

4.0 ALTERNATIVES TO THE PROPOSED PROJECT

4.1 Rationale for Alternative Selection

In accordance with Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines, an Environmental Impact Report (EIR) must describe a range of reasonable alternatives to 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.

Impacts of the project to biological resources, cultural resources, paleontological resources, hazards and hazardous materials, and noise would be reduced to less than significant levels through implementation of mitigation measures. Impacts to traffic/circulation can be mitigated to a level less than significant with recommended mitigation measures; however, implementation of certain off-site improvements are under the jurisdiction and control of another agency, so the impact has been considered unmitigated as the specific timing and certainty of implementing the improvements are unknown. Impacts to greenhouse gas emissions are also considered significant and unmitigable. Each of the alternatives addressed in this chapter were examined in order to determine the extent to which they would avoid or minimize the significant impacts associated with the project.

Potential impacts to the following issues were determined not to be significant after further evaluation: aesthetics; air quality; geology and soils; ~~greenhouse gas emissions~~; hydrology and water quality; land use and planning; utilities and service systems; and energy use and conservation. The following issues were determined not to be significant or have no impact during the Initial Study process: agriculture and forestry resources; mineral resources; population and housing; public services; and recreation. The environmental issue areas that were analyzed and determined to be less than significant as part of the EIR process and Initial Study process are not discussed in this chapter.

CEQA Guidelines Section 15126.6(f) states that “the range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.” The CEQA Guidelines Section 15126.6(f)(1) provide several factors that should be considered with regard to the feasibility of an alternative: (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).

According to the CEQA Guidelines Section 15126.6(d), discussion of each alternative should be sufficient “to allow meaningful evaluation, analysis, and comparison with the proposed project.” Therefore, the significant effects of each alternative are discussed in less detail than those of the project, but in enough detail to provide decision-makers perspective and a reasoned choice among alternatives to the proposed project.

The CEQA Guidelines require the evaluation of a No Project Alternative. The discussion of the No Project Alternative may proceed along two lines:

1. If the project is a development proposal, the No Project Alternative is the circumstance under which the project does not proceed.

2. When the project is the revision of an existing land use or regulatory plan, the No Project Alternative is the continuation of the existing plan.

In the case of the project described in this EIR, both types of No Project Alternative apply and are discussed. Because the project represents a revision of an existing plan, in this case the General Plan, the No Project/Existing General Plan Designation Alternative would analyze the development that is permitted under the existing plan. The No Project/No Development alternative is also analyzed as what would reasonably be expected to occur in the future if the project is not approved and the existing general plan designation alternative is not carried forward.

As described in Chapter 1.0, the proposed project objectives are as follows:

1. Expand an existing commercial node to further enhance and support the economic development of the Lakeside Village regional category which will assist in the implementation of the Community Development Model.
2. Develop a new commercial center compatible with the character of the Lakeside community that will serve the retail shopping needs of the southwest corner of the Lakeside Community Plan area from Blossom Valley to Lake Jennings Park Road.
3. Develop commercial uses adjacent to a major freeway and close to existing residential uses.
4. Provide Los Coches Creek with a buffer from developed urban uses and provide for the long-term maintenance of the open space area at no cost to the public.
5. Provide needed infrastructure improvements including roadway/intersection improvements, sidewalks which will correct existing public infrastructure deficiencies, and an improved public multi-purpose trail.
6. Preserve biological and cultural resources in dedicated open space easements.

4.2 Alternatives Considered but Rejected

Alternative Site

Section 15126.6(f)(2) of the CEQA Guidelines addresses alternative locations for a project. The key question and first step in the analysis is whether any of the significant effects of the proposed project would be avoided or substantially lessened by putting the proposed project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR. Further, CEQA Guidelines Section 15126.6(f)(1) states that among the factors that may be taken into account when addressing the feasibility of alternative locations are whether the project proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).

An effort was made to identify an alternative location for the project. The selection criteria were developed to identify potential alternative project sites that would be fairly easy to acquire, and large enough to accommodate the proposed uses. When looking for the alternative sites, the following criteria were used:

- Alternative site had to be within the identified market area.

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- Land had to be privately owned.
- Alternative site had to feasibly accomplish most of the basic objectives of the project.

Potential alternative sites were determined by examination of a Geographic Information Systems (GIS) derived parcel map produced by the County of San Diego. On initial examination, several parcels were identified as suitably sized. These included parcels near Flinn Springs County Park, a parcel south of Interstate 8 (I-8) Business Route and west of Flaven Lane, and a parcel south of I-8 near Valley Rim Road. Next, aerial photography of San Diego County was consulted. Parcels which were on extreme slopes or inaccessible from a reasonable circulation road network were removed from the list of potential sites. Finally, the Public Land Ownership GIS coverage was viewed in conjunction with aerial photography of San Diego County to ensure the possible alternative sites were privately owned. From the analysis one alternative site remained after the screening process.

One possible alternative site is located on the north side of I-8, approximately one mile east of the project site. The 45-acre triangular-shaped lot is bound by I-8 on the south, Blossom Valley Road on the northwest, and Flinn Springs Road on the northeast. This alternative site is zoned Limited Agricultural Use (A70) and is currently occupied as a nursery. The nursery is a permitted use by the A70 Use Regulations.

Construction of the proposed project on the alternative site would result in additional impacts that were not identified for the project at its currently proposed location. Based on the Department of Conservation, Division of Land Resources, Farmland Mapping and Monitoring Program, the alternative site contains Farmland of Local Importance, Unique Farmland, and Grazing Farmland. Therefore, construction of the proposed project on the alternative site would result in a significant impact associated with the conversion of designated farmland to non-agricultural use.

Blossom Valley and Flinn Spring Roads are both rural roads with one lane of traffic moving in each direction. Additionally, there is no immediate access from I-8 to the alternative site. The site would be accessible via the Lake Jennings Park Road/I-8 interchange or the Alpine Boulevard/I-8 interchange. These I-8 access points are approximately ½ mile west and three miles east of the site, respectively. The proposed commercial center is anticipated to generate 4,683 ADT. The addition of traffic from the development would likely degrade these roadways. Improvements to roads in the vicinity of the alternative site (Blossom Valley Road, Flinn Springs Road, and Olde Highway 80) would have to occur to mitigate traffic impacts to below a level of significance. Traffic impacts and roadway and intersection improvements associated with this alternative are expected to be greater than for the project due to the fact that the alternative site is not adjacent to a freeway ramp and would require more extensive roadway improvements. Furthermore, because this alternative site is situated further away from I-8 and is not surrounded by as much development, it is assumed that the existing noise environment is less than the proposed project's existing noise environment. The addition of vehicular traffic proposed under this alternative may result in a significant noise impact on offsite areas as the ambient conditions are lower.

Based on these considerations, this alternative would increase impacts to noise and traffic and would not substantially reduce any environmental impacts associated with the proposed project. In addition, this alternative would result in additional impacts (agricultural resources) that were not identified for the project at its currently proposed location. Therefore, it was eliminated from further consideration in this EIR.

Mixed Use Alternative

A mixed-use alternative was also considered for the project site. Under a mixed-use alternative, the project site would be developed with a combination of commercial and residential uses. It should be noted that the project site is currently zoned Urban Residential (RU-15); therefore, this alternative would require rezoning a portion of the project site to support commercial uses. Commercial uses would be positioned on the northern portion of the project site, adjacent to Olde Highway 80 and near existing commercial uses. Residential uses would be positioned on the southern portion of the project site.

This alternative was rejected from further consideration, as parking field requirements would limit the amount of commercial that could be built on the project site. Additionally, it is unlikely that commercial tenants would be attracted to the site, as there would not be a major anchor under this scenario. Further, this alternative would likely triple the traffic generation compared to the project. It is for these reasons that this alternative was not considered for further in the EIR.

4.3 Analysis of the No Project/No Development Alternative

4.3.1 No Project/No Development Alternative Description and Setting

The No Project/No Development Alternative proposes to leave the project area in its present condition, without project development or new construction. The No Project/No Development Alternative is what would reasonably be expected to occur in the future if the project is not approved and the existing general plan designation alternative is not carried forward. Existing conditions for each environmental issue, as described in Sections 2 and 3 would remain.

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

Biological Resources

This alternative would avoid direct impacts to non-native grassland and individual oak trees which would occur with the project. This alternative would also avoid the indirect impacts to the southern riparian forest habitat due to project construction and operation. However, this alternative would not receive the benefit of the open space easement for riparian habitat as proposed with the project. Biological resource impacts under this alternative would be less than significant. Compared to the project, this alternative would decrease the overall level of biological resource impacts.

Under the No Project/No Development Alternative, biological resource conditions on the site would remain as described under Section 2.1.1 of the EIR. No new development would occur on the project site.

Because no new development would occur on the project site, implementation of the No Project/No Development Alternative would avoid impacts associated with the 15 individual oak trees (**Impact BIO-1**), construction during least Bell's vireos breeding season (**Impact BIO-2**), and short-term noise related to construction which could impact wildlife utilizing the riparian area (**Impact BIO-3**). This alternative would also avoid indirect impacts (i.e., accessibility to the site, trash dumping, and

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increase noise and light from operation of the project) to the wildlife using the southern riparian forest (**Impact BIO-4**).

Compared to the proposed project, the No Project/No Development Alternative would avoid the removal of 6.91 acres of non-native grassland during clearing and grading to prepare building pads and parking areas for construction (**Impact BIO-5**).

Under this alternative, 1.14 acres would not be revegetated to enhance the buffer between the RPO wetland and development. This alternative would avoid temporary grading activities in the RPO buffer (**Impact BIO-6**).

Cultural Resources

Because no new construction would take place under the No Project/No Development Alternative, cultural resources that exist within the project area would not be disturbed. Compared to the proposed project, this alternative would avoid impacts to cultural resources on the project site. Compared to the proposed project, implementation of this alternative would avoid the direct impact to site CA-SDI-15117 (**Impact CR-1**) and indirect impacts due to increase human activity associated with implementation of the proposed project. The No Project/No Development Alternative would also avoid the impact associated with previously undiscovered cultural sites as a result of earth-disturbing activities (**Impact CR-2**).

Greenhouse Gas Emissions

The No Project/No Development Alternative proposes to leave the project area in its present condition, without project development or new construction. Therefore, under this alternative, no GHG emissions would be generated. Compared to the proposed project, this alternative would avoid impacts associated with GHG emissions and climate change. Compared to the proposed project, implementation of this alternative would avoid the significant and unmitigable impact related to the generation of GHG emissions above the efficiency threshold (**Impact GHG-1**). This alternative would also avoid the impact due to conflict with applicable plan, policy, or regulation adopted for the purposes of reducing the emissions of GHGs (**Impact GHG-2**).

Hazards and Hazardous Materials

An existing 6-inch asbestos cement pipe (ACP) water pipeline is located underneath Pecan Park Lane. Removal of the 6-inch ACP during construction could pose a health hazard and risk of upset due to potential dispersal of asbestos. Compared to the proposed project, implementation of this alternative would not involve the removal of an existing 6-inch ACP water pipeline located underneath Pecan Park Lane. Therefore, the potential for impacts associated with friable and non-friable ACMs, (**Impact HZ-1**) would be avoided.

The No Project/No Development Alternative would not increase the demand on fire protection services as it would not include additional development on the project site. Therefore, it would not require the installation of additional fire hydrants. Under the No Project/No Development Alternative, a systematic fuel management strategy would not be put in place, nor would a 6-foot masonry wall be constructed along the southern boundary of the project site. Therefore, this

alternative would expose people or structures to a significant risk of loss, injury or death involving wildland fires (**Impact HZ-2**). However, compared to the proposed project, this impact would be reduced as the southern portion of the project site is unoccupied.

Noise

The No Project/No Development Alternative would not result in any new uses that would increase noise in the project vicinity. Ambient noise conditions would remain consistent with those identified in Section 2.4.1.

This alternative would avoid the noise impact associated with construction activities (**Impact NOI-1**). Additionally, because no commercial uses are proposed under this alternative, this alternative would avoid the impacts associated with the operation of the carwash (**Impact NOI-2**), rooftop HVAC units (**Impact NOI-3**), and the trash compactor unit (**Impact NOI-4**). Compared to the proposed project, this alternative would avoid significant noise impacts.

Paleontological Resources

No new development would occur under the No Project/No Development Alternative. Because no earthwork activities would take place under the No Project/No Development Alternative, potential discovery of paleontological resources would not be disturbed. Compared to the proposed project, this alternative would avoid impacts from the potential to discover paleontological resources (**Impact PR-1**) on the project site.

Transportation/Traffic

The No Project/No Development Alternative would not involve any new uses in the project area. Therefore, this alternative would not generate any new vehicle trips. Under this alternative, Pecan Park Lane would not be vacated. This alternative would not include the benefit of the Pecan Park Lane/Olde Highway 80 intersection redesign proposed as part of the project. Under this alternative, the trail proposed by the project would not be developed, thus opportunities for alternative methods of transportation (e.g., equestrian, pedestrian) would not be realized. Compared to the project, implementation of this alternative would avoid the direct and cumulative impacts to study area intersections and roadway segments (**Impacts TR-1 through TR-23**).

4.4 Analysis of the No Project/Existing General Plan Designation Alternative

4.4.1 No Project/Existing General Plan Designation Alternative Description and Setting

The County of San Diego Board of Supervisors approved the Lake Jennings Village Project (SCH No. 2005111013) on August 5, 2009. The Lake Jennings Village Project proposed the construction of eight 20-unit buildings for a total of 160 two-bedroom multi-family residential units on the Lake Jennings Market Place project site. The project included a General Plan Amendment (GPA 05-005) to change existing Residential [4.3 dwelling units per gross acre], Residential [14.5 dwelling units per gross acres], General Commercial, and Service Commercial to Residential. Therefore, for the Existing General Plan Alternative, it is assumed that the site could be developed with the previously-approved residential project.

4.4.2 Comparison of the Effects of the No Project/Existing General Plan Alternative to the Proposed Project

Biological Resources

Implementation of the No Project/Existing General Plan Designation alternative would result in direct impacts similar to those of the project, because the development footprint would be the same as the project. This would include direct impacts to non-native grassland and individual oak trees. Similar to the project, an open space area easement and biological buffer would be required by the County of San Diego to protect the riparian habitat at the southern edge of the property. This would decrease the number of residential units that could be developed under this alternative, as portions of the residential parcels would not be permitted to be developed in identified sensitive areas. Mitigation for direct impacts to non-native grassland and individual oak trees would be similar to the mitigation identified for the project and would reduce the impact to below a level of significance.

Indirect impacts to southern riparian forest due to project construction and operation are also expected under this alternative; however implementation of mitigation proposed for the project would also be applicable to this alternative and would reduce the indirect impact to below a level of significance.

As with the proposed project, this alternative would impact 15 individual oak trees. Individual oak trees are considered locally important; therefore, impacts to these 15 individual oak trees are considered significant. This impact (**Impact BIO-1**) would be the same under this alternative as the proposed project. Similar to the proposed project, there is the potential that least Bell's vireos move into the riparian area prior to project construction. If construction is proposed during the breeding season and within 300 feet of the riparian habitat, an indirect impact to this species would occur. This impact (**Impact BIO-2**) would be similar to the proposed project.

This alternative would also result in a similar impact as a result of short-term noise related to construction, which could impact sensitive wildlife utilizing the riparian area. These are potentially significant indirect impacts of the project (**Impact BIO-3**), and this alternative would result in a similar impact.

As with the proposed project, accessibility to the site, trash dumping, and increased noise and light from operation of the proposed project may cause adverse impacts. This impact associated with the project (**Impact BIO-4**), could be potentially significant and require mitigation. This alternative would also result in a similar impact.

Under the proposed project, approximately 6.91 acres of non-native grassland habitat are proposed to be impacted on and off-site (**Impact BIO-5**). Implementation of this alternative would result in the same impact to the non-native grassland community.

Similar to the proposed project, no direct impacts to the RPO wetland would occur as a result of implementation of this alternative. However, under the proposed project, 1.14 acres would be revegetated to enhance the buffer between the RPO wetland and development. Temporary grading activities in the RPO buffer would be mitigated through the implementation of a revegetation plan (**Impact BIO-6**). The impact under this alternative would be similar to the proposed project as the same disturbance footprint would occur.

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As with the proposed project, implementation of mitigation measures M-BIO-1 through M-BIO-6 would reduce all impacts to biological resources to a less than significant level. These measures include the off-site acquisition of 0.90 acre of coast live oak woodland within an approved mitigation bank within the MSCP, pre-construction surveys for the least Bell's vireo, implementation of measures to reduce indirect effects (such as use of shielded lighting entering into the RPO wetland habitat, placement of a 6-foot cinderblock wall and signage to prevent unauthorized access into the open space area, off-site acquisition of 3.46 acres of a Tier III or greater habitat within a pre-approved mitigation area, and revegetation of the buffer between the RPO wetland and development to convert 1.14 acres of non-native grassland to a higher quality (Tier III or greater), low density native shrub/grassland community that meets County requirements for fire safety and protection.

Cultural Resources

This alternative would have the same footprint as the project and would require careful siting to avoid archaeological resources known to occur on the project site. Through careful site design and the implementation of a capping plan, similar to what is proposed for the project, it is anticipated that impacts to cultural resources under this alternative would be less than significant and the same as the project.

As with the proposed project, (**Impact CR-1**), implementation of this alternative would directly impact site CA-SDI-15117 through the construction of the project and indirectly impact this site because of increased human activity associated with project implementation. Also, prehistoric activity in the area is evident by the number of previously recorded cultural resources. In addition, archaeological site CA-SDI-15117 is located within the area of potential effect. As such, because the same area of disturbance would occur under this alternative as with the proposed project, there is the potential to directly impact previously unrecorded buried archaeological resources (**Impact CR-2**).

As with the proposed project, mitigation measures M-CR-1 and M-CR-2 would be required to reduce the impact to cultural resources to a less than significant level. These measures include implementing a site capping program for archaeological site CA-SDI-15117, archaeological monitoring, recovery and curation of artifacts, and archaeological monitoring during ground disturbance activities.

Greenhouse Gas Emissions

Similar to the proposed project, this alternative would generate GHG emissions from short-term construction and long-term operations. Operational GHG emissions would include energy use (including electricity, natural gas and water and wastewater), transportation vehicle miles traveled (VMT), area sources, and solid waste. Under the No Project/Existing General Plan Designation alternative, approximately 160 residential units could be proposed for the project site. This alternative is estimated to generate approximately 1,600 average daily trips (ADTs), compared to the 4,683 ADT generated by the proposed project. This alternative would reduce the amount of ADT compared to the proposed project. According to OB-1 Analyses, the yearly contribution to GHG from motor vehicles would be 1,263.7 MTCO₂e per year under this alternative. Compared to the proposed project, this alternative would reduce GHG emissions from motor vehicles by 931.4 MTCO₂e per year.

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Similar to the proposed project, this alternative would be eligible to take credit for the State of California implementation of adopted standards and would apply similar feasible mitigation measures (Mitigation Measures M-GHG-1 through M-GHG-17) to reduce GHG emissions. With implementation of adopted standards and Mitigation Measures M-GHG-1 through M-GHG-17, this alternative's total GHG emissions would be 1,234.7 MTCO₂e per year.

As discussed in Section 2.3, Greenhouse Gas Emissions, in coordination with County staff, the use of an Efficiency Metric, which assesses the GHG efficiency of a project on a "service population" basis (Efficiency Metric = project emissions divided by the sum of the number of jobs and the number of residents provided by a project) has been applied to this project. The Metric represents the rate of emissions needed to achieve a fair share of the State's emissions mandate embodied in AB 32. The use of "fair share" in this instance indicates the GHG efficiency level that, if applied Statewide, would meet the AB 32 emissions target and support efforts to reduce emissions beyond 2020.

To calculate the Efficiency Metric, this alternative's GHG emissions is divided by the sum of the number of proposed residents only (this alternative does not include the commercial component that would yield employees). This alternative would yield an estimated total of 458 residents. Using 1,234.7 MTCO₂e per year divided by 458 residents, this alternative demonstrates an efficiency of 2.7 MTCO₂e per service population. Compared to the proposed project, this alternative would not exceed the efficiency threshold of 4.9 MTCO₂e per service population. Therefore, compared to the proposed project, this alternative would reduce GHG impacts to below a level of significance (**Impact GHG-1**). Accordingly, this alternative would achieve the fair share of the State's emissions mandate embodied in AB 32 to reduce emissions beyond 2020.

EO B-30-15 established an interim GHG reduction target of 40 percent below 1990 levels by 2030, and EO S-03-05 established a long-term goal of reducing statewide GHG emissions to 80 percent below 1990 levels by 2050. Achieving these long-term GHG reduction policies will require systemic changes in how energy is produced and used. The changes necessitated to achieve these targets will require additional policy and regulatory changes, which are unknown at this time. Moreover, there is currently no statewide plan that lays out the framework as to exactly how the state plans on achieving these targets and to what extent action is required at the local and project level in order to achieve these targets. Therefore, the extent to which the project's emissions and resulting impacts would be mitigated through implementation of such changes is not known and would thus be inconsistent with plans, policies, or regulations adopted for the purpose of reducing GHG emissions in the long-term. Therefore, similar to the proposed project, impacts related to a conflict with an applicable plan, policy, or regulation would be potentially significant (**Impact GHG-2**).

Hazards and Hazardous Materials

Development under this alternative would also require the preparation of a fire protection plan, and the implementation of appropriate site design and low-fuel landscaping to minimize fire risk to future residents and occupants of the site under this alternative. A masonry wall along the southern boundary of the development zone of this alternative would also be required. The construction of the masonry wall, similar to the project, would serve to mitigate any potential fire safety impact to future residents. The installation of fire hydrants would also be required under this alternative, and the applicant would be required to pay for the design and installation of the hydrants. This is similar to the impact identified for the project. Therefore, implementation of this project results in a similar level of fire safety impact as identified for the project.

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As with the proposed project, implementation of this alternative would involve the removal of an existing 6-inch ACP water pipeline located underneath Pecan Park Lane. Removal of the 6-inch ACP during construction could pose a health hazard and risk of upset due to potential dispersal of asbestos (**Impact HZ-1**). Also, similar to the proposed project, there is a potential for the project to expose people or structures to a significant risk of loss, injury of death involving wildland fires (**Impact HZ-2**).

Implementation of this alternative would require the same mitigation measures as the proposed project to reduce impacts to less than significant. Mitigation Measure M-HZ-1 requires a licensed asbestos abatement consultant or Certified Inspector be present during ACP removal. In addition, all asbestos containing material removed onsite shall be transported by a Cal-OSHA registered asbestos abatement contractor to handle asbestos-containing materials and disposed of at a licensed receiving facility and under proper manifest. This mitigation measure would reduce impacts to less than significant. Also, this alternative would involve construction of a 6-foot non-combustible block wall with stucco covering along the southern edge of the development area, north of the equestrian trail, with a minimum of 40 feet up to 80 feet of fuel modification north of the 6-foot non-combustible wall that will be constructed 10 feet north of the open space (Mitigation Measure M-HZ-2).

Noise

The project site currently experiences a high ambient noise level due to the proximity to I-8. If the site is proposed for residential uses, this would create a noise-sensitive land use. Because the site is subject to noise levels of approximately 70 dBA, existing noise levels exceed the limitations set forth in the County Noise Ordinance. Mitigation for residential uses would be required to ensure that interior and exterior noise levels comply with County standards. Ground level patio areas would be screened or enclosed to reduce the noise levels to 60 dBA. Special dual-paned windows would be required to mitigate noise in interior residential spaces. Similar to the proposed project, noise impacts would require mitigation to reduce impacts to less than significant.

Construction activities would be a temporary contributing factor to levels of noise within the project vicinity. Similar to that of the proposed project, the alternative must conform to County Noise Ordinance Section 36.410. Noise generated from this alternative would be less than that of the proposed project, as residential land uses typically create less noise when compared to commercial land uses.

Implementation of this alternative would require similar construction activities as the proposed project. As with the proposed project, without mitigation, the expected construction noise level from the nearest residential receptor could exceed the County of San Diego construction noise abatement of 75 dB(A) L_{eq-8h} (**Impact NOI-1**). As with the proposed project, implementation of mitigation measures M-NOI-1 and M-NOI-2 would be required to reduce potential construction noise impacts to less than significant. These measures require that equipment set back distances are provided to minimize noise to sensitive receptors and comply with County noise standards pursuant to County Noise Ordinance, Section 36.409 and that a Construction Noise Blasting Plan be prepared which includes identification of planned blasting locations, a description of the planned blasting methods, an inventory of receptors potentially affected by the planned blasting, and calculations to determine the area affected by the planned blasting.

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Because no commercial uses are proposed under this alternative, this alternative would avoid the impacts associated with the operation of the carwash (**Impact NOI-2**), rooftop HVAC units (**Impact NOI-3**), and the trash compactor unit (**Impact NOI-4**).

Paleontological Resources

This alternative would have the same footprint and similar excavation depths as the project; therefore, impacts to paleontological resources under this alternative would be similar to the proposed project. Because earthwork would occur within Upper Jurassic and Lower Cretaceous Marine and Nonmarine geological formations, which have marginal potential to contain unique paleontological resources, as with the proposed project, this alternative would result in a potentially significant impact to unique paleontological resources (**Impact PR-1**). Implementation of mitigation measure M-PR-1 would be required, which requires paleontological monitoring during grading activities.

Transportation/Traffic

Under the No Project/Existing General Plan Designation alternative, approximately 160 residential units could be proposed for the project site. This alternative is estimated to generate approximately 1,600 ~~average daily trips~~ (ADTs), compared to the 4,683 ADT generated by the proposed project. This alternative would reduce the amount of ADT compared to the proposed project. However, mitigation will still be required to reduce traffic impacts to below a level of significance. Although this alternative would reduce the amount of traffic, impacts would still occur to the same facilities. Specifically, the following impacts would occur:

- Olde Highway 80 from Lake Jennings Park Road to Project Driveway 1 (LOS F) (**Impact TR-1**)
- Olde Highway 80 from Project Driveway 1 to Project Driveway 2 (LOS F) (**Impact TR-2**)
- Olde Highway 80 from Project Driveway 2 to Project Driveway 3 (LOS E) (**Impact TR-3**)
- Olde Highway 80 from Project Driveway 3 to Rios Canyon Road extension (LOS E) (**Impact TR-4**)
- Olde Highway 80 from Rios Canyon Road to Pecan Park Lane east (LOS E) (**Impact TR-5**)
- Lake Jennings Park Road from Harritt Road to Blossom Valley Road (LOS E) (**Impact TR-6**)
- Lake Jennings Park Road from Blossom Valley Road to I-8 Westbound Off-Ramp (LOS F) (**Impact TR-7**).
- Lake Jennings Park Road from I-8 Westbound Off-Ramp to Olde Highway 80 (LOS F) (**Impact TR-8**).
- Lake Jennings Park Road and I-8 Westbound Off-Ramp (PM Peak Hour- LOS F) (**Impact TR-9**)
- Lake Jennings Park Road and I-8 Eastbound Off-Ramp (PM Peak Hour- LOS F) (**Impact TR-10**)

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- Based on a signal warrant analysis, Project Driveway 2 at Olde Highway 80 warrants a traffic signal (**Impact TR-11**).
- Olde Highway 80 from Lake Jennings Park Road to Project Driveway 1 – LOS F (**Impact TR-12**)
- Olde Highway 80 from Project Driveway 1 to Project Driveway 2 – LOS F (**Impact TR-13**)
- Olde Highway 80 from Project Driveway 2 to Project Driveway 3 – LOS F (**Impact TR-14**)
- Olde Highway 80 from Project Driveway 3 to Rios Canyon Road – LOS F (**Impact TR-15**)
- Olde Highway 80 from Rios Canyon Road to Pecan Park Lane – LOS E (**Impact TR-16**)
- Lake Jennings Park Road from Jack Oak Road to Harritt Road – LOS E (**Impact TR-17**)
- Lake Jennings Park Road from Harritt Road to Blossom Valley Road – LOS E (**Impact TR-18**)
- Lake Jennings Park Road from Blossom Valley Road to I-8 Westbound Off-Ramp – LOS F (**Impact TR-19**)
- Lake Jennings Park Road from I-8 Westbound Off-Ramp to Olde Highway 80 – LOS F (**Impact TR-20**)
- Lake Jennings Park Road and Blossom Valley Road (PM Peak Hour- LOS F) (**Impact TR-21**)
- Lake Jennings Park Road and I-8 Westbound Off-Ramp (PM Peak Hour- LOS F) (**Impact TR-22**)
- Lake Jennings Park Road and I-8 Eastbound Off-Ramp (PM Peak Hour- LOS F) (**Impact TR-23**)

As with the proposed project, the following improvements would be required:

Roadway Segment: Olde Highway 80 from Lake Jennings Park Road to Rios Canyon Road

- Widen Olde Highway 80 from Lake Jennings Park Road to Rios Canyon Road to provide four lanes with intermittent turn lanes between Lake Jennings Park Road and Rios Canyon Road.

Roadway Segment: Olde Highway 80 from Rios Canyon Road to Pecan Park Lane

- Improve Olde Highway 80 from Rios Canyon Road to Pecan Park Lane to one lane each way with a two-way left-turn lane between new Rios Canyon Road and Pecan Park Lane (east).

Roadway Segment: Lake Jennings Park Road from Harritt Road to Blossom Valley Road

- Add northbound through lane from Blossom Valley Road to Jennings Vista Drive.
- Improve transition from one southbound through lane to two southbound through lanes from Harritt Road to Jennings Vista Drive.

- Add southbound through lane from Jennings Vista Drive to Blossom Valley Road.
- Add two-way left-turn south of Harritt Road to Rancho Del Villa.
- Extend northbound left-turn pocket at Blossom Valley Road to 115 feet.
- Modify the southbound right turn lane at Blossom Valley Road to a shared through/right lane.

Roadway Segment: Lake Jennings Park Road from Blossom Valley Road to I-8 Westbound Off-Ramp

- Extend the northbound left-turn pocket at Blossom Valley Road to 115 feet.
- Widen Lake Jennings Park Road from Blossom Valley Road to I-8 Westbound Off-Ramp to provide 4 lanes and bicycle lanes.

Roadway Segment: Lake Jennings Park Road from I-8 Westbound Off-ramp to Olde Highway 80

- Widen Lake Jennings Park Road from I-8 Westbound Off-Ramp to Olde Highway 80 to provide 4 lanes plus bicycle lanes.

Intersection: Lake Jennings Park Road and I-8 Westbound Off-Ramp

- Provide additional capacity at intersection according to segmental improvements above.
- Provide southbound refuge lane for the westbound left-turn movement from the I-8 Westbound Off-Ramp.
- Alternatively, Caltrans may install full, or partial roundabout improvements at this location.

Intersection: Lake Jennings Park Road and I-8 Eastbound Off-Ramp

- Install a traffic signal at the intersection of Lake Jennings Park Road and Olde Highway 80/ I-8 EB off-ramp.
- Widen off-ramp for 320 feet to have a third lane to accommodate a left-turn lane, a left through lane, and a through right lane.
- Alternatively, Caltrans may install full, or partial roundabout improvements at this location.

Intersection: Olde Highway 80 and Project Driveway 2

- Install a traffic signal at the intersection opposite the Lakeside Tractor Supply Project.

Also, certain roadway segment and intersection impacts (**Impacts TR-7 through TR-10, TR-19, TR-20, TR-22, and TR-23**) related to the I-8 eastbound and westbound off-ramps can be mitigated through off-site improvements as required by, and under the jurisdiction of Caltrans. Although the proposed traditional intersection improvements have been determined to be feasible, Caltrans is in the process of analyzing the feasibility of developing full or partial roundabout improvements at these locations, which if implemented, would also reduce the traffic/circulation impact to a level less

than significant, should these roundabout improvements be determined to be feasible. However, due to the fact that the I-8 interchange related improvements are the responsibility of another agency (Caltrans) and that such changes or alterations are within the responsibility and jurisdiction of another public agency and not the County of San Diego, and the exact timing of the improvements are unknown, these impacts are considered significant and unmitigable. Although this alternative would reduce the amount of traffic, impacts would still occur to the same facilities and the I-8 interchange related improvements would still be the responsibility of Caltrans. Therefore, traffic impacts would be similar to the proposed project.

4.5 Analysis of Reduced Commercial Alternative 1

4.5.1 Reduced Commercial Alternative 1 Description

The purpose of this alternative would be to avoid, or reduce, the significant traffic and noise impacts associated with the proposed project by reducing the vehicular trips generated by the project. According to KOA, this alternative would generate 3,233 ADT, which is a reduction of 1,450 ADT compared to the proposed project. The Reduced Commercial Alternative 1 would reduce the size of the Market Building (Building A) from 43,000 sq. ft. to 17,300 sq. ft. and would shift the building further north. This alternative would also avoid, or reduce the significant biological impacts associated with the proposed project by pulling the southern portion of the development further back from the proposed open space to reduce impacts to non-native grassland. In addition, this alternative would remove the parking spaces directly above archaeological site CA-SDI-15117. This alternative would place a cap over CA-SDI-15117 but without construction of the parking lot in this area to leave it available for future research potential.

This alternative would reduce the proposed commercial square footage by 25,700 sq. ft., for a total commercial square footage of 50,400 sq. ft. (as compared to 76,100 under the proposed project). Figure 4-1 depicts the Reduced Commercial Alternative 1. Specifically, this alternative would involve that following components:

- Major Retail Building A – 17,300 s.f. (Major Retail) located on the east site of the project site and Rios Canyon Road.
- Financial Building (Building B – 4,500 sq. ft., Lot 5) located in the northeast portion of the site along Olde Highway 80 and east of the proposed signalized project entrance on Olde Highway 80.
- Restaurant with drive through (Building C – 3,500 sq. ft., Lot 3) located in the north-central portion of the site west of the intersection of Olde Highway 80 and the proposed signalized project entrance.
- Restaurant-Retail Building (Building D – 9,600 sq. ft., Lot 2) located in the southwest portion of the site.
- Gas Station with car wash (42,210 sq. ft. pad¹ or 0.97 acres, Lot 1) and Commercial building (Building E – 3,000 sq. ft., Lot 1) in the northwest portion of the site at the intersection of Olde Highway 80 and Lake Jennings Park Road.
- Major Building (Building F – 12,500 sq. ft., Lot 4) in the south-central portion of the site.

¹ The 42,210 sq. ft. pad for the gas station is not included in the project's total square footage.

4.5.2 Comparison of the Effects of the Reduced Commercial Alternative 1 to the Proposed Project

Biological Resources

Under the Reduced Commercial Alternative 1, the commercial footage would be reduced by 25,700 sq. ft. Similar to the project, an open space area easement and biological buffer would be required by the County of San Diego to protect the riparian habitat at the southern edge of the property. Mitigation for direct impacts to non-native grassland and individual oak trees would be similar to the mitigation identified for the project and would reduce the impact to below a level of significance.

Indirect impacts to southern riparian forest due to project construction and operation are also expected under this alternative; however, implementation of mitigation proposed for the project would also be applicable to this alternative and would reduce the indirect impact to below a level of significance.

As with the proposed project, this alternative would impact 15 individual oak trees. Individual oak trees are considered locally important; therefore, impacts to these 15 individual oak trees are considered significant. This impact (**Impact BIO-1**) would be the same under this alternative as the proposed project. Similar to the proposed project, there is the potential that least Bell's vireos move into the riparian area prior to project construction. If construction is proposed during the breeding season and within 300 feet of the riparian habitat, an indirect impact to this species would occur. This impact (**Impact BIO-2**) would be similar to the proposed project.

This alternative would also result in a similar impact as a result of short-term noise related to construction, which could impact sensitive wildlife utilizing the riparian area. These are potentially significant indirect impacts of the project (**Impact BIO-3**), and this alternative would result in a similar impact.

As with the proposed project, accessibility to the site, trash dumping, and increased noise and light from operation of the proposed project may cause adverse impacts. This impact associated with the project (**Impact BIO-4**), could be potentially significant and require mitigation. This alternative would also result in a similar impact.

Under the proposed project, approximately 6.91 acres of habitat are proposed to be impacted on and off-site (**Impact BIO-5**). Under this alternative, the development footprint would be reduced by pulling the southern portion of the development further back from the proposed open space. This would reduce the amount of non-native grassland impacted by the proposed project.

Similar to the proposed project, no direct impacts to the RPO wetland would occur as a result of implementation of this alternative. However, under the proposed project, 1.14 acres would be revegetated to enhance the buffer between the RPO wetland and development. Temporary grading activities in the RPO buffer would be mitigated through the implementation of a revegetation plan (**Impact BIO-6**). The impact under this alternative would be similar to the proposed project as the same disturbance footprint would occur.

4.0 Alternatives to the Proposed Project

As with the proposed project, implementation of mitigation measures M-BIO-1 through M-BIO-6 would reduce all impacts to biological resources to a less than significant level. These measures include the off-site acquisition of 0.90 acre of coast live oak woodland within an approved mitigation bank within the MSCP, pre-construction surveys for the least Bell's vireo, implementation of measures to reduce indirect effects: such as use of shielded lighting entering into the RPO wetland habitat, placement of a 6-foot cinderblock wall and signage to prevent unauthorized access into the open space area, off-site acquisition of 3.46 acres of a Tier III or greater habitat within a pre-approved mitigation area, and revegetation of the buffer between the RPO wetland and development to convert 1.14 acres of non-native grassland to a higher quality (Tier III or greater), low density native shrub/grassland community that meets County requirements for fire safety and protection. Although slightly reduced, this alternative would still be required to place Tier III or greater habitat within a pre-approved mitigation area.

Cultural Resources

This alternative would pull the southern portion of the development further back from the proposed open space and remove the parking spaces directly above archaeological site CA-SDI-15117. Compared to the proposed project, this alternative would avoid the direct and indirect impacts to archaeological site CA-SDI-15117 (**Impact CR-1**). Capping of the archaeological site (M-CR-1) would still be required under this alternative, but the paved parking lot would not be placed over CA-SDI-15117.

Although this alternative would reduce the development footprint and avoid direct and indirect impacts to archaeological site CA-SDI-15117, there is still a potential to directly impact previously unrecorded buried archaeological resources on the project site. Unknown CEQA and/or RPO-significant archaeological resources could be buried within the project site. Such previously undiscovered cultural sites could be disturbed during on-site earth-disturbing activities (**Impact CR-2**). As with the proposed project, mitigation measure M-CR-2 would be required to reduce the impact to cultural resources to a less than significant level. Mitigation measure M-CR-2 would require an archaeological monitoring program, which would ensure that grading activities associated with the project would not impact undiscovered cultural resources.

Greenhouse Gas Emissions

Under the Reduced Commercial Alternative 1, fewer ADT would be generated as compared to the proposed project. According to the project traffic consultant (KOA) and as shown in Table 4-1, this alternative would generate 3,233 ADT, which is a reduction of 1,450 ADT compared to the proposed project. Therefore, mobile-source GHG emissions are anticipated to be less compared to the proposed project.

Similar to the proposed project, this alternative would be eligible to take credit for the State of California implementation of adopted standards and would apply similar feasible mitigation measures (Mitigation Measures M-GHG-1 through M-GHG-17) to reduce GHG emissions. With implementation of adopted standards and Mitigation Measures M-GHG-1 through M-GHG-17, this alternative's total GHG emissions would be 1,531.3 MTCO₂e per year.

As discussed in Section 2.3, Greenhouse Gas Emissions, in coordination with County staff, the use of an Efficiency Metric, which assesses the GHG efficiency of a project on a "service population" basis

4.0 Alternatives to the Proposed Project

(Efficiency Metric = project emissions divided by the sum of the number of jobs and the number of residents provided by a project) has been applied to this project. To calculate the Efficiency Metric, this alternative's GHG emissions is divided by the sum of the number of employees only (this alternative does not include a residential component that would yield residents). This alternative would yield an estimated total of 84 employees. Using 1,531.3 MTCO₂e per year divided by 84 employees, this alternative demonstrates an efficiency of 18.1 MTCO₂e per service population. Although slightly reduced compared to the proposed, this alternative's mitigated GHG emissions would still exceed the efficiency threshold (4.9 MTCO₂e per service population). Therefore, similar to the proposed project, this alternative would result in a significant and unmitigable GHG impact (**Impact GHG-1**).

EO B-30-15 established an interim GHG reduction target of 40 percent below 1990 levels by 2030, and EO S-03-05 established a long-term goal of reducing statewide GHG emissions to 80 percent below 1990 levels by 2050. Achieving these long-term GHG reduction policies will require systemic changes in how energy is produced and used. The changes necessitated to achieve these targets will require additional policy and regulatory changes, which are unknown at this time. Moreover, there is currently no statewide plan that lays out the framework as to exactly how the state plans on achieving these targets and to what extent action is required at the local and project level in order to achieve these targets. Therefore, the extent to which the project's emissions and resulting impacts would be mitigated through implementation of such changes is not known and would thus be inconsistent with plans, policies, or regulations adopted for the purpose of reducing GHG emissions in the long-term. Therefore, similar to the proposed project, impacts related to a conflict with an applicable plan, policy, or regulation would be potentially significant under this alternative (**Impact GHG-2**).

Hazards and Hazardous Materials

Development under this alternative would also require the preparation of a fire protection plan, and the implementation of appropriate site design and low-fuel landscaping to minimize fire risk to future residents and occupants of the site under this alternative. A masonry wall along the southern boundary of the development zone of this alternative would also be required. The construction of the masonry wall, similar to the project, would serve to mitigate any potential fire safety impact to future residents. The installation of fire hydrants would also be required under this alternative, and the applicant would be required to pay for the design and installation of the hydrants. This is similar to the impact identified for the project. Therefore, implementation of this project results in a similar level of fire safety impact as identified for the project.

As with the proposed project, implementation of this alternative would involve the removal of an existing 6-inch ACP water pipeline located underneath Pecan Park Lane. Removal of the 6-inch ACP during construction could pose a health hazard and risk of upset due to potential dispersal of asbestos (**Impact HZ-1**). Also, similar to the proposed project, there is a potential for the project to expose people or structures to a significant risk of loss, injury or death involving wildland fires (**Impact HZ-2**).

Implementation of this alternative would require the same mitigation measures as the proposed project to reduce impacts to less than significant. Mitigation Measure M-HZ-1 requires a licensed asbestos abatement consultant or Certified Inspector be present during ACP removal. In addition, all asbestos containing material removed onsite shall be transported by a Cal-OSHA registered asbestos abatement contractor to handle asbestos-containing materials and disposed of at a licensed receiving

facility and under proper manifest. This mitigation measure would reduce impacts to less than significant. Also, this alternative would involve construction of a 6-foot non-combustible block wall with stucco covering along the southern edge of the development area, north of the equestrian trail, with a minimum of 40 feet up to 80 feet of fuel modification north of the 6-foot non-combustible wall that will be constructed 10 feet north of the open space (Mitigation Measure M-HZ-2).

Noise

Under the Reduced Commercial Alternative 1, fewer ADT would be generated as compared to the proposed project. According to KOA, this alternative would generate 3,233 ADT, which is a reduction of 1,450 compared to the proposed project. This would reduce noise associated with vehicular trips.

Construction activities would be a temporary contributing factor to levels of noise within the project vicinity. Similar to that of the proposed project, this alternative must conform to County Noise Ordinance Section 36.410. Implementation of this alternative would require similar construction activities as the proposed project. As with the proposed project, without mitigation, the expected construction noise level from the nearest residential receptor could exceed the County of San Diego construction noise abatement of 75 dB(A) L_{eq-8h} (**Impact NOI-1**).

As with the proposed project, this alternative would involve the operation of a car wash. Similar to the proposed project, without the inclusion of an extended car wash tunnel and clockwise movement of automobiles into the facility, noise levels would exceed the noise standards for fixed noise/and or operational noise of the San Diego County Noise Ordinance Section 36.404 and a potentially significant impact would occur (**Impact NOI-2**).

Under this alternative, rooftop HVAC units would also be placed on commercial buildings. Similar to the proposed project, noise levels attributed to unshielded HVAC mechanical systems could exceed the County noise limit of 60 dB(A) $L_{eq-(h)}$. As a result, the impact of noise from HVAC equipment under this alternative would have a similar impact as the project (**Impact NOI-3**).

As with the proposed project, a trash compactor unit would be located outside of Market Building A. Compared to the proposed project, the trash compactor unit would be located immediately east of Market Building A instead of north of the building. Under this alternative, the trash compactor unit would be closer to residences located on Rios Canyon Road. Similar to the proposed project, based on a maximum noise level of 80 dBA at 15 feet, noise levels attributed to an unshielded trash compactor could exceed the County noise limit of 60 dB(A) $L_{eq-(h)}$. As a result, the impact of noise from the operation of the proposed trash compactor unit under this alternative would have a similar impact as the proposed project (**Impact NOI-4**).

The same mitigation measures required for the proposed project would be required with this alternative in order to reduce noise impacts to a level less than significant. These measures include ensuring that equipment set backs distances are provided to minimize noise to sensitive receptors and comply with County noise standards pursuant to County Noise Ordinance, Section 36.409, preparation of a Construction Noise Blasting Plan which would include identification of planned blasting locations, a description of the planned blasting methods, an inventory of receptors potentially affected by the planned blasting, and calculations to determine the area affected by the planned blasting, designing the car wash facility with an extended car wash tunnel as shown in the

4.0 Alternatives to the Proposed Project

architectural site plans prepared by Smith Consulting Architects (January 2015) to comply with the property line noise level limits established by County Noise Ordinance Section 36.404 and providing a clockwise movement of automobiles into the facility for proper equipment placement to minimize property line noise exposure and screening all rooftop mounted HVAC mechanical by a minimum three-foot-high parapet screen, or similar noise screening design.

Paleontological Resources

Under the Reduced Commercial Alternative 1, the commercial square footage would be reduced by 25,700 sq. ft. Although this alternative would reduce the project area subject to excavation during construction activities, this alternative would still require similar excavation depths similar to the proposed project. Earthwork would still occur within Upper Jurassic and Lower Cretaceous Marine and Nonmarine geological formations, which have marginal potential to contain unique paleontological resources. Therefore, similar to the proposed project, this alternative would result in a potentially significant impact to unique paleontological resources (**Impact PR-1**). Although slightly reduced, impacts to paleontological resources would be similar to the proposed project.

Transportation/Traffic

Under the Reduced Commercial Alternative 1, fewer ADT would be generated as compared to the proposed project. According to KOA and as shown in Table 4-1, this alternative would generate 3,233 ADT, which is a reduction of 1,450 ADT compared to the proposed project. Although this alternative would reduce the amount of traffic, impacts would still occur to the same facilities and mitigation will still be required to reduce traffic impacts to below a level of significance. Specifically, the following impacts would occur:

- Olde Highway 80 from Lake Jennings Park Road to Project Driveway 1 (LOS F) (**Impact TR-1**)
- Olde Highway 80 from Project Driveway 1 to Project Driveway 2 (LOS F) (**Impact TR-2**)
- Olde Highway 80 from Project Driveway 2 to Project Driveway 3 (LOS E) (**Impact TR-3**)
- Olde Highway 80 from Project Driveway 3 to Rios Canyon Road extension (LOS E) (**Impact TR-4**)
- Olde Highway 80 from Rios Canyon Road to Pecan Park Lane east (LOS E) (**Impact TR-5**)
- Lake Jennings Park Road from Harritt Road to Blossom Valley Road (LOS E) (**Impact TR-6**)
- Lake Jennings Park Road from Blossom Valley Road to I-8 Westbound Off-Ramp (LOS F) (**Impact TR-7**).
- Lake Jennings Park Road from I-8 Westbound Off-Ramp to Olde Highway 80 (LOS F) (**Impact TR-8**).
- Lake Jennings Park Road and I-8 Westbound Off-Ramp (PM Peak Hour- LOS F) (**Impact TR-9**)
- Lake Jennings Park Road and I-8 Eastbound Off-Ramp (PM Peak Hour- LOS F) (**Impact TR-10**)

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- Based on a signal warrant analysis, Project Driveway 2 at Olde Highway 80 warrants a traffic signal (**Impact TR-11**).
- Olde Highway 80 from Lake Jennings Park Road to Project Driveway 1 – LOS F (**Impact TR-12**)
- Olde Highway 80 from Project Driveway 1 to Project Driveway 2 – LOS F (**Impact TR-13**)
- Olde Highway 80 from Project Driveway 2 to Project Driveway 3 – LOS F (**Impact TR-14**)
- Olde Highway 80 from Project Driveway 3 to Rios Canyon Road – LOS F (**Impact TR-15**)
- Olde Highway 80 from Rios Canyon Road to Pecan Park Lane – LOS E (**Impact TR-16**)
- Lake Jennings Park Road from Jack Oak Road to Harritt Road – LOS E (**Impact TR-17**)
- Lake Jennings Park Road from Harritt Road to Blossom Valley Road – LOS E (**Impact TR-18**)
- Lake Jennings Park Road from Blossom Valley Road to I-8 Westbound Off-Ramp – LOS F (**Impact TR-19**)
- Lake Jennings Park Road from I-8 Westbound Off-Ramp to Olde Highway 80 – LOS F (**Impact TR-20**)
- Lake Jennings Park Road and Blossom Valley Road (PM Peak Hour- LOS F) (**Impact TR-21**)
- Lake Jennings Park Road and I-8 Westbound Off-Ramp (PM Peak Hour- LOS F) (**Impact TR-22**)
- Lake Jennings Park Road and I-8 Eastbound Off-Ramp (PM Peak Hour- LOS F) (**Impact TR-23**)

As with the proposed project, the following improvements would be required:

Roadway Segment: Olde Highway 80 from Lake Jennings Park Road to Rios Canyon Road

- Widen Olde Highway 80 from Lake Jennings Park Road to Rios Canyon Road to provide 4 lanes with intermittent turn lanes between Lake Jennings Park Road and Rios Canyon Road.

Roadway Segment: Olde Highway 80 from Rios Canyon Road to Pecan Park Lane

- Improve Olde Highway 80 from Rios Canyon Road to Pecan Park Lane to one lane each way with a two-way left-turn lane between new Rios Canyon Road and Pecan Park Lane (east).

Roadway Segment: Lake Jennings Park Road from Harritt Road to Blossom Valley Road

- Add northbound through lane from Blossom Valley Road to Jennings Vista Drive.
- Improve transition from one southbound through lane to two southbound through lanes from Harritt Road to Jennings Vista Drive.
- Add southbound through lane from Jennings Vista Drive to Blossom Valley Road.

- Add two-way left-turn south of Harritt Road to Rancho Del Villa.
- Extend northbound left-turn pocket at Blossom Valley Road to 115 feet.
- Modify the southbound right turn lane at Blossom Valley Road to a shared through/right lane.

Roadway Segment: Lake Jennings Park Road from Blossom Valley Road to I-8 Westbound Off-Ramp

- Extend the northbound left-turn pocket at Blossom Valley Road to 115 feet.
- Widen Lake Jennings Park Road from Blossom Valley Road to I-8 Westbound Off-Ramp to provide 4 lanes and bicycle lanes.

Roadway Segment: Lake Jennings Park Road from I-8 Westbound Off-ramp to Olde Highway 80

- Widen Lake Jennings Park Road from I-8 Westbound Off-Ramp to Olde Highway 80 to provide 4 lanes plus bicycle lanes.

Intersection: Lake Jennings Park Road and I-8 Westbound Off-Ramp

- Provide additional capacity at intersection according to segmental improvements above.
- Provide southbound refuge lane for the westbound left-turn movement from the I-8 Westbound Off-Ramp.
- Alternatively, Caltrans may install full, or partial roundabout improvements at this location.

Intersection: Lake Jennings Park Road and I-8 Eastbound Off-Ramp

- Install a traffic signal at the intersection of Lake Jennings Park Road and Olde Highway 80/I-8 EB off-ramp.
- Widen off-ramp for 320 feet to have a third lane to accommodate a left-turn lane, a left through lane, and a through right lane.
- Alternatively, Caltrans may install full, or partial roundabout improvements at this location.

Intersection: Olde Highway 80 and Project Driveway 2

- Install a traffic signal at the intersection opposite the Lakeside Tractor Supply Project.

Also, certain roadway segment and intersection impacts (**Impacts TR-7 through TR-10, TR-19, TR-20, TR-22, and TR-23**) related to the I-8 eastbound and westbound off-ramps can be mitigated through off-site improvements as required by, and under the jurisdiction of Caltrans. Although the proposed traditional intersection improvements have been determined to be feasible, Caltrans is in the process of analyzing the feasibility of developing full or partial roundabout improvements at these locations, which if implemented, would also reduce the traffic/circulation impact to a level less than significant, should these roundabout improvements be determined to be feasible. However, due

to the fact that the I-8 interchange related improvements are the responsibility of another agency (Caltrans) and that such changes or alterations are within the responsibility and jurisdiction of another public agency and not the County of San Diego, and the exact timing of the improvements are unknown, these impacts are considered significant and unmitigable. Although this alternative would reduce the amount of traffic, impacts would still occur to the same facilities and the I-8 interchange related improvements would still be responsibility of Caltrans. Therefore, traffic impacts would be similar to the proposed project.

4.6 Analysis of Reduced Commercial Alternative 2

4.6.1 Reduced Commercial Alternative 2 Description

The purpose of this alternative would be to avoid, or reduce, the significant biological impacts associated with the proposed project by pulling the southern portion of the development further back from the proposed open space to reduce impacts to non-native grassland. This alternative would also remove the parking spaces directly above archaeological site CA-SDI-15117. This alternative would place a cap over CA-SDI-15117 but without construction of the parking lot in this area to leave it available for future research potential. The Reduced Site Plan Alternative 2 would be similar to the proposed project, but it would eliminate the Major Building (Building F) from the project site. This alternative would reduce the proposed commercial square footage by 12,500 sq. ft., for a total commercial footage of 63,600 sq. ft. (as compared to 76,100 sq. ft. under the proposed project). Figure 4-2 depicts the Reduced Commercial Alternative 2. Specifically, this alternative would involve that following components:

- Major Retail Building A – 43,000 sq. ft. (Major Retail) located on the east site of the project site and Rios Canyon Road
- Financial Building (Building B – 4,500 sq. ft. Lot 5) located in the northeast portion of the site along Olde Highway 80 and east of the proposed signalized project entrance on Olde Highway 80.
- Restaurant with drive through (Building C – 3,500 sq. ft., Lot 3) located in the north-central portion of the site west of the intersection of Olde Highway 80 and the proposed signalized project entrance.
- Restaurant-Retail Building (Building D – 9,600 sq. ft., Lot 2) located in the southwest portion of the site.
- Gas Station with car wash (42,210 sq. ft. pad² or 0.97 acres, Lot 1) and Commercial building (Building E – 3,000 sq. ft., Lot 1) in the northwest portion of the site at the intersection of Olde Highway 80 and Lake Jennings Park Road.

² The 42,210 sq. ft. pad for the gas station is not included in the project's total square footage.

4.6.2 Comparison of the Effects of the Reduced Commercial Alternative 2 to the Proposed Project

Biological Resources

Under the Reduced Commercial Alternative 2, the commercial square footage would be reduced by 12,500 sq. ft. This alternative would pull the southern portion of the development further back from the proposed open space, reducing impacts to non-native grassland vegetation. Similar to the project, an open space area easement and biological buffer would be required by the County of San Diego to protect the riparian habitat at the southern edge of the property. Mitigation for direct impacts to non-native grassland and individual oak trees would be similar to the mitigation identified for the project and would reduce the impact to below a level of significance.

Indirect impacts to southern riparian forest due to project construction and operation are also expected under this alternative; however, implementation of mitigation proposed for the project would also be applicable to this alternative and would reduce the indirect impact to below a level of significance.

As with the proposed project, this alternative would impact 15 individual oak trees. Individual oak trees are considered locally important; therefore, impacts to these 15 individual coast live oak trees are considered significant, this impact (**Impact BIO-1**) would be the same under this alternative as the proposed project. Similar to the proposed project, there is the potential that least Bell's vireos move into the riparian area prior to project construction. If construction is proposed during the breeding season and within 300 feet of the riparian habitat, an indirect impact to this species would occur. This impact (**Impact BIO-2**) would be similar to the proposed project.

This alternative would also result in a similar impact as a result of short-term noise related to construction, which could impact sensitive wildlife utilizing the riparian area. These are potentially significant indirect impacts of the project (**Impact BIO-3**), and this alternative would result in a similar impact.

As with the proposed project, accessibility to the site, trash dumping, and increased noise and light from operation of the proposed project may cause adverse impacts. This impact associated with the project (**Impact BIO-4**), could be potentially significant and require mitigation. This alternative would also result in a similar impact.

Under the proposed project, approximately 6.91 acres of non-native grassland habitat are proposed to be impacted during clearing and grading to prepare building pads and parking areas for construction (**Impact BIO-5**). Under this alternative, the development footprint would be reduced by pulling the southern portion of the development further back from the proposed open space. This would reduce the amount of non-native grassland impacted by the proposed project.

Similar to the proposed project, no direct impacts to the RPO wetland would occur as a result of implementation of this alternative. However, under the proposed project, 1.14 acres would be revegetated to enhance the buffer between the RPO wetland and development. Temporary grading activities in the RPO buffer would be mitigated through the implementation of a revegetation plan

4.0 Alternatives to the Proposed Project

(Impact BIO-6). The impact under this alternative would be similar to the proposed project as the same disturbance footprint (proposed revegetation area) would occur.

As with the proposed project, implementation of mitigation measures M-BIO-1 through M-BIO-6 would reduce all impacts to biological resources to a less than significant level. These measures include the off-site acquisition of 0.90 acre of coast live oak woodland within an approved mitigation bank within the MSCP, pre-construction surveys for the least Bell's vireo, implementation of measures to reduce indirect effects (such as use of shielded lighting entering into the RPO wetland habitat, placement of a 6-foot cinderblock wall and signage to prevent unauthorized access into the open space area, and revegetation of the buffer between the RPO wetland and development to convert 1.14 acres of non-native grassland to a higher quality (Tier III or greater), low density native shrub/grassland community that meets County requirements for fire safety and protection. Although slightly reduced, the proposed project would still be required to place Tier III or greater habitat within a pre-approved mitigation area.

Cultural Resources

This alternative would pull the southern portion of the development further back from the proposed open space and remove the parking spaces directly above archaeological site CA-SDI-15117. Compared to the proposed project, this alternative would avoid the direct and indirect impacts to archaeological site CA-SDI-15117 (**Impact CR-1**). Capping of the archaeological site (M-CR-1) would still be required under this alternative, but the paved parking lot would not be placed over CA-SDI-15117.

Although this alternative would reduce the development footprint and avoid direct and indirect impacts to archaeological site CA-SDI-15117, there is still a potential to directly impact previously unrecorded buried archaeological resources on the project site. Unknown CEQA and/or RPO-significant archaeological resources could be buried within the project site. Such previously undiscovered cultural sites could be disturbed during on-site earth-disturbing activities (**Impact CR-2**). As with the proposed project, mitigation measure M-CR-2 would be required to reduce the impact to cultural resources to a less than significant level. Mitigation measure M-CR-2 would require an archaeological monitoring program, which would ensure that grading activities associated with the project would not impact undiscovered cultural resources.

Greenhouse Gas Emissions

Under the Reduced Commercial Alternative 2, fewer ADT would be generated as compared to the proposed project. According to the project traffic consultant (KOA) and as shown in Table 4-1, this alternative would generate 3,978 ADT, which is a reduction of 705 ADT compared to the proposed project. Therefore, mobile-source GHG emissions are anticipated to be less compared to the proposed project.

Similar to the proposed project, this alternative would be eligible to take credit for the State of California implementation of adopted standards and would apply similar feasible mitigation measures (Mitigation Measures M-GHG-1 through M-GHG-17) to reduce GHG emissions. With implementation of adopted standards and Mitigation Measures M-GHG-1 through M-GHG-17, this alternative's total GHG emissions would be 1,980.7 MTCO₂e per year.

4.0 Alternatives to the Proposed Project

As discussed in Section 2.3, Greenhouse Gas Emissions, in coordination with County staff, the use of an Efficiency Metric, which assesses the GHG efficiency of a project on a “service population” basis (Efficiency Metric = project emissions divided by the sum of the number of jobs and the number of residents provided by a project) has been applied to this project. To calculate the Efficiency Metric, this alternative’s GHG emissions is divided by the sum of the number of employees only (this alternative does not include a residential component that would yield residents). This alternative would yield an estimated total of 106 employees. Using 1980.7 MTCO₂e per year divided by 106 employees, this alternative demonstrates an efficiency of 18.6 MTCO₂e per service population. Similar to the proposed project, this alternative would exceed the efficiency threshold of 4.9 MTCO₂e per service population. Therefore, similar to the proposed project, this alternative’s mitigated GHG emissions would still exceed the efficiency threshold (4.9 MTCO₂e per service population). Therefore, similar to the proposed project, this alternative would result in a significant and unmitigable GHG impact (**Impact GHG-1**).

EO B-30-15 established an interim GHG reduction target of 40 percent below 1990 levels by 2030, and EO S-03-05 established a long-term goal of reducing statewide GHG emissions to 80 percent below 1990 levels by 2050. Achieving these long-term GHG reduction policies will require systemic changes in how energy is produced and used. The changes necessitated to achieve these targets will require additional policy and regulatory changes, which are unknown at this time. Moreover, there is currently no statewide plan that lays out the framework as to exactly how the state plans on achieving these targets and to what extent action is required at the local and project level in order to achieve these targets. Therefore, the extent to which the project’s emissions and resulting impacts would be mitigated through implementation of such changes is not known and would thus be inconsistent with plans, policies, or regulations adopted for the purposed of reducing GHG emissions in the long-term. Therefore, similar to the proposed project, impacts related to a conflict with an applicable plan, policy, or regulation would be potentially significant under this alternative (**Impact GHG-2**).

Hazards and Hazardous Materials

As with the proposed project, implementation of this alternative would involve the removal of an existing 6-inch ACP water pipeline located underneath Pecan Park Lane. Removal of the 6-inch ACP during construction could pose a health hazard and risk of upset due to potential dispersal of asbestos (**Impact HZ-1**). Also, similar to the proposed project, there is a potential for the project to expose people or structures to a significant risk of loss, injury of death involving wildland fires (**Impact HZ-2**).

Implementation of this alternative would require the same mitigation measures as the proposed project to reduce impacts to less than significant. Mitigation Measure M-HZ-1 requires a licensed asbestos abatement consultant or Certified Inspector be present during ACP removal. In addition, all asbestos containing material removed onsite shall be transported by a Cal-OSHA registered asbestos abatement contractor to handle asbestos-containing materials and disposed of at a licensed receiving facility and under proper manifest. This mitigation measure would reduce impacts to less than significant. Also, this alternative would involve construction of a 6-foot non-combustible block wall with stucco covering along the southern edge of the development area, north of the equestrian trail, with a minimum of 40 feet up to 80 feet of fuel modification north of the 6-foot non-combustible wall that will be constructed 10 feet north of the open space (Mitigation Measure M-HZ-2).

Noise

Under the Reduced Commercial Alternative 2, fewer ADT would be generated as compared to the proposed project. According to KOA, this alternative would generate 3,978 ADT, which is a reduction of 705 ADT compared to the proposed project. This would reduce noise associated with vehicular trips.

Construction activities would be a temporary contributing factor to levels of noise within the project vicinity. Similar to that of the proposed project, the alternative must conform to County Noise Ordinance Section 36.410. Implementation of this alternative would require similar construction activities as the proposed project. As with the proposed project, without mitigation, the expected construction noise level from the nearest residential receptor could exceed the County of San Diego construction noise abatement of 75 dB(A) L_{eq-8h} (**Impact NOI-1**).

As with the proposed project, this alternative would involve the operation of a car wash. Similar to the proposed project, without the inclusion of an extended car wash tunnel and clockwise movement of automobiles into the facility, noise levels would exceed the noise standards for fixed noise/and or operational noise of the San Diego County Noise Ordinance Section 36.404 and a potentially significant impact would occur (**Impact NOI-2**).

Under this alternative, rooftop HVAC units would also be placed on commercial buildings. Similar to the proposed project, noise levels attributed to unshielded HVAC mechanical systems could exceed the County noise limit of 60 dB(A) $L_{eq-(h)}$. As a result, the impact of noise from HVAC equipment under this alternative would have a similar impact as the project (**Impact NOI-3**).

As with the proposed project, a trash compactor unit would be located immediately north of Market Building A. Based on a maximum noise level of 80 dBA at 15 feet, noise levels attributed to an unshielded trash compactor could exceed the County noise limit of 60 dB(A) $L_{eq-(h)}$. As a result, the impact of noise from the operation of the proposed trash compactor under this alternative could be significant (**Impact NOI-4**).

The same mitigation measures required for the proposed project would be required with this alternative in order to reduce noise impacts to a level less than significant. These measures include ensuring that equipment set backs distances are provided to minimize noise to sensitive receptors and comply with County noise standards pursuant to County Noise Ordinance, Section 36.409, preparation of a Construction Noise Blasting Plan which would include identification of planned blasting locations, a description of the planned blasting methods, an inventory of receptors potentially affected by the planned blasting, and calculations to determine the area affected by the planned blasting, designing the car wash facility with an extended car wash tunnel as shown in the architectural site plans prepared by Smith Consulting Architects (January 2015) to comply with the property line noise level limits established by County Noise Ordinance Section 36.404 and providing a clockwise movement of automobiles into the facility for proper equipment placement to minimize property line noise exposure and screening all rooftop mounted HVAC mechanical by a minimum three-foot-high parapet screen, or similar noise screening design.

Paleontological Resources

Under the Reduced Commercial Alternative 2, the commercial square footage would be reduced by 12,500 sq. ft. Although this alternative would reduce the project area subject to excavation during construction activities, this alternative would still require similar excavation depths similar to the proposed project. Earthwork would still occur within Upper Jurassic and Lower Cretaceous Marine and Nonmarine geological formations, which have marginal potential to contain unique paleontological resources. Therefore, similar to the proposed project, this alternative would result in a potentially significant impact to unique paleontological resources (**Impact PR-1**). Although slightly reduced, impacts to paleontological resources would be similar to the proposed project.

Transportation/Traffic

Under the Reduced Commercial Alternative 2, fewer ADT would be generated as compared to the proposed project. According to KOA and as shown in Table 4-1, this alternative would generate 3,978 ADT, which is a reduction of 705 ADT compared to the proposed project. Although this alternative would reduce the amount of traffic, impacts would still occur to the same facilities and mitigation will still be required to reduce traffic impacts to below a level of significance. Specifically, the following impacts would occur:

- Olde Highway 80 from Lake Jennings Park Road to Project Driveway 1 (LOS F) (**Impact TR-1**)
- Olde Highway 80 from Project Driveway 1 to Project Driveway 2 (LOS F) (**Impact TR-2**)
- Olde Highway 80 from Project Driveway 2 to Project Driveway 3 (LOS E) (**Impact TR-3**)
- Olde Highway 80 from Project Driveway 3 to Rios Canyon Road extension (LOS E) (**Impact TR-4**)
- Olde Highway 80 from Rios Canyon Road to Pecan Park Lane east (LOS E) (**Impact TR-5**)
- Lake Jennings Park Road from Harritt Road to Blossom Valley Road (LOS E) (**Impact TR-6**)
- Lake Jennings Park Road from Blossom Valley Road to I-8 Westbound Off-Ramp (LOS F) (**Impact TR-7**).
- Lake Jennings Park Road from I-8 Westbound Off-Ramp to Olde Highway 80 (LOS F) (**Impact TR-8**).
- Lake Jennings Park Road and I-8 Westbound Off-Ramp (PM Peak Hour- LOS F) (**Impact TR-9**)
- Lake Jennings Park Road and I-8 Eastbound Off-Ramp (PM Peak Hour- LOS F) (**Impact TR-10**)
- Based on a signal warrant analysis, Project Driveway 2 at Olde Highway 80 warrants a traffic signal (**Impact TR-11**).
- Olde Highway 80 from Lake Jennings Park Road to Project Driveway 1 – LOS F (**Impact TR 12**)

- Olde Highway 80 from Project Driveway 1 to Project Driveway 2 – LOS F (**Impact TR-13**)
- Olde Highway 80 from Project Driveway 2 to Project Driveway 3 – LOS F (**Impact TR-14**)
- Olde Highway 80 from Project Driveway 3 to Rios Canyon Road – LOS F (**Impact TR-15**)
- Olde Highway 80 from Rios Canyon Road to Pecan Park Lane – LOS E (**Impact TR-16**)
- Lake Jennings Park Road from Jack Oak Road to Harritt Road – LOS E (**Impact TR-17**)
- Lake Jennings Park Road from Harritt Road to Blossom Valley Road – LOS E (**Impact TR-18**)
- Lake Jennings Park Road from Blossom Valley Road to I-8 Westbound Off-Ramp – LOS F (**Impact TR-19**)
- Lake Jennings Park Road from I-8 Westbound Off-Ramp to Olde Highway 80 – LOS F (**Impact TR-20**)
- Lake Jennings Park Road and Blossom Valley Road (PM Peak Hour- LOS F) (**Impact TR-21**)
- Lake Jennings Park Road and I-8 Westbound Off-Ramp (PM Peak Hour- LOS F) (**Impact TR 22**)
- Lake Jennings Park Road and I-8 Eastbound Off-Ramp (PM Peak Hour- LOS F) (**Impact TR-23**)

As with the proposed project, the following improvements would be required:

Roadway Segment: Olde Highway 80 from Lake Jennings Park Road to Rios Canyon Road

- Widen Olde Highway 80 from Lake Jennings Park Road to Rios Canyon Road to provide four lanes with intermittent turn lanes between Lake Jennings Park Road and Rios Canyon Road.

Roadway Segment: Olde Highway 80 from Rios Canyon Road to Pecan Park Lane

- Improve Olde Highway 80 from Rios Canyon Road to Pecan Park Lane to one lane each way with a two-way left-turn lane between new Rios Canyon Road and Pecan Park Lane (east).

Roadway Segment: Lake Jennings Park Road from Harritt Road to Blossom Valley Road

- Add northbound through lane from Blossom Valley Road to Jennings Vista Drive.
- Improve transition from one southbound through lane to two southbound through lanes from Harritt Road to Jennings Vista Drive.
- Add southbound through lane from Jennings Vista Drive to Blossom Valley Road.
- Add two-way left-turn south of Harritt Road to Rancho Del Villa.
- Extend northbound left-turn pocket at Blossom Valley Road to 115 feet.
- Modify the southbound right turn lane at Blossom Valley Road to a shared through/right lane.

Roadway Segment: Lake Jennings Park Road from Blossom Valley Road to I-8 Westbound Off-Ramp

- Extend the northbound left-turn pocket at Blossom Valley Road to 115 feet.
- Widen Lake Jennings Park Road from Blossom Valley Road to I-8 Westbound Off-Ramp to provide four lanes and bicycle lanes.

Roadway Segment: Lake Jennings Park Road from I-8 Westbound Off-ramp to Olde Highway 80

- Widen Lake Jennings Park Road from I-8 Westbound Off-Ramp to Olde Highway 80 to provide four lanes plus bicycle lanes.

Intersection: Lake Jennings Park Road and I-8 Westbound Off-Ramp

- Provide additional capacity at intersection according to segmental improvements above.
- Provide southbound refuge lane for the westbound left-turn movement from the I-8 Westbound Off-Ramp.
- Alternatively, Caltrans may install full, or partial roundabout improvements at this location.

Intersection: Lake Jennings Park Road and I-8 Eastbound Off-Ramp

- Install a traffic signal at the intersection of Lake Jennings Park Road and Olde Highway 80/ I-8 EB off-ramp.
- Widen off-ramp for 320 feet to have a third lane to accommodate a left-turn lane, a left through lane, and a through right lane.
- Alternatively, Caltrans may install full, or partial roundabout improvements at this location.

Intersection: Olde Highway 80 and Project Driveway 2

- Install a traffic signal at the intersection opposite the Lakeside Tractor Supply Project.

Also, certain roadway segment and intersection impacts (**Impacts TR-7 through TR-10, TR-19, TR-20, TR-22, and TR-23**) related to the I-8 eastbound and westbound off-ramps can be mitigated through off-site improvements as required by, and under the jurisdiction of Caltrans. Although the proposed traditional intersection improvements have been determined to be feasible, Caltrans is in the process of analyzing the feasibility of developing full or partial roundabout improvements at these locations, which if implemented, would also reduce the traffic/circulation impact to a level less than significant, should these roundabout improvements be determined to be feasible. However, due to the fact that the I-8 interchange related improvements are the responsibility of another agency (Caltrans) and that such changes or alterations are within the responsibility and jurisdiction of another public agency and not the County of San Diego, and the exact timing of the improvements are unknown, these impacts are considered significant and unmitigable. Although this alternative would reduce the amount of traffic, impacts would still occur to the same facilities and the I-8 interchange related improvements would still be responsibility of Caltrans. Therefore, traffic impacts would be similar to the proposed project.

4.7 Environmentally Superior Alternative

Table 4-2 provides a qualitative comparison of the impacts for each alternative compared to the proposed project. The No Project/No Development Alternative would be environmentally superior to the proposed project, based on the reduction of the proposed project's environmental impacts. However, the No Project/No Development Alternative does not meet most of the basic project objectives. Additionally, CEQA Guidelines, Section 15126.6(e)(2) requires that, if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Therefore, the Reduced Commercial Alternative 1 would be considered the environmentally superior alternative because it would reduce impacts for the following environmental issue areas as compared to the proposed project: biological resources, cultural resources, greenhouse gas emissions, noise, and traffic.

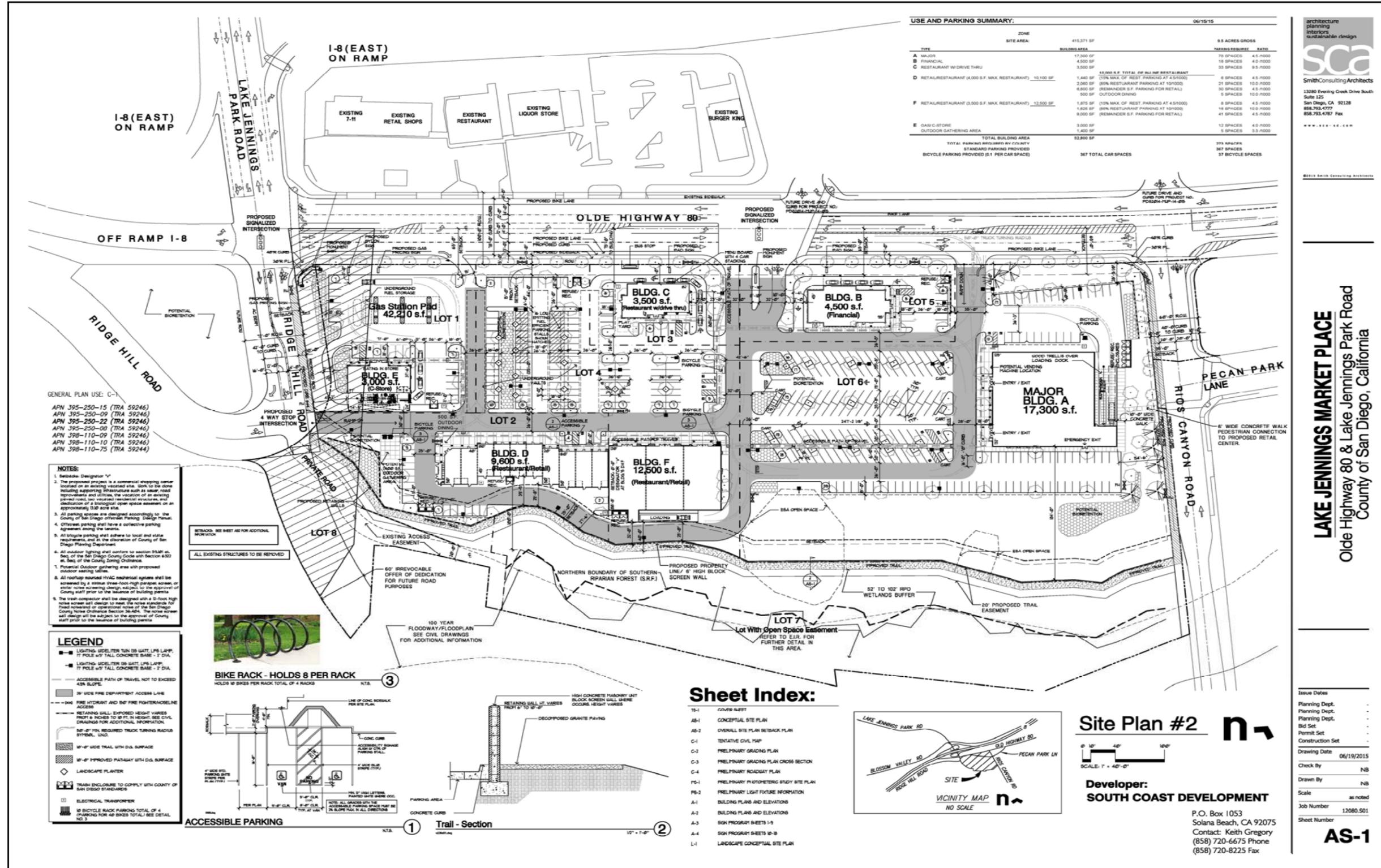


Figure 4-1
 Reduced Commercial Alternative 1

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**Table 4-1
Alternative Trip Generation Comparison**

	Proposed Project	No Project/No Development Alternative	No Project/Existing General Plan Designation Alternative	Reduced Commercial Alternative 1	Reduced Commercial Alternative 2
Total Trip Generation	4,683	0	1,600	3,233	3,978
Change in Total Trip Generation vs. Proposed Project	--	-4683	-3,083	-1,450	-705

**Table 4-2
Comparison of Project and Alternatives**

Alternatives	Issue Area						
	Biological Resources	Cultural Resources	Greenhouse Gas Emissions	Hazards and Hazardous Materials	Noise	Paleontological Resources	Transportation/Circulation
Proposed Project	Mitigated to below a level of significance	Mitigated to below a level of significance	<u>Significant and unmitigable</u>	Mitigated to below a level of significance	Mitigated to below a level of significance	Mitigated to below a level of significance	Significant and unmitigable
No Project/No Development	Avoid	Avoid	<u>Avoid</u>	Avoid	Avoid	Avoid	Avoid
No Project/Existing General Plan Designation	Same as project	Same as project	<u>Less than project</u>	Same as project	Less than project	Same as project	Less than project
Reduced Commercial Alternative 1	Less than project	Less than project	<u>Less than project, but still remains significant</u>	Same as project	Less than project	Same as project	Less than project
Reduced Commercial Alternative 2	Less than project	Less than project	<u>Less than project, but still remains significant</u>	Same as project	Less than project	Same as project	Less than project

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