CHAPTER 5.0 – ALTERNATIVES TO THE PROPOSED PROJECT

5.1 Rationale for Alternative Selection

Section 15126.6(a) of the State CEQA Guidelines requires the discussion of "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 proposed project was determined to result in potentially significant and unmitigated impacts related to traffic/circulation and air quality, and potentially significant but mitigable impacts to biological resources, cultural resources, paleontological resources, public services and utilities, and noise. The alternatives discussed in this Chapter were developed for their ability to reduce or eliminate these impacts and meet the basic objectives of the proposed project listed in Subchapter 1.2. Section 15126 states that "the range of alternatives in an EIR is governed by the 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." The State CEQA Guidelines provide several factors that should be considered in regard to the feasibility of an alternative; those factors include: (1) site suitability; (2) economic viability; (3) availability of infrastructure; (4) general plan consistency; (5) other plans or regulatory limitations; (6) jurisdictional boundaries; and (7) whether the project applicant can reasonably acquire, control or otherwise have access to the alternative site (if an off-site alternative is evaluated). The project alternatives evaluated in detail and addressed in Subchapters 5.2, 5.3, 5.4, and 5.5 within this chapter include:

- No Project/No Development Alternative
- Reduced Development Footprint Alternative
- Reduced Daily Grading Alternative
- On-site Biological Mitigation Alternative

Each of these alternatives was selected in order to avoid or minimize significant impacts associated with the proposed project as analyzed in the SEIR. Specifically, the following criteria were considered.

The No Project/No Development Alternative was included because it would allow retention of uses similar to those currently existing on site, thereby avoiding both construction-period and long-term impacts (i.e., to traffic and air quality) associated with development of the proposed project.

The Reduced Development Footprint Alternative was included to focus on minimization of significant impacts related to project footprint and sensitive biological resources. Open space would increase on the site, and encroachment into sensitive habitat would be reduced.

The Reduced Daily Grading Alternative was included because it would reduce temporary construction-related impacts to below a level of significance.

Similar to the Reduced Development Footprint Alternative, the On-site Biological Mitigation Alternative was included to minimize impacts to biological resources. The On-site Biological Mitigation Alternative also would have the benefit of being able to mitigate all significant impacts to biological resources on site, instead of having to purchase mitigation credits on off-site parcels.

These four alternatives represent a reasonable range for alternatives, as defined in the State CEQA Guidelines, because they would reduce and/or eliminate significant impacts associated with the proposed project as analyzed in the SEIR.

Alternatives Considered But Rejected From Further Study

The following two alternatives were considered but ultimately rejected for detailed consideration as discussed below:

Alternative Location

In accordance with State CEQA Guidelines Section 15126.6(f)(2), an alternative project site location should be considered if development of another site is feasible and if development of another site would avoid or substantially lessen significant impacts of the proposed project. Factors that may be considered when identifying an alternative site location include the size of the site, its location, the General Plan (or Subregional Plan) land use designation, and availability of infrastructure. State CEQA Guidelines Section 15126.6(f)(2)(A) states that a key question in looking at an off-site alternative is "whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location."

Within the EOMSP area, there are over 2,370 acres of land planned for industrial development, a portion of which are developed or are in the process of receiving entitlements (see Table 1-5 in Chapter 1.0, *Project Description*). Land east of the project site that is near the U.S.-Mexico International Border is planned for industrial development (similar to the proposed project site), but has significant topographic and greater biological constraints (i.e., MSCP Major Amendment area) that are not present on the proposed project site. Industrial noise impacts to planned rural residential areas east of the site would be similar to the proposed project, while industrial noise impacts to breeding birds in sensitive habitat could be greater since more Diegan coastal sage scrub occurs on the slopes east of the site. Land west and south of the project site is smaller in size, has similar topographic and biological issues but also has vernal pools, a highly sensitive biological resource that is not present on site. In addition, several parcels designated for industrial development in the northern portion of Otay Mesa and, in particular within the EOMSP area, have been acquired by the applicant and others for the purposes of biological mitigation and are no longer available for industrial development. Much of the remaining industrial land in the EOMSP area is in a Minor Amendment area for the MSCP similar to the proposed site and has similar biological resources (e.g., non-native grassland, Quino and burrowing owls). Similarly-sized industrial development in any other portion of East Otay Mesa would still result in significant and unmitigable impacts to roadways and intersections in the City of San Diego; thus, an alternative location would not avoid or lessen traffic impacts of the proposed project. Similarly, construction emissions caused by a similarly-sized industrial development in the East Otay Mesa area would still have the potential for significant and unmitigable impacts to regional air quality due to the production of particulate matter and ozone precursors. Much of the East Otay Mesa features similar cultural resources and the same potential for paleontological resources as the project site and project impacts would not be avoided to those resources. Regardless of where industrial development is proposed in the East Otay Mesa area, significant direct and cumulative impacts to public services and utilities would also arise due to deficiencies in downstream sewer line capacity in the City's Otay Mesa Trunk Sewer.

In conclusion, there are no feasible alternative sites in the East Otay Mesa area that are of similar size and would have comparable border-oriented development potential compared to the proposed project on the Otay Crossings Commerce Park site. In addition, selection of an alternative location elsewhere in the unincorporated East Otay Mesa area would not avoid any of the significant project impacts to transportation/circulation, air quality, biological resources, cultural resources, paleontology, public services and utilities, and noise.

EOMSP Environmentally Preferred Alternative

The EOMSP Final EIR included an Environmentally Preferred Alternative in Section 5.0. That alternative allowed for industrial development only with preservation of all environmentally sensitive portions of the Specific Plan area containing coastal sage scrub and native grassland in open space (see Figure 5.3-1 in the EOMSP Final EIR). The hillside area in the eastern portion of the Specific Plan area, including the steep slopes on the proposed project site, would be designated open space and no residential development would be permitted there. Open Space areas proposed by Figure 5.3-1 of the EOMSP Final EIR correspond to Major Amendment Areas and Minor Amendment Areas Subject to Special Consideration (see Figure 3.1.-1 of this SEIR) on the proposed project site. Figure 5.3-1 of the EOMSP Final EIR indicates approximately 8 additional acres would be designated open space in the area of proposed Lots 24, 25, and 26. However, only Lot 24 contains coastal sage scrub, and the majority of sensitive habitats and species would be placed in open space on this lot as proposed by the project. Furthermore, a minor portion of sensitive habitat and species would be impacted in this area due to the extension of Siempre Viva Road either by the proposed project or other future projects. Therefore, the designation of additional open space on the project site pursuant to the EOMSP Final EIR Environmentally Preferred Alternative would not result in significant additional protection of sensitive habitats or species (other than non-native grassland) compared to the proposed project. In addition, the additional 8 acres placed into open space on Lots 24 through 26 would have a very minor effect in reducing vehicle trips or amount of land to be graded, and thus the traffic and air quality impacts of the proposed project.

5.2 Analysis of the No Project/No Development Alternative

5.2.1 No Project/No Development Alternative Description and Setting

In accordance with Section 15126.6(e) of the State CEQA Guidelines, the No Project Alternative includes a discussion of: (1) the existing conditions at the time the NOP is published; and (2) what would be reasonably expected to occur in the foreseeable future if the proposed project were not approved, based on current plans and availability of infrastructure and services. The discussion of the No Project Alternative can pertain to: 1) the continuation of an existing plan (e.g. EOMSP), policy, or operation into the future; or 2) the circumstance under which the project does not proceed. This subchapter evaluates Scenario 2, which is a No Project/No Development Alternative, but with acknowledgement that SR-11 and the future POE are still likely to be developed on portions of the project by Caltrans and GSA. Scenario 1 is not discussed here, as the remaining alternatives are examples of other possible development that could occur either by the applicant or others under the existing EOMSP.

Under the No Project/No Development Alternative, the 311-acre project site would remain as it is today, consisting of undeveloped land crossed by a series of dirt roads that are used by the U.S. Border Patrol and others for domestic security purposes. The industrial lots and circulation element roads,

road improvements and utility infrastructure proposed by the Otay Crossings Commerce Park project would not be constructed. Proposed ROW for the western alignment for SR-11 that would cross the project site and the federal POE would not be reserved by the project applicant under this alternative. In addition, the applicant would not grade the industrial pads where the potential ROW for SR-11 and POE may be developed (i.e., Lots 54, 55 and 56 on the TM). Others could construct the circulation element roads and utility infrastructure that are planned on site; in addition, Caltrans could construct the SR-11 and the GSA could implement the federal POE regardless of whether the project is constructed. Thus, the No Project/No Development Alternative could reasonably result in some site disturbance by others. However, unlike development under the proposed project, future improvements on site would not be planned in a comprehensive fashion.

5.2.2 Comparison of the Effects of the No Project/No Development Alternative to the Proposed Project

The No Project/No Development Alternative would avoid significant and unmitigable traffic and air quality impacts identified for the proposed project since no new traffic and industrial construction would occur. Cumulatively significant impacts to traffic could, however, still arise as other projects in the cumulative study area are constructed. This alternative would avoid the proposed project's significant but mitigable impacts to biological resources, cultural resources and paleontological resources (see Table 5-1). Specifically, direct impacts to sensitive habitat (i.e., native grassland, Diegan coastal sage scrub, non-native grassland, tamarisk scrub and disturbed wetland), sensitive plants (i.e., variegated dudleya, San Diego barrel cactus, San Diego marsh elder and small flowered-morning glory) and sensitive animals (i.e., fairy shrimp, burrowing owl and Quino) would be avoided. None of the sensitive biological resources would, however, be placed in permanent open space or protected on or off site, as they would under the proposed project. Potential indirect noise impacts to breeding birds caused by industrial noise on site would be avoided by this alternative. Since testing determined that the cultural resources on and off site are not considered significant and only subsurface resources may occur, no impacts to archaeological or historic features would occur from this alternative. Since no grading would occur on site under this alternative, potentially significant paleontological resource impacts caused by cut into formational materials with resource potential would be avoided by this alternative. If no industrial development is proposed on site, significant cumulative impacts to public services and utilities would nonetheless arise due to deficiencies in downstream sewer line capacity in the City's Otay Mesa Trunk Sewer. The No Project/No Development Alternative would not contribute to those public services impacts. Direct significant traffic noise impacts to existing residences along Otay Mesa Road would still be expected as the EOMSP builds out since existing noise levels already exceed the County standards for residential areas and other projects in the EOMSP would contribute traffic to the segment of Otay Mesa Road where the homes are located. With project traffic eliminated by this alternative, there would be no contribution to that cumulative noise impact under the No Project/No Development Alternative. In addition, potential industrial noise impacts on planned rural residential areas east of the site would be avoided.

The No Project/No Development Alternative would not necessarily avoid all impacts to biological, cultural and paleontological resources; other project applicants could be conditioned to construct the same roads and sewer mains needed to serve the project area. In addition, if others and Caltrans proceed with the circulation element road improvements and the federal government implements the future POE planned on site, biological, cultural and paleontological resource impacts would not be avoided.

5.3 Analysis of the Reduced Development Footprint Alternative

5.3.1 Reduced Development Footprint Alternative Description and Setting

The Reduced Development Footprint Alternative would eliminate all grading on industrial lots east of the Lone Star Road, specifically, Lots 16 through 24, north of Siempre Viva Road, and Lots 25 through 33, south of Siempre Viva Road, and place an open space easement across those portions of the project site (Figure 5-1, *Reduced Development Footprint Alternative*). As shown on that figure, this alternative would still implement the entire easterly extension of Siempre Viva Road since it is a circulation element road envisioned in the EOMSP and required for access by property east of the project site. The purposes of this alternative would be to increase biological conservation on site, increase the distance between proposed industrial development and potential rural residential areas and sensitive biological habitat supporting breeding birds to the east, and to reduce traffic-related impacts of the proposed project, including noise and air quality.

Eliminating 18 industrial lots from the TM (equating to 48.6 acres) would increase open space dedication on site to approximately 95.7 acres, but would not affect the project applicant's ability to reserve ROW for the western alignment of SR-11 and the federal POE. The industrial lot development area would be reduced in size to approximately 216.5 acres, of which 84 acres would still be reserved for interim use and ultimately for Caltrans ROW and the federally proposed POE (i.e., Lots 54 through 56). Grading would still be conducted in two phases, although the phase boundary could change to ensure balanced grading. The conceptual landscape plan would also be implemented as proposed, except that a ten-foot brush management zone would be required along Lone Star Road since it would interface directly with undeveloped open space (per the County Fire Code). The Reduced Development Footprint Alternative would require sewer and water infrastructure, although the size of the mains and pump station could be reduced.

A Minor MSCP Amendment would be required to obtain take authorization for listed and sensitive species on site. In addition, a BMO exception would still be needed for impacts to marsh elder and barrel cactus.

5.3.2 Comparison of the Effects of the Reduced Development Footprint Alternative to the Proposed Project

The Reduced Development Footprint Alternative would increase the project's conservation of sensitive vegetation communities, such as non-native grassland, Diegan coastal sage scrub and tamarisk scrub and individual sensitive plants, such as barrel cactus, as compared to the proposed project. No reduction or avoidance in project impacts to fairy shrimp, burrowing owl or Quino) would occur under this alternative because these species were not observed in the 18 lots that would be eliminated by this alternative. Despite the increased biological open space and decreased grading, the Reduced Development Footprint Alternative would still result in significant impacts to sensitive vegetation communities, sensitive plants and sensitive animals. Specifically, the increased open space would not preserve any more marsh elder and 28 percent of barrel cactus would still be impacted. Thus, the BMO exception required for the proposed project would also be required for this alternative. As noted in Subchapter 3.1, the majority of rare plant impacts occur in association with extending Lone Star Road and Siempre Viva Road. The Reduced Development Footprint Alternative would substantially lessen significant indirect impacts caused by construction and operational (industrial) noise since

grading and development would be pulled back 500 to 1,000 feet from adjacent coastal sage scrub habitat. All other indirect impacts would be reduced accordingly.

Similar to the proposed project, significant and unmitigable traffic impacts to roads and intersections in the City of San Diego would be anticipated in the interim years before full buildout of the EOMSP, even with an approximate 5,800 daily trip reduction (i.e., 48.6 acres at 120 trips per acre) associated with the reduced development area because this alternative scenario would produce ADT levels that are comparable to constructing Units 1 through 3 of the proposed project (refer to Table 2 in the TIS located in EIR Appendix B). Based on this assumption, in the Existing Plus Project condition, this alternative would avoid the two direct Interim SR-905 segment impacts and the direct Otay Mesa Road/Britannia Boulevard intersection impact of the project, but all other direct roadway and intersection impacts would remain(refer to Tables 2.1-5a/b, 2.1-6a/b and 2.1-7a/b/c/d). In the Cumulative Plus Project condition, this alternative would result in reduced impacts, however, the cumulative (2020) impacts would remain significant.

In terms of air quality impacts, the Reduced Development Footprint Alternative would substantially reduce total fugitive dust emissions by grading approximately 48 fewer acres of the project site (i.e., 21 fewer acres within Grading Phase 1 and 27 fewer acres within Grading Phase 2). Because the maximum daily construction scenario would be unchanged, short-term emissions of VOC, NO_x, $PM_{2.5}$ and PM_{10} would be above the County's significance guidelines even with emissions controls in place and a temporary, but significant and unmitigable, impact would still be expected. The Reduced Development Footprint Alternative would produce approximately 5,800 fewer daily trips and reduce traffic emissions produced by the proposed project. Operational emissions of CO, NO_x and VOCs would be reduced, but remain above the screening thresholds; therefore, significant impacts would not be avoided despite the overall trip reduction. Greenhouse gas emissions would be reduced by this alternative since less construction and operational emissions would be produced. As with the project, the alternative would comply with AB 32 and would include a number of measures to reduce emissions of GHGs to 25 percent below "business as usual."

Eliminating grading east of Lone Star Road would lessen but not avoid impacts to potential subsurface historic resources that occur elsewhere on the project site. Therefore, significant cultural resources impacts would still be expected for the Reduced Development Footprint Alternative and grading monitoring would be required. Impacts to paleontological resources would be reduced by the elimination of grading on lots requiring cuts into formational materials; however, significant and mitigable impacts would still be anticipated elsewhere on site.

With regard to public services and utilities, this alternative would still contribute to increased demand on the wastewater system capacity in the East Otay Mesa. The demand would be less than anticipated for the proposed project since 48.6 fewer acres of industrial development would occur. Nonetheless, significant direct and cumulative impacts to those public services would occur due to deficiencies in the current infrastructure and mitigation would be required.

As previously stated, this alternative would produce ADT levels that are comparable to constructing Units 1 through 3 of the proposed project. Because Otay Mesa Road between Sanyo Avenue and Enrico Fermi Drive would carry 90-95 percent of the Unit 1-3 project traffic (based on the trip distribution in the TIS, refer to Figure 5 in Appendix B), the project traffic on this segment would be reduced by approximately 5,800 ADT. Therefore, significant cumulative traffic noise impacts to the three nearby residences along Otay Mesa Road would be slightly reduced under this alternative, but

still significant. Potential impacts from industrial noise sources projected to the property line would be reduced and a potentially significant impact avoided since development would be pulled back an average distance of approximately 500 feet from the eastern property line where planned residential use could occur.

In conclusion, while this alternative would reduce grading and traffic generated by the proposed project, associated traffic and air quality impacts would be less but would remain significant and unmitigable. Biology, cultural, paleontological resources, public services and noise impacts would be lessened, but significant and mitigable impacts would still occur.

5.4 Analysis of the Reduced Daily Grading Alternative

5.4.1 Reduced Daily Grading Alternative Description and Setting

Under the Reduced Daily Grading Alternative, the applicant would grade less of the project site on a daily basis in an effort to reduce short-term construction emissions of particulate matter and gaseous emissions below levels that are deemed significant under the County significance guidelines. In the case of the proposed project, grading would have to be reduced four-fold to no more than 10 acres of grading disturbance per day. A commensurate reduction in the amount of construction equipment would also occur due to the reduced grading effort. Reducing the amount of construction equipment on site would permit the equipment to operate for the full (eight-hour) construction day, rather than for two-hour day predicted if no equipment reduction were implemented (see Subchapter 2.2 of the SEIR). Therefore, this alternative would reduce the maximum daily construction emissions associated with Grading Phase 1 (Units 1 through 3) below levels predicted in Table 2.2-3. The Reduced Daily Grading Alternative would not change the long-term, operational emissions of the proposed project; however, it would lengthen the period required to mass grade Units 1 through 3 and would increase the overall schedule for implementing the proposed project. An MSCP amendment would still be processed for the Reduced Daily Grading Alternative.

5.4.2 Comparison of the Effects of the Reduced Daily Grading Alternative to the Proposed Project

In contrast to the proposed project, the Reduced Daily Grading Alternative would avoid significant emissions of PM_{10}, VOC and NO_x by limiting the extent of daily grading activities and restricting the amount of equipment used during grading operations. All other impacts associated with operating the proposed project would remain the same because the amount of industrial development would not change under this alternative. As such, project impacts to traffic would remain significant and unmitigable and impacts to biology, cultural resources, paleontology, public services and utilities, and noise would continue to be significant but mitigated as discussed in Chapter 3.0 of this report.

5.5 Analysis of the On-site Biological Mitigation Alternative

5.5.1 On-site Biological Mitigation Alternative Description and Setting

The On-site Biological Mitigation Alternative would remove proposed grading from the southern half of the site and reconfigure the proposed TM and Preliminary Grading Plan such that all project

impacts to non-native grassland and burrowing owl habitat on the northern half would be mitigated on site in the southern half at a ratio of 1:1 (impact to mitigation). As such, the northern half of the site would be subdivided and graded as defined by Phase 1 (Units 1 through 3, including Lots 58 and 59 preserved in open space) of the project, while the southern half (or Phase 2 lots) would be placed in open space (Figure 5-2, *On-site Biological Mitigation Alternative*). Mitigation for impacts in the north would be offset by the southern open space. As shown in Figure 5-2, grading would be restricted to the 158 acres in the Phase 1 grading area. No grading would be permitted on the eastern half of Lots 21 and 22. Reducing two lots and eliminating 15 lots from the TM would provide for approximately 153 acres of open space preservation. The project applicant would only reserve ROW for the northern segment of SR-11; no land would be reserved for the southern segment of SR-11 or the future POE (see Figure 5-2). Grading would occur in a single phase. This alternative would reduce the developed area by 110 acres to a total developed area of 155 acres. The conceptual landscape plan would also be implemented on the northern half of the site.

The segment of Siempre Viva east of Lone Star Road and local road access to properties east of the project would be constructed under this alternative since it is a circulation element road connection needed to provide access to properties east of the project site. The On-site Biological Mitigation Alternative would require some sewer and water infrastructure, although the size of the mains could be reduced. The sewer pump station would not be required for this alternative since it is proposed to serve the southern portion of the site.

A Minor MSCP Amendment would be required to obtain take authorization for listed and sensitive species on site from the County. A BMO exception would be required for impacts to marsh elder and barrel cactus.

5.5.2 Comparison of the Effects of the On-site Biological Mitigation Alternative to the Proposed Project

The On-site Biological Mitigation Alternative would increase the project's conservation of sensitive vegetation communities, such as non-native grassland and Diegan coastal sage scrub (see Figure 5-2). This alternative would also reduce and/or avoid project impacts to some sensitive plants, such as Otay tarplant, as compared to the proposed project. However, the increased open space would not preserve any more marsh elder or barrel cactus than the proposed project and a BMO exception would still be required. In addition, this alternative would avoid project impacts to sensitive animal species observed in the southern half of the site (i.e., four pair of burrowing owls and habitat for the Quino). By placing the southern half of the property in open space, impacts to non-native grassland and burrowing owl habitat would be mitigated at a 1:1 ratio and no off-site habitat purchase would be required. However, the grading would still result in significant impacts to sensitive vegetation communities, sensitive plants (i.e., barrel cactus and marsh elder) and sensitive animals (i.e., burrowing owls and fairy shrimp) due to development of the northern half of the site. Similar to the proposed project, impacts to marsh elder and fairy shrimp would remain unavoidable since they would be caused by the extension of Lone Star Road (a Circulation Element Road) on site from its current terminus on the property to the north. The On-site Biological Mitigation Alternative would substantially lessen significant indirect impacts caused by construction and operational (industrial) noise since grading and development would be pulled back 500 feet from the coastal sage scrub habitat in the southern half of the site. All other indirect impacts would be reduced accordingly, particularly the edge effects in the southern portion of the site. Potentially significant indirect industrial noise impacts to breeding birds

in sensitive habitat on site would still occur due to construction on Lots 16 through 18; Lot 24 indirect noise impacts would be avoided by this alternative.
The TIS was prepared in accordance with the EOMSP, which specifies a trip generation rate of 120 ADT per acre of technology business park development. Therefore, the overall project trip generation would be reduced by 13,200 ADT (from 21,279 ADT to 8,079 ADT) under the On-site Biological Alternative. This alternative would generate slightly more traffic than the Unit 1 scenario. Based on this estimation, this alternative would avoid the following direct impacts: Airway Road from SR-905 to Sanyo Avenue; Interim SR-905 between Heritage Road and Britannia Boulevard; Otay Mesa Road/SR-905; Otay Mesa Road/Sanyo Avenue; Otay Mesa Road/Enrico Fermi Drive; Otay Mesa Road/Britannia Boulevard; and Otay Mesa Road/Heritage Road (refer to Tables 2.1-5a/b, 2.1-6a/b and 2.1-7a/b/c/d). In the cumulative (2020) condition, cumulative impacts would be reduced but would remain significant. Although the On-site Biological Mitigation Alternative would reduce project traffic by 60 percent, significant and unmitigable direct and cumulative traffic impacts to City roads and intersections would be anticipated under this alternative in the interim years before full buildout of the EOMSP because the project would still contribute traffic to intersections that operate at unacceptable levels of service in the future.

Significant traffic noise impacts would be reduced by this alternative, but not avoided. The Cumulative without SR-905 Plus Project Unit 1 scenario would produce an ADT of 28,070 along the noise-sensitive segment of road (see Table 3.5-3). Because Otay Mesa Road between Vann Centre Drive and Enrico Fermi Drive would carry approximately half of the overall project traffic (see Figure 8 in TIS), the project traffic on this segment would be reduced by 6,600 ADT; this alternative would reduce trips along the noise-sensitive segment of Otay Mesa Road to 21,470, which represents more than double the existing ADT. However, project traffic would still contribute to ambient noise levels that currently exceed County standards for residential development. Industrial noise impacts would be avoided by this alternative because of the increase buffer distance between future industrial operations and planned rural residential. No pump station would be required due to the reduced development footprint in the southern half of the site and no pump station noise would be produced under this alternative. In terms of air quality impacts, the On-site Biological Mitigation Alternative would substantially reduce total fugitive dust emissions by grading 110 less acres of the project site. Because maximum daily construction scenario would not change, daily emissions of VOC, NO_x, $PM_{2.5}$ and PM_{10} during Grading Phase 1 would be above the County's significance guidelines (see Table 2.2-3 in this report); a temporary, but significant and unmitigable, impact would still be expected under this alternative. The On-site Biological Mitigation Alternative would produce 13,200 fewer daily trips and reduce operational traffic emissions produced by the proposed project. However, operational traffic emissions of CO, NO_x and VOCs would remain above the screening thresholds; therefore, significant air quality impacts would not be avoided despite the overall trip reduction. The On-site Biological Mitigation Alternative would reduce the amount of greenhouse gas emission produced by the proposed project. The emission reduction measures included for the proposed project would still be included in this alternative to minimize "business as usual" emission levels by 25 percent and provide compliance with AB 32.

Although eliminating grading south of the Siempre Viva Road/Lone Star Road intersection would preserve several insignificant cultural resource sites in open space, it would not avoid impacts to potential subsurface historic resources that occur elsewhere on the project site. Therefore, significant cultural resources impacts would still be expected for the On-site Biological Mitigation Alternative and grading monitoring would be required in the northern half of the site. Similarly, impacts to

paleontological resources would be less (due to decreased grading activity), but still significant and mitigable due to the presence of sensitive formational materials beneath the northern half of the site.

In conclusion, this alternative would substantially reduce grading and development impacts of the proposed project. Significant but mitigable impacts to sensitive habitat, sensitive plants and sensitive animal species would still be expected, although these impacts would be reduced to below a level of significance through on site avoidance and mitigation measures. Traffic impacts generated by the proposed project would remain significant and unmitigated because of impacts in the City of San Diego jurisdiction where mitigation is not assured or is infeasible at certain locations. Associated air quality impacts would be less but would remain significant and unmitigable. Cultural resource and paleontology impacts would be less but still potentially significant due to the presence of resources in the northern half of the site and within the off-site roads and sewer line. Off-site traffic noise and on-site industrial noise impacts would be similar to the proposed project.

5.6 Environmentally Superior Alternative

Although the No Project/No Development Alternative would result in minimal to no environmental impacts (see Subchapter 5.2 above), Section 15126.6(e)(2) of the State CEQA Guidelines requires identification of an alternative other than the No Project as the Environmentally Superior Alternative. As such, the On-site Biological Mitigation Alternative is considered to be the Environmentally Superior Alternative for its ability to reduce the extent of significant impacts to sensitive biological resources, as described in Subchapter 5.5.

Table 5-1
COMPARISON OF PROJECT ALTERNATIVE IMPACTS TO PROPOSED PROJECT IMPACTS

Issue	Proposed Project	No Project/No Development	Reduced Development Footprint	Reduced Grading	On-site Biological Mitigation Alternative
Transportation/ Circulation	SU	LS	SU (Less)	SU (Same)	SU (Less)
Air Quality	SU	LS	SU (Less)	SM (Less)	SU (Less)
Biological Resources	SM	LS	SM (Less)	SM (Same)	SM (Less)
Cultural Resources	SM	LS	SM (Less)	SM (Same)	SM (Less)
Paleontological Resources	SM	LS	SM (Less)	SM (Same)	SM (Less)
Public Services and Utilities	SM	LS	SM (Less)	SM (Same)	SM (Less)
Noise	SM	LS	SM (Less)	SM (Same)	SM (Less)

LS = less than significant; NI = no impact; SM = significant but mitigable; SU = significant and unmitigable

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