

# CHAPTER 6

## PROJECT ALTERNATIVES

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### 6.1 INTRODUCTION

According to State CEQA Guidelines (section 15126.6), an EIR shall describe a range of reasonable alternatives to the project or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. The guidelines further require that the discussion focus on alternatives capable of eliminating significant adverse impacts of the project, or reducing them to a level of insignificance even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The alternatives analysis also should identify any significant effects that may result from a given alternative. 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 potentially feasible project alternatives for examination, and must publicly disclose its reasoning for selecting those alternatives. The range of alternatives is governed by a “rule of reason” that requires the EIR to set forth only those potentially feasible alternatives necessary to permit a reasoned choice. The alternatives shall be limited to those that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only those that the lead agency determines could feasibly attain most of the basic objectives of the project. An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. Alternatives in an EIR must be “potentially feasible.” Agency decision makers ultimately decide what is “actually feasible.”

“Feasible” means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors (State CEQA Guidelines, section 15364). 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 already owns the alternative site). None of these factors establishes a fixed limit on the scope of reasonable alternatives. The concept of feasibility also encompasses the question of whether a particular alternative or mitigation measure promotes the underlying goals and objectives of a project. Moreover, feasibility under CEQA encompasses “desirability” to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, legal, and technological factors.

## 6.2 SUMMARY OF IMPACTS AND PROJECT OBJECTIVES

### 6.2.1 Significant Project Impacts

The following potentially significant impacts have been identified. Impact Bio-4 can be mitigated to a less-than-significant level, but Impact Cul-1 cannot and is a significant unavoidable impact.

- ❑ **BIO-4: Impacts to Nesting Birds.** Tree removal and/or future development as a result of the proposed Downtown Plan amendments could result in disturbance to nesting birds if any are present in the vicinity of construction sites along the San Lorenzo River.
- ❑ **CUL-1: Historical Resources.** The proposed Project would cause a substantial adverse change in the significance of a historical resource due to demolition.

### 6.2.2 Summary of Project Objectives

1. Develop a mixed-used commercial-residential project that supports the following First Principles of the Downtown Plan:
  - a) *Form and Character.* Construct new buildings with individual character and architectural articulation.
  - b) *Building Height.* Develop a project with buildings that meet the criteria for additional height as the 2017 Downtown Plan update recognizes that taller buildings contribute greatly to the architectural fabric of the City and can provide significant opportunities to plan for environmentally sound infill development without damaging the character of the City.
  - c) *Housing.* Provide a significant new housing opportunity along the San Lorenzo riverfront, north of Laurel and adjacent to regional transit center.
  - d) *Accessibility.* Develop a project that aesthetically integrates access to the site, the San Lorenzo River, and downtown.
  - e) *Open Space and Streetscape.* Develop a project that creates public plazas in the form of two pedestrian passageways and open space areas along the riverfront to contribute to a socially active and pedestrian-oriented downtown.
  - f) *Circulation.* Construct a housing project in the downtown area that includes project improvements such as increased sidewalk width and pedestrian passageways between the downtown and the Riverwalk in support of a primarily pedestrian-oriented downtown, and that places residents in close proximity to employment opportunities, goods, and services to encourage pedestrian, bicycle, and transit movement.
2. Support the goals of the City of Santa Cruz 2015-2023 Housing Element by:

- a) Developing a project that provides diversity in housing types and affordability levels to accommodate present and future housing needs of Santa Cruz residents.
  - b) Developing a project that provides a greater level of affordability than that which is required by the City's Inclusionary Ordinance by utilizing the state Density Bonus Law to feasibly maximize the number of affordable units that can be approved. *(Applicant Objective)*
  - c) Construct a project that will contribute to the City's housing needs while promoting an environmentally sustainable, compact community within the Downtown area. *(Applicant Objective)*
3. Provide a mixed-use, transit-priority, pedestrian-oriented project that supports the regional Sustainable Communities Strategies and other City and statewide goals and actions to reduce greenhouse gas emissions and respond to global warming and climate change.
  4. In support of San Lorenzo Urban River Plan and Local Coastal Program policies, provide a new development that incorporates design features that encourage active engagement with the Riverwalk, including filling the area adjacent to the Riverwalk with landscaping, providing direct physical access to the Riverwalk, including appropriate active commercial and/or residential uses adjacent to the Riverwalk.
  5. Construct a project that incorporates pedestrian and/or bicycle connections between Front Street, the Riverwalk, Cathcart Street, and the future extension of Elm Street. *(Applicant Objective)*
  6. Provide new and improved public access to the San Lorenzo River through provision of attractive connections to the San Lorenzo River with the development of key east-west public passageways between Front Street and the Riverwalk and a second pedestrian passageway south of the Cathcart Street passageway, consistent with Section 30211 of the Coastal Act, the Downtown Plan, and the San Lorenzo Urban River Plan.
  7. Construct a mixed use project that includes wide breaks between buildings to reduce building mass and to retain views to the river levee from Pacific Avenue.
  8. Develop a project adjacent to the Riverwalk that is designed to prevent impacts to the adjacent sensitive San Lorenzo River and that will result in clean-up of degraded areas along the back of the levee and so promote public health and safety.
  9. Provide greatly enhanced public access to the San Lorenzo River through provision of a new landscaped terrace that provides an amenity and contributes to the open space character and safety along the Riverwalk.

10. Maintain financially viable project design through administrative review and approval process to help assure that the project will be constructed. (*Applicant Objective*)

## 6.3 ALTERNATIVES ANALYSIS

### 6.3.1 Alternatives Considered

Section 15126.6(c) of State CEQA Guidelines indicates that the range of potential alternatives 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. In developing the alternatives, consideration was given to modification and/or elimination of Project elements or recommendations that would eliminate or substantially reduce identified significant impacts while attaining most of the Project objectives.

The EIR also should identify any alternatives that were considered by the lead agency but were rejected as infeasible, and briefly explain the reasons underlying the lead agency’s determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (1) failure to meet most of the basic project objectives, (2) infeasibility, or (3) inability to avoid significant environmental impacts.

The City considered a number of alternatives, three of which were eliminated from further consideration as explained below. The review of potential alternatives considered technical memorandums prepared by the applicant’s consultants (Page & Turnbull 2018 and 2019).

#### Full Preservation

The Full Preservation Alternative project would retain the existing buildings at 418 and 428 Front Street in their current location, which would require a project redesign to construct the Project around the buildings. This alternative would include the construction of the proposed Project with subterranean parking while preserving the existing two buildings while construction is performed around them. This alternative would theoretically retain a majority of character-defining features of the historic resources at these historical buildings, including the characteristic placement of the buildings at the front of the lot line, portions of the building volumes, and all significant features of the exterior facades. The proposed Project is a seven-story structure that would be supported by a two-level cast-in-place structural concrete “podium”<sup>1</sup> structure that would extend one full level below grade at the front of the building and approximately 20 feet below grade at the back of the Project site. The building footprint of the proposed Project covers the entire site and would

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<sup>1</sup>Podium slabs are special type of floor system that transfers loads from a steel or wood frame structure above the slab to walls and columns below. Load bearing elements such as walls and columns of superstructure above the podium slab may not align with substructure load bearing elements below.

require earth shoring with possible tie backs or internal bracing to accommodate the excavation of the site and the construction of the subsurface podium structure (FBA Inc. 2019).

Due to the excavation requirements needed to develop the structural support for the building, it was deemed structurally infeasible to retain the existing historical buildings in place, to temporarily shore them, excavate under them, and build the podium structures underneath (FBA Inc. 2019). The infeasibility of this option also is due to the quality of the soil and the construction materials of the two existing buildings, which consist of perimeter concrete and CMU walls on non-structural slabs on grade (Page & Turnbull 2019). Therefore, full preservation with construction of the Project was not considered a feasible alternative. Furthermore, full preservation would not be consistent with goals of the Downtown Plan regarding redevelopment of the area with mixed-use projects.

Due to infeasibility of constructing the subsurface structural support and protect the two existing historical buildings, consideration was given to disassembling the buildings and re-erecting them after the subsurface work is complete. It is likely that additional alterations would be made to incorporate the buildings into the Project design. This option entails the disassembly of certain elements of the structures, most likely the facades and then to putting the elements back in place after completion of subsurface work with incorporation of the buildings into the proposed new building. The facades of the existing buildings are made of various elements that have been altered over time with concrete and/or concrete masonry unit (CMU) being part of these elements. This alternative would require the bracing of the facades, the removal of the roof structures (since they are fully or partially supported by the walls), the disassembly of the walls into 8 to 10 feet wide elements, hauling the elements offsite for storage during construction. Once re-erected, this would also require the strengthening of these elements to meet current codes (which entails the placement of a gunnite/shotcrete wall on the inside face of the façade that would serve as a support structure to stitch the various 8 to 10 feet elements (FBA Inc. 2019).

This approach would not meet the Secretary of the Interior’s Standards for Rehabilitation, nor the intention of the Full Preservation Alternative. This alternative, therefore would not avoid and may not substantially lessen the significant impact on the two historic resources at 418 and 428 Front Street because it would demolish or materially alter in an adverse manner those physical characteristics of the historical resources that convey their historical significance, and that justify their eligibility for inclusion in the California Register (Page & Turnbull 2019).

For these reason, full preservation of the two buildings as part of the proposed Project was eliminated from further consideration. Partial preservation of character-defining features of the buildings is addressed in Alternative 1 in this EIR.

### **Retain One of the Historical Buildings**

Under this potential alternative, one of the historical Project buildings would be retained with attention to retention of character-defining features, but the other building would be demolished (Page & Turnbull 2018). The demolition of one of the buildings would still result in a significant impact to historical resources, but the overall Project impact would be lessened. This option would not preserve the entire building in place at 428 Front Street as the Project cannot be feasibly constructed around the building for the reasons explained above.

The building at 418 Front Street is located at the edge of the Project site, whereas the building at 428 Front Street is located within the Project development area. The front building façade at 418 Front Street was identified as having mostly significant historical features, except for windows, door and awning, whereas the front building façade at 428 Front Street was identified as having a slightly lower coverage of significant features. Therefore, for the purpose of CEQA, retention of the building at 418 Front Street was considered.

Preservation of the building at 418 Front Street would eliminate an approximate 3,400-square-foot area from the Project plans. Since the building is located at the southern end of the Project site and its front façade measures just under 45 linear feet from the southern property boundary, this alternative assumes that the southern 45 feet of the site plan would not be developed. This would result in the reduction of the ground floor commercial use by approximately 200 square feet, and approximately 33 upper level residential units. Because the Project entrance also is sited in this location, it would have to be relocated slightly north of the proposed location, which could further eliminate street level commercial space. This alternative would require a redesign of the southern portion of one of the three buildings and would result in elimination of nearly 20 percent of the planned residential units and most of the units requested with a density bonus. Because this potential alternative would result in a substantial redesign of the Project, would not meet basic Project objectives related to provision of affordable housing, and would still result in a significant unavoidable impact as one historic building would still be demolished, this alternative was eliminated from further consideration.

### **Construct Replica Building(s)**

A project that includes replications of one or both of the existing historic structures would not be consistent with the Secretary of the Interior’s Standards for Rehabilitation of historic properties. The standards specifically call for new additions or new related construction to be differentiated from the preserved historic structure to protect the historic compatibility of the property (Standard 9). The Standards do not call for replication of a historic resource, although reconstruction may be recommended in some situations. According to the National Park Service, reconstruction is defined as “the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location.” “Reconstruction” is the fourth treatment standard for historic resources after preservation,

rehabilitation, and restoration, and is intended for use in those instances where the historic building or feature is no longer present. Since this is not the case with the proposed Project as existing structures remain, reconstruction would not be an appropriate alternative with regards to mitigation of impacts to historical resources. Thus, replication would not be an appropriate alternative for the significant impact of demolition of a historic resource.

### 6.3.2 Alternatives Analysis

Based on the above discussion, this section evaluates the following potentially feasible alternatives:

- No Project: Required by CEQA
- Alternative 1: Partial Preservation – Incorporation of Building Facades into Project
- Alternative 2: Relocation of Historic Buildings

Each alternative is described and analyzed below, and the ability to meet project objectives also is addressed.

#### **No Project Alternative**

Section 15126.6(e) of the State CEQA Guidelines requires that the impacts of a “no project” alternative be evaluated in comparison to the proposed project. Section 15126(e) also requires that the No Project Alternative discuss the existing conditions that were in effect at the time the Notice of Preparation was published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

#### ***Project Description***

Under the No Project Alternative, the proposed Project would not be approved, and therefore, none of the identified Project impacts would occur. For the purpose of the Alternatives discussion, the No Project Alternative assumes that in the foreseeable future, another project to redevelop the site could be proposed. However, it is noted that no redevelopment of the Project site would be inconsistent with the General Plan and Downtown Plan forecasts and intentions for redevelopment of the site and Project area. Given adopted City plans for the area, another development project may be proposed for the Project site in the future, although the type and amount of development that may be proposed is unknown at this time.

#### ***Impacts***

The No Project Alternative would not result in construction of the proposed Project and none of the impacts identified in this EIR would occur. No new significant impacts would occur under this

alternative. Since redevelopment of the downtown area, including the Project properties, is encouraged in the City's adopted *Downtown Plan* to provide additional residential uses, it is likely that some form of a mixed-used commercial-residential project would be proposed at some point in the future, although the type and timing of such a project are not known. However, some of the impacts identified in this EIR could result at some unknown time in the future and at an unknown magnitude depending on the development proposal. It is also noted that there are some public improvements and amenities proposed as part of the Project that would not occur under the No Project Alternative, e.g., improved access to the Santa Cruz Riverwalk and an expanded outdoor river area. Thus, the No Project Alternative would not accomplish goals set forth in the Downtown Plan regarding improvements along the Riverwalk, including improved access.

#### *Ability to Meet Project Objectives.*

The No Project alternative would not meet any of the Project objectives.

### **Alternative 1: Partial Preservation – Incorporation of Building Facades into Project**

**Project Description.** Alternative 1 involves the partial preservation of the existing historic buildings on the site through retention of the primary historic building facades and incorporating them into the new building. This alternative would involve the preservation of the primary street facades and the demolition of all secondary facades, structure, foundations, and roofs. The street facades would be disassembled in eight- to ten-foot-wide segments, stored at a different location, and re-assembled and incorporated into the Project after completion of subsurface work. As indicated above, it is not possible to retain the facades in place during construction. Under this alternative, there would be no change to the proposed Project uses and site layout, except the design would be altered to incorporate the building facades of the existing on-site historic buildings.

The facades of the existing buildings are made of various elements that have been altered over time with concrete and/or CMU being part of these elements. This alternative would require the bracing of the facades, the removal of the roof structures (since they are fully or partially supported by the walls), the disassembly of the walls into 8 to 10 feet wide elements, hauling the elements offsite for storage during construction, and the re-assembly and incorporation into the new building once the subsurface work is completed. This would also require the strengthening of these elements to meet current codes (which entails the placement of a gunnite/shotcrete wall on the inside face of the façade that would serve as a support structure to stitch the various 8 to 10 feet elements (FBA Inc. 2019). Review by the Project structural engineer indicates that this process can be accomplished, however, the overall cost viability is not known.

The three seven-story mixed-use buildings would be constructed behind the two one-story facades. In one conceptual scheme, the facades would be retained in their existing locations. The façade of 418 Front Street would be located at the south end of the southern proposed new building, and a mid-block passage would extend behind the north portion of the façade of 428 Front Street. An opening would presumably be required through the façade to access the mid-

block passage. In a second conceptual scheme, the two facades would be relocated so that the façade of 418 Front Street would be located at the middle of the center proposed building and the façade of 428 Front Street would be located at the center of the southern proposed building. The new construction behind the facades would be differentiated from the historic resources through the use of modern materials and design (Page & Turnbull 2019).

**Impacts.** Under this alternative, the identified significant unavoidable impact related to historical resources would be slightly lessened, but would not be reduced to a less-than-significant level. The biological resource and geology/soils impacts would not change. No new significant impacts would occur under this alternative.

- **Biological Resources:** This alternative would result in development of the site as with the proposed Project. The identified less-than-significant impacts would remain unchanged. Similarly, the potentially significant impact to nesting birds would remain unchanged, and the mitigation measure included in the Downtown Plan Amendments EIR would be required as with the proposed Project.
- **Cultural Resources:** The purpose of Partial Preservation Alternative 1 is to consider a plan that would lessen the significant impacts of the proposed Project on the existing historic resources. Partial Preservation Alternative 1 would retain a number of character-defining features of the historic resources at 418 and 428 Front Street, including the characteristic placement of the buildings at the front of the lot line and all characteristic features of the exterior facades. Partial Preservation Alternative 1 would not retain the buildings' character-defining massing or height as volumetric structures. Thus, the buildings' significant architectural styles would be conveyed in the features of their facades, but their representation as whole buildings would be compromised. Furthermore, the massing, size, and scale of the new seven-story buildings to be constructed behind the historic primary façades would not be compatible with the one-story historic resources. The new buildings would significantly overshadow the historic façades due to the height difference and lack of strong setback. The additional stories would create a significant change in the overall visual impression of the property and its environment. As a result, the Project would not be in compliance with the Secretary of the Interior's Standards for Rehabilitation (Page & Turnbull 2019). Specifically, it would not meet the following Rehabilitation Standards:
  - Standard 1: A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.
  - Standard 2: The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
  - Standard 9: New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible

with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

- Standard 10: New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Partial Preservation Alternative 1 would be an improvement over the proposed Project based on the retention of some character-defining features, but it would still result in a significant unavoidable impact on the two historic resources at 418 and 428 Front Street because it would demolish or materially alter in an adverse manner those physical characteristics of the historical resources that convey their historical significance, and that justify their eligibility for inclusion in the California Register. Partial Preservation Alternative 1 would retain a majority of the character-defining features of the historic resources at 418 and 428 Front Street; however, it would change the setting and would demolish the structure and spaces that constitute the historic resources as buildings and would therefore cause a substantial adverse change to the historic resources (Page & Turnbull 2019).

- **Geology-Soils:** This alternative would result in development of the site as with the proposed Project. The identified less-than-significant impacts would remain unchanged.
- **Other Impacts:** The other remaining identified less-than-significant impacts (energy and land use) would remain the same as with the proposed Project as the entire site would continue to be developed.

**Ability to Meet Project Objectives.** Under this alternative, there would be no change to the proposed Project uses and site layout, except the design would be altered to incorporate the building facades of the existing on-site historic buildings. This alternative would meet all Project objectives, except it may not meet objective #10 regarding maintaining a financially viable project.

## Alternative 2: Relocation of Historic Buildings

Alternative 2 involves the relocation of the two historic buildings to a new site. Under this alternative, there would be no change to the proposed Project uses and site layout. According to the July 2019 memorandum by structural engineer FBA, Inc., due to the nature of the historic buildings' perimeter concrete and CMU walls on non-structural slabs on grade, this alternative would involve deconstruction followed by reconstruction. More specifically, it would involve vertical shoring and bracing of the structures' roofs and walls; removal of existing roofing material; salvaging the roof beams, trusses, and interior columns and supports; and disassembly of all perimeter walls into eight- to ten-foot sections. These materials would be delivered to a new site. Floor slabs, non-structural partition walls, and existing foundations would be demolished and recycled. New foundations and floor slabs would be built at the new site, and all salvaged elements

would be reassembled. The buildings would be reconstructed as close to their original forms as possible, while upgrading the buildings to meet current building codes.

Relocation should be considered only in situations where relocation is the only feasible alternative to demolition. In these cases, relocation may mitigate a significant impact to a less-than-significant level provided that the new location is compatible with the original character and use of the historical resource and the resource retains its eligibility for listing on the California Register (14 CCR § 4852(d)(1)). To ensure that the building is not destroyed or damaged during the move, a treatment plan for the move would need to be prepared, as well as, plans to rehabilitate the building once it is relocated (California Office of Historic Preservation 2001). Furthermore, establishing an appropriate use of the building, along with agreement on continued responsibility for maintenance would be necessary.

The first consideration is discussing the feasibility of relocation is the potential for finding an appropriate new location where the buildings can still convey their significance. The second consideration is the physical feasibility of moving the buildings.

First, to find a new location entails identifying a suitable parcel of land in downtown Santa Cruz that is available for development and purchase by the applicant. The new location would need to be similar to the existing historic setting which is downtown Santa Cruz. There are no known vacant properties in the downtown area that are not part of a planned future development. Other properties in the vicinity of the Project site that are also located adjacent to the San Lorenzo River are currently developed and/or could be redeveloped in the future under the City's adopted *Downtown Plan*. An approved mixed-use project down the street from the Project site that is anticipated to begin construction in 2021, but the site is currently developed and is mostly occupied by existing buildings. There are two City-owned parking lot sites along Front Street that do not contain structures. However, a City review of parking supply and demand in the downtown area in 2018 found that the downtown parking district is projected to experience a parking deficit for both 10-year and 20-year planning horizons (City of Santa Cruz June 2018). Due to this identified parking shortage, relocating one or more of the historical buildings to one or both of the existing City-owned surface parking lots without an identified replacement of those spaces would not be viable. Therefore, it appears that there are no downtown sites that could accommodate relocation of the two structures. In addition, there are no other nearby sites owned by or available to the applicant that could be used.

Another key factor in determining the feasibility of relocation as a viable alternative is determining if the buildings can be physically moved. Moving the buildings would entail vertical shoring and bracing of the structure's roofs and walls, the removal of existing roofing material, the salvaging of roofs beams, purlins, trusses, and interior columns/supports, the disassembly of all perimeter walls into 8 to 10 feet sections and transporting and re-erecting the structures at a new location site. Floor slabs, non-structural partition walls, and existing foundation will be demolished and recycled. A new foundation and floor slab will be built at the new site, and all salvaged elements will be reassembled to bring the buildings to their original forms as close as possible while

upgrading the buildings to standards that are acceptable to the local building official (FBA Inc. 2019). While this option is theoretically possible, review by the Project structural engineer concluded that it may not be economically or logistically feasible due to the nature of the existing structures (size, material used, and type of construction). Preliminary estimates to disassemble, move, re-assemble, and bring to near current standard will be an eight-figure cost, excluding the cost of land acquisition (FBA 2019).

**Impacts.** Under this alternative, the identified significant unavoidable impact related to historical resources would be substantially lessened and potentially reduced to a less-than-significant impact if the relocated structure could comply with the Secretary of Interior Standards for Reconstruction, and if not, the impact would not be reduced to a less-than-significant level. The biological resource and geology/soils impacts would not change. No new significant impacts would occur under this alternative.

- **Biological Resources:** This alternative would result in development of the site as with the proposed Project. The identified less-than-significant impacts would remain unchanged. Similarly, the potentially significant impact to nesting birds would remain unchanged, and the mitigation measure included in the Downtown Plan Amendments EIR would be required as with the proposed Project.
- **Cultural Resources:** The purpose of Alternative 2 is to consider a plan that would lessen the significant impacts of the proposed Project on the existing historic resources. This alternative would retain a number of character-defining features of the historic resources at 418 and 428 Front Street, including all or most of the characteristic features of the exterior facades, as well as the character-defining massing and height as volumetric structures. Some of the buildings' exterior character-defining features may be altered in order to meet current building codes and/or conditions at the new site. Depending on the location of the receiving site, the buildings' characteristic placement at the front of the lot line next to the sidewalk may be compromised. The buildings' setting as it currently exists on a commercial street, adjacent to the San Lorenzo River, is likely also to be compromised by moving the buildings to a new receiving site.

Due to the deconstruction and reconstruction, the Secretary of the Interior's Standards for Rehabilitation would not be applicable, as they require minimal alteration to historic features and materials. Secretary of the Interior's Standards for Reconstruction may apply, and are outlined as follows:

- ♦ Standard 1: Reconstruction will be used to depict vanished or non-surviving portions of a property when documentary and physical evidence is available to permit accurate reconstruction with minimal conjecture, and such reconstruction is essential to the public understanding of the property. Standard 2: Reconstruction of a landscape, building, structure or object in its historic location will be preceded by a thorough archeological investigation to identify and evaluate those features and artifacts that

are essential to an accurate reconstruction. If such resources must be disturbed, mitigation measures will be undertaken.

- Standard 3: Reconstruction will include measures to preserve any remaining historic materials, features and spatial relationships.
- Standard 4: Reconstruction will be based on the accurate duplication of historic features and elements substantiated by documentary or physical evidence rather than on conjectural designs or the availability of different features from other historic properties. A reconstructed property will re-create the appearance of the non-surviving historic property in materials, design, color and texture.
- Standard 5: A reconstruction will be clearly identified as a contemporary re-creation.
- Standard 6: Designs that were never executed historically will not be constructed.

Partial Preservation Alternative 2 could meet the Standards for Reconstruction provided that reconstruction is based on documented evidence of the appearance of the buildings and does not include conjecture or design that was not executed historically. In order to comply with the Standards for Reconstruction, the receiving site would need to resemble the historic location's setting (placement at the front of the lot line on a commercial street, adjacent to the San Lorenzo River) and also accommodate the buildings' existing spatial relationships, for example their spacing from each other.

As indicated above, while this option is theoretically possible, review by the Project structural engineers indicated that this may not be logistically feasible due to the nature of the existing structures, e.g., size, material used, and type of construction (FBA, Inc. 2019). Preliminary estimates to disassemble, move, re-assemble, and bring the buildings to current building standards would be an eight-figure cost, excluding cost of land acquisition (ibid.).

Partial Preservation Alternative 2 would be an improvement over the proposed Project based on the retention of some character-defining features. Provided that Partial Preservation Alternative 2 could comply with the Standards for Reconstruction, it would likely result in a less-than-significant impact with mitigation. If Partial Preservation Alternative 2 is not able to meet the Standards for Reconstruction, it would result in a significant impact on the two historic resources at 418 and 428 Front Street because it would demolish or materially alter in an adverse manner those physical characteristics of the historical resources that convey their historical significance, and that justify their eligibility for inclusion in the California Register. Alternative 2 would retain a majority of the character-defining features of the historic resources at 418 and 428 Front Street, but the ability of the alternative to avoid substantial adverse change would depend on the similarity of the receiving site to the current site (Page & Turnbull 2019).

- **Geology-Soils:** This alternative would result in development of the site as with the proposed Project. The identified less-than-significant impacts would remain unchanged.
- **Other Impacts:** The other remaining identified less-than-significant impacts (energy and land use) would remain the same as with the proposed Project as the entire site would continue to be developed.

**Ability to Meet Project Objectives.** Under this alternative, there would be no change to the proposed Project uses and site layout. This alternative would meet all Project objectives, except it may not meet objective #10 regarding maintaining a financially viable project. **Environmentally Superior Alternative**

According to CEQA Guidelines section 15126.6(e), if the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Furthermore, Sections 21002 and 21081 of CEQA require lead agencies to adopt feasible mitigation measures or feasible alternatives in order to substantially lessen or avoid otherwise significant adverse environmental effects, unless specific social or other conditions make such mitigation measures or alternatives infeasible. Where the environmentally superior alternative also is the no project alternative, CEQA Guidelines in Section 15126(d)(4) requires the EIR to identify an environmentally superior alternative from among the other alternatives.

Table 6-1 (on the next page) presents a comparison of project impacts between the proposed Project and the alternatives. The No Project Alternative would avoid all impacts identified for the proposed Project. Of the other alternatives considered, both Alternatives 1 and 2 would lessen the significant unavoidable historical resource impact than would occur with the proposed Project. Alternative 2 could potentially lessen the impact to a less-than-significant level, although there is the possibility that the reconstructed and rehabilitated historical buildings under this alternative may not meet the Secretary of Interior Standards for Reconstruction, and therefore, the impact may remain significant and unavoidable.

Of the alternatives considered, Alternative 1 would best achieve project objectives, while also reducing the severity of identified significant impacts and therefore, is considered the environmentally superior alternative of the alternatives reviewed. While Alternative 2 would also lessen the severity of the historical resource impact, it may be potentially infeasible due to lack of identified sites to relocate the historic buildings.

**Table 6-1: Comparison of Impacts of Project Alternatives**

<b>Environmental Issue</b>	<b>PP</b>	<b>NP</b>	<b>ALT 1</b>	<b>ALT 2</b>
Biological Resources BIO-1: Special Status Species	LS	NI	LS	LS
Biological Resources BIO-3: Sensitive Riparian Habitat	LS	NI	LS	LS
Biological Resources BIO-4: Nesting Birds	LSM	NI	LSM	LSM
Biological Resources BIO-5: Conflicts with Local Ordinances	NI	NI	NI	NI
Cultural Resources CUL-1: Historical Resources	SU	NI	SU-	SU -
Cultural Resources CUL-2: Archaeological Resources	LS	NI	LS	LS
Cultural Resources CUL-3: Human Remains	LS	NI	LS	LS
Geology and Soils GEO-1: Seismic Hazards	LS	NI	LS	LS
Geology and Soils GEO-2: Soils and Erosion	LS	NI	LS	LS
Geology and Soils GEO-3: Geologic Hazards	LS	NI	LS	LS
Geology and Soils GEO-4: Expansive Soils	LS	NI	LS	LS
Geology and Soils GEO-6: Paleontological Resources	LS	NI	LS	LS
Energy Conservation ENER-1: Wasteful Consumption of Energy	LS	NI	LS	LS
Energy Conservation ENER-2: Conflict with Plans	LS	NI	LS	LS
Land Use LAND-1: Conflicts with Plans and Policies	NI	NI	NI	NI
New Significant Impacts		None	None	None
<b>Notes:</b>				
PP = Proposed Project NP = No Project ALT1 = Partial Preservation ALT2 = Relocation of Historical Buildings  S = Significant LSM = Less than significant with mitigation SU = Significant unavoidable impact NI = No impact LS = Less than significant impact  + = Greater adverse impact than proposed project - = Lesser adverse impact than proposed project				

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