

## 5.1 INTRODUCTION

Section 15126.6(a) of the CEQA Guidelines requires that an EIR describe a reasonable range of project alternatives that could feasibly attain the basic objectives of the project, while avoiding or reducing impacts associated with the project.

According to CEQA Guidelines Section 15126.6(a), the discussion of alternatives must focus on alternatives to the project, or to the project location, which will avoid or substantially reduce any significant effects of the project, even if the alternatives would be costlier or hinder to some degree the attainment of the project objectives.

The “No Project” alternative must also be evaluated. The “No Project” analysis must discuss the existing conditions and what would reasonably be expected to occur in the foreseeable future if the project was not approved.

The range of alternatives required is governed by a “rule of reason,” meaning that the EIR must only evaluate those alternatives necessary to permit a reasoned choice. The alternatives must be limited to only ones that would avoid or substantially lessen any of the significant effects of the project.

Additionally, an EIR should not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative. The CEQA Guidelines also require an EIR to state why an alternative is being rejected. If the City ultimately rejects any or all alternatives, the rationale for rejection will be presented in the findings that are required before the City certifies the EIR and takes action on the proposed project.

According to Section 15126.6(f)(1) of the CEQA Guidelines, among the factors that may be taken into account when addressing feasibility of alternatives are environmental impacts, site suitability, economic viability, availability of infrastructure, general plan consistency, regulatory limitations, jurisdictional boundaries, and whether the applicant could reasonably acquire, control, or otherwise have access to the alternate site.

CEQA requires that an environmentally superior alternative be identified; that is, an alternative that would result in the fewest or least significant environmental impacts. If the No Project Alternative is the environmentally superior alternative, State CEQA Guidelines Section 15126.6(e)(2) requires that another alternative that could feasibly attain most of the project’s basic objectives be chosen as the environmentally superior alternative.

## 5.2 PROJECT OBJECTIVES

The purpose of the project is to create a community that provides a mixture of product types that would offer opportunities for housing across income groups in conformance with the City's 2013-2021 Housing Element (City of Encinitas 2019). The key project objectives are presented below.

1. Provide housing options to support an inclusive, diverse community to meet current and future housing demand in the City.
2. Provide at least the minimum number of multi-family dwelling units and housing opportunities that are consistent with the goals of the adopted City of Encinitas Housing Element while protecting surrounding natural and aesthetic resources.
3. Provide affordable housing within the project for very low income families, thereby helping to meet the state-mandated affordable housing requirements and further encouraging diversity within the community.
4. Provide dedicated on- and off-site open space for the long-term protection of sensitive habitat and species for biological mitigation purposes, as well for the protection of existing views, by concentrating development within a portion of the site.
5. Provide a residential housing product aimed at meeting growing demand for for-sale multi-family townhomes.
6. Create a walkable environment that promotes and enhances the pedestrian experience throughout the site, with safe, convenient, and attractive connections including a walking paseo and an outdoor common area to support community engagement.
7. Minimize visual impacts of the development by providing landscaped buffers, distancing structures from adjacent roadways, and respecting maximum height allowances of the applicable zoning.

## 5.3 IMPACTS OF THE PROPOSED PROJECT

Based on the analysis contained in Section 3.0, Environmental Analysis, the only significant and unavoidable impact (unable to fully mitigate below established thresholds) relates to vehicle miles traveled (VMT). Refer to Section 3.12, Transportation.

Other impacts, including impacts related to air quality, biological resources, cultural resources, geology and soils (paleontological resources), noise, tribal cultural resources, and wildfire would be mitigated to less than significant with the incorporation of mitigation measures. Refer to Chapter 3.0, Environmental Analysis, for additional discussion.

Impacts to agriculture and forestry resources, aesthetics, energy conservation and climate change, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services and recreation, and utilities and service systems were found to be less than significant. No mitigation measures are therefore required.

It should be noted that the project requests one waiver, as allowed by state Density Bonus Law. The waiver requested is necessary because the project exceeds the allowable encroachment into steep slopes pursuant to Encinitas Municipal Code Section 30.34.030 (Hillside/Inland Bluff Overlay Zone). Without City approval of this waiver, the project footprint would be substantially reduced, thereby impacting the project's ability to provide for deed-restricted affordable housing on-site. As the project would be subject to City review and approval of the proposed waiver, the project would not conflict with the requirements of the City's Hillside/Inland Bluff Overlay Zone. Refer to Section 3.9, Land Use and Planning.

## 5.4 ALTERNATIVES TO THE PROPOSED PROJECT

This analysis focuses on alternatives capable of eliminating significant adverse environmental effects or reducing them to less than significant levels, even if these alternatives would impede, to some degree, the attainment of the proposed project objectives.

As noted previously, the CEQA Guidelines (Section 15126.6(e)(2)) require that the alternatives discussion include an analysis of the No Project Alternative. Pursuant to CEQA, the No Project Alternative refers to the analysis of existing conditions (i.e., implementation of current plans) and what would reasonably be expected to occur in the foreseeable future if the project was not approved. Further, CEQA Section 15126.6(a) provides that an EIR need not consider every conceivable alternative to a project; rather, an EIR need only consider a reasonable range of alternatives. The following alternatives have been identified for analysis in compliance with CEQA:

- **Alternative 1:** No Project/No Development Alternative
- **Alternative 2:** Reduced Development Footprint Alternative

Table 5.0-1, Comparison of Alternative Project Impacts to the Proposed Project, summarizes the potential impact of each alternative on the environmental resources evaluated in the EIR that require mitigation as compared to the proposed project.

**Table 5.0-1: Comparison of Alternative Project Impacts to the Proposed Project**

Topic	Alternative 1: No Project/No Development	Alternative 2: Reduced Development Footprint Alternative
Air Quality	<	=
Biological Resources	<	<
Cultural and Tribal Cultural Resources	<	<
Geology and Soils (Paleontological Resources)	<	<
Noise	<	=
Transportation <sup>1</sup>	<	=
Wildfire	<	=

Notes:

= Impact is equivalent to impact of proposed project (neither environmentally superior nor inferior).

&lt; Impact is less than impact of proposed project (environmentally superior).

&gt; Impact is greater than impact of proposed project (environmentally inferior).

<sup>1</sup> Transportation impacts are based upon VMT (not traffic) Refer to Section 3.12, Transportation.

## ALTERNATIVE 1: NO PROJECT/NO DEVELOPMENT ALTERNATIVE

As part of the City's 2013-2021 HEU, the project site was designated with an R-30 Overlay and allocated up to 206 residential units (6.88 acres x 30 DU/acre) prior to application of a density bonus. With the application of density bonus, the project could support up to 310 homes. No changes to the existing land use or zoning classification are required or proposed to allow for implementation of the project as currently proposed.

Under the No Project Alternative, the project as proposed would not be approved and future development would not occur. As such, the project site would remain undeveloped, vacant land. Although found to be a less than significant impact in this EIR, and therefore not further evaluated in this alternative analysis, this alternative would generally reduce effects related to aesthetics, energy conservation and greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, public services and recreation, and utilities as no new development would occur on-site and the site would remain in its current condition. However, a significant and unavoidable impact relative to transportation would not occur with this alternative.

It should be noted that this alternative would not be consistent with the City's requirement to provide for housing per the HEU and the City's obligations under the Regional Housing Needs Assessment. Further, this alternative would not meet any of the stated project objectives, as no development would occur.



### ***Air Quality***

Based on the results of the Health Risk Assessment (HRA), the proposed project requires installation of MERV-16 filters within homes to reduce cancer risks for project residents resulting from exposure to suspended diesel particles generated from Interstate 5 (I-5).

As no development would occur on-site with this alternative, residents that would otherwise occupy the project site would not be exposed to suspended diesel particles generated from I-5. Therefore, air quality impacts would be reduced when compared to the proposed project.

### ***Biological Resources***

Based on the results of the Biological Technical Report, the proposed project requires mitigation measures to reduce the significant impacts to sensitive species and habitat that may occur as a result of development of the project. In particular, mitigation measure **BIO-1** would require the applicant to preserve in perpetuity the vegetation within the proposed off-site preserve area, comprised of APN 216-110-4-35-00 and the northern portion of APN 254-144-01-00, and prepare a preserve management plan for the mitigation areas.

The No Project/No Development Alternative would not implement the mitigation measures proposed with the project, as development of the subject site would not occur. Potential impacts to sensitive biological resources during site preparation, vegetation clearing, and ground-disturbing activities would therefore be reduced, as no disturbance would occur.

However, long-term protection of sensitive biological resources within the off-site preserve area, as proposed with the project, would not be achieved, and no easement or other protective measure would be implemented. As such, there is no certainty that the lands comprising the intended off-site preserve area would be protected in perpetuity if the No Project/No Development Alternative was adopted. Overall, as compared to the proposed project, the potential for significant impacts to sensitive biological resources would be reduced with this alternative.

### ***Cultural and Tribal Cultural Resources***

Impacts to cultural and tribal resources generally occur during ground-disturbing activities such as grading and excavation. As the No Project/No Development Alternative would not include such activities, disturbance of unknown cultural and tribal cultural resources would not occur. Therefore, impacts to cultural and tribal cultural resources would be reduced when compared to the proposed project.

***Geology and Soils (Paleontological Resources)***

The project site is generally underlain by Quaternary-age Very Old Paralac Deposits and Santiago Formation. Quaternary-age Very Old Paralac Deposits are considered to have a moderate paleontological sensitivity; the Santiago Formation is considered to have a high paleontological sensitivity.

Impacts to paleontological resources generally occur during ground-disturbing activities, such as grading or excavation. As this alternative does not include such activities, direct and indirect impacts to undiscovered paleontological resources would not occur with this alternative. Therefore, impacts to paleontological resources would be reduced when compared to the proposed project.

***Noise***

As no development would occur on-site with this alternative, no noise generated by construction activities or operations would result. Noise levels would remain the same as under existing conditions. Therefore, noise impacts would be reduced when compared to the proposed project.

***Transportation***

As no on-site development would be undertaken with this alternative, no conflict with transportation-related programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities would result. No improvements that would result in increased hazards or incompatible uses would occur, and emergency access would not be adversely affected.

As discussed in Section 3.12, Transportation, the proposed residential uses are anticipated to generate a VMT/capita of 23.7 miles which exceeds the 85 percent significance threshold of 16.1 miles by 7.6 miles. Although transportation demand measures would be implemented to reduce project VMT impacts associated with the project as proposed, impacts relative to VMT would remain significant and unavoidable.

As no on-site development would occur under the No Project/No Development Alternative, no new residential uses or associated vehicle trips would be generated since the site is currently undeveloped, vacant land (e.g., non-traffic generating land use). This alternative would therefore avoid the significant and unavoidable impact to VMT that would result with project implementation. Impacts would be reduced as compared to the proposed project.

### ***Wildfire***

As the subject site would remain in its natural state under this alternative, the property would be unoccupied and no building construction or other site improvements that could result in the potential for impairment of emergency response or evacuation; exacerbation of or exposure to wildfire risks due to slope or prevailing winds; increased fire risk due to maintenance or infrastructure; or, exposure of people or structures to flooding or landslides due to runoff, post-fire slope instability, or drainage changes would occur. As such, impacts relative to wildfire would be reduced under the No Project/No Development Alternative as compared to the proposed project. However, it should be noted that no preventative measures, such as routine brush management, would be implemented on-site that would contribute to a reduction in potential risk or spread of wildfire in the area.

### ***Summary***

As ground-disturbing activities would not occur as part of this alternative, impacts to sensitive biological resources would be reduced compared to the proposed project; however, this alternative would not ensure the long-term preservation of the off-site preserve area. Impacts relative to air quality; noise; cultural, tribal cultural, and paleontological resources (e.g., potential to inadvertently discover unknown resources); and wildfire would be reduced as the subject site would not be developed. This alternative would not result in transportation-related impacts as the project site is current undeveloped, and vacant land would not generate daily vehicle trips (or vehicle miles traveled).

As shown in Table 5.0-1, Comparison of Alternative Project Impacts to the Proposed Project, this alternative would result in reduced impacts relative to air quality, biological resources, cultural resources, geology and soils (paleontological resources), noise, tribal cultural resources, and transportation as compared to the proposed project. However, this alternative would not achieve most of the project objectives including, but not limited to, providing housing options to support an inclusive, diverse community to meet current and future housing demand in the City; providing affordable housing for very low income families, thereby helping to meet the state-mandated affordable housing requirements within the community; or, providing dedicated on- and off-site open space for the long-term protection of sensitive habitat and species for biological mitigation purposes.

It should be noted that, based on the analysis included in Section 3.8, Hydrology and Water Quality, the proposed project would result in less than significant impacts to hydrology and water quality as it would incorporate the construction of new infrastructure improvements that would reduce runoff from the project site and treat water quality to standards consistent with the municipal separate storm sewer system (MS4) permit. Although not analyzed herein for this

alternative because project impacts were determined to be less than significant, no such stormwater infrastructure improvements would be installed with the No Project/No Development Alternative and runoff from the site would continue to leave the property untreated (current condition). While this is part of the baseline under CEQA, it represents a greater potential impact to water quality and hydrology as compared the proposed project.

## **ALTERNATIVE 2: REDUCED DEVELOPMENT FOOTPRINT ALTERNATIVE**

### **Reduced Development Footprint Alternative**

The Reduced Development Footprint Alternative would reduce the overall development footprint on-site and would allow for additional biological open space protection due to a reduction in the area required for brush clearance. As with the proposed project, the “off-site preserve area” would remain in its natural state under this alternative with no disturbance or improvements proposed. This parcel would serve as mitigation land for impacts resulting with development of the southern parcel (“project site”).

The Reduced Development Footprint Alternative would result in construction of 149 multi-family residential units, similar to the proposed project. A similar mixture of unit types (52 one-bedroom homes, 37 two-bedroom homes, and 60 three-bedroom homes) is anticipated. Of the 149 residential units, 134 would be market-rate homes and 15 would be “very low” income affordable homes, similar to that proposed with the project. No amenities (e.g., pool, spa, pool house, or lounge seating) are proposed with the Reduced Footprint Alternative.

In order to achieve a reduced development footprint and maintain the same unit count, this alternative would require construction of two 5-story buildings, as compared to the 16 three-story buildings proposed with the project. As such, the on-site structures with the Reduced Development Footprint Alternative would reach an estimated 65 feet in total height.

Additionally, rooftop decks would not be proposed with the residential units and the common area/pool would be located further to the east within the site. This design approach would reduce potential adverse noise effects from traffic along Interstate 5 as compared to the project, although noise effects would still occur due to proximity of the freeway.

No individual parking garages would be provided for the residential units. Adequate parking (271 spaces) would be provided on-site in conformance with City requirements, similar to the proposed project.

Access to the site under this alternative would be provided via a single access point along Plato Place. No access would be provided from Piraeus Street.

Unlike the proposed project, this alternative does not propose vacating the approximately 0.25-acre area along the Plato Place frontage and 0.71 acres along the Piraeus Street frontage, adjacent to the project boundary. Maintaining the existing right-of-way would require more extensive on-site slope grading which would be visible from surrounding public roadways, as depicted in Figures 5.0-1B, 5.0-2B, and 5.0-4B.

This alternative would require approval of a Condominium Tentative Map, Density Bonus Tentative Map, Design Review Permit, and a Coastal Development Permit (non-appealable) to allow for development of the property, similar to that required for the proposed project. City approval of a waiver to building height limits pursuant to Density Bonus law would be required to allow for the exceedance in building height over that allowed within the Coastal Overlay Zone.

Figures 5.0-1A, -2A, -3A, and -4A show existing views of the project site from the southwest corner of Piraeus Street and Plato Place; near the southeastern portion of the project site; from 1690 Gascony Road (Station White); and from I-5, respectively (refer to Section 3.1 for additional descriptions of the existing views).

As shown in Figures 5.0-1B, -2B, and -4B, the on-site residential buildings would be substantially more visible from the corner of Piraeus Street and Plato Place, the southeastern portion of the project site, and I-5 when compared to the proposed project (refer to Section 3.1 for descriptions of views from each of these vantage points associated with development of the proposed project).

As shown in Figure 5.0-3B, the upper portions of the proposed alternative would be more visible as compared to the proposed project. However, views of the proposed alternative are not anticipated to be noticeable by passengers in vehicles traveling along Gascony Road or occupying the public seating area provided at this location, similar to the proposed project.

This alternative is anticipated to reduce, to a degree, significant impacts on biological resources, cultural and tribal cultural resources, and geology and soils (paleontological resources) as compared to the proposed project. Impacts relative to transportation (vehicle miles traveled, or VMT), would remain significant and unavoidable, similar to the proposed project.

It is worth noting that demands on public parks and recreational facilities within the City and larger surrounding area would increase under this alternative, as no on-site common amenities would be provided. Additionally, as building heights would substantially increase to accommodate a reduced development footprint, this alternative would further increase the degree of visual change experienced in the existing visual setting, as compared to the proposed project.

The increased building height would also exceed allowable height limits for the R-30 Overlay Zone and would therefore conflict with relative General Plan goals and policies, thereby requiring City approval of a waiver to allow for construction. Further, the site is located within a Very High Fire Hazard Severity Zone and is considered to be at greater risk for potential wildfire occurrence; refer also to Section 3.15, Wildfire. As a result, a 100 foot Fuel Modification Zone is required in order to ensure public safety. City General Plan Land Use Element Policy 1.13 and Public Safety Element Policy 1.3 require that brush clearance around structures for fire safety not exceed a 30-foot perimeter in areas of native or significant brush, and as provided by Resource Management Policy 10.1. It is anticipated that the Reduced Development Footprint Alternative could achieve consistency with this requirement due to the on-site placement of buildings, as compared to the proposed project which would require deviation from these policies (as stated in Section 10.04.010 of the Municipal Code) in order to meet Fuel Modification Zone requirements; refer to discussion under Biological Resources, below, and Section 3.9, Land Use and Planning.

### ***Air Quality***

Under this alternative, the same number of units would be constructed and the project would generate an equivalent addition of residents as compared to the proposed project (374 residents). Although the residences would be located further from I-5 under this alternative, based on analysis included in the HRA, cancer risk for residents towards the eastern portion of the project site (close to where residences would be located under this alternative) would exceed the established San Diego Air Pollution Control District excess cancer risk significance threshold (refer to Appendix C-2). Therefore, it is anticipated that this alternative would expose the same number of residents to excess cancer risk and would require the installation of MERV-16 filters within residences (mitigation measure **AQ-1**). Impacts relative to air quality would therefore remain less than significant with mitigation incorporated, similar to the proposed project.

### ***Biological Resources***

Direct and indirect impacts to sensitive wildlife or plant species would still occur under this alternative, similar to the proposed project. Under this alternative, the same number of units and parking spaces would be developed as those proposed by the project. While the alternative would result in the construction of fewer buildings (two versus the project's proposed 16), thus reducing the building footprint, the overall area of disturbance would not be substantially reduced as compared to the proposed project, as parking would be entirely located via surface parking spaces and would not be located in private garages.

However, it is anticipated that potential impacts to sensitive biological resources would be lessened as the disturbance area resulting from brush management activities would be reduced. With the residential units accommodated within a fewer number of on-site structures, the

proposed buildings could be further distanced from the northern development boundary within the interior of the parcel, thereby reducing the degree to which required brush management activities would extend into adjacent biologically sensitive lands (measured outward from on-site structures). Therefore, impacts in this regard, as compared to the proposed project, would be reduced.

As with the project, construction of this alternative would have the potential to indirectly affect avian species if determined to be present at the time construction is undertaken. Similar to the project, no impacts to riparian habitat or wetlands would occur, as no such habitat is present. Therefore, impacts on biological resources would be considered similar, but somewhat reduced, as compared to those anticipated to result with the proposed project. Similar mitigation measures as identified with the project would be required to reduce impacts to less than significant.

### ***Cultural and Tribal Cultural Resources***

As with the proposed project, construction on the subject site under this alternative would have the potential to directly and/or indirectly impact unknown cultural resources; however, a reduced land area would be disturbed. Similar mitigation measures as the proposed project would be required to address undiscovered cultural and tribal cultural resources. Therefore, impacts would be similar, but somewhat reduced, as compared to the proposed project and considered less than significant with mitigation incorporated.

### ***Geology and Soils (Paleontological Resources)***

Impacts to paleontological resources generally occur during ground disturbing activities (i.e., grading and excavation). This alternative would include construction activities similar to that of the proposed project, thereby resulting in direct and indirect impacts to unknown paleontological resources from various subsurface construction disturbances. However, this alternative would eliminate the need for construction of a retaining wall along Piraeus Street, thereby slightly reducing the overall amount of earthwork required. Similar mitigation measures as the proposed project would be required to address the recovery of unknown paleontological resources, if encountered during construction. Therefore, impacts would be similar, but somewhat reduced, as compared to the project and would be reduced to less than significant with mitigation incorporated.

### ***Noise***

Under this alternative, the same number of units would be constructed, along with surface parking, landscaping, and other supporting (e.g., utility) improvements. As the same number of units would be constructed, construction duration and resulting noise impacts during

construction activities are anticipated to be similar to the proposed project. Therefore, potential noise impacts are considered to be similar with this alternative as compared to the proposed project.

### ***Transportation***

This alternative would develop the project site in generally the same intensity as the proposed project (e.g., multi-family residential uses). This alternative would include measures similar to the proposed project that would reduce VMT-related impacts, such as implementation of an electric bikeshare program, to encourage residents and visitors to utilize alternative means of transit. However, trip lengths would remain the same as for the proposed project and the adopted threshold would similarly be exceeded. As with the project, impacts relative to VMT would remain significant and unavoidable.

### ***Wildfire***

As a similar development footprint and unit count would occur with this alternative, it is anticipated that potential impacts relative to impairment of emergency response or evacuation; increased fire risk due to maintenance or infrastructure; or, exposure of people or structures to flooding or landslides due to runoff, post-fire slope instability, or drainage changes would remain less significant, similar to the proposed project. However, as the off-site preserve area and the subject site are designated as a Very High Fire Hazard Severity Zone, this alternative would have the potential to exacerbate wildfire risks or expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire fire risk. Implementation of mitigation measures would be required, similar to the proposed project, to ensure that such risks are reduced to a less than significant level. Potential impacts would therefore be similar to the proposed project in this regard.

### ***Summary***

As shown in Table 5.0-1, Comparison of Alternative Project Impacts to the Proposed Project, this alternative would result in similar impacts relative to air quality, noise, and wildfire. Impacts to biological resources, cultural resources, geology and soils (paleontological resources), and tribal cultural resources would be reduced to a degree, due to anticipated site design, grading requirements, and/or on-site building location. Additionally, impacts related to VMT would remain significant and unavoidable, as trip lengths per person would be unchanged as compared to the proposed project.

This alternative would achieve most of the project objectives, including but not limited to: providing housing options to support an inclusive, diverse community to meet current and future housing demand in the City; providing at least the minimum number of multi-family dwelling



units and housing opportunities that are consistent with the goals of the adopted City of Encinitas Housing Element while protecting surrounding natural and aesthetic resources; providing affordable housing within the project for very low income families, thereby helping to meet the state-mandated affordable housing requirements and further encouraging diversity within the community; providing dedicated on- and off-site open space for the long-term protection of sensitive habitat and species for biological mitigation purposes, as well for the protection of existing views, by concentrating development within a portion of the site; and providing a residential housing product aimed at meeting growing demand for for-sale multi-family townhomes. However, this alternative would not provide amenity space that would otherwise support community engagement and would not minimize visual impacts of the development, as building heights would exceed allowable limits within the City's Coastal Overlay Zone.

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## 5.5 ALTERNATIVES CONSIDERED BUT REJECTED

In accordance with CEQA Guidelines Section 15126.6, an EIR should identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and should briefly explain the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are failure to meet most of the basic project objectives, infeasibility, or inability to avoid significant environmental effects. The following are alternatives that have been rejected by the lead agency (in this case, the City of Encinitas) and will not be analyzed further in this EIR.

### ALTERNATIVE SITE ALTERNATIVE

Off-site alternatives are typically included in an environmental document to avoid, lessen, or eliminate a project's significant impacts by considering the proposed development in a different location. To be feasible, development of off-site locations must be able to fulfill the project purpose and meet most of the project's basic objectives. It is anticipated that locating the proposed project on off-site lands in the surrounding vicinity would generally result in similar development potential and associated environmental impacts, depending on the developed or undeveloped nature and physical characteristics of the selected site.

However, because Encinitas is generally urbanized and largely built out, impacts relative to biological resources, cultural resources, geology and soils, etc., are anticipated to be similar to those that would result with the project if the same development were built elsewhere in the community. Because most impacts would be similar, and because the proposed project only results in one significant, unavoidable impact, the alternative site would also be required to meet the 15% VMT reduction threshold to avoid significant and unavoidable impacts related to transportation.

Within the City, to achieve the allowed project density of 208 units (at a density of 30 dwelling units per acre), only sites with R-30 zoning were considered. These sites are limited to those identified by the 2019 HEU. None of these sites are considered feasible because they are not owned by the project proponent. Further, none of these sites is within "walking distance" (defined as ½ mile or less) of the Encinitas Coaster Station, which may reduce regional VMT by encouraging multi-modal transportation. Therefore, no alternative project locations were determined to meet the majority of the project objectives and reduce significant and unavoidable impacts to VMT.

Within the region, alternate project location sites to reduce VMT impacts were considered in major employment areas also served by transit and which allow for high-density housing. This limited sites to the UTC area of San Diego (where the current MTS Blue Line trolley is being

extended) and downtown San Diego. After reviewing these areas, it was determined that such alternative project locations would be infeasible because none of these sites are owned or controlled by the project proponent, and none would meet the majority of the project objectives.

For the above reasons, an alternative site location is considered infeasible pursuant to CEQA Guidelines Section 15126.6(c). Therefore, the Alternative Site Alternative was rejected from further analysis in the EIR.

## **FULL APPLICATION OF DENSITY BONUS**

A housing development including five or more residential units may propose a density bonus in accordance with California Government Code Section 65915 et seq. (“Density Bonus Law”). California’s Density Bonus Law is intended to encourage cities to offer bonuses and development concessions to projects that would contribute significantly to the economic feasibility of lower income housing in proposed housing developments.

The subject site currently has a General Plan land use designation of R30 OL (Residential 30 Overlay) and RR2 (Rural Residential; 1.01-2.00 dwelling units per acre) and is zoned RR2 with a R-30 overlay zone as part of the City’s Housing Element. Under the R-30 overlay designation and zoning, the parcel could be developed with up to 206 base residential units (6.88 acres x 30 DU/acre) prior to application of a density bonus (and without adjustments for on-site steep slope allowances).

Under this alternative, development on the site would be maximized based on full unit allocation allowed under the R-30 overlay and application of state Density Bonus Law. With application of a density bonus (up to a 50 percent increase in unit count), the subject site could support a maximum of 310 residential units. Of the 310 residential units, 31 units, or 10 percent, would be allocated as “very low” income units. Under this alternative, it is assumed that the “off-site preserve area” would remain undeveloped and similarly serve to mitigate for impacts to biological resources resulting with development of the subject site.

Although this alternative would achieve the majority of the project objectives, it would not substantially reduce or avoid significant impacts resulting with the proposed project, due to the increase in unit count and density. With an expanded development footprint to accommodate the additional residential units, it is anticipated that impacts related to biological and cultural resources would be increased under this scenario. Additionally, this alternative would generate additional vehicle trips as compared to the project, thereby increasing related air quality emissions, energy demands, and noise, as well as increasing demand on public services and utility systems. For these reasons, this alternative was rejected from further analysis in the EIR.

## REDUCED UNIT COUNT ALTERNATIVE

Under this alternative, the subject site would be developed with the minimum number of residential units as allowed by the HEU. As identified in the HEU, the minimum density allowed is 25 residential dwelling units per acre. Therefore, theoretically, the approximately 6.88-acre site could be developed with 172 for-sale dwelling units, or 23 more units than that proposed with the project. However, applying the same adjustments for existing on-site steep slopes as for the proposed project (which restrict the allowable development area), a minimum of 134 dwelling units (or 15 fewer units than the proposed project) could be constructed under this alternative. Therefore, this alternative considers construction of 134 new residential townhomes. Of the 134 units, 121 units would be market-rate and 13 units (or ten percent) would be available as “very low” affordable income units, as compared to 15 “very low” income affordable units with the proposed project.

With a reduction in the number of residential units proposed, the development footprint on the project site could be reduced. Therefore, additional dedicated open space would be preserved on the northern portion of the subject site under this alternative.

Additionally, rooftop decks would not be proposed with the residential units and the common area/pool would be located further to the east within the site. This design approach would reduce potential adverse noise effects from traffic along Interstate 5 as compared to the project, although noise effects would still occur due to proximity of the freeway.

Although this alternative would achieve most of the stated project objectives, it would not introduce any components that would substantially reduce or avoid significant impacts as compared to the proposed project. The alternative is expected to reduce, to a degree, significant impacts to biological resources, cultural and tribal cultural resources, geology and soils (paleontological resources), and noise as compared to the proposed project; however, similar mitigation measures to the proposed project would still be required to reduce impacts to less than significant.

Additionally, impacts relative to VMT would remain significant and unavoidable, as this alternative would also exceed the adopted threshold, due to the similar location. Although measures to reduce VMT could be implemented, such measures would not reduce impacts to below the threshold. Therefore, VMT impacts would not be reduced with this alternative as compared to the proposed project. This alternative would also provide fewer housing opportunities within the City while resulting in similar environmental impacts as compared to the proposed project. For these reasons, the alternative was rejected from further analysis in the EIR.

## **NO PROJECT/EXISTING ZONING ALTERNATIVE**

The proposed “off-site preserve area” (APN 216-110-35) to the north of the proposed project site currently has a General Plan land use designation of RR1 (Rural Residential; 0.51-1.0 dwelling units/acre) and is zoned RR1 (or 1 dwelling unit per acre maximum). The parcel is approximately 4.95 acres in size; therefore, under the RR1 zoning, four residential dwelling units could be developed.

The project site (APN 254-144-01) currently has a General Plan land use designation of RR2 (Rural Residential; 1.01-2.00 dwelling units per acre) and is zoned RR2 with a R-30 overlay zone as part of the City’s Housing Element. Under this alternative, the parcel would be developed with the minimum number of residential units as allowed by the HEU. As identified in the HEU, the minimum density allowed is 25 residential units per acre. Therefore, the approximately 6.88-acre site would be developed with 172 for-sale dwelling units under this alternative (without consideration for steep slope allowances), or 23 more units than with the proposed project. Of the 172 units, 155 would be market-rate units and 17 (or ten percent) would be available as “very low” affordable income units, as compared to 15 “very low” income affordable units with the proposed project. Combined with allowable development on the parcel to the north, this alternative would result in development of 176 residential units under current zoning conditions (without application of a density bonus).

Although this alternative would achieve most of the stated project objectives, it would not introduce any components that would substantially reduce or avoid significant impacts as compared to the proposed project. Impacts relative to VMT would remain significant and unavoidable. Further, impacts related to biological and cultural resources would be increased under this scenario, as the northern parcel would be partially developed with residential uses and supporting infrastructure rather than preserved in its current undeveloped state. Additionally, this alternative would increase traffic generation as compared to the project, as well as related air quality emissions, energy demands, and noise, in addition to increased demand for public services and utility systems. For these reasons, this alternative was rejected from further analysis in the EIR.

## **5.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

CEQA requires that an environmentally superior alternative be identified; that is, an alternative that would result in the fewest or least significant environmental impacts. If the No Project Alternative is the environmentally superior alternative, State CEQA Guidelines Section 15126.6(e)(2) requires that another alternative that could feasibly attain most of the project’s basic objectives be chosen as the environmentally superior alternative.

The No Project/No Development Alternative is the environmentally superior alternative. However, in accordance with CEQA Guidelines Section 15126.6(e)(2), a secondary alternative must be chosen since the No Project/No Development Alternative is environmentally superior. Therefore, Alternative 2, Reduced Development Footprint Alternative, would be considered the environmentally superior alternative as it would reduce (to a degree) potential impacts to biological resources, cultural/tribal cultural resources, and geology/soils (paleontology), as compared to the proposed project.

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