

SECTION 4: MODIFICATIONS TO THE DRAFT EIR

This section presents modifications that have been made to the Draft EIR. Below is a brief introduction to the subject areas being addressed, followed by actual changes to the Draft EIR as they will appear in the Final EIR.

4.1 - Rationale for Modifications

Executive Summary

CEQA Guidelines Section 15126.6(e)(2) requires that if the environmentally superior alternative is the “No Project” alternative, then an environmentally superior alternative from amongst the other alternatives should also be identified. For purposes of clarification, language was added to this section to meet this requirement.

Alternatives Analysis

Modifications to the Alternatives Analysis section are identical to those described above for the Executive Summary, and are made to provide consistency throughout the document.

4.2 - Changes to the Draft EIR

The following sections of the Draft EIR were changed to accommodate the items noted above. Where applicable, sections of the Draft EIR are reproduced here with text additions shown in underline and text deletions shown in strikethrough. Text that is neither underlined nor stricken-through is original Draft EIR text and has not been modified, but is presented here to provide the reader with context for the changes marked. All corrections, clarifications, and refinements to the Draft EIR text identified herein are considered part of the Final EIR.

Executive Summary, Section 1.5.3 (Page 1-45 of the Draft EIR)

This alternative would abandon the project as currently designed and instead provide emergency communication services through alternative technology. These technologies could include the use of satellites or other services that would not require the use of land-based networks and thus avoid the significant environmental effects of the proposed project. The challenge with this alternative is that it is simply not possible with current technologies. While satellite communication sounds like an easy answer to communication challenges, the ability to offer these types of services in a reliable and safe manner is probably many years away. For instance, satellite coverage typically requires line-of-site connectivity between the user and the satellite. For this reason, satellite communications do not work particularly well in buildings or in areas where physical obstructions block the line-of-site. This is particularly problematic for public safety personnel, who regularly work inside buildings and in situations where reliable communication is critical.

Satellite transmitters also present challenges in regards to the safety of users. Most persons view satellite technology based on experience with consumer electronics that utilize satellites, such as

hand-held Global Positioning System (GPS) units or satellite television. The critical distinction with these products, however, is that they are *receiving* devices only. They themselves do not *transmit* a signal. The signal they receive is actually a very weak signal due to its distance from the transmitter (i.e., the satellite). For these devices to be able to transmit with sufficient strength to actually communicate with the satellite, the transmission signal from the device would need to be substantially higher than levels considered safe for a hand-held device. Even short-term exposure to these excessive levels of signal strength would have implications for the safety of emergency service providers.

If this alternative were at all feasible and safe, it would certainly be the environmentally superior alternative simply because it would meet all of the project's objectives while completely avoiding all of the environmental impacts of the proposed project. However, it is not possible at this time to implement this technology in an effective or safe manner. Perhaps in the future, this may be considered as a viable alternative, but at the present time it is not. ~~Therefore, this alternative is not environmentally superior to the proposed project.~~ Therefore, this alternative was rejected as both ineffective and infeasible given currently available technology.

Alternatives Analysis, Section 6.2.3 (Page 6-9 of the Draft EIR)

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