described in Chapter 4.8, before transfer of the property, the Navy and regulatory agencies must ensure that all applicable statutory and regulatory requirements have been satisfied. The Navy prepared a Finding of Suitability to Transfer for the transfer of title to real property by deed to non-federal entities. The project site contains sites that could pose a potential hazard due to past on-site activities. In addition, existing buildings may contain asbestos-containing materials, lead-based paints, and other hazardous materials. The No Project Alternative would not involve site preparation or demolition activities that would have the potential to disturb existing on-site hazardous materials. In addition, this alternative would not involve the use of hazardous materials associated with construction and operation of the future Regional Park. However, the proposed project would comply with existing regulations and deed restrictions and would therefore not create any significant impacts due to construction or operation of the future Regional Park.

Neither the proposed project nor the No Project Alternative would result in impacts associated with airport hazards or conflict with an emergency response plan or evacuation plan.

Under the No Project Alternative, the project site would not be managed by the District and therefore the District's existing wildfire reduction plans and procedures and proposed management prescriptions would not apply.

The No Project Alternative could create a new impact associated with wildland fires; therefore, overall this alternative would be a *slight deterioration* in comparison to the proposed project.

5.5.1.9 HYDROLOGY AND WATER QUALITY

As described in Chapter 4.9, Hydrology and Water Quality, of this Draft EIR, the proposed project would result in five significant-but-mitigable impacts.

The No Project Alternative would not involve construction or operation activities that would have the potential to degrade water quality, deplete groundwater supplies, alter drainage patterns, or increase stormwater runoff.

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Neither the proposed project nor the No Project Alternative would place housing or structures within a flood hazard area; create hazards associated with the failure of a levee or dam; or result in inundation by seiche, tsunami, or mudflow.

As described in Chapter 4.9, the proposed project would reduce the total impervious area on the site by approximately 41 acres, or 33 percent, thus improving groundwater recharge and reducing runoff. The No Project Alternative would maintain the existing impervious surfaces on the project site.

Overall, because the No Project Alternative would avoid the significant-but-mitigable impacts of the proposed project, this alternative would represent a *slight improvement* in comparison to the proposed project.

5.5.1.10 LAND USE AND PLANNING

As described in Chapter 4.10, Land Use and Planning, of this Draft EIR, the proposed project would result in less-than-significant impacts and no mitigation measures are required.

The proposed project would have a positive impact because it would enhance, rather than hinder, connectivity through and across the project site. Under the No Project Alternative, the future Regional Park's trail connections would not be developed and the project site would not be opened to the public. Therefore, this alternative would not provide the increased connectivity planned by the proposed project and tie into the planned community planned in the Area Plan. However, since no new barriers would be created and the Area Plan has not yet been developed, this alternative would not create a negative impact associated with the physical division of an established community.

The No Project Alternative would not redevelop the project site into a future Regional Park and therefore would conflict with District and City land use plans and policies intended to develop, manage, and maintain the site in a manner that avoids environmental effects. The No Project Alternative would also be inconsistent with the proposed project site's current land use designation of CRP-OS, which intends to protect and enhance the sensitive habitats and valuable topographical and hydrological features of the site. This could result in a new significant and unavoidable impact associated with conflicts with existing plans and policies intended to avoid environmental impacts.

As discussed in Section 5.5.1.6, the No Project Alternative, the No Project Alternative may hinder the City's ability to achieve the sustainable vision for the Bay Area outlined by ABAG/MTC's *Plan Bay Area*.

Neither the proposed project nor the No Project Alternative would conflict with a habitat conservation plan.

Overall, because the No Project Alternative would conflict with applicable plans and policies intended to guide the conversion of the project site into a well-managed open space and park setting, the No Project Alternative would result in a *substantial deterioration* in comparison to the proposed project.

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5.5.1.11 NOISE

As described in Chapter 4.11, Noise, of this Draft EIR, the proposed project would result in less-than-significant impacts.

Under the No Project Alternative, no future site preparation or construction activities would occur and no construction related noise impacts would occur.

Under this alternative, the project site would largely remain in its existing conditions. Therefore, as under the proposed project, no operational noise impacts would occur.

Neither the proposed project nor the No Project Alternative would result in impacts associated with traffic-related or airport noise.

Overall, neither the No Project Alternative nor the proposed project would result in significant noise impacts. Therefore, the No Project Alternative would be *similar* to the proposed project.

5.5.1.12 POPULATION AND HOUSING

As described in Chapter 4.12, Population and Housing, of this Draft EIR, the proposed project would result in less-than-significant impacts and no mitigation measures are required.

With the exception of the caretaker's residence included in the proposed Plan, neither the proposed project nor the No Project Alternative would involve new housing on the project site. Therefore, neither scenario would have the potential to exceed growth projections.

Neither the proposed project nor the No Project Alternative would remove existing housing or displace people.

Overall, the impacts related to population and housing would be *similar* than that of the proposed project.

5.5.1.13 PUBLIC SERVICES AND RECREATION

As described in Chapter 4.13, Public Services and Recreation, of this Draft EIR, impacts to fire protection services, police services, and parks, under the proposed project, were found to be less than significant and no mitigation measures are required.

As discussed in Chapter 4.13, Public Services and Recreation, the proposed project would not require the expansion of Contra Costa County Fire Protection District or Concord Police Department facilities. The No Project Alternative would not increase the use or population of the project site and therefore would not increase demands for fire or police services. However, because the No Project Alternative would not involve the District's management and oversight of the project site, it is possible that under this alternative the project site could become a result in wildland fire hazards or public safety and security concerns.

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Because the proposed project would facilitate the development of a future publicly accessible park, the project would not increase demands for park services that would require existing facilities to be expanded or new facilities to be built. Under the No Project Alternative, the future Regional Park would not be developed. Therefore, the project site would not be available to balance the proposed new development under the Area Plan.

Overall, the No Project Alternative would represent a *slight deterioration* in comparison to the proposed project.

5.5.1.14 TRANSPORTATION AND TRAFFIC

As discussed in Chapter 4.14, Transportation and Traffic, of this Draft EIR, the proposed project would result in one significant-but-mitigable impact associated with temporary impacts due to construction activity.

The No Project Alternative would not involve construction activities and would not temporarily impact the circulation system.

As described in Chapter 4.14, the traffic generated by the proposed project would not exceed the City's peak-hour vehicle trip threshold for a full traffic impact analysis. Under the No Project Alternative, the project site would not be redeveloped or opened for public use, and therefore no new vehicle traffic impacts would occur.

The No Project Alternative would not provide any transit, bicycle, or pedestrian connections. However, since none are currently planned on the project site, this would not create a new impact associated with plan conflicts.

Neither the proposed project nor the No Project Alternative would cause impacts related to inadequate emergency access and hazards, or result in a change in air traffic patterns.

Overall, because the No Project Alternative would avoid the significant-but-mitigable impact of the proposed project, this alternative would represent a *slight improvement* in comparison to the proposed project.

5.5.1.15 UTILITIES AND SERVICE SYSTEMS

As described in Chapter 4.15, Utilities and Service Systems, of this Draft EIR, impacts to water supply services were found to be significant but mitigatable. Under Mitigation Measure UTIL-2, the District would require all required water infrastructure to be constructed to meet Contra Costa Water District requirements in order to ensure that impacts would be less than significant. Impacts to sanitary wastewater services, stormwater infrastructure, solid waste services, and energy conservation were found to be less than significant and no mitigation measures are required.

Under the No Project Alternative, the project site would remain in its existing use and would not require the construction of new water infrastructure. Therefore, this alternative would avoid the significant-but-mitigable impact that would occur under the proposed project.

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Although the proposed project would increase wastewater, solid waste, stormwater, and energy utility demands, it would not require new facilities that would result in a significant impact. Under the No Project Alternative, the project site would remain in its existing use and these service demands would not be increased. Therefore, as under the proposed project, under the No Project Alternative no significant impacts would occur.

Overall, because the No Project Alternative would avoid the significant-but-mitigable impact of the proposed project, this alternative would represent a *slight improvement* in comparison to the proposed project.

5.5.1.16 WILDFIRE

As described in Chapter 4.16, Wildfire, of this Draft EIR, the proposed project would result in less-than-significant impacts.

Under the No Project Alternative, no new structures would be built that would exacerbate wildfire risks, require the installation and maintenance of new infrastructure, or expose people or structures to downslope and downstream flooding or landslides as a result of post-fire effects. However, Under the No Project Alternative, the project site would not be managed by the District and therefore the District's existing wildfire reduction plans and proposed management prescriptions would not apply.

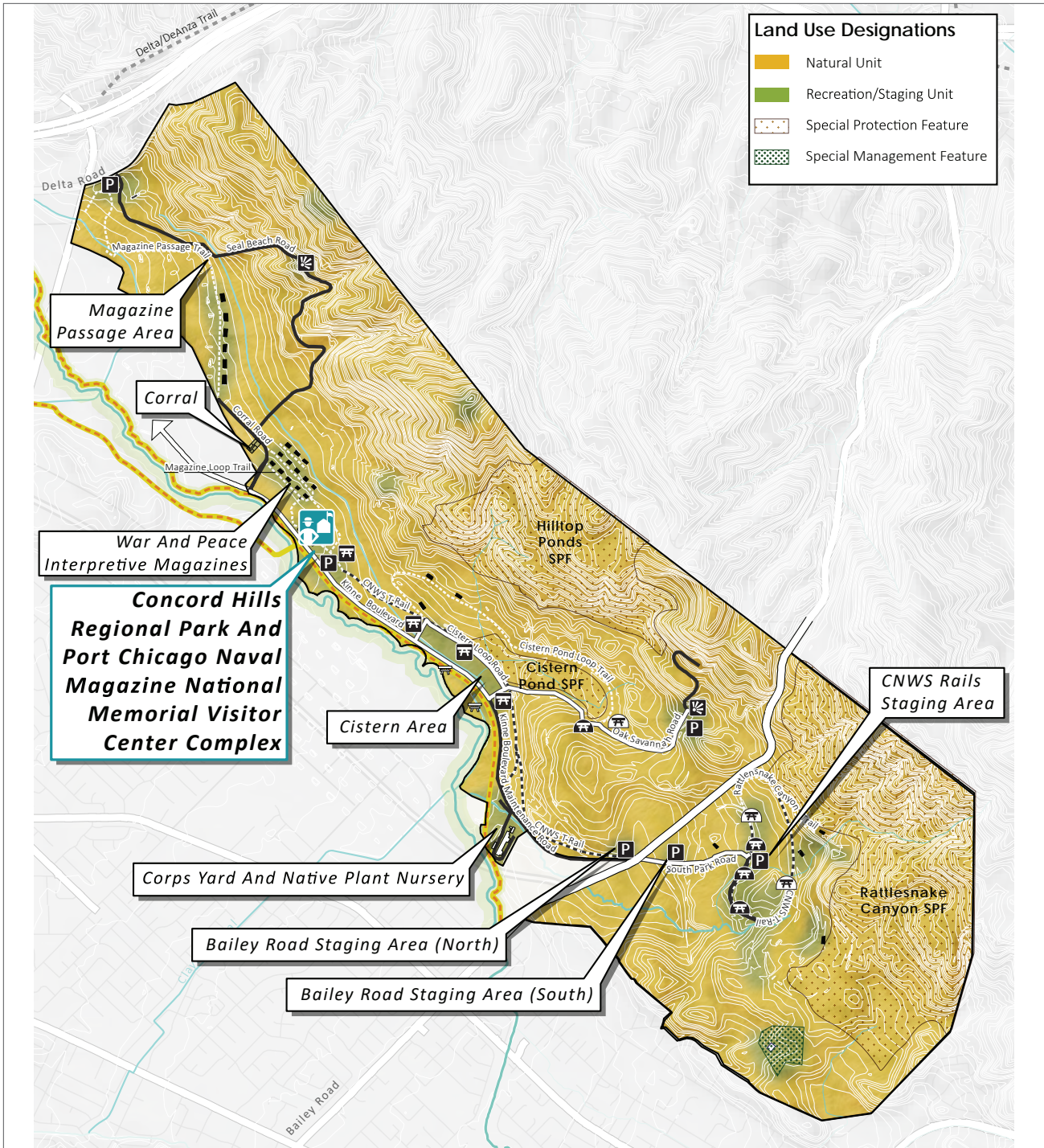
Overall, neither the No Project Alternative nor the proposed project would result in significant wildfire impacts. However, since the No Project Alternative would not fall under the District's wildfire reduction plans, the No Project Alternative would represent a *slight deterioration* in comparison to the proposed project.

5.5.2 LIMITED FOOTPRINT ALTERNATIVE

Under Limited Footprint Alternative, proposed park uses would be scaled back to focus the intensity of use in the previously-developed areas of the project site. North of Bailey Road, proposed facilities and trails within the western portion of the site would be maintained. South of Bailey Road, the inner loop of proposed trails would be maintained, but the trails and roadways extending out from this loop and South Park Road would not be developed. Where proposed features of the proposed Plan have been removed, under this alternative these areas would be left in their existing conditions or restored to a more natural state. This alternative would not include the proposed community orchard, Diablo Center, Rancho Monte Group Campsite, Eagle's Nest Backcountry Campsite, Port Chicago Overlook, Delta Vista Overlook, Water Tank Overlook, or Concord Overlook. Several picnic areas would also be removed. It is assumed that the caretaker's residence would be relocated to a new site within the western portion of the site. An overview of this alternative is shown in Figure 5-1.

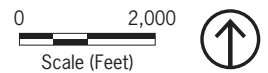
It is assumed that, under this alternative, the park would accommodate fewer visitors and fewer employees, and would provide less programming, due to the removal of several miles of trail, the proposed orchard and Diablo Center, two campsites, and several picnic areas and overlooks. With its smaller footprint, it is unknown whether the park would be created and managed by the District or whether it would become a City or National Park Service park instead.

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Source: Concord Hills Regional Park Land Use Plan, 2017.

- | | | | |
|--|---|--|---|
| | overlook | | hiking-only trail (narrow natural surface) |
| | picnic area with parking | | multi-use trail (narrow natural surface) |
| | picnic area with parking at existing magazines | | paved multi-use trail |
| | picnic area without parking | | rail to multi-use trail conversion |
| | picnic area at existing magazines without parking | | multi-use trail along Mount Diablo Creek and connection to N. Concord BART (rail to trail conversion where appropriate) |
| | staging area with parking | | existing regional trail |
| | campsite | | public road |
| | magazine incorporated into park programming | | maintenance road (hikers, bikers, and equestrians permitted) |
| | irrigation canal | | |
| | 10' contour line | | |



SPF = Special Protection Feature

Figure 5-1
 Limited Footprint
 Alternative Overview

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However, it is assumed that the same or similar management prescriptions would apply to a City- or National Park Services-managed park. It is also assumed that this alternative would adhere to the Biological Opinion within the park area. However, the portions of the project site that would not be included in the park may not be managed to the same level as they would be under the proposed project.

The potential environmental impacts associated with the Limited Footprint Alternative when compared to the proposed project are described below.

5.5.2.1 AESTHETICS

As described in Chapter 4.1, Aesthetics, of this Draft EIR, the proposed project would result in less-than-significant impacts and no mitigation measures are required.

As described in Section 5.5.1.1, there are no officially-designate scenic vistas, roadways, or highways within the project site or vicinity. Under the Limited Footprint Alternative, fewer structures would be renovated or reconstructed than under the proposed project. In areas of the project site that would not be incorporated as part of the park, it is assumed that some structures would be demolished and others would remain in their existing conditions. This alternative would involve less removal of unutilized utility lines and infrastructure that obstruct long-range views and/or detracts from the character of the project site. Therefore, for park visitors, views within and across the project site would be of a lower visual quality than under the proposed project. This alternative would also provide fewer opportunities for the public to enjoy scenic areas of the project site and access scenic overlooks. Overall, this alternative would represent a *slight deterioration* in comparison to the proposed project.

5.5.2.2 AIR QUALITY

As described in Chapter 4.2, Air Quality, of this Draft EIR, the proposed project would result in less-than-significant impacts and no mitigation measures are required.

Under the Limited Footprint Alternative, fewer structures would be renovated or redeveloped and a smaller portion of the project site would be improved. Therefore, fewer construction-related emissions would be generated in comparison to the proposed project. In addition, because the park would host less programming and accommodate fewer visitors and employees, operational emissions would be reduced due to the reduced vehicular travel associated with the project. Overall, neither the Limited Footprint Alternative nor the proposed project would result in significant air quality impacts. Therefore, Limited Footprint Alternative would be *similar* to the proposed project.

5.5.2.3 BIOLOGICAL RESOURCES

As discussed in Chapter 4.3, Biological Resources, of this Draft EIR, the proposed project would result in several significant-but-mitigable impacts. Mitigation measures would require surveys, buffers, relocation, avoidance, alternative roosts, and the implementation of management prescriptions to ensure that impacts would be reduced to less-than-significant levels.

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Under the Limited Footprint Alternative, fewer structures would be renovated or redeveloped and fewer site preparation activities would occur on the project site. Therefore, the Limited Footprint Alternative would disturb fewer acres of existing California annual grassland, habitat for on-site animal species, foraging land for golden eagles, bat roosts, and trees. Because this alternative would still open up parts of the project site for public access, this alternative would result in the same potential for western pond turtles, Alameda whipsnake, and coast horned lizards to be inadvertently harmed by trail construction, vehicle or foot traffic as would occur under the proposed project.

It is assumed that, the Limited Footprint Alternative would involve the same management prescriptions and Biological Opinion requirements that would be involved in the proposed project. However, under this alternative, large portions of the project site would not be included in the park. These excluded areas would not receive foot traffic and would not have roads or trails enabling District staff to regularly patrol the areas. These restricted areas would be more vulnerable to trespassing, vandalism, and undiscovered impacts to resources under the Limited Footprint Alternative than under the proposed project.

Neither the proposed project nor the Limited Footprint Alternative would result in impacts to riparian habitat or interfere with wildlife movement.

Overall, the Limited Footprint Alternative would reduce the scope of, but not entirely avoid, the significant-but-mitigable impacts of the proposed project, and it would add the potential for increased impacts due to lack of patrol and supervision of the entirety of the project site. Therefore, overall the Limited Footprint Alternative would represent *similar* impacts in comparison to the proposed project.

5.5.2.4 CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES

As described in Chapter 4.4, Cultural Resources and Tribal Cultural Resources, of this Draft EIR, the proposed project would result in three significant-but-mitigable impacts. Mitigation measures would require preconstruction training, monitoring, and inadvertent discovery procedures to ensure that impacts would be reduced to less-than-significant levels.

Under the Limited Footprint Alternative, fewer structures would be redeveloped and fewer areas of the project site would be subject to site preparation activities. However, implementation of the Limited Footprint Alternative could also result in the discovery of cultural resources, and this alternative would also require mitigation to reduce impacts to less than significant. None of the buildings or structures in the project site are eligible for listing in either the National or California Registers. Therefore, neither the Limited Footprint Alternative nor the proposed project would have the potential to cause a substantial adverse change in the significance of a historical resource.

Overall, since both the proposed project and the Limited Footprint Alternative require the same mitigation measures to reduce impacts to less than significant, impacts of the Reduced Footprint Alternative would be *similar* when compared to the proposed project.

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5.5.2.5 ENERGY

As described in Chapter 4.5, Energy, of this Draft EIR, the proposed project would result in less-than-significant impacts, and no mitigation measures are required.

Under the Limited Footprint Alternative, fewer structures would be renovated or redeveloped and a smaller portion of the project site would be improved. Therefore, construction energy consumption would be reduced. In addition, because the future park would host less programming and accommodate fewer visitors and employees, vehicular travel would be reduced and therefore operational energy consumption would be reduced.

Overall, neither the Limited Footprint Alternative nor the proposed project would result in significant energy. Therefore, the Limited Footprint Alternative would be *similar* to the proposed project.

5.5.2.6 GEOLOGY AND SOILS

As described in Chapter 4.6, Geology and Soils, of this Draft EIR, the proposed project would result in one significant-but-mitigable impact to paleontological resources.

Under the Limited Footprint Alternative, fewer structures would be renovated or redeveloped and a smaller portion of the project site would be open to the public. Thus, fewer people or structures would be exposed to geologic hazards. Neither the proposed project nor the Limited Footprint Alternative would exacerbate existing geologic hazards, result in substantial soil erosion, or involve soils incapable of supporting the use of septic tanks or alternative wastewater disposal systems.

As described in Chapter 4.6, implementation of the proposed project could result in the accidental discovery of paleontological resources. Implementation of the Limited Footprint Alternative could also result in the discovery of paleontological resources, and this alternative would also require mitigation to reduce impacts to paleontological resources to less than significant.

Overall, since both the proposed project and the Limited Footprint Alternative require the same mitigation measures to reduce impacts to less than significant, impacts of the Reduced Footprint Alternative would be *similar* when compared to the proposed project.

5.5.2.7 GREENHOUSE GAS EMISSIONS

As described in Chapter 4.7, Greenhouse Gas Emissions, of this Draft EIR, the proposed project would result in less-than-significant impacts and no mitigation measures are required.

Under the Limited Footprint Alternative, fewer structures would be renovated or redeveloped and a smaller portion of the project site would be improved. Therefore, fewer construction-related GHG emissions would be generated. In addition, because the future park would host less programming and accommodate fewer visitors and employees, operational emissions would be reduced due to the reduced vehicular travel associated with the project. Overall, neither the Limited Footprint Alternative nor the

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proposed project would result in significant air quality impacts. Therefore, Limited Footprint Alternative would be *similar* to the proposed project.

5.5.2.8 HAZARDS AND HAZARDOUS MATERIALS

As discussed in Chapter 4.8, Hazards and Hazardous Materials, of this Draft EIR, the proposed project would result in less-than-significant impacts and no mitigation measures are required.

As described in Section 5.5.1.8, the Navy has prepared a Finding of Suitability to Transfer that identifies several sites within the project site that could pose a potential hazard due to past on-site activities. In addition, existing buildings may contain asbestos-containing materials, lead-based paints, and other hazardous materials. The Limited Footprint Alternative would involve fewer site preparation or demolition activities that would have the potential to disturb existing on-site hazardous materials. In addition, this alternative would involve a reduced use of hazardous materials associated with construction and operation of the future park. However, by concentrating park activities and users within the previously-disturbed areas of the project site, this alternative would potentially involve a more intensive use of these areas, which are the areas of the project site with a greater potential for existing hazards (such as volatile organic compounds and arsenic) to occur. It is expected that, as under the proposed project, compliance with existing regulations and deed restrictions would ensure that any significant impacts due to construction or operation of the future Regional Park would be avoided.

Neither the proposed project nor the Limited Footprint Alternative would result in impacts associated with airport hazards or conflict with an emergency response plan or evacuation plan.

It is assumed that under the Limited Footprint Alternative, the project site would be managed by similar wildfire reduction plans and procedures and management prescriptions as would apply under the proposed project.

The Limited Footprint Alternative would reduce the use and potential disturbance of some potentially hazardous areas but could increase the use of other areas of concern. Therefore, overall this alternative would be *similar* to the proposed project.

5.5.2.9 HYDROLOGY AND WATER QUALITY

As described in Chapter 4.9, Hydrology and Water Quality, of this Draft EIR, the proposed project would result in five significant-but-mitigable impacts.

The Limited Footprint Alternative would involve fewer construction or operation activities that would have the potential to degrade water quality, deplete groundwater supplies, alter drainage patterns, or increase stormwater runoff. The Limited Footprint Alternative would however require the same mitigation measures as the proposed project to reduce impacts to less than significant.

Neither the proposed project nor the Limited Footprint Alternative would place housing or structures within a flood hazard area; create hazards associated with the failure of a levee or dam; or result in inundation by seiche, tsunami, or mudflow.

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As described in Chapter 4.9, the proposed project would reduce the total impervious area on the site by approximately 41 acres, or 33 percent, thus improving groundwater recharge and reducing runoff. Although, the Limited Footprint Alternative would involve fewer miles of roads and trails than the proposed project, it may also not include the same extent of site restoration as the proposed project. Therefore, it is possible that this alternative would not decrease impervious surfaces by the same extent that would occur under the proposed project.

Overall, since both the proposed project and the Limited Footprint Alternative require the same mitigation measures to reduce impacts to less than significant, impacts of the Reduced Footprint Alternative would be *similar* when compared to the proposed project.

5.5.2.10 LAND USE AND PLANNING

As described in Chapter 4.10, Land Use and Planning, of this Draft EIR, the proposed project would result in less-than-significant impacts and no mitigation measures are required.

The proposed project would have a positive impact because it would enhance, rather than hinder, connectivity through and across the project site. Under the Limited Footprint Alternative, many of the proposed trail connections would not be developed and large portions of the project site would not be opened to the public. Therefore, this alternative would not provide the same level of increased connectivity planned by the proposed project. However, since no new barriers would be created, this alternative would not create a negative impact associated with the physical division of an established community.

The Limited Footprint Alternative would create a future park but due to its smaller size it may not be managed as a regional park and would not be of the same scale previously planned by the District and City. Large portions of the project site would not be included in the park and would not be managed for the same level of resource protection as they would be under the proposed project. Therefore, this alternative would conflict with District and City land use plans and policies intended to develop, manage, and maintain the site in a manner that avoids environmental effects.

The Limited Footprint Alternative may also create inconsistencies in portions of the project site excluded from the park with the project site's current land use designation of CRP-OS, which intends to protect and enhance the sensitive habitats and valuable topographical and hydrological features of the entire site. This could result in a new significant and unavoidable impact associated with conflicts with existing plans and policies intended to avoid environmental impacts.

Neither the proposed project nor the Limited Footprint Alternative would conflict with a habitat conservation plan.

Overall, because the Limited Footprint Alternative may conflict with applicable plans and policies intended to guide the conversion of the entire project site into a well-managed open space and park setting, the Limited Footprint Alternative could result in a *substantial deterioration* in comparison to the proposed project.

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5.5.2.11 NOISE

As described in Chapter 4.11, Noise, of this Draft EIR, the proposed project would result in less-than-significant impacts

Under the Limited Footprint Alternative, fewer site preparation and construction activities would occur. However, the Limited Footprint Alternative, similar to the proposed project, would not result in construction noise impacts.

Under this alternative, a larger portion of the project site would remain in its existing conditions. Therefore, as under the proposed project, no operational noise impacts would occur.

Neither the proposed project nor the Limited Footprint Alternative would result in impacts associated with traffic-related or airport noise.

Overall, neither the Limited Footprint Alternative nor the proposed project would result in significant noise impacts. Therefore, the Limited Footprint Alternative would be *similar* to the proposed project.

5.5.2.12 POPULATION AND HOUSING

As described in Chapter 4.12, Population and Housing, of this Draft EIR, the proposed project would result in less-than-significant impacts and no mitigation measures are required.

With the exception of the caretaker's residence, neither the proposed project nor the Limited Footprint Alternative would involve new housing on the project site. Therefore, neither scenario would have the potential to exceed growth projections.

Neither the proposed project nor the Limited Footprint Alternative would remove existing housing or displace people.

Overall, the impacts related to population and housing would be *similar* than that of the proposed project.

5.5.2.13 PUBLIC SERVICES AND RECREATION

As described in Chapter 4.13, Public Services and Recreation, of this Draft EIR, impacts to fire protection services, police services, and parks, under the proposed project, were found to be less than significant and no mitigation measures are required.

As discussed in Section 5.5.1.13, the proposed project would not require the expansion of Contra Costa County Fire Protection District or Concord Police Department facilities. The Limited Footprint Alternative would result in a lower level of use of the project site and therefore would result in lower demands for fire or police services in comparison to the proposed project. However, under this alternative, large portions of the project site would not be included in the future park and may not be managed to the same level as they would be under the proposed project. Since much of the project site adjacent to these areas would be included in the park and open to the public, it is likely that some visitors will venture off of trails and

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access portions of the site that are not intended for public use. This activity could result in public safety and security issues, including the potential for wildfires to be started by unsanctioned campfires or similar activities. This could create a new impact that would not occur under the proposed project.

Like the proposed project, this alternative would create a publicly accessible park and would therefore not increase demands for park services that would require existing facilities to be expanded or new facilities to be built.

Overall, the Limited Footprint Alternative would represent a *slight deterioration* in comparison to the proposed project.

5.5.2.14 TRANSPORTATION AND TRAFFIC

As discussed in Chapter 4.14, Transportation and Traffic, of this Draft EIR, the proposed project would result in one significant-but-mitigable impact associated with temporary impacts due to construction activity. As described in Chapter 4.14, construction activity associated with the proposed Regional Park could result in temporary impacts to the circulation system. Although the Limited Footprint Alternative would involve fewer construction related trips, this alternative would also require mitigation to reduce this impact to a less-than-significant level.

As described in Chapter 4.14, the traffic generated by the proposed project would not exceed the City's peak-hour vehicle trip threshold for a full traffic impact analysis. Under the Limited Footprint Alternative, the project site would accommodate fewer park visitors and employees. Therefore, traffic levels would be lower than under the proposed project.

The Limited Footprint Alternative would provide fewer transit, bicycle, and pedestrian connections than the proposed project. However, since none are currently planned on the project site, this would not create a new impact associated with plan conflicts.

Neither the proposed project nor the Limited Footprint Alternative would cause impacts related to inadequate emergency access and hazards, or result in a change in air traffic patterns.

Overall, since both the proposed project and the Limited Footprint Alternative require the same mitigation measures to reduce impacts to less than significant, impacts of the Reduced Footprint Alternative would be *similar* when compared to the proposed project.

5.5.2.15 UTILITIES AND SERVICE SYSTEMS

As described in Chapter 4.15, Utilities and Service Systems, of this Draft EIR, impacts to water supply services were found to be significant but mitigatable. Under Mitigation Measure UTIL-2, the District would require all required water infrastructure to be constructed to meet Contra Costa Water District requirements in order to ensure that impacts would be less than significant. Impacts to sanitary wastewater services, stormwater infrastructure, solid waste services, and energy conservation were found to be less-than-significant and no mitigation measures are required.

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Although the proposed project would increase wastewater, solid waste, stormwater, and energy utility demands, it would not require new facilities that would result in a significant impact. Under the Limited Footprint Alternative, demands for these services would increase in comparison to existing conditions, but to a lesser level than under the proposed project. Therefore, as under the proposed project, under the Limited Footprint Alternative no significant impacts would occur.

Overall, the Limited Footprint Alternative would avoid the significant-but-mitigable impact of the proposed project. Therefore, this alternative would represent a *slight improvement* in comparison to the proposed project.

5.5.2.16 WILDFIRE

As described in Chapter 4.16, Wildfire, of this Draft EIR, the proposed project would result in less-than-significant impacts.

Under the Limited Footprint Alternative, fewer structures would be renovated or redeveloped and a smaller portion of the project site would be improved. With this alternative, a number of proposed trails, staging areas, the Corp Yard, and the Visitor Center Complex would be located downslope of potential debris flow sources and downstream of potential post-fire flooding. Since the Caregiver's Residence would not be developed, the risk of an on-site resident being exposed to wildfire risks is eliminated. With the reduced park site, it is expected that fewer visitors and contractors would utilize the project site and therefore the potential for accidental fires to be created from human activities would be reduced. Under this alternative, the project site would be managed by the District and therefore the District's existing wildfire reduction plans and proposed management prescriptions would apply.

Overall, the Limited Footprint Alternative would reduce the structures exposed to the risk of wildfires. Therefore, this alternative would represent a *slight improvement* in comparison to the proposed project.

5.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of the proposed project and the alternatives, Section 15126.6 of the CEQA Guidelines requires that an "environmentally superior" alternative be selected and the reasons for such a selection be disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of significant impacts. Identification of the environmentally superior alternative is an informational procedure and the alternative selected may not be the alternative that best meets the goals or needs of the District. The project under consideration cannot be identified as the environmentally superior alternative, so the identification of the environmentally superior alternative does not mean that that alternative is superior to the proposed project, only that it is superior among the alternatives considered.

The No Project Alternative would result in a deterioration in relation to aesthetics, biological resources, GHG emissions, hazards and hazardous materials, land use and planning (for which the deterioration would be substantial), public services and recreation, and wildfire, and would result in an improvement in relation to cultural resources, geology and soils, hydrology and water quality, transportation, and utilities

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and service systems. Overall, the No Project Alternative would result in worsened impacts in comparison to the proposed project.

As shown in Table 5-1, overall the Limited Footprint Alternative would result in a deterioration in relation to aesthetics, land use and planning (for which the deterioration would be substantial), and public services and recreation, and would result in an improvement in relation to wildfire and utilities and service systems. Overall, the Limited Footprint Alternative would be a slight deterioration in comparison to the proposed project in terms of its overall level of impact. The Limited Footprint Alternative would be the environmentally superior alternative.

Neither the Limited Footprint Alternative nor the No Project Alternative would result in an overall improvement in comparison to the proposed project.

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