

7.0 ALTERNATIVES

7.1 INTRODUCTION

Section 15126.6(a) of the State CEQA Guidelines requires that EIRs describe “...a reasonable range of alternatives to a project, or the location of a 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.” Section 15126.6(f) of the State CEQA Guidelines further states that “the range of alternatives in an EIR is governed by the ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.” The State CEQA Guidelines provide several factors that should be considered with regard to the feasibility of an alternative. Those factors include: (1) site suitability; (2) economic viability; (3) availability of infrastructure; (4) general plan consistency; (5) other plans or regulatory limitations; (6) jurisdictional boundaries; and (7) whether the project applicant can reasonably acquire, control, or otherwise have access to the alternative site (if an off-site alternative is evaluated).

7.2 SUMMARY OF PROJECT OBJECTIVES AND SIGNIFICANT EFFECTS

In accordance with State CEQA Guidelines Section 15126.6(a), the project alternatives are assessed relative to their ability to: (1) meet the basic objectives of the project; and (2) avoid or substantially lessen the significant effects of the project. As there are no identified significant unavoidable environmental effects associated with the project, this alternatives analysis considers a comparative analysis of the project’s less than significant effects with mitigation measures incorporated.

7.2.1 Project Objectives

As described in Section 3.1 of this EIR, *Project Goals and Objectives*, the following are the primary goals and objectives of the project:

1. Address the City’s housing supply needs by providing for the development of a mix of housing types to maximize the advantages of locating new infill housing in close proximity to existing regional transportation facilities, including the adjacent 70th Street Trolley Station, connecting bus routes, and freeway access;
2. Establish a land use plan that would improve public safety in the project area by providing public improvements at current City standards for Alvarado Road, construct channel improvements to address flooding conditions from Alvarado Creek, and relocation and improvement of existing sanitary sewer system infrastructure within the Alvarado Creek Flood Channel;
3. Provide high quality student housing with a short and direct link to San Diego State University from the 70th Street Trolley Station;
4. Establish a land use plan that would transform the site with private development and public improvements that would serve as a new and positive gateway image for the community;

5. Construct and maintain a multi-modal circulation system for vehicles, bicycles, and pedestrians to enhance accessibility and support active transportation and public transit use;
6. Transform Alvarado Creek within the Specific Plan Area into an urban creek and open space feature within a planned residential community;
7. Provide an environmentally sustainable residential development through the implementation of features such as energy conservation, sustainable landscape, water conservation, and support for alternative transportation, consistent with the City's CAP; and
8. Create a unified private development plan that is consistent with the City's General Plan and SANDAG's San Diego Forward: The Regional Plan.

7.2.2 Significant Impacts of the Proposed Project

Based on the evaluations in Section 4.0 of this EIR, *Environmental Analysis*, the project would result in significant but mitigable impacts related to the environmental resources areas discussed below.

Implementation of the project could result in potentially significant biological resources impacts to sensitive species (Cooper's hawk and other raptor species) and nesting birds, sensitive vegetation (freshwater marsh and willow woodland), jurisdictional waters and wetlands (freshwater marsh, willow woodland, and non-wetland waters/streambed), and consistency with habitat conservation plans (La Mesa HCP/NCCP Subarea Plan due to potential impacts MSCP-covered species). Impacts would be reduced to below a level of significance through the mitigation measures (BIO-1 through BIO-3) described in Section 4.2.6.

The project has the potential to impact subsurface archaeological and tribal cultural resources that may be located underground within the site. This impact would be reduced to below a level of significance through implementation of an archaeological monitoring program during project construction, followed by the preparation and submittal of a monitoring report, as described in mitigation measure CUL-1 in Section 4.3.6.

Implementation of the proposed project could result in a potentially significant hazards impact during demolition activities associated with release of ACM and/or LBP. Impacts would be reduced to below a level of significance through implementation of an ACM and LBP survey and disposal, as described in mitigation measure HAZ-1 in Section 4.6.6.

Implementation of the proposed project could result in a potentially significant impact to unknown paleontological resources given the entire project site is underlain by Stadium Conglomerate Formation, which is assigned a high paleontological resource sensitivity rating. This impact would be reduced to below a level of significance through implementation of paleontological monitoring program during project construction, followed by the preparation and submittal of a monitoring report, as described in mitigation measure PAL-1 in Section 4.10.6.

7.3 ALTERNATIVES CONSIDERED BUT REJECTED

Section 15126.6(c) of the State CEQA Guidelines requires that an EIR identify alternatives that were considered and rejected as infeasible, and briefly explain the reasons for their rejection. Alternatives

considered but rejected from further study for the project include the Project Location Alternative, Existing Zoning Alternative, and Senior Housing Alternative as outlined below.

7.3.1 Project Location Alternative

The State CEQA Guidelines recommend that off-site alternative locations be considered if relocating the project would result in the avoidance of significant impacts of a project. There are no significant and unavoidable environmental impacts anticipated from project implementation; therefore, relocation of the project would not avoid a significant impact of the project. However, relocation of the project to another site could potentially result in a substantial reduction or avoidance of an impact that would be reduced to less than significant with the incorporation of the mitigation measures that have been identified for the project. Factors that need to be considered when identifying an off-site location for the project include the size of the site, sensitive environmental resources on the site, its location relative to major transportation corridors (e.g., I-8) and regional transit facilities, the General Plan land use designation, and ability to meet the project objectives.

The project applicant has owned the project site for over 20 years and has operated the RV resort as a “non-conforming” use, which means that the current use is permitted until such time that it is removed. However, the long-term vision has been to redevelop the site with a high-density multi-family residential use as contemplated in the General Plan. The General Plan describes long-term goals and policies encouraging redevelopment and revitalization of the Specific Plan area with more intensive infill development, the need for missing and updated public improvements, and provision of flood protection facilities for the Specific Plan area. The project applicant considered this prior to the purchase of the project property.

Primary considerations for selecting the project location included properties that could accommodate a housing development near existing infrastructure and regional transportation and transit opportunities, and at a site that was previously developed. As a result, the project location on a previously developed site within an existing area located adjacent to a major freeway corridor (i.e., the I-8 freeway) and within a half mile of transit opportunities was selected. Most of the areas in La Mesa are developed and there are no similar properties in the area that would support the project. No alternative locations were identified for the project that could meet the project objectives and substantially reduce project impacts, and therefore this alternative is rejected.

7.3.2 Existing Zoning Alternative

The Existing Zoning Alternative corresponds with the maximum development allowed under the existing underlying Light Industrial and Commercial Service (CM) zoning of the project site. Per municipal code Section 24.06.010, the CM zone is intended to include heavy commercial activity and light industrial services. As a result, this alternative would entail an entirely different land use than the proposed project, as the only allowable residential use within this zone is one caretaker apartment for each business entity. Based on the commercial and light industrial uses, this alternative would be expected to result in greater impacts to transportation as these uses typically generate more daily traffic trips than residential uses. VMT would also be expected to be greater because residential uses would not be developed at the site, which is within a TPA and Smart Growth area. Given the anticipated increase in traffic tips and VMT, air emissions and GHG would also be greater than residential uses.

The Existing Zoning Alternative would not provide the much needed additional housing within the City to respond to the existing housing shortage in La Mesa, as well as in San Diego County and statewide. Additionally, development under this alternative would not be TOD or capitalize on the site's proximity to adjacent transit facilities in accordance with SANDAG's Regional Plan. In consideration of the above discussion and because this alternative would not meet any of the project objectives, the Existing Zoning Alternative is rejected and not carried forward.

7.3.3 Senior Housing Alternative

During the public circulation of the NOP, members of community suggested providing senior housing as a major component of the project (refer to Appendix A). The population of seniors (age 65 and older) within La Mesa is generally higher compared to the region. Approximately 17.1 percent of the existing population of La Mesa comprises seniors compared to approximately 14.4 percent in the San Diego region (SANDAG 2019c and 2019d). The percentage of seniors in La Mesa is forecasted to increase to 23.1 percent in 2035 compared to 19.2 percent in the region, and 23.4 percent in 2050 compared to 19.7 percent in the region (SANDAG 2013b and 2013c). Based on the current and projected population of seniors in La Mesa, there is a market demand for senior housing, especially for for-rent senior units. Senior housing facilities are ideally located in or near village or town centers because they would provide seniors with easier access to essential services, such as a pharmacy, food market, shops, banks and general merchandise within a close distance to their home. Although the project site is located adjacent to transit facilities, the site is not within or near commercial areas that provide any of the noted essential services. Moreover, mixing senior housing with non-senior housing and particularly student housing within the same development would not ideally be compatible or preferable by these residential sectors.

This alternative would achieve all of the identified project objectives. It would not, however, avoid or substantially lessen the significant effects of the project. Therefore, this alternative was rejected from further consideration.

7.4 PROPOSED PROJECT ALTERNATIVES

The following three alternatives are carried forward and evaluated in this analysis:

- No Project Alternative;
- Reduced Density Alternative; and
- Phase 1 Only Alternative.

The following rationale was considered when developing this range of alternatives:

- The No Project Alternative is required per State CEQA Guidelines Section 15126.6(e). It provides a basis for comparing the impacts that would occur if the project were approved, relative to what would occur if the project were not approved.
- The Reduced Density Alternative and Phase 1 Only Alternative are included in this section to evaluate whether any impacts would be reduced substantially when compared to the project.

These alternatives represent a reasonable range of alternatives, as defined in the State CEQA Guidelines, because they provide feasible alternate development patterns that would reduce (but not eliminate) the significant impacts associated with the project. The impacts associated with these alternatives are compared to those identified for the project in the following analysis, and the alternatives are assessed relative to their ability to meet the basic objectives of the project, with an overview of project and alternative impacts provided in Table 7-1, *Comparison of Project and Alternative Impacts*, located at the end of this section.

7.4.1 No Project Alternative

7.4.1.1 Description

Section 15126.6(e) of the State CEQA Guidelines provides that the “no project” analysis “shall discuss the existing conditions at the time the notice of preparation is published, as well as what would be reasonably expected to occur in the foreseeable future if a project were not approved, based on current plans and consistent with available infrastructure and community services.” For a development project, the “no project” alternative is defined as the circumstance under which the project does not proceed and a comparison of the environmental effects of the property remaining in its existing state against the environmental effects associated with the project. Accordingly, the No Project Alternative assumes that the project would not be adopted, no multi-family residential buildings would be constructed, and no public improvements to Alvarado Creek, Alvarado Road, or utilities would be constructed. The existing RV resort would remain as well as other existing conditions described in Chapter 2 of this EIR.

7.4.1.2 Environmental Analysis

Air Quality

No demolition, grading, construction, or new development would occur under the No Project Alternative. Therefore, this alternative would not have the potential to increase air pollutant emissions from the site as would occur with the project. Although air quality impacts would not be significant under the project, this alternative would result in lower environmental effects associated with air quality during construction because no new construction or demolition would occur.

No demolition, grading, construction, or additional development would occur under the No Project Alternative. Therefore, this alternative would not have the potential to increase the existing air pollutant emissions associated with the existing use of the site as an RV resort. This is compared to the project for which impacts would be less than significant with no mitigation required. No new construction or demolition air pollution emissions or long-term, daily vehicle trip emissions would occur, compared to the project, for which such emissions would occur. No air quality impacts would occur under the No Project Alternative. In terms of long-term, regional effects, potential benefits related to reduced vehicle trips/miles due to placement of higher-density multi-family residential uses in close proximity to transit with easy access to public transportation options as well as improvements in connectivity between pedestrian, bicycle, and transit modes would not occur.

Biological Resources

Under this alternative, the project site would remain as it currently exists, mostly developed and disturbed with some areas of natural vegetation along and within Alvarado Creek. No development would occur and there would be no impact to biological resources. The No Project Alternative would

avoid impacts to biological resources resulting from the project, including sensitive species (Cooper's hawk and other raptor species) and nesting birds, sensitive vegetation (freshwater marsh and willow woodland), jurisdictional waters and wetlands (freshwater marsh, willow woodland, and non-wetland waters/streambed), and consistency with habitat conservation plans (La Mesa HCP/NCCP Subarea Plan due to potential impacts MSCP-covered species). The benefits of an improved Alvarado Creek associated with restoration and hydrology would not be realized with this alternative.

Cultural and Tribal Cultural Resources

Under the No Project Alternative, no excavation or grading activities would occur and the potential for impacts to unknown subsurface historical resources (including Native American resources and remains) from implementation of the project would be avoided. As described in Section 4.3, *Cultural and Tribal Cultural Resources*, of this EIR, the identified potential for impacts to archaeological and tribal cultural resources associated with implementation of the project would be significant but mitigable with the implementation of a monitoring program. No archaeological and tribal cultural resources impacts are associated with the No Project Alternative.

Geology and Soils

The No Project Alternative would not result in additional development or related disturbance on the project site, with no associated impacts related to geology and soils. Neither the project nor this alternative would result in significant impacts associated with geologic hazards and conditions; however, this alternative would have even less potential for geology impacts as there would be no excavation or grading on the site and no introduction of additional structures or people to the site. The less than significant impacts of the project would be avoided. It should also be noted that the project site would remain subject to a number of existing geologic hazards under the No Project Alternative (e.g., seismic ground shaking), as described in Section 4.4, *Geology and Soils*.

Greenhouse Gas Emissions

Similar to air quality, this alternative would not result in new GHG emissions or impacts over the existing contributions from the current use of the site as an RV resort. This is compared with the project which is anticipated to have less than significant GHG emissions associated with construction and operation of the project. It also, however, would not result in implementation of strategies to reduce regional GHG emissions, such as concentrating high-density residential development near a transit station and improving connectivity with and between alternative modes of travel, including bicycle and pedestrian travel and improved access to transit.

Hazards and Hazardous Materials

As described in Section 4.6, *Hazards and Hazardous Materials*, the site contains existing buildings that potentially could contain ACM and/or LBP based on their construction date. This presents potential health hazards during construction due to the potential for release of these hazardous building materials into the environment that could adversely affect the health of construction personnel and nearby sensitive receptors (i.e., residents and school children). These potential adverse effects would be addressed through implementation of a mitigation measure requiring a pre-construction hazardous building materials survey and if required, appropriate remediation in compliance with regulatory requirements during the demolition and removal of the buildings to prevent the release of such materials. Project impacts would be less than significant with mitigation. The No Project Alternative

would leave the project site in its current condition; the existing buildings would remain along with any potentially hazardous building materials present on them. Although there would be no development activities and no impact would occur thus avoiding the potentially significant impact of the project, a potential benefit of the project to remove potentially hazardous materials would not be realized with this alternative.

Neither the project nor this alternative would result in significant impacts associated with airport hazards; however, this alternative would have even less potential for such impacts as there would be substantially less people residing at the site compared to the development of up to 950 multi-family residential units.

The project would have a less than significant impact with respect to wildfire and emergency response/evacuation, as described in Section 4.6, and because no development would occur under this alternative, no impacts would occur. However, under this alternative, a potential benefit of improving Alvarado Road that would provide improved circulation along the roadway, including for emergency vehicles would not be realized.

Hydrology and Water Quality

As the No Project Alternative would not result in additional development, it would not result in potential impacts related to the generation of impervious surfaces, increases in runoff rates/ amounts, storm drain capacity, flooding, erosion/sedimentation, hydromodification, drainage alteration, and water pollutants. All of these impacts under the project would, however, be avoided or reduced below a level of significance through implementation of proposed design measures and required conformance with applicable regulatory/industry standards.

As the No Project/No Development Alternative would not result in additional development, it would not result in potential impacts related to the generation of impervious surfaces, increases in runoff rates/ amounts, storm drain capacity, flooding, erosion/sedimentation, hydromodification, drainage alteration, and water pollutants. No action would be taken and no impacts would occur. Drainage and water quality conditions on the project site would remain as they currently are. As described in Section 4.7, *Hydrology and Water Quality*, of this EIR, the project would increase impervious surfaces on the project site, alter drainage patterns, and introduce uses that could generate pollutants and impact the quality of storm water runoff. These potential hydrology and water quality impacts associated with the project would be less than significant, however, conformance with applicable storm water standards and water quality regulations (including the NPDES Construction General, Municipal and Groundwater permits) would be required.

If the project site operates in its current state under this alternative, it would continue to generate associated urban contaminants similar to those described for the project. Based on the construction date of current on-site development, it is anticipated that no associated volume/flow-based or other pollutant control BMPs are present, and that the related long-term storm water pollutant generation from the site could, therefore, be more detrimental to water quality under the No Project Alternative than for the project (which would include pollutant control BMPs in conformance with associated regulatory requirements). Additionally, the proposed improvements to Alvarado Creek would not occur under this alternative and thus, the existing drainage and flood issues associated with the site that would be addressed with the project would remain and could continue to worsen over time (particularly since the channel would not be improved and cleared of non-native vegetation and debris). Therefore,

although hydrology and water quality impacts associated with the No Project Alternative would be less than significant because no development would occur, they would be greater than the project impacts.

Land Use

Under the No Project Alternative, the existing uses and physical conditions on the project site would remain. The RV resort would continue to operate as a non-conforming use and Alvarado Creek, Alvarado Road, the overhead utility lines, and existing sewer facilities would remain in their current condition and configuration. While the RV resort is not consistent with the General Plan and zoning designations for the site, it is permitted at the site based on its non-conforming use status. Thus, as with the proposed project, no land use plan consistency impacts would occur. However, this alternative would not implement or further express the goals, objectives, or policies of the General Plan. Furthermore, it would not support goals in SANDAG's Regional Plan that encourage high-density development in proximity to transit facilities. As with the project, this alternative would not physically divide an established community. No significant land use impacts are anticipated with the project, and none would occur under this alternative.

Noise

As described in Section 4.9, *Noise*, of this EIR, noise impacts associated with the project would be less than significant. The No Project Alternative would not result in demolition or construction activities or new stationary and mobile noise sources in the vicinity of existing noise-sensitive land uses. Therefore, no impact would occur, and no mitigation would be required. The existing noise conditions on the project site would continue and there would be no new noise sources at the site that could potentially impact off-site uses.

Paleontological Resources

Under the No Project Alternative, project development would not occur, and no other development/disturbance activities would be implemented. Accordingly, no associated impacts to paleontological resources would result, and impacts identified to the Stadium Conglomerate Formation (moderate to high resource potential) from implementation of the project would be avoided. As described in Section 4.10, *Paleontological Resources*, of this EIR, the noted impacts to paleontological resources associated with implementation of the project would be reduced below a level of significance through the required monitoring program.

Public Facilities and Services

The less than significant impacts of the project with respect to public services such as police, fire, parks, and library services, would not occur under this alternative. No development would occur under the No Project Alternative that would increase population, resulting in a need to expand public services and facilities. Impacts related to demand for these services also would be less than significant for the project.

Public Utilities

As the No Project Alternative would not alter the intensity of development on the project site, it would not result in demand for additional water, sewer, solid waste disposal, or other utility services. Impacts related to demand for these services also would be less than significant for the project. Under this

alternative, a potential benefit of relocated the existing overhead utility lines that traverse the site underground would not be realized.

Transportation

As no development is proposed under this alternative, no additional traffic beyond existing conditions would be generated and no impact would occur. Similarly, because no development would occur, there would be no associated transportation design hazard impacts.

The No Project Alternative would not result in construction-related traffic impacts, as no construction would occur. In addition, the project improvements to pedestrian and bicycle facilities, as well as improved access to the adjacent 70th Street Trolley Station, would not be implemented with this alternative. Thus, while there would be no impacts because no development would occur, the No Project Alternative would not be consistent with applicable transportation plans, including the General Plan Circulation Element and Bicycle Facilities and Alternative Transportation Plan. Furthermore, it would not be consistent with SANDAG's Regional Plan that encourage high-density development in proximity to transit facilities.

The project would have a less than significant impact with respect to emergency access, as described in Section 4.13, *Transportation*, of this EIR, and because no development would occur under this alternative, no impacts would occur. However, under this alternative, a potential benefit of improving Alvarado Road that would provide improved circulation along the roadway, including for emergency vehicles would not be realized.

Visual Resources

The No Project Alternative would retain existing visual conditions at the site. This alternative would not result in the introduction of new residential structures, enhanced landscaping, or architectural design that would improve the relationship of the project site to the surrounding areas. Views from the freeway and adjacent residential neighborhoods would continue to be the developed RV resort and the stand of mature palm trees. As this alternative would not result in any site improvements that would change the existing visual environment, no impacts to visual resources would occur.

7.4.1.3 Conclusion

The No Project Alternative would avoid significant but mitigable impacts to biological resources, cultural and tribal cultural resources, hazards and hazardous materials, and paleontological resources identified for the project. It would also avoid all other impacts of the project related to air quality, geology and soils, GHG emissions, hydrology and water quality, land use, noise, public facilities and services, public utilities, transportation, and visual resources, which would be less than significant for the project. However, the benefits of the proposed project would not be realized under the No Project Alternative, including the following:

- Long-term, regional benefits of reduced air and GHG emissions related to reduced vehicle trips/miles due to placement of higher-density multi-family residential uses in close proximity to transit as well as improvements in connectivity between pedestrian, bicycle, and transit modes;
- Alvarado Creek would not be improved to resolve drainage and flooding issues, and would not be restored with riparian vegetation;

- The project site would not be improved with volume/flow-based or other pollutant control BMPs to treat storm water runoff before being conveyed to Alvarado Creek; and
- The project would potentially remove hazardous building materials that may be present on existing on-site buildings.

Based on the preceding analysis and the fact that no development of any of the project features would occur with the No Project Alternative, this alternative would fail to meet any of the basic project objectives listed above in Section 7.2.1.

7.4.2 Reduced Density Alternative

7.4.2.1 Description

There were no feasible residential development alternatives identified that could eliminate any of the impacts associated with the project. Therefore, an alternative was selected for analysis that would potentially lessen project impacts and would result in a feasible development for the applicant to implement. The Reduced Density Alternative would involve a similar development proposal to the project, but with a 25-percent reduction in the number of residential units. Specifically, this alternative considers the development of 712 multi-family residential units along with up to 15,000 SF of resident-serving commercial space. The public improvements to Alvarado Creek, Alvarado Road, and utility facilities proposed as part of the project also would occur under this alternative. Under this alternative, the development footprint and number of buildings would be the same as the project; however, buildings would include fewer floors of residential built on the podium.

7.4.2.2 Environmental Analysis

Air Quality

Demolition, grading, and construction activities would occur under the Reduced Density Alternative and would generate air emissions during construction and operation; however, air emissions during both construction and operations would be incrementally less overall when compared to the project, because fewer units would be constructed. Emissions during grading would be expected to be similar as it is anticipated that most of the site would still need to be graded and a substantial amount of excavation would still be needed to remove existing fill materials that are unsuitable for building foundations. The Reduced Density Alternative would generate less daily vehicle trips than the project. As vehicle emissions would be the predominant source of operational emissions, this alternative would be expected to generate less air pollution than the project. Overall, both the project and the Reduced Density Alternative would have less than significant air quality impacts, but the impacts associated with the alternative would be slightly less than those associated with the project.

Biological Resources

Under the Reduced Density Alternative, the site would be redeveloped with the same land uses as the project and with a similar development footprint; however, with 25-percent fewer homes. Impacts to sensitive species (Cooper's hawk and other raptor species) and nesting birds, sensitive vegetation (freshwater marsh and willow woodland), jurisdictional waters and wetlands (freshwater marsh, willow woodland, and non-wetland waters/streambed), and consistency with habitat conservation plans (La Mesa HCP/NCCP Subarea Plan due to potential impacts MSCP-covered species) that would require

mitigation under the project would likely still occur in order to implement the residential development and Alvarado Creek improvements. Both the project and the Reduced Density Alternative would result in similar significant but mitigable impacts to biological resources, with similar mitigation requirements.

Cultural and Tribal Cultural Resources

As described in Section 4.3, *Cultural Resources and Tribal Cultural Resources*, of this EIR, no significant on-site cultural resources were identified, but there is the potential for unknown resources to be discovered during on-site grading. The noted impacts to cultural and tribal cultural resources associated with implementation of the project would be reduced below a level of significance through mitigation measures requiring monitoring of specific ground disturbance activities. Ground disturbance associated with development of the Reduced Density Alternative would be slightly less than that associated with the project, because it is likely that slightly less grading would be required. Therefore, the likelihood of encountering cultural resources would be similar, but slightly less than the project. Both scenarios would have a significant but mitigable potential for impacts to unidentified prehistoric or ethnohistoric resources (including Native American resources and remains), with the same mitigation requirements for construction monitoring.

Geology and Soils

Both the project and the Reduced Density Alternative would be required to comply with the applicable recommendations of an on-site geotechnical investigation, and it is expected that these recommendations would be very similar for both of these scenarios. Both would require a similar amount of grading, including excavation and recompaction of much of the existing on-site fill materials to create suitable building foundations, although grading could be slightly less for the alternative. This alternative would expose 25 percent fewer buildings and people to geologic hazards on the project site should a seismic event occur. Impacts would be less than significant for both the project and this alternative, with slightly less impacts anticipated for the alternative.

Greenhouse Gas Emissions

The Reduced Density Alternative would result in site-specific GHG emissions associated with construction and operation of the project, but at a reduced amount associated with the 25 percent reduction in the number of residential units. As a result, GHG impacts would remain less than significant but would be incrementally reduced under this alternative when compared to the project due to a reduction in traffic trips and development intensity.

Hazards and Hazardous Materials

As described in Section 4.6, *Hazards and Hazardous Materials*, the existing on-site buildings have potential to contain ACM and/or LBP. These conditions present potential health hazards during construction due to the potential for release of these materials to adversely affect the health of construction personnel and nearby sensitive receptors (residents and school children). These potential adverse effects would be addressed through implementation of a mitigation measure requiring a pre-construction hazardous building materials survey and if required, appropriate remediation in compliance with regulatory requirements during the demolition and removal of the buildings to prevent the release of such materials. Project impacts would be less than significant with mitigation. The Reduced Density Alternative would implement a similar, but slightly less intense, residential development on the project site, which would also require the removal of the existing buildings.

Accordingly, the impacts and required mitigation would be the same for this alternative as for the project. Both types of development would be required by law to properly store, use, and dispose of hazardous substances used in the course of construction and long-term maintenance of the developed site.

The project would have a less than significant impact with respect to airport hazards and this alternative would have a slightly less potential for such impacts given the lower building heights, 25 percent reduction in residential units, and associated reduction in the number of people residing at the site.

It is anticipated that this development alternative would result in a similar transportation infrastructure to that associated with the project. This would include similar benefit of improving Alvarado Road that would provide improved circulation along the roadway, including for emergency vehicles. The project and this alternative would have a similar, less than significant impact with respect to wildfire and emergency response/evacuation.

Hydrology and Water Quality

The Reduced Density Alternative would result in the same type of development as the project, except there would be 25 percent less development. Potential impacts related to the generation of impervious surfaces, increases in runoff rates/amounts, storm drain capacity, flooding, erosion/sedimentation, hydromodification, drainage alteration, and water pollutants would generally be similar given that the development footprint and number of buildings would be the same as the project. As described in Section 4.7, *Hydrology and Water Quality*, of this EIR, hydrology and water quality impacts associated with the project would be less than significant as conformance with City storm water standards, water quality regulations (including the NPDES Construction General, Municipal and Groundwater permits) and water conservation policies would be required. As a result, the less than significant hydrology and water quality impacts associated with the Reduced Density Alternative would be similar compared to the project even though the intensity and use of the site may be slightly reduced.

Land Use

Under the Reduced Density Alternative, the existing RV resort would be removed and replaced with a residential development, similar to the project, but with 25 percent fewer residences. Like the project, this alternative would implement and further express goals, objectives, and policies of the General Plan and also would support goals in SANDAG's Regional Plan to promote higher density development near transit facilities, although to a lesser extent than the project. As with the project, this alternative would not physically divide an established community. It should be noted that this alternative would provide less housing at a time when the City is seeking to increase its available housing supply. Land use impacts would be less than significant but slightly greater than the project.

Noise

Noise impacts to surrounding development from project construction, traffic, and on-site operations were determined to be less than significant for the project. The Reduced Density Alternative would involve less construction and less long-term operational traffic, which would in turn result in reduced noise impacts compared to the project. While specific impacts to adjacent properties would depend on the design of the project, similar to the project, a reduced intensity residential development would be required to conform with applicable City noise standards.

While this alternative would involve a new site plan that could potentially locate planned residential uses farther from I-8, residential units and exterior usable spaces would still be exposed to noise from I-8 in excess of applicable noise standards, requiring noise reduction design features measures similar to those identified for the project to be incorporated into the design of this alternative. It is expected that this alternative would also need to incorporate private exterior use area noise barriers and higher STC-rated building materials to be consistent with General Plan noise-land use compatibility standards. Land use impacts associated with noise compatibility would be less than significant and similar for the project and this alternative. Overall, noise impacts associated with the Reduced Density Alternative would remain less than significant and would likely be reduced compared to the project, depending on the specific design of the alternative development.

Paleontological Resources

Under the Reduced Density Alternative, the extent of grading would be slightly reduced but the anticipated depth of excavation would be similar to the project due to the site conditions associated with the floodplain. Impacts to potential paleontological resources associated with the Stadium Conglomerate Formation (moderate to high resource potential) would, therefore, be the same as the project. Both scenarios would have a significant but mitigable potential for impacts to paleontological resources, with the same mitigation requirements for construction monitoring, as described in Section 4.10, *Paleontological Resources*.

Public Services and Facilities

Impacts related to demand for most public services and facilities, including police, fire, libraries, and parks/recreation, would be about 25 percent less under this alternative compared to the project, proportional to the reduced number of residents. Overall, the Reduced Density Alternative would place less demand on public services than the project; however, impacts under either scenario would be less than significant.

Public Utilities

As the Reduced Density Alternative would involve the construction and operation of 25 percent less development than the project, it would result in reduced demand for additional water, sewer, solid waste disposal, and other utility services. Impacts related to demand for public utilities under the project and this alternative would both be less than significant; overall, however, impacts under the Reduced Density Alternative would be comparatively less than the project.

Transportation

Development of the project site with 25 percent fewer residential units would result in a corresponding decrease in traffic compared to the project. This would result in slightly reduced traffic volumes and VMT. Both the project and this alternative would be within 0.5 mile of a major transit stop and thus, transportation impacts related to VMT would be less than significant. Moreover, this alternative would incorporate the same VMT reduction measures as the project, which would result in a further reduction in VMT.

The Reduced Density Alternative would include reduced transportation/circulation impacts during construction as less materials and equipment associated with earthwork and structural development would be needed when compared to the project. Similar to the project, no transportation hazards would

occur under this alternative. It is anticipated that this alternative would provide similar pedestrian and bicycle amenities to benefit the proposed residents and the surrounding community.

The same project improvements to pedestrian and bicycle facilities, as well as improved access to the adjacent 70th Street Trolley Station, would be implemented with this alternative. Thus, like the proposed project, the Reduced Density Alternative would be consistent with adopted transportation plans, including the General Plan Circulation Element, Bicycle Facilities and Alternative Transportation Plan, and SANDAG's Regional Plan.

Both the project and this alternative would have a less than significant impact with respect to emergency access because both would include improvements to Alvarado Road that would provide improved circulation along the roadway, including for emergency vehicles.

Overall, less than significant transportation impacts would be associated with both the project and this alternative but would be incrementally less with the Reduced Density Alternative.

Visual Resources

The Reduced Density Alternative would involve the replacement of the existing RV resort with a residential development similar to the project but with 25 percent fewer units. Depending on the layout of the project site under this alternative, it may be possible to achieve lower building heights with slightly wider setbacks from existing development; these modifications may be discernible to some nearby residents but would likely not be substantial enough to be noticeable during brief public views from such vantagepoints. While both the project and this alternative would be compatible with the surrounding community and would have less than significant impacts related to visual resources, the impacts associated with the Reduced Density Alternative would be slightly less than the impact of the project.

7.4.2.3 Conclusion

The Reduced Density Alternative would not avoid any significant but mitigable impacts associated with the project. Significant but mitigable impacts to cultural and tribal cultural resources would be slightly less than the project impacts, but the required mitigation would be the same. The project and this alternative would have essentially the same significant impacts with the same mitigation required to reduce impacts to less than significant levels relative to biological resources, hazards and hazardous materials, and paleontological resources. Less than significant impacts associated with both the project and this alternative with respect to air quality, geology and soils, GHG, noise, public services and facilities, public utilities, transportation, and visual resources would be slightly less for this alternative, while less than significant hydrology/water quality impacts would be approximately the same. The differences are primarily associated with the slightly reduced intensity of development required for this alternative. Less than significant land use impacts would be slightly greater due to the reduction in residential units that would not fully capitalize on the site's proximity to transit facilities.

As the Reduced Density Alternative would involve a reduction by 25 percent of the development intensity of the project but with the same uses and public improvements, it would meet the project objectives, but to a lesser extent than the proposed project given the reduction of residential units.

7.4.3 Phase 1 Only Alternative

7.4.3.1 Description

As stated in Section 7.5, there were no feasible residential development alternatives identified that could eliminate any of the impacts associated with the project. As with the Reduced Density Alternative, this alternative was selected for evaluation in that it would potentially lessen project impacts and would result in a feasible development for the applicant to implement. The Phase 1 Only Alternative would involve a similar development proposal to the project, as only Phase 1 would be developed on the project site. Under this alternative, the portion of the site west of Alvarado Creek would be developed with Buildings 1, 2, and 3 that would include up to 645 multi-family residential units along with some resident-serving commercial space. The buildings would be the same as those of the project in terms of size, area, number of units, design, location, etc. The total area of the commercial space would be slightly less than the 15,000 SF associated with the project since three buildings would be constructed instead of four. The public improvements to Alvarado Creek, Alvarado Road, and utility facilities proposed as part of the project also would occur under this alternative. The eastern portion of the project site would not be redeveloped, and the existing RV resort would continue to operate in this portion of the site.

7.4.3.2 Environmental Analysis

Air Quality

Under the phase 1 Only Alternative, demolition, grading, and construction activities would occur and would generate air emissions during construction and operation. Emissions during both construction and operations would be less overall when compared to the project. Emissions during grading would be expected to be reduced because the eastern portion of the site would not be graded; however, there would be adjacent sensitive receptors at the existing RV resort. The Phase 1 Only Alternative would generate less daily vehicle trips than the project due to the fewer units that would be developed. As vehicle emissions would be the predominant source of operational emissions, this alternative would be expected to generate less air pollution than the project. Overall, both the project and the Phase 1 Only Alternative would have less than significant air quality impacts, but the impacts associated with this alternative would be less than those associated with the project.

Biological Resources

Under the Phase 1 Only Alternative, the western portion of the site would be redeveloped with the same land uses as the project with the same development footprint on this portion of the project site. The eastern portion of the site would not be redeveloped. Impacts to sensitive species (Cooper's hawk and other raptor species) and nesting birds, sensitive vegetation (freshwater marsh and willow woodland), jurisdictional waters and wetlands (freshwater marsh, willow woodland, and non-wetland waters/streambed), and consistency with habitat conservation plans (La Mesa HCP/NCCP Subarea Plan due to potential impacts MSCP-covered species) that would require mitigation under the project would likely still occur in order to implement the residential development and Alvarado Creek improvements. Both the project and the Phase 1 Only Alternative would result in similar significant but mitigable impacts to biological resources, with similar mitigation requirements.

Cultural and Tribal Cultural Resources

No significant on-site cultural resources were identified on the project site, but there is the potential for unknown resources to be discovered during on-site grading. As described in Section 4.3, *Cultural and Tribal Cultural Resources*, impacts to cultural and tribal cultural resources associated with implementation of the project would be reduced below a level of significance through mitigation measures requiring monitoring during certain construction activities involving ground disturbance. Ground disturbance associated with development of the Phase 1 Only Alternative would be less than that associated with the project, because less grading would be required. Therefore, the likelihood of encountering cultural resources would be similar, but slightly less than the project. Both scenarios would have a significant but mitigable potential for impacts to unidentified cultural resources, with the same mitigation requirements for construction monitoring.

Geology and Soils

Both the project and the Phase 1 Only Alternative would be required to comply with the applicable recommendations of an on-site geotechnical investigation, and it is expected that these recommendations would be very similar for both of these scenarios. They both would require grading, including excavation and recompaction of the existing on-site fill materials to create suitable building foundations, although grading would be less for the alternative. This alternative would expose fewer buildings and people to geologic hazards on the project site should a seismic event occur. Impacts would be less than significant for both the project and this alternative, with less impacts anticipated for the alternative.

Greenhouse Gas Emissions

The Phase 1 Only Alternative would result in site-specific GHG emissions associated with construction and operation of the project, but at a reduced amount given that no development would occur on the eastern portion of the site. As a result, GHG impacts would remain less than significant and would be less under this alternative when compared to the project due to a reduction in traffic trips and development intensity.

Hazards and Hazardous Materials

The existing on-site buildings have potential to contain hazardous building materials associated with ACM and/or LBP, as discussed in Section 4.6, *Hazards and Hazardous Materials*, of this EIR. These conditions present potential health hazards during construction due to the potential for release of these materials to adversely affect the health of construction personnel and nearby sensitive receptors (residents and school children). Potential adverse effects would be addressed through implementation of a mitigation measure requiring a pre-construction hazardous building materials survey and if required, appropriate remediation in compliance with regulatory requirements during the demolition and removal of the buildings to prevent the release of such materials. Project impacts would be less than significant with mitigation. The Phase 1 Only Alternative would require the removal of five of the existing six buildings. Accordingly, the impacts and required mitigation would be the same for this alternative as for the project. Both types of development would be required by law to properly store, use, and dispose of hazardous substances used in the course of construction and long-term maintenance of the developed site. It is noted that one of the existing buildings would remain under this alternative, which would potentially leave hazardous building materials on the project site.

The project would have a less than significant impact with respect to airport hazards and this alternative would have a slightly less potential for such impacts given the reduction in residential units and associated reduction in the number of people residing at the site.

Like the project, this alternative would include improvements to Alvarado Road that would provide improved circulation along the roadway, including for emergency vehicles. The project and this alternative would have a similar, less than significant impact with respect to wildfire and emergency response/evacuation.

Hydrology and Water Quality

The Phase 1 Only Alternative would result in the same type of development as the project, except there would be less development. Potential impacts related to the generation of impervious surfaces, increases in runoff rates/amounts, storm drain capacity, flooding, erosion/sedimentation, hydromodification, drainage alteration, and water pollutants would generally be similar. Although there would be a smaller development footprint and reduced impervious surfaces associated with new development, the eastern portion of the site would remain in its current condition, which is almost entirely paved.

As described in Section 4.7, *Hydrology and Water Quality*, of this EIR, hydrology and water quality impacts associated with the project would be less than significant as conformance with City storm water standards, water quality regulations (including the NPDES Construction General, Municipal and Groundwater permits) and water conservation policies would be required. As a result, the less than significant hydrology and water quality impacts associated with the Phase 1 Only Alternative would be similar compared to the project even though the intensity and use of the site would be reduced.

Land Use

Under the Phase 1 Only Alternative, the western portion of the existing RV resort would be removed and replaced with a residential development, similar to the project, but with three buildings and a corresponding reduction in the number of residential units. While this alternative would implement and further express goals, objectives, and policies of the General Plan and also would support goals in SANDAG's Regional Plan to promote higher density development near transit facilities, it would do so to a lesser extent than the project because of the fewer number of residential units that would be developed. As with the project, this alternative would not physically divide an established community. Land use impacts would be less than significant but slightly greater than the project. It should be noted that this alternative would provide less housing at a time when the City is seeking to increase its available housing supply.

Noise

Noise impacts to surrounding development from project construction, traffic and on-site operations were determined to be less than significant for the project. The Phase 1 Only Alternative would involve less construction and less long-term operational traffic, which would result in reduced noise impacts compared to the project. Impacts to adjacent properties would be similar to the project, and although an additional noise-sensitive land use would exist in the project area (the adjacent portion of the existing RV resort that would remain), this alternative would be required to conform with applicable City noise standards.

Like the project, residential units and exterior usable spaces would still be exposed to noise from I-8 in excess of applicable noise standards, requiring noise reduction design features measures similar to those identified for the project to be incorporated into the design of this alternative. It is expected that this alternative would also need to incorporate private exterior use area noise barriers and higher STC-rated building materials, in order to be consistent with General Plan noise-land use compatibility standards. Land use impacts associated with noise compatibility would be less than significant and similar for the project and this alternative. Overall, noise impacts associated with the Phase 1 Only Alternative would remain less than significant and would be similar in severity to the project.

Paleontological Resources

Under the Phase 1 Only Alternative, the extent of grading would be slightly reduced but the anticipated depth of excavation would be same as the project. Impacts to potential paleontological resources associated with the Stadium Conglomerate Formation (moderate to high resource potential) would, therefore, be the same as the project. Both scenarios would have a significant but mitigable potential for impacts to paleontological resources, with the same mitigation requirements for construction monitoring, as described in Section 4.10, *Paleontological Resources*.

Public Services and Facilities

Impacts related to demand for public services and facilities, including police, fire, libraries, and parks/recreation, would be reduced less under this alternative compared to the project because there would be fewer residential units and residents on the site with this alternative. People staying at the portion of the existing portion of the RV resort that would remain would continue to require and utilize public services and facilities. Overall, the Phase 1 Only Alternative would place less demand on public services than the project; however, impacts under either scenario would be less than significant.

Public Utilities

As the Phase 1 Only Alternative would involve the construction and operation of less development than the project, it would result in reduced demand for additional water, sewer, solid waste disposal, and other utility services compared to the project. People staying at the portion of the existing portion of the RV resort that would remain would continue to require public utility service. Impacts related to demand for public utilities under the project and this alternative would both be less than significant; overall, however, impacts under the Phase 1 Only Alternative would be less than the project.

Transportation

Development of only the western portion of the site would result in fewer residential units and a corresponding decrease in traffic compared to the project. This would equate to slightly reduced traffic volumes and VMT. Both the project and this alternative would be within 0.5 mile of a major transit stop and thus, transportation impacts related to VMT would be less than significant. Moreover, this alternative would incorporate the same VMT reduction measures as the project, which would further reduce VMT.

The Phase 1 Only Alternative would include reduced transportation/circulation impacts during construction as less materials and equipment associated with earthwork and structural development would be needed compared to the project. Similar to the project, no transportation hazards would occur under this alternative. The same project improvements to pedestrian and bicycle facilities, as well as

improved access to the adjacent 70th Street Trolley Station, would be implemented with this alternative. Thus, like the proposed project, the Phase 1 Only Alternative would be consistent with adopted transportation plans, including the General Plan Circulation Element, Bicycle Facilities and Alternative Transportation Plan, and SANDAG's Regional Plan. Both the project and this alternative would have a less than significant impact with respect to emergency access because both would include improvements to Alvarado Road that would provide improved circulation along the roadway, including for emergency vehicles. Overall, less than significant transportation impacts would be associated with both the project and this alternative but would be incrementally less with the Phase 1 Only Alternative.

Visual Resources

The Phase 1 Only Alternative would involve the replacement of the existing RV resort west of Alvarado Creek with a residential development similar to the project but with one fewer building and a reduced number of residential units. The eastern portion of the site would remain as is with a RV resort. Consequently, the bulk and scale of overall development associated with this alternative would appear to be less compared to the project from some vantage points. Building forms, heights, densities, and development envelopes would be the same as the project on the western portion of the site, as would architecture and design elements.

While both the project and this alternative would be compatible with the surrounding community and would have less than significant impacts related to visual resources, the impacts associated with the Phase 1 Only Alternative would be less than the project.

7.4.3.3 Conclusion

The Phase 1 Only Alternative would not avoid any significant but mitigable impacts associated with the project. Significant but mitigable impacts to cultural and tribal cultural resources would be slightly less than the project impacts, but the required mitigation would be the same. The project and this alternative would have essentially the same significant impacts with the same mitigation required to reduce impacts to less than significant levels relative to biological resources, hazards and hazardous materials, and paleontological resources. Less than significant impacts associated with both the project and this alternative with respect to air quality, geology and soils, GHG, public services and facilities, public utilities, transportation, and visual resources would be slightly less for this alternative, while less than significant hydrology/water quality and noise impacts would be approximately the same. The differences are primarily associated with the slightly reduced intensity of development required for this alternative. Less than significant land use impacts would be slightly greater due to the reduction in residential units that would not fully capitalize on the site's proximity to transit facilities.

As the Phase 1 Only Alternative would involve fewer buildings and residential units but with the same uses and public improvements, it would meet the project objectives, but to a lesser extent than the proposed project given the reduction of residential units.

7.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The State CEQA Guidelines require the identification of an environmentally superior alternative among the alternatives analyzed in an EIR, which is typically selected based on an ability to avoid or substantially reduce significant environmental effects associated with the project. The guidelines also

require that if the No Project Alternative is identified as the environmentally superior alternative, another environmentally superior alternative must be identified.

The project would not result in any significant and unavoidable impacts, and mitigation measures or project design features have been identified to reduce all potentially significant impacts to a less than significant level. However, the No Project Alternative is identified as the environmentally superior alternative as this alternative would not result in any new impacts because no development would occur under this alternative. Some adverse conditions would remain (e.g., drainage and flood issues and on-site hazardous building materials) and some potential project benefits would not be realized (e.g., public improvements to Alvarado Creek, Alvarado Road, and utilities). This alternative, however, would avoid the significant but mitigable impacts associated with the project related to biological resources, cultural and tribal cultural resources, hazards and hazardous materials, and paleontological resources (refer to Table 7-1, *Comparison of Project and Alternative Impacts*). The No Project Alternative does not meet the purpose and objectives of the project, however, as outlined in Section 7.4.1.3.

**Table 7-1
COMPARISON OF PROJECT AND ALTERNATIVE IMPACTS**

Environmental Topic	Proposed Project	No Project Alternative	Reduced Density Alternative	Phase 1 Only Alternative
Air Quality	LS	N	LS<	LS<
Biological Resources	SM	N	SM=	SM=
Cultural Resources and Tribal Cultural Resources	SM	N	SM<	SM<
Geology and Soils	LS	N	LS<	LS<
Greenhouse Gas Emissions	LS	N	LS<	LS<
Hazards and Hazardous Materials	SM	N	SM=	SM=
Hydrology and Water Quality	LS	N	LS=	LS=
Land Use	LS	N	LS>	LS>
Noise	LS	N	LS<	LS=
Paleontological Resources	SM	N	SM=	SM=
Public Services and Facilities	LS	N	LS<	LS<
Public Utilities	LS	N	LS<	LS<
Transportation	LS	N	LS<	LS<
Visual Resources	LS	N	LS<	LS<

SM = significant but mitigable impacts; LS = less than significant impacts; N = no impacts

<= comparatively reduced impact relative to the project (if impact designation is the same and impact varies)

> = comparatively greater impact relative to the project (if impact designation is the same and impact varies)

"=" = same/similar impacts relative to the project

Of the remaining alternatives, the environmentally superior alternative would be the Reduced Density Alternative. This alternative would reduce many of the impacts of the project, except that the significant but mitigable impacts to biological resources, hazards and hazardous materials, and the less than significant hydrology and water quality impacts would be about the same for both the project and this alternative. Every other impact would be reduced with this alternative. This alternative would meet all of the identified project objectives although some to a lesser extent than the project.

The Phase 1 Only Alternative is similar to the Reduced Density Alternative in terms of potential impacts compared to the project and its ability to meet the project objectives. The main difference is that it would not reduce the less than significant noise impacts of the project like the Reduced Density Alternative would.

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