

# CHAPTER 6.0

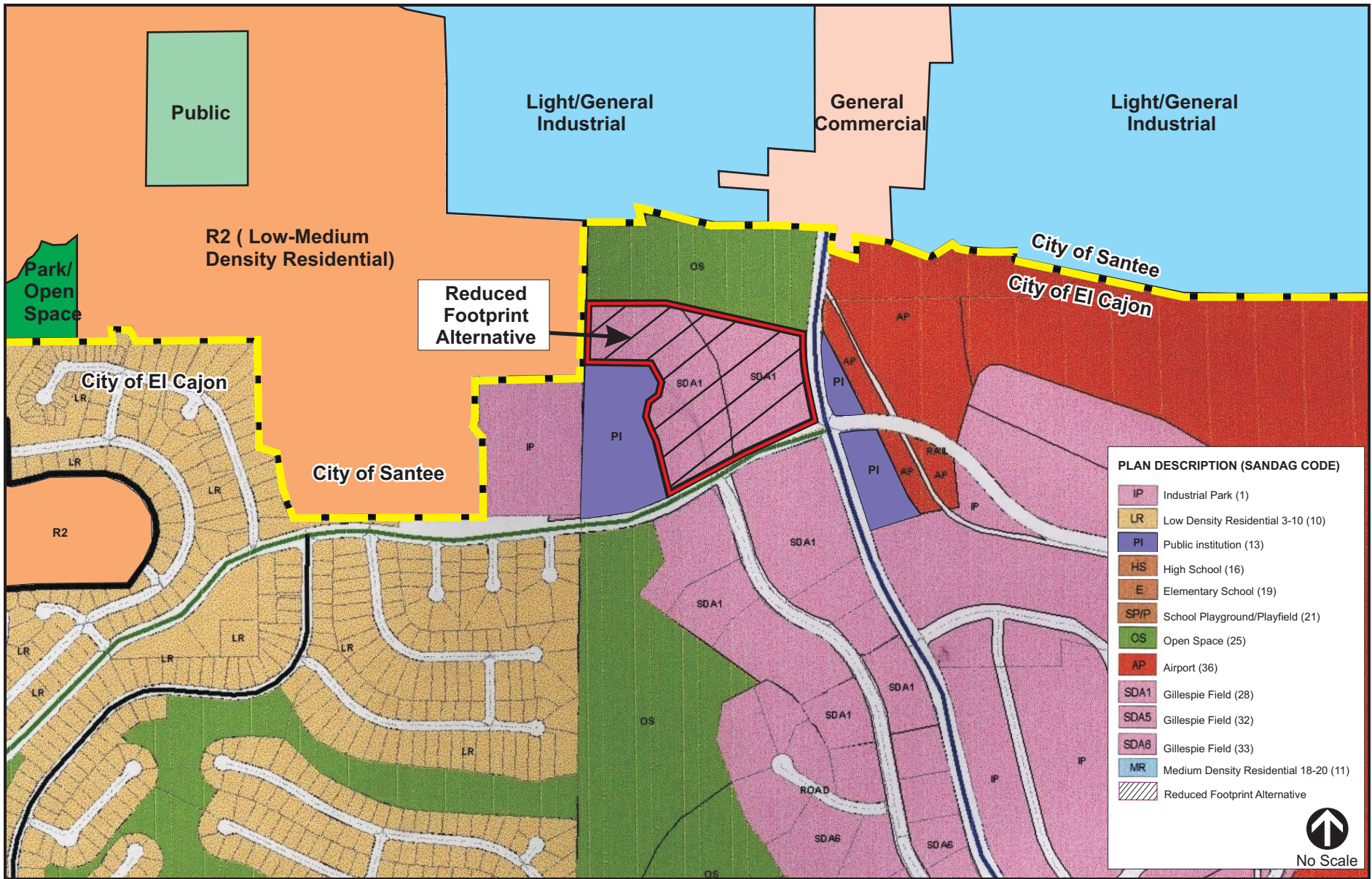
## ALTERNATIVES

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The State CEQA Guidelines indicate that EIRs are required to evaluate a “range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain the basic objectives of the project” (Section 15126.6(a) State CEQA Guidelines). The project objectives as stated in Section 3.2 of this EIR are reiterated below:

1. Create three new parcels on the 31.5-acre project site that coincide with Phases 1 through 3 of the proposed project;
2. Construct industrial buildings on each of the proposed parcels to complement existing industrial uses within the Gillespie Field Airport property;
3. Change the General Plan land use designation of the site to Industrial Park (IP) and develop the project site consistent with the industrial park land use designation identified in the City of El Cajon General Plan;
4. Provide quality industrial use space within the Gillespie Field Airport property to account for the loss of industrial uses in other areas of the airport property;
5. Rezone the project site to M (Manufacturing);
6. Provide approximately 463,000 square feet (SF) of new industrial space to serve the projected future growth of the City of El Cajon and Gillespie Field Airport;
7. Design the proposed industrial park to be consistent with the Gillespie Field Airport Land Use Compatibility Plan (2004) and applicable FAA regulations;
8. Make improvements to the existing Weld Boulevard/Gillespie Way intersection;
9. Construct sidewalk and other right-of-way (ROW) improvements along Weld Boulevard and Cuyamaca Boulevard; and
10. Implement landscaping and drainage improvements to the project site.

The discussion of alternatives should focus on “alternatives capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives could impede to some degree the attainment of the project objectives or would be more costly” (Section 15166.6(b) State CEQA Guidelines). Based on the State CEQA Guidelines, one alternative, the Alternate Site Alternative, was considered, but ultimately rejected from further analysis. Two project alternatives that would avoid or reduce significant project impacts were identified and are addressed in this EIR: the No Project Alternative and the Reduced Footprint Alternative. The Reduced Footprint Alternative would be the environmentally superior alternative, and is illustrated on Figure 6-1.



**REDUCED FOOTPRINT ALTERNATIVE**

**FIGURE 6-1**

CEQA further directs that “the significant effects of the alternatives shall be discussed, but in less detail than the significant effects of the project as proposed” (Section 15126.6(d) State CEQA Guidelines). Sections 6.2 and 6.3 provide a discussion of each of the project alternatives including a determination of their potential significant effects.

## **6.1 ALTERNATIVES CONSIDERED BUT REJECTED**

The following alternatives were considered but ultimately rejected from further analysis due to the reasons described below.

### **6.1.1 ALTERNATE SITE ALTERNATIVE (CITY OF EL CAJON)**

Implementation of the proposed project on an alternate site in the City of El Cajon was considered but rejected due to the lack of other suitable sites in the City which would accomplish most of the project objectives. Few undeveloped areas zoned for industrial use exist within the City of El Cajon, and no other sites of adequate size for the proposed project exist. In addition, several of the project objectives require a site in close proximity to the Gillespie Field Airport. The Gillespie Field Airport area has evolved into one of the City’s prime industrial areas, and implementation of the project in this area would continue to promote Gillespie Field as the City’s established industrial area. Furthermore, implementation of the project within the Gillespie Field Airport property would allow for the development of new industrial uses within the airport property, which would partially offset the loss of 70 acres of planned industrial uses on the Brucker Leasehold within the airport property (see Section 4.9, Land Use, for further discussion regarding this issue). A review of available sites on or surrounding the airport property indicated that they were not of adequate size or zoning to allow for the development of the proposed project. Therefore, an alternate site within the City of El Cajon was rejected as a project alternative.

### **6.1.2 ALTERNATE SITE ALTERNATIVE (OTHER JURISDICTIONS)**

Alternate sites located outside the City of El Cajon were also considered but ultimately rejected from further analysis. As discussed above, several of the project objectives require a site in close proximity to the Gillespie Field Airport. The Gillespie Field Airport area is located in the City of El Cajon but also borders the City of Santee; therefore, a review of available sites within the City of Santee near the airport property was conducted. However, no sites of adequate size or appropriate zoning for industrial uses were identified within the City of Santee near the Gillespie Field Airport property. Furthermore, an alternate site within the City of Santee would not accomplish the project objectives of serving the projected future growth of the City of El Cajon and Gillespie Field Airport and complementing existing industrial uses within the Gillespie Field Airport property (Objectives 2 and 6). In addition, potential sites within the City of Santee are outside of the lead agency’s jurisdiction. CEQA case law has determined that an alternative outside of the lead agency’s jurisdiction could be considered infeasible and that a project alternative which cannot be feasibly accomplished need not be extensively considered (*Citizens of Goleta Valley v. Board of Supervisors of Santa Barbara County*, 1990). Alternate sites outside of the City of Santee were not considered because they would not meet most of the project objectives and are outside the lead agency’s jurisdiction. Therefore, an alternate site location within the City of Santee or other jurisdictions was rejected as a feasible project alternative.

CEQA further directs that “the significant effects of the alternatives shall be discussed, but in less detail than the significant effects of the project as proposed” (Section 15126.6(d) State CEQA Guidelines). In the following sections, each of the project alternatives is described and their significant effects are discussed. The Reduced Footprint Alternative is illustrated on Figure 6-1.

## **6.2 NO PROJECT ALTERNATIVE**

### **6.2.1 DESCRIPTION OF ALTERNATIVE**

CEQA requires the No Project Alternative to be addressed in an EIR. Under the No Project Alternative, it is assumed that no additional development would occur on the project site. The site would remain in its present state and the proposed project would not be implemented. The southern portion of the project site would remain as an abandoned golf range and the northern portion of the site would remain as a former outdoor storage facility. Although the project site is designated as Open Space, Public Institution and Special Designation Area 1 (SDA-1) in the El Cajon General Plan, the No Project Alternative assumes that the project site would not be developed with General Plan compatible uses.

### **6.2.2 COMPARISON WITH PROPOSED PROJECT**

Similar to the proposed project, the No Project Alternative would not result in significant impacts associated with the following environmental issues: Aesthetics, Global Climate Change and Energy, Public Services, and Utilities.

Construction and operational activities identified for the proposed project would not occur under this alternative. Therefore, significant unavoidable impacts to air quality from the exceedance of NO<sub>x</sub> during simultaneous project construction of Phase 3 and operation of Phases 1 and 2 would be avoided.

Under the No Project Alternative, the significant mitigable impacts to biological resources associated with the proposed project would be avoided. The project site would not be disturbed by grading and construction activities and, therefore, impacts to the federally endangered San Diego ambrosia, jurisdictional waters of the U.S., disturbed Diegan coastal sage scrub, and non-native grassland habitat would not occur. In addition, impacts to raptor foraging and nesting habitat would be avoided. However, future impacts to this habitat could occur as the result of on-site activities that would not require discretionary approval, such as brush clearing, mowing or tilling.

Similar to the proposed project, the No Project Alternative would not result in a cumulatively considerable contribution to global climate change, would not be significantly impacted by the effects of global climate change, and would not result in the wasteful or inefficient use of energy. This alternative would not require energy or increase the generation of GHG emissions from construction or operation activities.

The No Project Alternative would not result in significant mitigable impacts to human remains or unstable soils because it would not involve any new construction or ground disturbance.

Similar to the proposed project, this Alternative would not result in impacts associated with hazardous soil and groundwater conditions. The No Project Alternative would not result in potentially significant impacts associated with aircraft operations during construction, since no construction activities would occur under this alternative.

The No Project Alternative may result in significant impacts to water quality because the project site does not currently employ any best management practices to reduce pollutants in site runoff. The majority of the project site is vacant and contains exposed soils.

Similar to the proposed project, the No Project Alternative would not result in impacts associated with flood hazards, because the project site is not located within the 100 year flood hazard area.

Unlike the proposed project, the No Project Alternative would not require a General Plan Amendment to change the land use designation of the property to Industrial Park or a rezone to Manufacturing. The No Project Alternative would not result in any inconsistencies with land use plans, policies, or regulations or be inconsistent with adjacent or surrounding land uses. While the site's General Plan SDA-1 land use designation allows for industrial development, the No Project Alternative would not result in additional industrial development on the project site.

This alternative would not result in significant mitigable noise impacts associated with project operation, including the operation of HVAC equipment and truck deliveries, to adjacent residences. It would also avoid temporary mitigable noise impacts during construction.

Under the No Project Alternative, the project site would not be developed with land uses that would generate additional traffic on local roadways. Therefore, unlike the proposed project, this alternative would not result in a significant mitigable direct impact to the intersection of Weld Boulevard/Gillespie Way and a significant mitigable cumulative impact to the intersection of Fanita Drive/Grossmont College Drive.

## **6.2.3 ABILITY TO ACCOMPLISH PROJECT OBJECTIVES**

The No Project Alternative would not meet any of the ten objectives identified for the proposed project.

## **6.3 REDUCED FOOTPRINT ALTERNATIVE**

### **6.3.1 DESCRIPTION OF ALTERNATIVE**

Under the Reduced Footprint Alternative, the industrial park would be constructed on the portion of the project site that is designated as SDA-1 in the City of El Cajon General Plan. The northern portion of the proposed project site, which is designated as Open Space in the General Plan, would not be included in the footprint for this alternative and would remain in its current state. In addition, the small portion of the proposed project site that is designated Public Institution would not be included in the footprint for this alternative. The Reduced Footprint Alternative would reduce impacts to disturbed Diegan coastal sage scrub and non-native grassland habitat. In addition, it would not require a General Plan Amendment or rezone. Inside the footprint of the Reduced Project Alternative, it is estimated that approximately three of the four proposed industrial buildings could be constructed. The industrial park buildings would be altered from the proposed project site plan in order to maximize the developable area within the reduced footprint area (see Figure 6-1).

### **6.3.2 COMPARISON WITH PROPOSED PROJECT**

Similar to the proposed project, the Reduced Footprint Alternative would not result in significant impacts associated with the following environmental issues: Aesthetics, Global Climate Change and Energy, Public Services, and Utilities. This is due to the smaller footprint of this alternative, the reduced level of

construction effort and duration, and fewer vehicle trips generated by this alternative as compared to the proposed project.

Under this alternative, significant unavoidable impacts to air quality from the exceedance of NO<sub>x</sub> during simultaneous project construction of Phase 3 and operation of Phases 1 and 2 would be reduced and likely would be avoided altogether. This alternative would result in a reduced construction area and schedule as compared to the proposed project, which would result in reduced construction emissions. In addition, this alternative would result in a reduced number of vehicle trips from operation as compared to the proposed project, which would result in reduced operational emissions.

Under the Reduced Footprint Alternative, the significant mitigable impacts to biological resources associated with the proposed project would be reduced. Due to the smaller development area of the site, impacts to jurisdictional waters of the U.S., Diegan coastal sage scrub habitat, non-native grassland habitat, and raptor nesting and foraging habitat would be reduced, although impacts would not be avoided completely. Similar impacts would occur to the federally endangered San Diego ambrosia under this alternative. Mitigation would still be required to reduce biology impacts to below a level of significance, similar to the proposed project.

Similar to the proposed project, this alternative would have the potential to result in impacts to human remains from ground disturbance activities during construction. Mitigation would be required to reduce this impact to below a level of significance, similar to the measure identified for the proposed project.

Similar to the proposed project, the Reduced Project Alternative would not result in a cumulatively considerable contribution to global climate change, would not be significantly impacted by the effects of global climate change, and would not result in the wasteful or inefficient use of energy. This alternative would require less energy and result in a smaller increase in GHG emissions from construction or operation activities as the proposed project.

The Reduced Footprint Alternative would result in a potentially significant geology and soils impact associated with unstable soils, similar to the proposed project. The same mitigation measures used for the proposed project would be implemented for the Reduced Footprint Alternative in order to reduce impacts to below a level of significance.

This Alternative would result in similar significant mitigable impacts associated with hazards to aircraft operations during project construction. This alternative would implement mitigation measures similar to the proposed project to reduce this impact to below a level of significance. Similar to the proposed project, no significant impacts associated with soil or groundwater contamination would occur under this alternative.

Similar to the proposed project, the Reduced Footprint Alternative would not result in a significant impact associated with a flood hazard. The proposed project site is not located within the 100-year floodplain and would not be subject to inundation by levee or dam failure or seiche.

The Reduced Footprint Alternative would not be expected to result in any inconsistencies with applicable land use plans, policies, or regulations or be inconsistent with adjacent or surrounding land uses. The southern portion of the site would be developed with up to three industrial buildings, consistent with the SDA-1 land use designation identified in the El Cajon General Plan. No General Plan Amendment or rezone would be required. However, a site rezone from Open Space to Manufacturing would still be required. The Reduced Footprint Alternative would also be designed to meet the development requirements of the Gillespie Field Airport Land Use Compatibility Plan (2004) and applicable FAA

regulations. Proposed buildings would be located outside of Runway Protection Zones and meet the height restrictions of Inner Approach/Departure Zones.

This alternative would reduce significant noise impacts associated with project operation, including the operation of HVAC equipment, on adjacent residences due to the increased distance of the residences to the reduced project footprint. In particular, noise impacts to the residence north of the project site would be reduced as compared to the proposed project. Temporary mitigable noise impacts during construction would be expected to occur similar to the proposed project.

Under the Reduced Footprint Alternative, the project site would be developed with up to three new industrial buildings, which would result in the generation of additional traffic on local roadways as compared to the No Project Alternative, but less additional traffic as compared to the proposed project. Since traffic generation is based on building square footage, the Reduced Footprint Alternative would generate fewer trips than the proposed project because it proposes to construct less building space. However, due to the location of the project site, it is likely that this alternative would result in a significant mitigable impact to the intersection of Weld Boulevard/Gillespie Way, similar to the proposed project. In addition, a significant mitigable cumulative impact to the intersection of Fanita Drive/Grossmont College Drive may also occur; however, the project's fair share contribution is expected to be less under this alternative.

### **6.3.3 ABILITY TO ACCOMPLISH PROJECT OBJECTIVES**

The Reduced Footprint Alternative would meet six of the ten project objectives identified for the proposed project. The alternative would meet the requirements of the Gillespie Field Airport Land Use Compatibility Plan (2004) and applicable FAA regulations; construct sidewalk and other right-of-way improvements along Weld Boulevard and Cuyamaca Boulevard; make roadway improvements to the Weld Boulevard/Gillespie Way intersection; provide quality industrial use space within the Gillespie Field Airport property; implement landscaping and drainage improvements to the project site; and rezone the site to Manufacturing. However, this alternative would not meet the following four project objectives: create three new parcels on the 31.5-acre project site that coincide with Phases 1 to 3; construct industrial buildings on each of the parcels; change the General Plan land use designation of the site to Industrial Park (IP); and provide approximately 463,000 square feet (SF) of new industrial space.

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