

SECTION 8

ALTERNATIVES TO THE PROPOSED PROJECT

8.1 INTRODUCTION

CEQA requires EIRs to discuss a range of reasonable alternatives to a 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 (State CEQA Guidelines, Section 15126.6{a}). This Section thus describes alternatives which satisfy these two criteria, i.e., alternatives which both: (a) attain most of the Project's basic objectives; and, (b) substantially lessen the Project's potentially significant environmental effects. Pursuant to § 15126.6 (f)(1) of the State CEQA Guidelines, *among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (Projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)*. Although these factors do not present a strict limit on the scope of reasonable alternatives to be considered, they help establish the context in which "the rule of reason" is measured against when determining an appropriate range of alternatives sufficient to establish and foster meaningful public participation and informed decision-making.

The basic objectives of the Project are identified in Section 4 of this report. The Project's potentially significant impacts are set forth in Section 5 of the EIR. The focus of this alternatives analysis is limited to those issues that were identified in the Project's Initial Study as having potentially new significant environmental effects. These issues include traffic and circulation, air quality, noise, and hazardous materials and waste. All other issues have been evaluated in detail in the DODHF Novato Disposal and Reuse EIS and no new or additional significant environmental effects would be anticipated. For one alternative, *Demolition of Structures in the Capehart/Hillside Housing Planning Area Alternative*, the environmental analysis has been expanded to account for issues that were not specifically evaluated in the Disposal and Reuse EIS, as the EIS assumed rehabilitation rather than demolition and replacement of these structures.

Alternative uses of the proposed CEQA Project site are substantially limited by the existing site constraints imposed by the historical uses of the property as well as the regulatory agencies maintaining jurisdiction over certain aspects of the Project site. As such, and pursuant to the guidelines for determining the selection of a reasonable range of Project alternatives (§ 15126.6(c) of the State CEQA Guidelines), an alternative use of the Project site is not evaluated in this EIR. Based on the goals, policies and objectives of the City's General Plan, the Reuse Plan and the Redevelopment Plan with respect to this Project, as well

as the environmental, planning and design process inherent to the acquisition and transfer process, the City of Novato as well as the Redevelopment Agency of the City of Novato would not conceivably pursue development of this Project site if the proposed development scenario were composed of land uses, substantially different than those proposed as part of the Project.

Two alternatives were evaluated in detail in the DODHF Novato Disposal and Reuse EIS including an open space alternative and a no action alternative. Under the open space alternative, Rafael Village would be used for open space and parkland instead of residential uses. Developments could include creek restoration, playing fields, jogging and bike paths, playgrounds and sitting areas. The Mainside uses would be similar to those under the proposed CEQA Project except corporation yards would be allowed in the Commissary and Exchange Triangle planning areas, and all of the Town Center area would be used for community facilities. In addition, there would be less developed parkland and more open space in the Ballfields planning area. Under the no action alternative, the facility would remain closed but would remain indefinitely in federal ownership in a caretaker status. The two alternatives evaluated in the DODHF Novato Disposal and Reuse EIS are hereby incorporated by reference into this alternatives analysis.

Four additional alternatives have been evaluated in this EIR including the no-project alternative, the reduced residential density alternative, an alternative that evaluates demolition and replacement (rather than rehabilitation) of structures in the Capehart/Hillside Housing Planning Area, and an alternative that amends the Redevelopment Plan Area to repeal the inclusion of the New Hamilton Partnership (NHP) Master Plan Area. State CEQA Guidelines § 15126.6(e)(3) requires the evaluation of a “no-project” alternative. Although the DODHF Novato Disposal and Reuse EIS evaluated a no action alternative, the no-Project alternative evaluated in this document differs in that since completion of the EIS, the U.S. Congress has authorized the Negotiated Sale and Purchase Agreement for DODHF Novato. However, with the no-Project alternative, the City would not implement the Project. Without City adoption and implementation of the Project, the acquisition and conveyance of the property from the Navy to the Authority would not occur. The property could be transferred at a later date through some other means, such as a Public Benefit Discount or Economic Development Conveyance. The nature of such a potential future transfer is speculative and, therefore, not analyzed in this Draft EIR. The analysis of the no-project alternative assumes that the facility would remain in Navy caretaker status and that the Reuse Plan and/or Redevelopment Plan for the Hamilton Field Redevelopment Project would not be implemented.

The analysis of alternatives includes the assumption that all applicable mitigation measures associated with the Project would be implemented with the appropriate alternatives. However, applicable mitigation measures may be scaled to reduce or avoid the potential impacts of the alternative under consideration, and may not precisely match those identified for the Project. If a specific impact is not raised within the

discussion of an alternative, it is because the impact is expected to be the same as that associated with the implementation of the proposed CEQA Project.

A description of the no-project, reduced residential density, demolition of structures in the Capehart/Hillside Housing Planning Area and Redevelopment Project Area excluding NHP Master Plan Area alternatives, and a comparative environmental evaluation to the identified impacts of the proposed CEQA Project, is provided below. A comparative analysis of the environmental impacts associated with each alternative, including the alternatives evaluated in the DODHF Novato Disposal and Reuse EIS, is provided in Table 8-1.

TABLE 8-1 COMPARATIVE ANALYSIS OF ENVIRONMENTAL IMPACTS ASSOCIATED WITH ALL PROJECT ALTERNATIVES							
	Proposed Project	No Action Alt. (Included in EIS)	Open Space Alt. (Included in EIS)	No Project Alt.	Reduced Res. Density Alt.	Demolition of Structures in Capehart/Hillside Housing Planning Area Alt.	Redevelopment Project Area Excluding NHP Master Plan Area Alt.
Traffic and Circulation	U	--	--	--	--	U	U
Air Quality	+	--	+	--	+	+	+
Noise	U	--	U	--	U	U	U
Hazardous Materials and Waste	--	--	--	--	--	--	--
-- Less-Than-Significant Impact + Potentially Significant Impact U Significant and Unavoidable Impact							

8.2 NO-PROJECT ALTERNATIVE

8.2.1 DESCRIPTION

The no-project alternative assumes that future development of the proposed CEQA Project site would not occur. This alternative assumes a status-quo land use scenario. No foreseeable alterations, modifications or improvements to the Project site would occur under this alternative. The Project site would remain indefinitely in federal ownership in a caretaker status.

Section 15229 (b) of the State CEQA Guidelines requires that the no-project alternative include a description

of the conditions on the base as they exist at the time of EIR preparation, as well as what could be reasonably expected to occur in the foreseeable future if the reuse plan were not approved, based on current plans and consistent with available infrastructure and services. In accordance with Section 15229 (b), the following summarizes the existing conditions on the site.

The residential portions of the DODHF Property, including Rafael Village and Capehart/Hillside Housing, have been vacant since October 1996. The residential structures are boarded up and are in moderate disrepair because of a lack of building occupation and maintenance. The structures are deteriorating rapidly due to general neglect and are currently unusable. Landscaping surrounding the structures is maintained by the Navy to ensure fire safety and to minimize the blighted appearance of the structures within the Novato community. Access into the Capehart/Hillside Housing area is restricted through signage and road closures to authorized personnel. Although access is also restricted through signage, the residential structures within the Rafael Village area are easily accessible to vehicles and pedestrians from Ignacio Boulevard. Portions of Rafael Village and Capehart/Hillside continue to be affected by flooding during large storm events.

The non-residential portions of the DODHF Property, including the Commissary Triangle, Exchange Triangle, Bowling Alley, Officer's Club and Ballfields Planning Areas, currently include warehouse-style buildings, parking lots, a vacant exchange building with former retail stores, a former credit union, youth centers, a childcare center/tot lot, a former gas station, maintenance buildings, administration buildings, a homeless shelter, a vacated commissary, a vacant chapel, a vacant theater, a racquetball court, a gym, ballfields, a pool and a former officer's club which is currently used as a community center and offices. Most of the warehouse-style buildings are currently vacant although they are generally in a usable condition. Because of the relatively small area of commercial operations, traffic generation from this area has little effect on local roads.

The reasonably expected on-site activities associated with Navy caretaker status could include the following:

- ' Periodic landscape maintenance around unoccupied structures to protect them from fire or nuisance conditions and to preserve the visual character of the area;
- ' Continuation of security patrols or augmentation of city police services with private security where and as necessary;
- ' Maintenance of fire protection systems;
- ' Minimal maintenance of structures in a manner that facilitates interim use leasing or economical resumption of use; and
- ' Boarding up structures and capping utilities in structures not anticipated for reuse.

would be reasonably expected with this alternative in the near future. In general, the Project site's existing environmental baseline conditions (as of November 1998) would remain unchanged in the foreseeable future with the no-project alternative.

8.2.2 IMPACT EVALUATION

Traffic and Circulation

This alternative would result in substantially fewer vehicle trips than anticipated with the proposed CEQA Project. Traffic volumes on U.S. Highway 101 and State Route 37 would also be substantially less than anticipated with the proposed CEQA Project. Therefore, no significant impacts on local intersections or freeways would be anticipated with this alternative. No transit service would be provided to the Project site with this alternative; therefore, no impacts on transit service would occur. Also, no impacts on pedestrian and bicycle facilities would be expected.

Air Quality

Because this alternative would not include the construction or demolition activities associated with the proposed CEQA Project, no significant air quality impacts associated with construction activities would occur. Also, this alternative would not include any new facilities and significant vehicle emissions would not be anticipated.

Noise

No construction noise impacts would be anticipated with this alternative. Also, because none of the residential units at DODHF Novato would be occupied, there would be no ambient noise level impacts from U.S. Highway 101.

Hazardous Materials and Waste

This alternative would involve the storage and use of general maintenance-related hazardous materials, such as paint, thinners, and fuel. Any hazardous waste generated during the caretaker period would be managed under the appropriate hazardous waste regulations. Any demolition or repair of existing buildings performed as part of caretaker activities under this alternative would be performed in accordance with applicable regulations controlling asbestos emissions and handling procedures. Asbestos materials will degrade over time and result in occasional abatement activities, however, no significant impacts would be anticipated. Pesticide use is expected to be less than current conditions. The Navy would continue to carry out its polychlorinated biphenyl (PCB) removal program under this alternative and no impacts would be anticipated. No impacts

would be anticipated with this alternative related to the removal of storage tanks, lead in the soil, medical materials and waste, or radon.

8.2.3 CONCLUSIONS

Because no development would occur on the Project site with the no-project alternative, significant physical impacts related to proposed development would not occur. Therefore, the no-project alternative would be environmentally superior to the proposed CEQA Project. The advantage of this alternative is that it would avoid significant and potentially significant impacts. The disadvantage of this alternative is that it would not meet the basic Project objectives. This alternative would not implement the land use objectives of the Reuse Plan, the Redevelopment Plan and/or General Plan for the site and would result in the continued decline in the condition of the existing residential units and infrastructure at DODHF.

8.3 REDUCED RESIDENTIAL DENSITY

8.3.1 DESCRIPTION

This alternative assumes an estimated 200 new single-family dwelling units would be located in the Rafael Village Planning Area and an estimated 300 new single-family dwelling units would be located in the Capehart/Hillside Housing Planning Area, each of which would include up to 15% affordable housing units. This represents a 40 percent reduction in the dwelling units assumed with the proposed CEQA Project. This alternative was developed from the alternatives analysis included in the Draft EIR prepared for the Novato General Plan Revision (Leonard Charles and Associates, November 1995). The General Plan Draft EIR identified seven development alternatives for the City of Novato. The alternative used as the basis for this analysis was identified in the General Plan Draft EIR as the Greatly Reduced Development Alternative. This alternative assumed a 40 percent reduction in the development allowed under the General Plan. For the alternatives analysis included in this document, the 40 percent reduction in development potential has been applied to the Project site. This alternative assumes that the Reuse Plan is not implemented, but that an alternative development or series of developments proceeds under the guidance of the Greatly Reduced Development Alternative identified in the General Plan EIR.

Any proposed future development in the Rafael Village Planning Area would be substantially limited by existing site constraints and restrictions specified in the Novato General Plan. General Plan Land Use policies would require new development in the Rafael Village Planning Area to consider the constraints posed by Ignacio and San Jose creeks, riparian habitat in the creek corridor and unstable and steep slopes. According to policies contained in the General Plan Transportation Element, development in Rafael Village

is constrained by the linear nature of the site, the need to preserve the existing residential roadways in place, and City development standards which prohibit residential driveways from backing directly onto an arterial highway (i.e., Ignacio Boulevard). General Plan Environment Element policies would require provision of a neighborhood park within proposed developments, depending on the ultimate number of dwelling units proposed. The General Plan Safety and Noise Element indicates that noise levels on Ignacio Boulevard range from 60 to 65 Ldn, which is considered marginally acceptable for residential uses. General Plan Community Identity Element policies would require the preservation of the character of the existing neighborhood, compatibility with surroundings, and the provision of open areas and landscaping in Project design.

Any proposed future development in the Capehart/Hillside Housing planning area would also be substantially limited by existing site constraints and restrictions specified in the Novato General Plan. General Plan Land Use policies would require new development in the Capehart/Hillside Housing Planning Area to consider the constraints posed by Pacheco Creek, riparian habitat in the creek corridor, unstable and steep slopes, and wetland areas. General Plan Transportation Element policies would require secondary access for development in the Hillside Housing portion of the Planning Area. According to policies contained in the General Plan Environment Element, new development in Capehart/Hillside would require a neighborhood park, depending on the ultimate number of dwelling units proposed. In addition, one of the knolls within Capehart/Hillside is designated as a Scenic Hill. The General Plan Safety and Noise Element identifies the site's eastern edge and an area along Pacheco Creek as being within the 100-year flood plain. General Plan Community Identity Element policies would require the preservation of the character of the existing neighborhood, compatibility with surroundings, and the provision of open areas and landscaping in Project design.

8.3.2 IMPACT EVALUATION

Traffic and Circulation

The proposed CEQA Project's impacts on local intersections and regional freeways would be considered less than significant. This alternative would result in fewer vehicle trips on local roadways than anticipated with the proposed CEQA Project. Traffic volumes on U.S. Highway 101 and State Route 37 would also be less than anticipated with the proposed CEQA Project. The only significant traffic impact associated with the proposed CEQA Project would be the inability to add or expand transit routes along Nave Drive into the Mainside area. By reducing the number of homes served by public transit, this alternative would likely reduce the viability of expanding transit service when compared to the proposed CEQA Project, thus increasing the severity of this impact.

Air Quality

The air quality emissions associated with building demolition would not differ for this alternative when compared to the proposed CEQA Project because the same number of buildings would be demolished. However, emissions associated with renovation and construction would be reduced for this alternative. Vehicle emissions of nitrogen oxides and reactive organic compounds would be reduced but would likely still exceed Bay Area Air Quality Management District threshold levels of 80 pounds per day. Potentially significant air quality impacts, therefore, would still be anticipated with this alternative. Air quality mitigation measures, as identified in Section 4.11 of the Disposal and Reuse EIS (see Appendix C), would reduce these impacts to a less-than-significant level.

Noise

The noise generated by building demolition would not differ for this alternative when compared to the proposed CEQA Project because the same number of buildings would be demolished. The length of time that noise would be generated by construction activities would be shortened associated with the construction of fewer homes. Noise generated by vehicle traffic from the site would be slightly reduced with fewer vehicle trips although this reduction in noise levels would likely not be substantial. Also, fewer homes would be exposed to excessive noise levels in the Rafael Village and Capehart/Hillside Housing areas associated with existing traffic volumes.

Hazardous Materials and Waste

No significant hazardous materials impacts would be anticipated with the proposed CEQA Project and no impacts would be anticipated with this alternative.

8.3.3 CONCLUSIONS

Although transit impacts would increase with this alternative when compared to the proposed CEQA Project, all other impacts would be reduced including traffic, air quality and noise. Fewer vehicle trips would be generated than with the proposed CEQA Project, and thus, fewer vehicle emissions would be generated. Also, because fewer homes would be constructed, fewer residents would be exposed to excessive noise levels associated with existing traffic volumes. The impacts of this alternative on hazardous materials would not differ from the proposed CEQA Project.

8.4 DEMOLITION OF STRUCTURES IN THE CAPEHART/HILLSIDE HOUSING PLANNING AREA

8.4.1 DESCRIPTION

The proposed CEQA Project includes the demolition and replacement of the existing residential units within the Rafael Village planning area and the existing buildings in the Commissary Triangle and Exchange Triangle planning areas. The existing residential units within the Capehart/Hillside Housing Planning Area would be rehabilitated without being demolished. Implementation of this alternative assumes that in addition to the demolition and replacement of buildings in the Rafael Village, Commissary Triangle and Exchange Triangle planning areas, the existing structures within the Capehart/Hillside Housing Planning Area would be demolished and replaced with new residential housing.

8.4.2 IMPACT EVALUATION

Traffic and Circulation

As noted in Section 5.1 of this EIR, and in Section 4.10 of the Disposal and Reuse Final EIS, because these documents have been prepared at a program-level of detail, on-site circulation and access, parking and construction impacts are not assessed. These issues will be assessed on a project-by-project basis once site-specific development proposals are submitted for review within the Hamilton Field Redevelopment Project Area. In the absence of any specific development proposal for the Capehart/Hillside Housing Planning Area, it would be speculative to try and quantify the number of demolition and/or construction related truck trips that could be expected with implementation of this alternative. However, to provide the decision-maker with a general overview of what could be expected under this alternative, the following qualitative analysis has been provided for consideration and review.

This alternative would result in substantially higher levels of construction traffic than would otherwise be anticipated with the proposed CEQA Project. The demolition waste generated by implementation of this alternative could more than double the demolition waste generated by implementation of the proposed CEQA Project (assuming all Capehart/Hillside units are demolished). As a result, more than twice as many demolition-related truck trips would be anticipated over the course of development of this Planning Area. Construction vehicle trips would also be expected to increase with this alternative. More construction materials would be required to construct new homes than would be necessary to restore existing residential structures. Construction-related truck trips are generally considered potentially significant if they would interfere with area traffic flows. For the purposes of this analysis, it is conservatively assumed, given the maximum number of structures that could be demolished (708), that a temporary, but potentially significant traffic impact due to demolition and construction related activities could result, and mitigation measures

would be required. As the land use designations under this alternative are the same as those identified for the Project, the long-term traffic impacts of this alternative would be the same as with the proposed CEQA Project.

The following mitigation measures are provided to ensure that demolition and/or construction-related traffic impacts would be reduced to less-than-significant levels.

Mitigation Measures

1. Prior to issuance of a demolition permit, the property owner/developer (or the property owner/developer's construction manager) shall submit a Construction Staging Logistics Plan for review and approval by the City of Novato. At a minimum, the Construction Staging Logistics Plan shall include measures to ensure the safety of and minimal disruption to local traffic flow. If the property owner/developer cannot ensure minimal disruption of traffic, the following measures shall be considered:
 - ~ prior to issuance of a demolition permit, require the property owner/developer to identify construction and phasing plans, including identification of staging areas for each major construction phase;
 - ~ require most construction-related employees to arrive before 7:00 a.m. and depart before 4:00 p.m.;
 - ~ prior to issuance of a demolition permit, require the property owner/developer to designate travel routes for trucks to the site. The truck travel routes shall be subject to review and approval by the City of Novato.

Implementation of a Construction Staging Logistics Plan would reduce the identified demolition and construction-related traffic impacts to a less-than-significant level. This mitigation measure, or its environmental equivalent, is required in *addition to*, not in replacement of, any other future site-specific mitigation measures that may be developed and required for implementation of a site specific development proposal within the Hamilton Field Redevelopment Project Area.

Air Quality

The air quality emissions associated with building demolition and construction would increase with this alternative when compared to the proposed CEQA Project. Demolition activities would include tearing down existing structures, sorting recyclable materials, removing demolished materials, breaking and removing

concrete foundations, and cleaning up the site. Demolition of existing structures and subsequent

building construction would result in residents of the Lanham Village, New Hamilton Partnership and Spanish Housing areas being exposed to fugitive dust. The existing Hamilton School located to the west and the existing Chapel located to the north would also be affected by these short term impacts. This impact would be considered significant. Dust control measures, as identified in Section 4.11 of the Disposal and Reuse EIS (see Appendix C), would reduce these impacts to a less-than-significant level.

Noise

The noise generated by building demolition and construction would occur over a larger area than anticipated with the proposed CEQA Project. Demolition activities would expose surrounding sensitive land uses to short-term high noise levels. Although the restoration of the existing residential units within the Capehart/Hillside Housing anticipated with the proposed CEQA Project would increase ambient noise levels, the construction of completely new housing anticipated with this alternative would likely increase the duration and level of construction noise for surrounding land uses. This impact would be considered significant. Noise mitigation measures, as identified in Section 4.12 of the Disposal and Reuse EIS (see Appendix C), would reduce these impacts to a less-than-significant level.

Hazardous Materials and Waste

No significant hazardous material or waste impacts were identified in the Disposal and Reuse EIS for the proposed CEQA Project. The potential for construction workers to be exposed to hazardous materials during demolition activities would increase with this alternative because of the increased number of homes that would be demolished. However, because significant hazardous material and waste impacts were not anticipated with the previously assessed demolition activities (i.e., the Rafael Village structures proposed to be demolished), this impact would remain less than significant with this alternative.

Land Use

The demolition and replacement of the existing residential units in the Capehart/Hillside Housing area would increase the short-term nuisance impacts on adjacent land uses when compared with the restoration activities of the proposed CEQA Project. These impacts could include construction dust, high noise levels, and increased waste-hauling truck traffic. However, because these impacts would be temporary in nature, significant land use compatibility impacts would not be anticipated.

Aesthetic and Scenic Resources

The visual impacts associated with the demolition and construction activities would be minimal when

compared to the proposed CEQA Project. The construction of new homes would be required to comply with specific design guidelines for the Capehart/Hillside Housing area. Because the construction of new homes would be required to comply with specific design guidelines that would be intended to minimize visual incompatibility, the visual environment may actually improve with this alternative.

Utilities - Solid Waste Management

The demolition of the existing residential units within the Capehart/Hillside Housing area would increase the amount of solid waste generated from the site when compared to the proposed CEQA Project. The addition of this waste to the countywide waste stream would contribute to the nonattainment of solid waste reduction goals. This would be considered a significant impact. Waste minimization and recycling measures, as identified in Section 4.5 of the Disposal and Reuse EIS (see Appendix C), would reduce these impacts to a less-than-significant level. The long-term generation of solid waste with this alternative would not differ from the proposed CEQA Project because the number of residential units would remain the same.

Cultural Resources

No significant cultural resources were identified in the Capehart/Hillside Housing area during preparation of the Disposal and Reuse EIS. However, because this alternative would require more extensive excavation to accommodate new building foundations than would be anticipated with the proposed CEQA Project, the potential disturbance of subsurface cultural resources would be more likely to occur. In addition, the Reuse Plan identifies as a site constraint an archaeological site located to the west of the Capehart/Hillside Housing which may extend into the Planning Area.

The following mitigation measure is provided to ensure that grading impacts on cultural resources would be reduced to less-than-significant levels.

Mitigation Measures

2. Prior to issuance of a demolition permit, the property owner/developer (or the property owner/developer's construction manager) shall protect cultural resources within the Reuse Plan Area in accordance with the City's Cultural Resources Protection Ordinance, as stated in Reuse Plan Policy 7.4.1.1.9.

Implementation of a this measure would reduce the identified cultural resources impacts to a less-than-significant level. This mitigation measure, or its environmental equivalent, is required in *addition to*, not in replacement of, any other future site-specific mitigation measures that may be developed and required for implementation of a site specific development proposal within the Hamilton Field Redevelopment Project

Area.

Biological Resources

The demolition, excavation and construction activities anticipated with this alternative could increase erosion into local drainages when compared to the proposed CEQA Project. Increased sedimentation in local drainages could degrade water quality and adversely affect the quality of riparian habitats. Species dependent upon riparian habitat and wetland areas could be adversely affected. This would be considered a significant impact. Erosion control measures, as identified in Section 4.7 of the Disposal and Reuse EIS (see Appendix C), would reduce these impacts to a less-than-significant level.

Geology and Soils

The increased number of homes that would be demolished and replaced with this alternative would increase the total area of soil disturbance when compared to the proposed CEQA Project. During the demolition and construction period, the land would be exposed to the erosional forces of wind and surface water runoff. This impact would be considered significant. Erosion control measures, as identified in Section 4.8 of the Disposal and Reuse EIS (see Appendix C), would reduce these impacts to a less-than-significant level.

Water Resources

The demolition, excavation and construction activities anticipated with this alternative could increase erosion into local drainages when compared to the proposed CEQA Project. Soil erosion into local drainages could degrade water quality. This impact would be considered significant. Erosion control measures, as identified in Section 4.9 of the Disposal and Reuse EIS (see Appendix C), would reduce these impacts to a less-than-significant level.

8.4.3 CONCLUSIONS

All of the impacts anticipated with the proposed CEQA Project other than visual resources would increase with this alternative when compared to the proposed CEQA Project. For visual resources, because new homes would be constructed within the Capehart/Hillside Housing area that would be required to comply with specific design guidelines, the visual impacts would generally improve with this alternative. The increased impacts anticipated with this alternative, however, would be short-term in nature and would be considered less than significant with implementation of the mitigation measures included in the Disposal and Reuse EIS and this EIR. A comprehensive list of all the mitigation measures identified in both the Disposal and Reuse EIS and this EIR are included in Appendix C of this document.

8.5 REDEVELOPMENT PLAN AREA EXCLUDING THE NEW HAMILTON PARTNERSHIP MASTER PLAN AREA ALTERNATIVE

8.5.1 DESCRIPTION

This alternative would require that the Hamilton Field Redevelopment Plan Area be amended to exclude the New Hamilton Partnership Master Plan Area from the Redevelopment Plan Area.

The Redevelopment Plan recommended by the Agency at the June 9, 1998 Joint Agency and City Council public hearing included the entire area of Hamilton Field including the NHP Master Plan Area. However, in response to concerns of the County and other affected taxing agencies regarding the economic impacts of the proposed redevelopment project, the Agency revised its recommendation to delete significant portions of Hamilton Field (i.e., New Hamilton Partnership Master Plan Area) from the proposed redevelopment project, leaving only the DODHF Property in the project area. The effect of reducing the redevelopment project area boundaries to include only the DODHF Property was understood by the Agency to require additional grants and financial resources from other sources in order to fully implement the Reuse Plan, including its affordable housing goals for the reuse and development of the DODHF Property. On July 14, 1998, the City Council adopted a redevelopment plan for the Hamilton Field Redevelopment Project with the recommended elimination of the New Hamilton Partnership Master Plan Area, U.S. Army Airfield Parcel and Hospital Hill Planning Area properties from the boundaries of the Redevelopment Project.

On October 6, 1998, the City and Agency, with the consent and agreement of the Novato Public Finance Authority, entered into a Settlement Agreement with the County agreeing to consider an amendment to include the NHP Master Plan Area within the Redevelopment Plan Area. In November 1998, under Ordinance No. 1401, the 421-acre NHP Master Plan Area was added to the Redevelopment Plan Area. The purpose of adding the NHP Master Plan Area to the Redevelopment Plan Area was to further the reuse and redevelopment of the DODHF Property.

This alternative is included in this EIR to assess the environmental impacts that would occur if the Redevelopment Plan were amended to repeal the inclusion of the NHP Master Plan Area.

8.5.2 IMPACT EVALUATION

The environmental impacts resulting from this alternative would be the same as those resulting from the proposed CEQA Project. Although including the NHP Master Plan Area in the Redevelopment Plan was intended to further the reuse and redevelopment of the DODHF Property, its inclusion does not result in any

new developments, activities or actions not contemplated in the EIRs already prepared and certified for the NHP Master Plan (*Hamilton Field Project Final Subsequent EIR* and addenda thereto) or in this EIR. No physical changes in the redevelopment activities anticipated on the DODHF Property (see Section 4.5 of this EIR for further detail) would occur with this alternative. Eliminating the NHP Master Plan Area from the Redevelopment Plan Area would, therefore, not result in any environmental impacts other than those identified in this EIR.

8.5.3 CONCLUSION

This alternative would result in environmental impacts similar to those identified for the proposed CEQA Project in this EIR. Because elimination of the NHP Master Plan Area from the Redevelopment Plan Area would result in the need for additional grants and financial resources from other sources to fully implement the Reuse Plan, this alternative would moderately limit the Agency's ability to facilitate and further the goals of the Reuse Plan, including achieving the affordable housing goals for the DODHF Property as stated in Section 4.8 of this EIR. Therefore, this alternative offers no environmental advantage over the proposed CEQA Project and would not achieve project objectives as well as the proposed CEQA Project.

8.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

State CEQA Guidelines § 15126(d)(4) provides that “[i] the environmentally superior alternative is the no-Project alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” Accordingly, this section provides a discussion of environmentally superior alternatives for the proposed CEQA Project.

The no-project alternative would be the environmentally superior alternative among the alternatives evaluated in this EIR. Because no development would occur on the Project site with the no-project alternative, significant physical impacts related to proposed development on the Project site would not occur with this alternative. However, the no-project alternative would not achieve any of the Project objectives listed in Section 4 of this EIR and would result in the continued decline in the condition of the existing residential units and infrastructure at DODHF.

Other than the no-project alternative, the reduced residential density alternative would be the environmentally superior alternative. Impacts related to traffic and circulation, air quality, and noise would be reduced with this alternative. However, this alternative would not meet several of the Project objectives, as presented in Section 4 of this EIR, including implementing the goals and objectives of the Reuse Plan and Redevelopment Plan. This alternative would also not provide the maximum public benefit associated with the conservation and rehabilitation of the Project site including maximizing the creation of local job opportunities, providing the largest number of affordable housing opportunities for individuals and/or families of very-low, low- or

moderate-incomes, and generating the most taxes and revenues for the City of Novato and economic growth for the region.

8.7 ALTERNATIVES ELIMINATED FROM DETAILED CONSIDERATION

Most reuse options that were identified during the public scoping process for the EIS and the EIR have been incorporated into one or more of the alternatives analyzed in this EIR. Because reuse of the DODHF Novato property would consist mainly of the utilization of existing structures and the retention of historic land uses, the number of reasonable alternatives is limited. However, several land use alternatives for Rafael Village were considered and eliminated from detailed review in the EIS and are incorporated by reference into this EIR. A summary of these alternatives are described as follows.

Retain Existing Rafael Village Housing Units

The option of retaining, repairing, and reusing the existing housing structures at Rafael Village was considered but eliminated from detailed consideration. The Hamilton Reuse Planning Authority, in analyzing reuse options, performed a structural analysis of select housing units in Rafael Village. The housing units to be examined were chosen by the Hamilton Homes Task Force, the coalition of homeless providers in the area that was interested in the units for transitional housing purposes. The findings of this analysis, contained in the Reuse Plan Existing Conditions Report, along with findings in the Navy report “Economic Analysis of 505 Family Housing Units at Rafael Village,” determined that it would be more costly to renovate the existing units and bring them up to local building code than to demolish them and construct new units. For this reason, the alternative of retaining the existing Rafael Village housing units has been eliminated from detailed consideration in this EIR.

High Density Residential Development

The alternative of developing a larger number of housing units, both on the Mainside and at Rafael Village, was considered but eliminated from detailed consideration. The primary reason for not considering this alternative was the traffic impacts that would result from substantially increased residential development. U.S. Highway 101 is currently experiencing a degraded level of service during certain time periods. In addition, the substantially greater number of housing units proposed under this alternative would exceed the 1,200 dwelling units on the site as allowed under the Novato General Plan, and would therefore require an amendment to both the Reuse Plan and the General Plan. Although the proposed CEQA Project would increase the residential population, the Project would generally reuse existing housing stock, or replace existing units at a roughly one to one ratio. Residential development at a substantially higher level would also result in the need for a costly new highway interchange at U.S. Highway 101. For these reasons, this alternative was eliminated from detailed consideration in this EIR.

