

Chapter 9 | ALTERNATIVES TO THE PROPOSED PROJECT

9.1 INTRODUCTION

Under the California Environmental Quality Act (CEQA), the identification and analysis of alternatives to a project is a fundamental part of the environmental review process. Public Resources Code (PRC) § 21002.1(a) establishes the need to address alternatives in an environmental impact report (EIR) by stating that in addition to determining a project’s significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, “the purpose of an environmental impact report is ... to identify alternatives to the project.”

Direction regarding the definition of project alternatives is provided in *State CEQA Guidelines § 15126.6(a)*, as follows:

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 *State CEQA Guidelines* emphasize that the selection of project alternatives be based primarily on the ability to reduce impacts relative to the proposed project, “even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.”¹ The *State CEQA Guidelines* further direct that the range of alternatives be guided by a “rule of reason,” such that only those alternatives necessary to permit a reasoned choice are addressed.²

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, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site. . .

Beyond these factors, the *State CEQA Guidelines* require the analysis of a “no project” alternative and an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, the City must identify an environmentally superior alternative. If the environmentally superior alternative is the no project alternative, then the EIR must identify an environmentally superior alternative among the other alternatives.³ In addition, *State CEQA Guidelines § 15126.6(c)* requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible and discuss the reasons for their rejection.

The range of feasible alternatives must be selected and discussed in a manner to foster meaningful public participation and informed decision making. The range of potential alternatives to the proposed Project also includes those that could feasibly accomplish most of the project’s basic objectives and avoid or substantially lessen one or more of the significant effects. An alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative need not be considered.

¹ *State CEQA Guidelines § 15126.6(b)*.

² *State CEQA Guidelines § 15126.6(f)*.

³ *State CEQA Guidelines § 15126.6(e)(2)*.

9.2 PROJECT OBJECTIVES

In substantial conformance with State CEQA Guidelines § 15124, the following primary objectives support the Project's purpose, assist the Lead Agency in developing a reasonable range of alternatives to be evaluated in this EA, and ultimately aid the decision-makers in preparing findings and overriding considerations, if necessary. The Project's purpose is to address the City's housing needs and objectives and meet State law requirements. The Project objectives are to:

1. **Housing Choice.** Accommodate a variety of housing types to meet the needs of all Encinitas residents, creating opportunities for attainably-priced housing for all income groups.
2. **Adequate Supply.** Provide adequate sites with corresponding density to meet the City's Regional Housing Needs Assessment (RHNA) allocation, inclusive of prior planning cycle carryover housing units. Include a buffer sufficient to accommodate the RHNA during the entire planning period given the requirements of the "no net loss" statute.
3. **Effective Implementation.** Adopt State-mandated and locally desired programs to implement the City's Housing Element.
4. **Maintain Community Character.** Integrate future development using a blend of two- and three-story buildings or building elements into the City's community character through project design.
5. **Distribute Multi-Family Housing.** Distribute attached and multi-family housing to the City's five communities.

9.3 SIGNIFICANT AND UNAVOIDABLE PROJECT IMPACTS

Only those impacts found significant and unavoidable are relevant in making the final determination of whether an alternative is environmentally superior or inferior to the proposed Project; see State CEQA Guidelines § 15126.6. As concluded in Section 4.1 through Section 4.14, the Project would result in significant and unavoidable impacts concerning the following environmental issue areas:

AESTHETICS

- Despite compliance with the established regulatory framework, future development on Candidate Sites #3 and #10 would be dissimilar to the existing neighborhoods and could negatively impact the neighborhoods' characters. Therefore, future development of Candidate Sites #3 and #10 would result in significant unavoidable impacts concerning visual character.

AIR QUALITY

Despite compliance with the established regulatory framework and recommended mitigation measures, the Project would result in significant unavoidable air quality impacts concerning the following:

- Regional Air Quality Strategy Consistency: The candidate sites' combined emissions (Project buildout) would exceed the SDAPCD significance thresholds for criteria pollutants at the plan level. Exceeding these thresholds at the plan level has the potential to hinder the region's compliance with each RAQS.
- Criteria Pollutants:
 - Short-Term Construction Emissions: Neither the degree of concurrent construction nor project-specific details are known, and it cannot be determined with certainty that

construction emissions would be reduced to below regulatory thresholds. Therefore, the Project would result in a significant unavoidable impact concerning construction emissions at the plan level. Following compliance with the established regulatory framework and recommended mitigation measures, impacts at the Project level would be less than significant.

- Long-Term Operational Emissions: All future development projects would operate concurrently at buildout, and buildout operational emissions would exceed significance thresholds for all criteria pollutants. Therefore, at the plan level the Project would result in a significant unavoidable impact. Following compliance with the established regulatory framework, impacts at the Project level would be less than significant.

CULTURAL

Despite compliance with EGP Policies 7.1 and 7.2, EMC §30.34.050, and Mitigation Measure CUL-2, the Project would have potential to result in significant and unavoidable impacts concerning the alteration/destruction of an archaeological/prehistoric structure, object, or site, and adverse change in the significance of a tribal cultural resource.

GREENHOUSE GAS EMISSIONS

Despite compliance with the established regulatory framework and recommended mitigation measures, Project implementation would result in significant and unavoidable impacts concerning the following:

- Greenhouse Gas Emissions: The total greenhouse gas (GHG) emissions from Candidate Site #9 (largest site) long-term operations would be approximately 3,333.20 MTCO₂e/yr, which would exceed the City's 900 MTCO₂e/yr interim screening threshold for individual projects. Since several other candidate sites would involve similar MRY, their operational emissions would similarly exceed significance thresholds.
- Compliance with the City's CAP: Although the Project would not directly conflict with the policies and reduction measures within the City's CAP, the potential exceedance of the City's interim screening threshold would potentially conflict with the City's ability to achieve the CAP's GHG emissions reduction targets. Impacts would be significant and unavoidable despite the implementation of Mitigation Measures GHG-1 and GHG-2 at the plan level.
- Cumulative GHG Emissions: Because GHG emissions are global in nature, the Project's potential exceedance of the City's interim GHG screening threshold would also result in a cumulative impact despite compliance with the established regulatory framework and recommended mitigation measures.

LAND USE AND PLANNING

Despite compliance with the established regulatory framework, future development on Candidate Sites #3 and #10 would be dissimilar to the existing neighborhoods and could negatively impact the neighborhoods' very low-density characters. Therefore, consistent with the significance criteria set forth in the 2016 PEIR, future development of Candidate Sites #3 and #10 would result in significant unavoidable neighborhood compatibility impacts from the Project's effects on visual character. Future development of Candidate Site #9 would result in a significant unavoidable impact to agricultural resources.

TRANSPORTATION AND TRAFFIC

Despite compliance with the established regulatory framework and recommended mitigation measures, the Project would result in significant unavoidable transportation and traffic impacts concerning the following facilities:

Roadway Segments

- La Costa Avenue: North Coast Highway 101 to Vulcan Avenue – LOS F
- La Costa Avenue: Vulcan Avenue to Sheridan Road – LOS F
- Encinitas Boulevard: I-5 SB Ramps to I-5 NB Ramps – LOS F
- Encinitas Boulevard: I-5 NB Ramps to Saxony Road – LOS F
- Encinitas Boulevard: Quail Gardens Drive to Delphinium Street – LOS F
- Encinitas Boulevard: Delphinium Street to Balour Drive – LOS F
- Encinitas Boulevard: Balour Drive to Via Cantebria – LOS F
- Santa Fe Drive: Nardo Road to Windsor Road/Bonita Drive – LOS E
- Santa Fe Drive: Windsor Road/Bonita Drive to Balour Drive – LOS E
- Santa Fe Drive: Balour Drive to Lake Drive – LOS E
- Santa Fe Drive: Lake Drive to Crest Drive – LOS E
- Santa Fe Drive: Crest Drive to El Camino Real – LOS E
- South Rancho Santa Fe Road: City of Encinitas Limits to El Mirlo – LOS F

Intersections

- # 6 – Vulcan Avenue at La Costa Avenue – AM: LOS E, PM: LOS E
- # 17 – Saxony Road at Leucadia Boulevard – AM: LOS E, PM: LOS E
- # 45 – Balour Drive at Santa Fe Drive – AM: LOS F, PM: LOS F

Ramp Intersections

- I-5 Northbound Ramps/Leucadia Boulevard – over capacity during the PM peak hour
- I-5 Southbound Ramps/Encinitas Boulevard – over capacity during the AM and PM peak hours

Ramp Meters

- I-5 Northbound on-ramp at Encinitas Boulevard – 20 minutes during PM peak hour
- I-5 Southbound on-ramp at Encinitas Boulevard – 17.0 minutes during AM peak hour
- I-5 Southbound on-ramp at Santa Fe Drive – 34.0 minutes during AM peak hour

9.4 PROJECT ALTERNATIVES

Potential environmental impacts associated with the following alternatives are compared to the proposed Project's impacts:

- “No Project/Adopted General Plan” Alternative; and
- “Alternative Candidate Sites” Alternative.

9.4.1 “NO PROJECT/ADOPTED GENERAL PLAN” ALTERNATIVE

DESCRIPTION OF THE ALTERNATIVE.

According to State CEQA Guidelines § 15126.6(e), the specific alternative of “no project” shall also be evaluated along with its impact. The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed Project with impacts of not approving the proposed Project. The no project analysis is required to discuss the existing conditions (at the time the Notice of Preparation is 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.

The “No Project/Adopted General Plan” Alternative assumes that the 2013-2021 Housing Element Update Housing Implementation Plan (Project or HEU) would not be implemented. Under this Alternative, the Project’s proposed General Plan/Zoning Code/Specific Plan Amendments to the 17 candidate sites would not occur. The approximately seven dwelling units (7 DU) and approximately 793,757 square feet (SF) of non-residential land uses located on the candidate sites would not be removed/replaced by future residential development. Overall, the future development accommodated through Project implementation of as many as 2,494 DU, with a resultant population growth of approximately 6,250 persons (see Table 3-4, *Candidate Sites’ Forecast Population*), would not occur.

This Alternative assumes the City’s buildout land use and population growth projections for the City and its sphere of influence (SOI) area, as outlined in Encinitas General Plan (EGP) Land Use Element Table 3, *Land Use Distribution and Sphere*.

The existing/adopted EGP land use designations for each of the 36 parcels that make up the 17 candidate sites are specified in Appendix B, *Candidate Sites Table*, and Table 2-3, *Existing General Plan Land Use Designations*. Table 9-1, *Candidate Sites’ Maximum Realistic Yield (MRY) – “No Project/Adopted General Plan” Alternative*, presents the MRY for each candidate site based on adopted EGP under this Alternative. As indicated in Table 9-1, the candidate sites’ MRY based on adopted EGP would be 191 DU and approximately 831,016 square feet (SF) of non-residential land uses. With this Alternative, the forecast population growth would be approximately 479 persons. This Alternative would result in 2,303 fewer DU as compared to the proposed Project; see also Section 6.0, *Growth-Inducement*. When compared to existing on-the-ground (OTG) land uses, this Alternative would result in an additional 184 DU and an additional 37,259 SF of non-residential land uses.

Because the Project proposes only to add the R-30 Overlay on each candidate site, the existing underlying EGP land use designation would remain on all 17 sites. Thus, as compared to the proposed Project, the non-residential land uses’ MRY under this Alternative would be the same as the Project’s, and the following comparative analyses will focus on the change in residential uses. It is noted, this Alternative does not preclude development of candidate sites with non-residential land uses, consistent with existing land use designations.

TABLE 9-1: CANDIDATE SITES' MAXIMUM REALISTIC YIELD (MRY) – "NO PROJECT/ADOPTED GENERAL PLAN" ALTERNATIVE

Site	Parcel (Net Acres)	Dwelling Units		
		Existing On- the-Ground	Adopted General Plan	Proposed General Plan (Project)
01	2.00	0	2	60
02	6.93	0	14	208
03	7.60	0	8	228
05	4.78	1	0	143
06	2.93	0	0	88
07	2.97	0	0	89
08	6.02	3	12	181
09	9.85	1	30	296
10	9.85	1	20	296
11	1.92	0	6	58
12	3.39	0	0	102
AD01	2.40	0	7	72
AD02	9.05	0	39	272
AD06	6.25	0	0	188
AD07	0.80	0	0	24
AD08	2.00	1	6	60
AD09	4.40	0	48	132
Total	83.14	7	191	2,494
Alternative : Project Difference				-2,303
Alternative : Project % Difference				-92%
Note: Refer also to Appendix B, Candidate Sites Table.				

IMPACT COMPARISON TO THE PROPOSED PROJECT

Aesthetics

The "No Project/Adopted General Plan" Alternative would involve 2,303 fewer DU, as compared to the proposed Project, thus, potential aesthetic impacts concerning plan consistency, public views, visual character, and scenic resources would generally be proportionately less. As concluded in Section 4.1, *Aesthetics*, future development of Candidate Sites #3 and #10 would result in a significant unavoidable impact concerning visual character. Candidate Site #3's MRY according to the adopted EGP (RR-1 designation) would be eight (8) DU, and Candidate Site #10's MRY according to the adopted EGP (RR-2 designation) would be 20 DU. As compared to the Project's 30 DU per net acre density, future development of Candidate Sites #3 and #10 under this Alternative would involve low density residential development (RR-1 and RR-2), which would not be dissimilar to the existing neighborhoods and would not negatively impact the neighborhoods' characters. Thus, the Project's significant unavoidable impact concerning visual character would be avoided with this Alternative. Thus, the "No Project/Adopted General Plan" Alternative would be considered environmentally superior to the proposed Project concerning aesthetics.

Air Quality

The “No Project/Adopted General Plan” Alternative would generate significantly less pollutant emissions than the proposed Project, given this Alternative would involve approximately 92 percent less residential development. The “No Project/Adopted General Plan” Alternative would avoid the Project’s significant and unavoidable short-term, long-term, localized pollutant concentrations, and cumulative impacts to air quality, since it would involve significantly less development that would generate pollutant emissions below impact thresholds. Thus, the “No Project/Adopted General Plan” Alternative would be considered environmentally superior to the proposed Project concerning air quality.

Biological Resources

The “No Project/Adopted General Plan” Alternative would involve comparable impacts to biological resources, including special status plant and wildlife species and riparian habitat and other sensitive natural communities. Like the proposed Project, the “No Project/Adopted General Plan” Alternative’s potential impacts to biological resources would be reduced to less than significant following compliance with the existing regulatory framework and recommended mitigation measures. Based on similar development footprints, this Alternative would result in similar impacts as the proposed project concerning biological resources. Thus, the “No Project/Adopted General Plan” Alternative would be considered neither environmentally superior nor inferior to the proposed Project concerning biological resources.

Cultural and Tribal Cultural Resources

Although the “No Project/Adopted General Plan” Alternative would involve less residential development, as compared to the proposed Project, any site disturbance (i.e., construction-related earth-disturbing actions) could impact historical, archaeological, paleontological, and tribal cultural resources, and human remains. For this reason, the “No Project/Adopted General Plan” Alternative would likely involve comparable impacts to cultural and tribal cultural resources following compliance with the established regulatory framework, recommended mitigation measures, and site-specific mitigation measures. Based on similar development footprints, this Alternative would not avoid the Project’s significant and unavoidable impacts concerning the alteration/destruction of an archaeological/prehistoric structure, object, or site, and an adverse change in the significance of a tribal cultural resource. Thus, the “No Project/Adopted General Plan” Alternative would be considered neither environmentally superior nor inferior to the proposed Project concerning cultural and tribal cultural resources.

Geology and Soils

Following compliance with the established regulatory framework and recommended mitigation measures, the proposed Project would result in less than significant impacts concerning the exposure of people or structures to potential substantial adverse effects involving strong seismic ground shaking, seismic-related ground failure, and landslides, soil erosion, unstable geologic units, and expansive soils.

The “No Project/Adopted General Plan” Alternative would decrease the number of people and structures potentially exposed to seismic and geological hazards, given future development would occur at less density. However, because this Alternative would involve similar development footprints, like the Project, this Alternative would result in less than significant impacts concerning geology and soils, following compliance with the established regulatory framework and recommended mitigation measures. Therefore, this Alternative would be considered neither environmentally superior nor inferior to the proposed Project concerning geology and soils.

Greenhouse Gas Emissions

The “No Project/Adopted General Plan” Alternative would generate significantly less GHG emissions than the proposed Project, given this Alternative would involve approximately 92 percent less residential development. The “No Project/Adopted General Plan” Alternative would likely not avoid the Project’s significant and unavoidable GHG impacts concerning total GHG emissions, compliance with the City’s CAP, and cumulative GHG Emissions. Although it would involve significantly less development, it would generate emissions that would exceed the impact thresholds. Although Project impacts would not be avoided, the impacts under this Alternative would be less than the proposed Project. Thus, the “No Project/Adopted General Plan” Alternative would be considered environmentally superior to the proposed Project concerning GHG emissions.

Hazards and Hazardous Materials

As discussed in Section 4.7, *Hazards and Hazardous Materials*, following compliance with the established regulatory framework and recommended mitigation measures, the Project would result in less than significant impacts concerning: the creation of a hazard to the public/environment through the routine transport, use, or disposal of hazardous materials; reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; and emissions near a school. Similarly, the Project would result in less than significant impacts concerning interference with an adopted emergency response/evacuation plan, and would not exacerbate exposure to wildland fires. Because this Alternative would involve similar development footprints and land uses, like the Project, this Alternative would result in less than significant impacts concerning hazards and hazardous materials. Thus, the “No Project/Adopted General Plan” Alternative would be considered neither environmentally superior nor inferior to the proposed Project concerning hazards and hazardous materials.

Hydrology and Water Quality

As concluded in Section 4.8, *Hydrology and Water Quality*, the proposed Project would result in less than significant impacts concerning water quality, groundwater supplies, alterations to drainage patterns, contributions to runoff water, and dam inundation, following compliance with the established regulatory framework. Impacts related to hydrology and water quality under the “No Project/Adopted General Plan” Alternative would be comparable to the proposed Project based on similar development footprints. Future development under both the proposed Project and “No Project/Adopted General Plan” Alternative would be subject to Federal, State, and local regulations aimed at controlling hydrology and water quality related impacts. Thus, the “No Project/Adopted General Plan” Alternative would be considered neither environmentally superior nor inferior to the proposed Project concerning hydrology and water quality.

Land Use and Planning

The Project involves General Plan, Zoning Code, and Specific Plan Amendments to the 17 candidate sites. Based on the proposed amendments, the Project’s MRY would be 2,494 DU. The Project also proposes various conforming amendments to the EGP, Encinitas Municipal Code (EMC) Title 30, *Zoning Code*, Local Coastal Plan, Specific Plans (North 101 Specific Plan and Encinitas Ranch Specific Plan), and ancillary amendments to other planning documents, as necessary for clarification and consistency purposes. None of the Project’s proposed amendments would occur under the “No Project/Adopted General Plan” Alternative. As indicated in Table 9-1, under the “No Project/Adopted General Plan” Alternative, the candidate sites’ MRY based on adopted EGP would be 191 DU and approximately 831,016 square feet (SF) of non-residential land uses. This MRY is based on lower density residential land use designations (RR-1, RR-2, RR-3, RR-5, and RR-11) than the Project’s proposed R-30 Overlay, with 30 DU per net acre. Comparatively, this Alternative would result in 2,303 fewer DU (92 percent less) than the proposed Project. As described in Section 4.9, *Land Use and Planning*, future development on Candidate Sites #3

and #10 would be dissimilar to the existing neighborhoods and could negatively impact the neighborhoods' characters, thus resulting in significant unavoidable neighborhood land use compatibility impacts from the Project's effects on visual character. This Alternative would result in significantly less residential development than the proposed Project, and would avoid the Project's proposed land use amendments. Additionally, this Alternative would avoid the Project's significant unavoidable neighborhood land use compatibility impacts concerning visual effects on community character. As described in Section 4.9, future development on Candidate Site #9 would have significant unavoidable impacts to agricultural resources. This Alternative does not preclude development of candidate sites with non-residential land uses, consistent with existing land use designations. This impact would be avoided under this Alternative. Thus, the "No Project/Adopted General Plan" Alternative would be considered environmentally superior to the proposed Project concerning land use and planning.

Noise

As concluded in Section 4.10, *Noise*, following compliance with the established regulatory framework, the proposed Project would result in less than significant impacts concerning permanent increases in ambient traffic noise levels, exposure of persons noise levels exceeding City standards, and temporary increases in ambient noise levels. The "No Project/Adopted General Plan" Alternative would generate significantly less noise than the proposed Project, given this Alternative would involve approximately 92 percent less residential development. Like the proposed Project, following compliance with the established regulatory framework, this Alternative would result in less than significant impacts concerning noise. Overall, the noise-related impacts associated with this Alternative would be significantly less than the proposed Project's, given substantially less residential development would occur. Thus, the "No Project/Adopted General Plan" Alternative would be considered environmentally superior to the proposed Project concerning noise.

Population and Housing

As concluded in Section 4.11, *Population and Housing*, the Project's impacts concerning its potential to concentrate population growth and displace housing/people would be less than significant. Due to a similar development footprint, under the "No Project/Adopted General Plan" Alternative, existing housing/people would be similarly displaced, as with the proposed Project, resulting in less than significant impact.

Although population growth would occur under this Alternative as with the proposed Project, the degree of growth would be significantly less. With this Alternative, the forecast population growth would be approximately 479 persons, or approximately 81 percent less population growth than the proposed Project. Both the proposed Project and this Alternative would be required to adhere to EGP policies and EMC standards, and provide required development impact fees, to assure that the City can support the population growth.

As indicated in Table 6-3, *Encinitas General Plan Buildout Plus Project Growth Projections*, the City's buildout population based on existing adopted EGP (i.e., this Alternative) would be 66,417 persons. As indicated in Table 6-3, future development in accordance with the proposed HEU would increase the City's buildout population by approximately 9.4 percent (approximately 6,250 persons). Under this Alternative, the Project's forecast population growth would not occur.

Although, impacts concerning displacement of people/housing from the "No Project/Adopted General Plan" Alternative would be the same as the proposed Project, this Alternative's forecast population growth would be significant less than with the proposed Project. Thus, the "No Project/Adopted General Plan" Alternative would be considered environmentally superior to the proposed Project concerning population and housing.



Public Services and Recreation

The residential development and forecast population growth under the “No Project/Adopted General Plan” Alternative would be significantly less than the proposed Project. Thus, this Alternative would generate less demand for public services and recreational facilities than the proposed Project. Site-specific development accommodated under the “No Project/Adopted General Plan” Alternative would involve comparable, however less, impacts to public services and recreation as the proposed Project, following compliance with the established regulatory framework. Thus, the “No Project/Adopted General Plan” Alternative would be considered environmentally superior to the proposed Project.

Transportation and Traffic

Table 9-2, *Trip Generation Summary - “No Project/Adopted General Plan” Alternative*, identifies the ADT generation for this Alternative and the proposed Project. As indicated in Table 9-2, this Alternative would generate 1,149 ADT, or approximately 92% percent fewer ADT than the Project’s forecast 14,965 ADT. The “No Project/Adopted General Plan” Alternative would generate less traffic than the proposed Project, given less development would occur. Therefore, this Alternative would avoid the Project’s significant and unavoidable transportation and traffic impacts.

TABLE 9-2: TRIP GENERATION SUMMARY - “NO PROJECT/ADOPTED GENERAL PLAN” ALTERNATIVE	
Scenario	Average Daily Trips (ADT)
“NO PROJECT/ADOPTED GENERAL PLAN” ALTERNATIVE	1,146 ¹
Proposed Project	14,965 ²
<i>“No Project/Adopted General Plan” Alternative Compared to Project</i>	-13,818
<i>“No Project/Adopted General Plan” Alternative Compared to Project %</i>	-92.3%
Notes:	
1. Based on 6.0 ADT per DU (SANDAG).	
2. See Table 4.13-1, <i>Trip Generation Summary</i> .	

The Future Year 2035 Without Project (Adopted EGP- this Alternative) condition represents EGP buildout without the Project, as discussed in detail in Section 4.13, *Transportation and Traffic*. Forecast traffic data for this scenario was obtained from the 2016 PEIR Traffic Impact Study (see 2016 PEIR Appendix N, *Traffic Impact Study (Revised)*), which indicates that the City of Encinitas General Plan Update SANDAG Series 12 Year 2035 Sub-Area model was used as a base to develop the Year 2035 No Project forecasts.

Table 4.13-1, *Trip Generation Summary*, identifies the average daily trip (ADT) generation for the Future 2035 Adopted General Plan scenario, without and with the revised Project. As indicated in Table 4.13-1, 696,144 ADT would be generated under the Future 2035 Adopted General Plan Without Project scenario. The following summarizes the Section 4.13 findings concerning the Future 2035 Adopted General Plan Without Project scenario:

Roadway Segments. A total of 28 roadway segments are forecast to operate at a deficient level of service (LOS E or LOS F) (see Table 4.13-2). These 28 roadway segments would continue to be deficient with the Project. Also, four additional roadway segments would worsen to an unacceptable LOS E or LOS F with the Project.

Freeway Segments. All I-5 freeway segments would operate at LOS D or better under Future Year 2035 Without and With Project conditions.

Intersections. A total of 14 intersections are forecast to operate at a deficient LOS E or LOS F under Future Year 2035 Without Project conditions (see Table 4.13-4). The 14 intersections forecast to operate at a deficient LOS without the proposed Project would continue to be deficient with Project implementation.

Ramp Intersections. All signalized ramp intersections are forecast to operate “Under Capacity” or “At Capacity” during the AM and PM peak hours under Future Year 2035 Without and With Project conditions.

Ramp Metering. All ramp meters would operate acceptably under Future Year 2035 Without and With Project conditions, except at five locations where delays would exceed the 15-minute threshold.

Under Future Year 2035 Without Project conditions, many of the facilities would operation deficiently, like the Project. However, this Alternative would generate approximately 92% percent fewer ADT than the Project. Thus, the “No Project/Adopted General Plan” Alternative would be considered environmentally superior to the proposed Project concerning transportation and traffic.

Utilities and Service Systems

The residential development and forecast population growth under the “No Project/Adopted General Plan” Alternative would be significantly less than the proposed Project. Thus, this Alternative would generate less demand for utilities and service systems than the proposed Project. Site-specific development accommodated under the “No Project/Adopted General Plan” Alternative would involve comparable, however less, impacts to utilities and service systems as the proposed Project, following compliance with the established regulatory framework. Thus, the “No Project/Adopted General Plan” Alternative would be considered environmentally superior to the proposed Project concerning utilities and service systems.

ABILITY TO MEET PROJECT OBJECTIVES

The “No Project/Adopted General Plan” Alternative would result in less impacts than the proposed Project, proportionate to the reduced MRY. Although this Alternative could, in part, avoid the Project’s significant and unavoidable impacts, the “No Project/Adopted General Plan” Alternative would not achieve any of the Project’s Objectives concerning the HEU and housing strategies. The HEU includes General Plan/Zoning Code/Specific Plan Amendments specifically intended to accommodate the City’s remaining RHNA allocation of 1,594 DU. None of the Project’s proposed amendments would occur under this Alternative. Therefore, this Alternative would not provide adequate sites with corresponding density to meet the City’s RHNA allocation, inclusive of prior planning cycle carryover housing units. Under the “No Project/Adopted General Plan” Alternative, the City would not meet its current eight-year Fifth Housing Element Cycle 2013-2020 RHNA. Thus, this Alternative would directly conflict with California Government Code § 65583, which stipulates that a jurisdiction must assess its housing element every eight years and identify adequate sites for housing and provide for the existing and projected needs of all economic segments of the community.

9.4.2 “ALTERNATIVE CANDIDATE SITES” ALTERNATIVE

DESCRIPTION OF THE ALTERNATIVE

The “Alternative Candidate Sites” Alternative’s characteristics are generally, as described for the proposed Project in Chapter 3.0, *Project Descriptions*, with certain exceptions described below. This Alternative involves General Plan, Zoning Code, and Specific Plan Amendments to as many as 20 low- and very-low income candidate sites (as many as 46 parcels totaling approximately 107 acres); see Appendix H, “*Alternative Candidate Sites*” *Alternative Table*. The 20 candidate sites proposed under this Alternative are depicted on Figure 9-1, “*Alternative Candidate Sites*” *Alternative Map*. Appendix H, “*Alternative*



Candidate Sites” Alternative Table, indicates the candidate sites, which remained on the HEU’s inventory and are included in the sites that comprise this Alternative, as well as the candidate sites that were analyzed in the 2016 PEIR. Like the Project, this Alternative also proposes various conforming amendments to the EGP, EMC Title 30, Zoning Code, Local Coastal Plan, Specific Plans (North 101 Specific Plan, Encinitas Ranch Specific Plan, and Downtown Specific Plan), and ancillary amendments to other planning documents, as necessary for clarification and consistency purposes.

Table 9-3, Candidate Sites’ Maximum Realistic Yield (MRY) – “Alternative Candidate Sites” Alternative, presents the MRY for each candidate site based on the proposed zoning under this Alternative. As indicated in Table 9-3, the candidate sites’ MRY based on the proposed zoning under this Alternative would be 2,201 DU and 697,489 SF of non-residential land uses. With this Alternative, the forecast population growth would be approximately 5,516 persons.

TABLE 9-3: CANDIDATE SITES’ MAXIMUM REALISTIC YIELD (MRY) – “ALTERNATIVE CANDIDATE SITES” ALTERNATIVE				
Site ¹	Parcel (Net Acres)	Dwelling Units		
		Existing On-the-Ground	Adopted Zoning	Proposed Zoning (Alternative) ²
01	2.00	0	2	60
02	6.93	0	14	208
03	8.55	0	9	26
05	4.78	1	0	143
07	2.97	0	0	89
AD01	2.40	0	7	72
AD02	9.05	0	39	272
09	9.85	1	1	296
11	1.92	0	6	58
12	3.39	0	0	102
06	2.93	0	0	88
08	6.02	3	12	181
AD09	1.36	0	15	41
AD07	0.80	0	20	24
AD11	1.27	2	14	38
AD12	4.60	0	9	138
AD14	1.51	0	0	45
AD31	6.48	2	25	195
AD32	2.23	0	0	67
AD08	2.00	1	6	60
Total	81.0	10	179	2,201
Alternative : Project Difference				-293
Alternative : Project % Difference				-12%
Notes:				
1. Refer also to Appendix H, Candidate Sites Table – “Alternative Candidate Sites” Alternative.				
2. Total numbers are subject to slight round-off error.				



Because this Alternative proposes only to add the R-30 Overlay on each candidate site, the existing underlying zoning would remain on all 20 sites. Thus, as compared to the adopted zoning, the non-residential land uses’ MRY under this Alternative would be the same, and the comparative analyses presented below will focus on the change in residential uses.

As indicated in Table 9-3, as compared to existing OTG land uses, this Alternative’s MRY could result in a net increase of as many as 2,191 DU and a net decrease of as much as 750,805 SF of non-residential land uses. Like the proposed Project, although this Alternative would displace the existing OTG land uses (10 DU and 750,805 SF of non-residential uses), the impact analyses presented below conservatively assume Alternative buildout (i.e., 2,201 DU) and no credit for the displaced uses.

Table 9-4, “Alternative Candidate Sites” Alternative Compared to Project, compares this Alternative to the proposed Project. As indicated in Table 9-4, as compared to the proposed Project’s adopted zoning MRY, this Alternative could result in a net decrease of as many as 293 DU, or approximately 12 percent less than the proposed Project.

TABLE 9-4: “ALTERNATIVE CANDIDATE SITES” ALTERNATIVE COMPARED TO PROPOSED PROJECT				
Description	Project	Alternative	Change	% Change
Candidate Sites Total	17	20	+3	--
Gross Acres	111.2	107.3	-3.9	-3%
Net Acres	83.1	81.0	-2.1	-2%
Parcels	36	46	+10	--
MRY (DU)	2,494	2,201	-293	-12%
Population (Persons)	6,250	5,516	-734	-12%
Candidate Sites Added		+5 (#AD11, #AD12, #AD14, #AD31, #AD32)		
Candidate Sites Deleted		-2 (#AD06, #10)		
Site #3		Revised Gross & Net Acres Proposed RR-3, instead of R-30 OL		
Site #AD09		Revised Net Proposed R-35 OL, instead of R-30 OL		
Note: Refer also to Appendix H, Candidate Sites Table – “Alternative Candidate Sites” Alternative.				

IMPACT COMPARISON TO THE PROPOSED PROJECT

Aesthetics

The “Alternative Candidate Sites” Alternative would involve 293 fewer DU, however 3.9 less gross acres, as compared to the proposed Project, thus, potential aesthetic impacts concerning plan consistency, public views, visual character, and scenic resources would generally be like the proposed Project’s. As concluded in Section 4.1, *Aesthetics*, future development of Candidate Sites #3 and #10 would result in a significant unavoidable impact concerning visual character. Candidate Site #10 is excluded from this Alternative. Thus, the Project’s significant unavoidable impact concerning visual character associated with

Candidate Site #10 would be avoided with this Alternative. However, impacts associated with added Candidate Sites #AD11, #AD12, #AD14, #AD31, #AD32 would be introduced, including potential impacts to: a scenic view corridor and vista point critical viewshed from Candidate Site #AD11, a scenic view corridor from Candidate Sites #AD12, #AD31, and #AD32; and a vista point critical viewshed from Candidate Site #AD14, see Figure 9-1, “Alternative Candidate Sites” Alternative Map, and Figures 4.1-1a through 4.1-1e, *Scenic Resources*. Thus, the “Alternative Candidate Sites” Alternative would be considered neither environmentally superior nor inferior to the proposed Project concerning aesthetics.

Air Quality

The “Alternative Candidate Sites” Alternative would generate less pollutant emissions than the proposed Project, given this Alternative would involve approximately 12 percent less residential development. However, the “Alternative Candidate Sites” Alternative would not avoid the Project’s significant and unavoidable short-term, long-term, localized pollutant concentrations, and cumulative impacts to air quality, since it would involve only slightly less development that would generate pollutant emissions that would still exceed impact thresholds. Thus, the “Alternative Candidate Sites” Alternative would be considered environmentally superior to the proposed Project concerning air quality.

Biological Resources

Although the “Alternative Candidate Sites” Alternative would involve less development area than the Project, it would result in comparable impacts to biological resources, including special status plant and wildlife species and riparian habitat and other sensitive natural communities. Impacts associated with excluded Candidate Sites #AD06 and #10 would be avoided. However, impacts associated with added Candidate Sites #AD11, #AD12, #AD14, #AD31, #AD32 would be introduced, including potential impacts to: coastal sage scrub from Candidate Sites #AD12 and #AD32; and wetlands from Candidate Site #AD14; see Figure 9-1, “Alternative Candidate Sites” Alternative Map, and Figures 4.3-1a through 4.3-1e, *Existing Vegetation*. Like the proposed Project, the “Alternative Candidate Sites” Alternative’s potential impacts to biological resources would be reduced to less than significant following compliance with the existing regulatory framework and recommended mitigation measures. Given some impacts would be avoided while others would be introduced, this Alternative would result in similar impacts as the proposed project concerning biological resources. Thus, the “Alternative Candidate Sites” Alternative would be considered neither environmentally superior nor inferior to the proposed Project concerning biological resources.

Cultural and Tribal Cultural Resources

The “Alternative Candidate Sites” Alternative would involve slightly less (approximately 4.0 less acres) of site disturbance (i.e., construction-related earth-disturbing actions) could impact historical, archaeological, paleontological, and tribal cultural resources, and human remains. Impacts associated with excluded Candidate Sites #AD06 and #10 would be avoided. Additionally, impacts associated with added Candidate Sites #AD11, #AD14, #AD31, #AD32 would be introduced and comparable to the proposed Project’s impacts. Candidate Site #AD12 is in a High Sensitivity Zone, and Candidate Site #AD32 is in a Medium Sensitivity Zone; see Figure 9-1, “Alternative Candidate Sites” Alternative Map, and Figure 4.4-1, *Cultural Sensitivity Areas – City*. For this reason, the “Alternative Candidate Sites” Alternative would involve comparable impacts to cultural and tribal cultural resources following compliance with the established regulatory framework, recommended mitigation measures, and site-specific mitigation measures. This Alternative would not avoid the Project’s significant and unavoidable impacts concerning the alteration/destruction of an archaeological/prehistoric structure, object, or site, and an adverse change in the significance of a tribal cultural resource. Thus, the “Alternative Candidate Sites” Alternative would be considered neither environmentally superior nor inferior to the proposed Project concerning cultural and tribal cultural resources.

Geology and Soils

Following compliance with the established regulatory framework and recommended mitigation measures, the proposed Project would result in less than significant impacts concerning the exposure of people or structures to potential substantial adverse effects involving strong seismic ground shaking, seismic-related ground failure, and landslides, soil erosion, unstable geologic units, and expansive soils.

The “Alternative Candidate Sites” Alternative would decrease the number of people and structures potentially exposed to seismic and geological hazards, given slightly less residential development would occur. However, because this Alternative would involve only a slightly smaller development footprint, like the Project, this Alternative would result in less than significant impacts concerning geology and soils, following compliance with the established regulatory framework and recommended mitigation measures. Impacts associated with excluded Candidate Sites #AD06 and #10 would be avoided. However, impacts associated with added Candidate Sites #AD11, #AD12, #AD14, #AD31, #AD32 would be introduced. Candidate Sites #AD11 and #AD12 would be in a landslide hazard zone; see Figure 9-1, “Alternative Candidate Sites” Alternative Map, and Figure 4.5-3, *Landslide Hazards*. As with the proposed Project, impacts involving geology and soils under this Alternative would be less than significant following compliance with the established regulatory framework and recommended mitigation. Therefore, this Alternative would be considered neither environmentally superior nor inferior to the proposed Project concerning geology and soils.

Greenhouse Gas Emissions

The “Alternative Candidate Sites” Alternative would generate less GHG emissions than the proposed Project, given this Alternative would involve approximately 12 percent less residential development. The “Alternative Candidate Sites” Alternative would likely not avoid the Project’s significant and unavoidable GHG impacts concerning total GHG emissions, compliance with the City’s CAP, and cumulative GHG Emissions. Although it would involve less development, it would generate emissions that would exceed the impact thresholds. Although Project impacts would not be avoided, the impacts under this Alternative would be less than the proposed Project. Thus, the “Alternative Candidate Sites” Alternative would be considered environmentally superior to the proposed Project concerning GHG emissions.

Hazards and Hazardous Materials

As discussed in Section 4.7, *Hazards and Hazardous Materials*, following compliance with the established regulatory framework and recommended mitigation measures, the Project would result in less than significant impacts concerning: the creation of a hazard to the public/environment through the routine transport, use, or disposal of hazardous materials; reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; and emissions near a school. Similarly, the Project would result in less than significant impacts concerning interference with an adopted emergency response/evacuation plan, and would not exacerbate exposure to wildland fires. Because this Alternative would involve similar development footprints and land uses, like the Project, this Alternative would result in less than significant impacts concerning hazards and hazardous materials. Thus, the “Alternative Candidate Sites” Alternative would be considered neither environmentally superior nor inferior to the proposed Project concerning hazards and hazardous materials.

Hydrology and Water Quality

As concluded in Section 4.8, *Hydrology and Water Quality*, the proposed Project would result in less than significant impacts concerning water quality, groundwater supplies, alterations to drainage patterns, contributions to runoff water, and dam inundation, following compliance with the established regulatory framework. Impacts associated with excluded Candidate Sites #AD06 and #10 would be avoided. However, impacts associated with added Candidate Sites #AD11, #AD12, #AD14, #AD31, #AD32 would be

introduced, including potential impacts to Candidate Sites #AD11 and #AD12 from being in a Dam Inundation zone and FEMA Flood Zone – 100 year; see Figure 9-1, “Alternative Candidate Sites” Alternative Map, and Figure 4.8-2, *Flood Hazards – City*. Impacts related to hydrology and water quality under the “Alternative Candidate Sites” Alternative would be comparable to the proposed Project. Future development under both the proposed Project and “Alternative Candidate Sites” Alternative would be subject to Federal, State, and local regulations aimed at controlling hydrology and water quality related impacts. Therefore, the “Alternative Candidate Sites” Alternative would be considered neither environmentally superior nor inferior to the proposed Project concerning hydrology and water quality.

Land Use and Planning

The Project involves General Plan, Zoning Code, and Specific Plan Amendments to the 17 candidate sites. Based on the proposed amendments, the Project’s MRY would be 2,494 DU. The Project also proposes various conforming amendments to the EGP, Encinitas Municipal Code (EMC) Title 30, *Zoning Code*, Local Coastal Plan, Specific Plans (North 101 Specific Plan, Encinitas Ranch Specific Plan, and Downtown Specific Plan), and ancillary amendments to other planning documents, as necessary for clarification and consistency purposes. This Alternative involves a Downtown Specific Plan amendment (due to Candidate Site #AD14), which is not a part of the proposed Project. This Alternative would similarly involve amendments to the 20 candidate sites. As indicated in Table 9-3, under the “Alternative Candidate Sites” Alternative, the alternative candidate sites’ MRY based on adopted zoning would be 2,201 DU and approximately 697,489 SF of non-residential land uses. Like the proposed Project, this MRY is based on a proposed R-30 Overlay, with 30 DU per net acre for all candidate sites, except Candidate Site #3, where proposed zoning is RR-3 (instead of R-30 OL, as with the Project) and Candidate Site #AD09, where proposed zoning is R-35 OL (instead of R-30 OL, as with the Project). Comparatively, this Alternative would result in 293 fewer DU (12 percent less) than the proposed Project. As described in Section 4.9, *Land Use and Planning*, future development on Candidate Site #9 would have significant unavoidable impacts to agricultural resources, which would not be avoided under this Alternative. As also described in Section 4.9, future development on Candidate Sites #3 and #10 would be dissimilar to the existing neighborhoods and could negatively impact the neighborhoods’ characters, thus resulting in significant unavoidable neighborhood land use compatibility impacts from the Project’s effects on visual character. Candidate Site #10 is excluded from this Alternative. Thus, the Project’s significant unavoidable impact concerning visual effects on community character would be avoided with this Alternative. This Alternative would result in slightly less residential development than the proposed Project, however, would not avoid the Project’s proposed land use amendments. Additionally, this Alternative would avoid the Project’s significant unavoidable neighborhood land use compatibility impacts concerning visual effects on community character at Candidate Site #10. Thus, the “Alternative Candidate Sites” Alternative would be considered environmentally superior to the proposed Project concerning land use and planning.

Noise

As concluded in Section 4.10, *Noise*, following compliance with the established regulatory framework, the proposed Project would result in less than significant impacts concerning permanent increases in ambient traffic noise levels, exposure of persons noise levels exceeding City standards, and temporary increases in ambient noise levels. The “Alternative Candidate Sites” Alternative would generate slightly less noise than the proposed Project, given this Alternative would involve approximately 12 percent less residential development. Like the proposed Project, following compliance with the established regulatory framework, this Alternative would result in less than significant impacts concerning noise. Overall, the noise-related impacts associated with this Alternative would be less than the proposed Project’s, given less residential development would occur. Thus, the “Alternative Candidate Sites” Alternative would be considered environmentally superior to the proposed Project concerning noise.

Population and Housing

As concluded in Section 4.11, *Population and Housing*, the Project's impacts concerning its potential to concentrate population growth and displace housing/people would be less than significant. Under this Alternative, 10 DU would be displaced, as compared to seven with the proposed Project. Under the "Alternative Candidate Sites" Alternative, existing housing/people would be similarly displaced, as with the proposed Project, although to a slightly greater degree than the Project. As with the Project, impact under this Alternative would be less than significant impact.

Although population growth would occur under this Alternative as with the proposed Project, the degree of growth would be less. With this Alternative, the forecast population growth would be approximately 5,516 persons, or approximately 12 percent less population growth than the proposed Project. Both the proposed Project and this Alternative would be required to adhere to EGP policies and EMC standards, and provide required development impact fees, to assure that the City can support the population growth.

Although, impacts concerning displacement of people/housing from the "Alternative Candidate Sites" Alternative would be slightly greater than the proposed Project, this Alternative's forecast population growth would be less than with the proposed Project. Thus, the "Alternative Candidate Sites" Alternative would be considered environmentally superior to the proposed Project concerning population and housing.

Public Services and Recreation

The residential development and forecast population growth under the "Alternative Candidate Sites" Alternative would be less than the proposed Project. Thus, this Alternative would generate less demand for public services and recreational facilities than the proposed Project. Site-specific development accommodated under the "Alternative Candidate Sites" Alternative would involve comparable, however less, impacts to public services and recreation as the proposed Project, following compliance with the established regulatory framework. Thus, the "Alternative Candidate Sites" Alternative would be considered environmentally superior to the proposed Project.

Transportation and Traffic

Table 9-5, *Trip Generation Summary - "Alternative Candidate Sites" Alternative*, identifies the ADT generation for this Alternative and the proposed Project. As indicated in Table 9-5, this Alternative would generate 13,206 ADT, or approximately 12% percent fewer ADT than the Project's forecast 14,965 ADT. The "Alternative Candidate Sites" Alternative would generate less traffic than the proposed Project, given less development would occur. However, this Alternative would not avoid the Project's significant and unavoidable transportation and traffic impacts. It is anticipated this Alternative would result in similar impacts to roadway segments, freeway segments, intersections, ramp intersections, and ramp metering, as the proposed Project. Thus, the "Alternative Candidate Sites" Alternative would be considered environmentally superior to the proposed Project concerning transportation and traffic.

TABLE 9-5: TRIP GENERATION SUMMARY - "ALTERNATIVE CANDIDATE SITES" ALTERNATIVE

Scenario	Average Daily Trips (ADT)
"ALTERNATIVE CANDIDATE SITES" ALTERNATIVE	13,206¹
Proposed Project	14,965 ²
<i>"Alternative Candidate Sites" Alternative Compared to Project</i>	<i>-1,759</i>
<i>"Alternative Candidate Sites" Alternative Compared to Project %</i>	<i>-12%</i>
Notes:	
1. Based on 6.0 ADT per DU (SANDAG).	
2. See Table 4.13-1, <i>Trip Generation Summary</i> .	

Utilities and Service Systems

The residential development and forecast population growth under the "Alternative Candidate Sites" Alternative would be slightly less than the proposed Project. Thus, this Alternative would generate less demand for utilities and service systems than the proposed Project. Site-specific development accommodated under the "Alternative Candidate Sites" Alternative would involve comparable, however less, impacts to utilities and service systems as the proposed Project, following compliance with the established regulatory framework. Thus, the "Alternative Candidate Sites" Alternative would be considered environmentally superior to the proposed Project concerning utilities and service systems.

ABILITY TO MEET PROJECT OBJECTIVES

The "Alternative Candidate Sites" Alternative would result in slightly less impacts than the proposed Project, proportionate to the reduced MRY. Additionally, the Alternative would, in part, avoid the Project's significant and unavoidable impacts. Additionally, the "Alternative Candidate Sites" Alternative would achieve all the Project's Objectives.

9.5 ALTERNATIVES CONSIDERED BUT REJECTED

In accordance with State CEQA Guidelines § 15126.6(c), an EIR should identify any alternatives that were considered but rejected as infeasible and briefly explain the reasons for their rejection. According to the State CEQA Guidelines, among the factors that may be used to eliminate alternatives from detailed consideration are the alternative's failures to meet the most basic project objectives, the alternative infeasibility, or the alternative's inability to avoid significant environmental impacts. The current HEU process considered various candidate sites throughout the update process. The *Final Environmental Assessment/Program Environmental Impact Report for At Home in Encinitas, the City of Encinitas Housing Element Update* (2016 PEIR) considered a total of 28 candidate sites.⁴ Of these 28 candidate sites that were considered, all were rejected, except five candidate sites, which remained on the HEU's inventory and are included in the sites that comprise the "proposed Project" reviewed in this Environmental Assessment (EA); see Appendix B, *Candidate Sites Table*. Table 9-6, *Candidate Sites Considered But Rejected*, lists the candidate sites considered in the 2016 PEIR, but subsequently rejected. These sites were rejected for various reasons, including the following among others:

- Further analysis of individual site constraints;
- Property owner interest to develop housing from other property owners;
- Community input; and
- Existing commercial or other uses on the site.

⁴ 2016 PEIR Tables 3-4a, 3-4b, and 3-4c.

Additionally, some of the candidate sites were considered in the 2016 PEIR, but subsequently rejected, because it was unlikely that they would be redeveloped for housing within the planning period.

TABLE 9-6: CANDIDATE SITES CONSIDERED BUT REJECTED				
Site	Parcel Area (Net Acres)	Dwelling Units		
		Existing On-the-Ground	Adopted General Plan	Proposed Project
ALT 2	17.55	17	237	309
ALT 3	14.56	0	0	291
ALT 4	6.19	3	13	186
ALT 6	3.10	0	0	93
ALT 7	21.02	65	342	416
CBHMG-1	0.77	0	0	23
C-1	9.35	0	0	187
C-2	10.57	1	89	317
C-3	4.87	0	0	97
C-7	0.55	0	0	11
L-1	5.21	6	65	126
L-2	2.15	0	27	43
L-4	1.89	0	6	57
L-5	1.69	1	5	51
L-6	5.45	4	16	164
NE-1	10.20	0	0	188
NE-3	10.00	0	0	300
NE-4	18.90	0	0	378
NE-7	9.05	0	0	181
O-2	4.80	0	10	96
O-3	4.87	0	0	97
O-4	4.00	0	9	80
O-5	1.60	1	7	48
OE-1	2.31	5	43	46
OE-2	7.25	0	0	145
OE-4	4.00	0	0	80
OE-5	12.17	0	183	243
OE-8	11.09	0	0	222
TOTALS	205.16	103	1,052	4,475

Source: 2016 PEIR Tables 3-4a, 3-4b, and 3-4c.

9.6 “ENVIRONMENTALLY SUPERIOR” ALTERNATIVE

According to State CEQA Guidelines § 15126.6(e), “No Project” Alternative, “if the environmentally superior alternative is the “No Project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” Table 9-7, *Comparison of Alternatives*, summarizes the comparative analyses presented above (i.e., the Alternatives compared to the proposed Project).



TABLE 9-7: COMPARISON OF ALTERNATIVES		
Environmental Issues	“No Project/Adopted General Plan” Alternative	“Alternative Candidate Sites” Alternative
Aesthetics	∨	∨
Air Quality	∨	∨
Biological Resources	=	=
Cultural and Tribal Cultural Resources	=	=
Geology and Soils	=	=
Greenhouse Gas Emissions	∨	∨
Hazards and Hazardous Materials	=	=
Hydrology and Water Quality	=	=
Land Use and Planning	∨	∨
Noise	∨	∨
Population and Housing	∨	∨
Public Services and Recreation	∨	∨
Transportation and Traffic	∨	∨
Utilities and Service Systems	∨	∨
▲ Indicates an impact that is greater than the proposed Project (environmentally inferior). ∨ Indicates an impact that is less than the proposed Project (environmentally superior). = Indicates an impact that is equal to the proposed Project (neither environmentally superior nor inferior). * Indicates a significant and unavoidable impact.		

As shown in Table 9-7, the “No Project/Adopted General Plan” Alternative is the environmentally superior alternative, because it would avoid many of the proposed Project’s impacts. Therefore, in compliance with CEQA requirements, an environmentally superior alternative among the other alternatives is identified below.

The environmentally superior alternative is the “Alternative Candidate Sites” Alternative, given it would achieve the greatest impact reductions in various environmental issue areas. Additionally, the “Alternative Candidate Sites” Alternative would satisfy all Project Objectives.