

## 7. *Alternatives to the Proposed Project*

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### 7.1 INTRODUCTION

#### 7.1.1 Purpose and Scope

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives” (CEQA Guidelines Section 15126.6). This chapter identifies potential alternatives to the proposed project and evaluates them, as required by CEQA.

Key provisions of the CEQA Guidelines on alternatives (Section 15126.6[a] through [f]) are summarized below to explain the foundation and legal requirements for the alternatives analysis in the EIR.

- “The discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly” (15126.6[b]).
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact” (15126.6[e][1]).
- “The no project analysis shall discuss the existing conditions at the time the Notice of Preparation (NOP) is published, and at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives” (15126.6[e][2]).
- “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 alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project” (15126.6[f]).
- “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)” (15126.6[f][1]).
- “For alternative locations, “only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR” (15126.6[f][2][A]).
- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative” (15126.6[f][3]).



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As noted in Section 8 a number of impacts relating to Aesthetics, Agriculture and Forestry Resources, Biological Resources, Cultural Resources, Geology and Soils, Hazards, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Traffic, and Utilities and Service Systems when compared against the OSA PEIR were determined to have reduced impacts, no new impacts, or no new impacts after implementation of the existing plan, programs, or policies, existing regulations, and existing OSA Mitigation Measures.

In addition, however, the City determined that new information existed to show that the project could have one or more significant effects not discussed in the OSA PEIR. (State CEQA Guidelines, section 15162.) Specifically, the City determined that a supplemental EIR was required to evaluate air quality and greenhouse gas emissions. Based on that analysis, as explained in Section 5.0 above, the project would have the following significant unavoidable adverse air quality and greenhouse gas emissions (GHG) impacts:

### **Impact 5.1-1: Short-Term Air Quality Impacts due to Emissions of VOC and NO<sub>x</sub>**

Construction activities would generate short-term emissions in exceedance of SCAQMD's regional threshold criteria for VOC and NO<sub>x</sub> and cumulatively contribute to the SoCAB's nonattainment designations. While mitigation measures would result in reduced emissions during construction these reductions would not be sufficient to reduce all emissions to a less than significant level. Impact 5.1-1 would remain significant and unavoidable

### **Impact 5.1-2: Short-Term Air Quality Impacts due to Grading Activities**

During construction of Phases 2 and 3, when some of the residences of Phase 1 could be occupied, there is a potential for significant PM<sub>10</sub> and PM<sub>2.5</sub> LST impacts. While mitigation measures would result in reduced emissions during construction, these reductions would not be sufficient to reduce all emissions to a less than significant level. Impact 5.1-2 would remain significant and unavoidable.

### **Impact 5.1-3: Project Operation Exceeds Thresholds for VOC, NO<sub>x</sub>, PM<sub>10</sub>, and CO**

Long-term operation of the project would generate air pollutant emissions that would continue to exceed the SCAQMD's regional significance thresholds for VOC, NO<sub>x</sub>, PM<sub>10</sub>, and CO and cumulatively contribute to the SoCAB's nonattainment designations. While mitigation measures would result in reduced emissions during construction and operation, these reductions would not be sufficient to reduce all emissions to a less than significant level. Impact 5.1-3 would remain significant and unavoidable.

### **Impact 5.2-1: Cumulatively Considerable GHG Emissions**

The project's GHG emissions were considered significant even with mitigation. As a result, the project's GHG emissions and contribution to greenhouse gas emissions impacts are considered cumulatively considerable and therefore significant for GHG emissions. Impact 5.2-1 would remain significant and unavoidable.

For each development alternative, this analysis:

- Describes the alternative,
- Analyzes the impact of the alternative as compared to the proposed project,
- Identifies the impacts of the project that would be avoided or lessened by the alternative,
- Assesses whether the alternative would meet most of the basic project objectives, and
- Evaluates the comparative merits of the alternative and the project.

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Per the CEQA Guidelines Section 15126.6(d), additional significant effects of the alternatives are discussed in less detail than the significant effects of the project as proposed.

### 7.1.2 Project Objectives

As described in Section 3.2, the following objectives have been established for the proposed project and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts:

- To implement the General Plan land use designations established for the property by the Opportunities Study Area project, consisting of low density [2 to 7 units per acre], low-medium density [7 to 15 units per acre], and medium density [15 to 25 units per acre] residential, mixed uses, and open space.
- Provide a diversity of housing types to ensure that housing is available to residents with a range of incomes.
- To develop in accordance with the provisions of the Shea/Baker Ranch Development Agreement (DA) to ensure the orderly and economically viable build out of the project site.
- To create a balanced and integrated community by providing linkages to other segments of the City through trail systems, public amenities, and carefully planned residential neighborhoods.
- To implement the funding provisions set forth in the Shea/Baker Ranch DA which ensure that fees are paid (equivalent to a minimum of 1,957 residential units) as development proceeds to fund public facilities which provide community- and City-wide benefits.
- To benefit the entire community by providing adequate public open space (public parks and trail connections to existing regional trails), including the dedication of minimum 5-acre Community Park to the City.
- To benefit the entire community by providing adequate recreational facilities, including a Community Park and other parks that are open to all residents of the City.
- To protect natural resources in the project area, in particular by improvements to the slopes, vegetation, habitat, and water-carrying capacity of the Borrego Canyon Wash that will be installed as part of the Phase 2 Grading Plan and project construction.
- To facilitate and achieve completion of Alton Parkway to its full build-out as a 6-lane major arterial and provide funding for City-wide circulation improvements.



### 7.2 ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING/PROJECT PLANNING PROCESS

The following is a discussion of the land use alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in this Draft Supplemental EIR (DSEIR). Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts." [Guidelines Sec. 15126.6(c)]

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### 7.2.1 OSA PEIR Alternatives

Six alternatives were analyzed in the OSA PEIR, addressing all the opportunity sites, including Site 1. Although those alternatives predate the new air quality and greenhouse gas emissions analysis included in this DSEIR, they are still relevant because environmental impacts in these two impact categories remain significant and unavoidable. However, because they do not focus analysis on a project-level basis, they have been supplemented with the new Shea/Baker Ranch alternatives detailed in Section 7.3.

#### Alternatives Rejected as Infeasible in the OSA PEIR

The following alternatives were rejected as infeasible in the OSA PEIR:

- General Amendment and Zone Change for All-Commercial Development
- General Plan Amendment and Zone Change for All-Residential Development
- General Plan Amendment and Zone Change for All-Industrial/Business Park Development
- General Plan Amendment and Zone Change for Industrial-Residential Alternative
- Reduced Density Alternative
- Public Facilities Overlay on Sites 4 and 8

#### Potentially Feasible Alternatives Considered in the OSA PEIR

The following program-level alternatives were considered in the OSA PEIR. Alternatives 1-6 were analyzed in the original PEIR, while analysis of Alternative 7 was added in the recirculated PEIR. Although they analyzed environmental impacts at a program level, all seven alternatives included analysis of Site 1 (the Shea/Baker project site). The alternatives considered in the OSA PEIR do not affect the analysis of the SBRA Project.

- **Alternative 1: No Project/Reasonably Foreseeable General Plan Development.** This alternative assumed that development would occur on the OSA project sites as set forth in the then current General Plan.
- **Alternative 2: Development on Sites 1 through 6 and Public Facilities Overlay on Site 1.** This alternative assumed that the proposed OSA project development, with the exception that 408 residential units would be removed from Site 1 to allow development of all three community facilities (Civic Center, Community Center, and sports park) on a 45-acre portion in the northwestern portion of Site 1 adjacent to Bake Parkway. The site would have remained developed with 320,000 square feet of commercial development, and a new net development of 2,407 dwelling units consisting of 1,102 medium-density residential units, 805 single-family units, and 500 rental units. New General Plan designations would have remained for the site as under the proposed OSA project.
- **Alternative 3: Development on Sites 1 through 6 and Public Facilities Overlay on Sites 1, 3, and 4 (Split Park Site).** This alternative included the proposed OSA project development on Sites 2, 5, and 6. The analysis assumed that the Civic Center and Community Center would be built on Site 3, utilizing 6 acres, while two sports parks would utilize 18 acres from Site 1 and 20 acres from the southern portion of Site 4. Site 1 would have continued to accommodate residential units and commercial uses. Site 3 would have continued to accommodate 833 medium-density dwelling units, eliminating 250 residential units from Site 4 as under the proposed OSA project; 150,000 square feet of commercial would have been developed on Site 4. New General Plan designations would have remained the same as under the proposed OSA project alone.

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- **Alternative 4: Development on Sites 1 through 6 and Public Facilities Overlay on Sites 4 and 9.** This overlay assumed 35 acres from Site 4 and 10 acres from Site 9 for the public facilities; 150,000 square feet of commercial would have been developed on Site 4; the 200,000 square feet of business park uses that could be accommodated without the overlay would have been eliminated on Site 9. The 475 residential units would have removed from Site 4. Zoning for Site 9 would have changed from urban activity (Baker Ranch Planned Community) to Public Facility Overlay. Land use designation for site 9 would have been changed from business park to business park with land use overlay. Development on Sites 1, 2, 3, 5, and 6 would have remained as under the proposed OSA project.
- **Alternative 5: Landowner Concept Plan.** This alternative consisted of the conceptual plans submitted by six participating OSA landowners during Phase 2 of the Opportunities Study. Those plans comprised a mixed-use plan for the OSA with 6,617 residential units, 498,720 square feet of commercial uses, and 41.4 acres of neighborhood parks.
- **Alternative 6: Proposed Project plus Public Facilities/Land Use Overlay on Site 7.** In this alternative, the entire 121-acre site would have hosted all three public facilities on a 45-acre portion, plus 450 low-medium density (single-family detached) dwelling units on 76 acres at a gross density of approximately six units per acre. These units were in addition to the proposed OSA project's maximum of 5,415 residential units. The site would have retained its current General Plan designation of Business Park. All development on Sites 1 through 6 would have continued as under the proposed OSA project.
- **Alternative 7: Hybrid Alternative – Development on Sites 1 through 6 with No Development on Site 7 and Public Facilities Overlay on Site 9.** This alternative was developed following the close of the public comment period on the draft OSA PEIR. It was a reduced density alternative that reduced the total number of residences and commercial uses and increased the amount of public facilities as compared to the proposed OSA project. This alternative would have allowed up to 4,738 residential units, 360,000 square feet of commercial uses, and 73 acres of public facilities. The alternative was analyzed in Section 7.4 of the recirculated Draft OSA PEIR.



The OSA PEIR alternatives were considered infeasible with respect to the SBRA Project. First, the OSA PEIR Alternatives included sites that were out of the control and ownership of the landowner for the SBRA Project. Second, the SBRA Project proposes a significant reduction in residential units and non-residential square footage than was analyzed in the OSA PEIR. OSA PEIR Alternatives 5 and 7 which would reduce land use intensities on the OSA site overall and Alternative 2 which reduces intensity specifically on Site 1 (SBRA Project) would have more units and non-residential intensity than are being proposed under the SBRA Project. Therefore, OSA PEIR Alternatives 2, 5, and 7 would not reduce environmental impacts related to short-term construction and long-term operational air quality and GHG emissions. Third, OSA PEIR Alternatives 3, 4, and 6 would allow the previously approved land uses to be entitled for the SBRA Project. Again, this would allow more intensity than is being proposed under the SBRA Project and would not reduce significant environmental impacts. Last, OSA PEIR Alternative 1 which would allow development to continue under the then current General Plan would not be feasible because land uses have changed since the OSA PEIR was certified. The OSA PEIR Alternative 1 would also be rejected for the same reasons set forth under the “No Development/Existing General Plan Alternative” discussed under Section 7.2.4 below. For the reasons stated above, the OSA PEIR alternatives were considered infeasible. (CEQA Guidelines Section 15091(a)(3))

While the OSA EIR acknowledged that short-term construction and long-term operational air emissions and GHG emissions were found to be significant, it did not specifically quantify emission on a project specific

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level for the SBRA Project. This DSEIR quantified the emissions and found them to remain significant unavoidable adverse impacts related to air quality and GHG emissions. As a result, new alternatives, which have the potential to avoid or substantially lessen the significant impacts, have been developed for the SBRA Project were analyzed as described in Section 7.3, below

### **7.2.2 Alternative Development Areas**

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (Guidelines Sec. 15126[5][B][1]). In general, any development of the size and type proposed by the Shea/Baker Ranch project would have substantially the same impacts on air quality and greenhouse gas emissions impacts. Without a site specific analysis, impacts on aesthetics, biological resources, cultural resources, geology/soils, hazards and hazardous materials, hydrology/water quality, mineral resources, etc., cannot be evaluated. Consequently, this alternative has been considered and rejected from further analysis.

### **7.2.3 No Development/Existing Use Alternative**

This alternative assumes that the existing 372.7-acre site would continue to be used for nursery and vehicle storage purposes or would remain vacant and would not be developed for other uses, including the proposed project. The project site was partially graded and remains undeveloped except for a number of small structures related to a nursery that occupies the northwestern portion of the overall property. There is also an approximately 13-acre paved area used primarily for storage of recreational vehicles, north of Bake Parkway and west of Baffin Bay Drive (Baker Ranch RV Storage, 25690 Baffin Bay Drive, Lake Forest, CA 92630). Approximately 50 percent of the site has been graded, primarily the eastern and southern portions, including the vehicle storage facility. The remainder of the project site is primarily agricultural with remnants of avocado orchards and an ongoing wholesale/retail nursery operation. There are also two occupied residences.

The site's existing General Plan land use designations consist of Mixed-Use (MU), Low Density Residential (LDR), Medium Density Residential (MDR), Low-Medium Density Residential (L-MDR) and Open Space (OS), as shown in Figure 3-4, *Existing Land Use Designations*. The site's zoning is Baker Ranch Planned Community. The No Development/Existing Use Alternative would avoid or reduce short-term and operational significant and unavoidable impacts associated with regional air quality and greenhouse gas emissions. It would also avoid any other impacts associated with project development. However, this alternative has been rejected because it would not attain any of the objectives of the proposed project because it is not reasonable to assume that the applicant would never develop this site, a valuable economic resource, and that it would remain in its current physical condition. The applicant has a vested right to develop a minimum of 1,957 residential units, a maximum of 2,815 residential units, and 320,000 square feet of non-residential space pursuant to the DA, recorded October 20, 2010. The practical result of the disapproval of the proposed project is that the applicant would utilize the property pursuant to the DA. Based on current land use plans, the DA, and consistent with available infrastructure, it is reasonably foreseeable that the site would be developed with some other permitted land use, such as a single family homes, medium density residential, business park, and/or commercial uses. Consequently, No Development/Existing Use Alternative has been rejected from further analysis.

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### 7.2.4 No Development/Existing General Plan Alternative

This alternative is required by CEQA. Pursuant to CEQA Guidelines section 15126.6(e)(2), this alternative describes what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. The applicant has a vested right to develop a minimum of 1,957 residential units, a maximum of 2,815 residential units, and 320,000 square feet of non-residential space pursuant to the DA. The practical result of the disapproval of the proposed project is that the applicant would utilize the property pursuant to the DA. It is reasonably foreseeable that as land values increase, the applicant would develop the 372.7 acres to the maximum extent allowed under the DA. This would result in development of 369 additional residential units, 295,000 additional square feet of commercial, and a reduction of active and passive open space. While this alternative would meet all of the project objectives, it would not avoid or substantially lessen any of the significant and unavoidable environmental impacts. As a result, this alternative has been rejected from further analysis.

### 7.2.5 Reduced Density to Eliminate Significant and Unavoidable Impacts Alternative

This alternative assumes development of 300 single family homes and 2.6 acres of parks on the 386.8 acre site. This is approximately the maximum number of units that could be developed while avoiding all of the short-term construction and operation phase air quality and GHG impacts. This alternative would not require 5 million cubic yards (cy) of grading and with appropriate construction phasing, would likely eliminate all the significant and unavoidable impacts of the proposed project. However, this alternative would not meet most of the project's objectives. As discussed above in Section 7.2.2, the applicant has a vested right to develop a minimum of 1,957 residential units, a maximum of 2,815 residential units, and 320,000 square feet of non-residential space pursuant to recorded DA. As a result, the 300 single family home alternative is legally infeasible because it would conflict with the applicant's vested right to construct between 1,957 and 2,815 dwelling units on the property. For this reason, this alternative has been rejected from further analysis.



## 7.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

In addition to the alternatives considered in the OSA PEIR, two additional alternatives were selected based on the criteria set forth in Guidelines Section 15126.6 and the new information considered in this DSEIR. The "Reduced Grading Alternate Land Use Plan Alternative" and the "Reduced Intensity/Reduced Grading Alternate Land Use Plan" alternatives were selected to in order to reduce air quality and GHG construction related impacts by reducing the development footprint and the corresponding amount of grading required (2 million cy of cut and fill). These alternatives were also designed to eliminate the disruption of construction traffic traveling across Alton Parkway and the need for roadway closures by limiting the development to the south side of Alton Parkway. Lastly, Alton Parkway represents a significant land feature which bisects the site into two smaller portions. These alternatives are analyzed in detail in the following sections.

An EIR must identify an "environmentally superior" alternative and where the No Project Alternative is identified as environmentally superior, the EIR is then required to identify as environmentally superior an alternative from among the others evaluated. Each alternative's environmental impacts are compared to the proposed project and determined to be environmentally superior, neutral, or inferior. However, only those impacts found significant and unavoidable are used in making the final determination of whether an alternative is environmentally superior or inferior to the proposed project. Only the impacts involving air quality and GHG were found to be significant and unavoidable. Section 7.7 identifies the Environmentally Superior Alternative. The proposed project is analyzed in detail in Chapter 5 of this DSEIR.

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### Alternatives Comparison

The following statistical analysis provides a summary of general socioeconomic build-out projections determined by the two additional land use alternatives and the proposed project. It is important to note that these are not growth projections. That is, they do not anticipate what is likely to occur by a certain time horizon, but rather provide a build-out scenario that would only occur if all the areas of the City were to develop to the probable capacities yielded by the land use alternatives. The following statistics were developed as a tool to understand better the difference between the alternatives analyzed in the DSEIR. Table 7-1 identifies City-wide information regarding dwelling unit, population and employment projections, and also provides the jobs to housing ratio for each of the alternatives.

**Table 7-1**  
**Build-out Statistical Summary**

	<b>Proposed Project</b>	<b>Reduced Grading Land Use Plan Alternative</b>	<b>Reduced Intensity Alternative</b>
Dwelling Units	2,379	2,379	1,957
Commercial (sf)	25,000	25,000	25,000
Population	6,923	6,923	5,695
Employment	50	50	50
ADT	22,933	22,358	18,895
Park Dedication Acres	25	20.8	17.1

#### 7.4 REDUCED GRADING ALTERNATE LAND USE PLAN ALTERNATIVE

This alternative assumes that all development would occur south of Alton Parkway, with no development occurring north of Alton Parkway. Project development would be limited to areas within Grading Phase 1, shown in Figure 3-5, *Phase 1 Grading Plan*. All 2,379 units, 25,000 square feet of neighborhood serving commercial, roadways, infrastructure, and recreational facilities would be built on approximately 148.5 acres within Development Phases 1A, 1B, and Phase 2, as shown on Figure 3-7, *Overall Project Phasing*. As a result, the project's development footprint would be reduced by approximately 38 percent under this alternative.

Grading Phase 1 would result in 1 million cy of cut and 2 million cy of fill (including 1 million cy of import from other portions of the 386.8 acre project site). Overall, this alternative would reduce grading by approximately 2 million cy of cut and fill.



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**Table 7-2  
Reduced Grading Land Use Plan Statistical Summary**

	<i>Proposed Project</i>	<i>Reduced Grading Alternative</i>	<i>Difference</i>	<i>% Difference</i>
<b>Dwelling Unit Type</b>				
Single-Family Detached	1,144	745 <sup>1</sup>	-422	-37%
Townhome	641	1,040 <sup>2</sup>	399	+62%
Apartment	594	594 <sup>2</sup>	0	0
<b>Total</b>	<b>2,379</b>	<b>2,379</b>	<b>0</b>	<b>0</b>
Commercial (sf)	25,000	25,000	0	0
Population	6,923	6,923	0	0
Employment	50	50	0	0
ADT	22,933	22,358	-575	-2.5%
Park Dedication Acres	25	20.8	-4.2	-17%

Notes:

<sup>1</sup> 7-15 dwelling units (du) per acre (ac) with an average of 10 du/ac

<sup>2</sup> 15-25 du/ac with an average of 23 du/ac

As shown in Table 7-2, this alternative would result in an average density of 10 du/ac for the 745 single-family units and an average 23 du/ac for the remaining townhome/apartment units.

### 7.4.1 Air Quality

Total construction emissions (i.e., fugitive-dust emissions and construction-equipment exhausts) are shown in Table 5.1-9, *Short Term Regional Construction Impacts*, DSEIR Section 5.1. As shown, daily regional construction emissions could exceed the daily thresholds of VOCs and NO<sub>x</sub> established by South Coast Air Quality Management District (SCAQMD). The project's development footprint would be reduced by approximately 38 percent under this alternative. Grading would be limited to the Phase 1 Grading Plan footprint. As a result, construction activities and emissions associated with grading on the north side of Alton Parkway as part of the Phase 2 Grading Plan would be eliminated. Consequently this alternative would reduce short-term construction emissions compared to the proposed project and fewer large pieces of construction equipment would be necessary. Under this alternative, even with mitigation incorporated, short-term emissions would be reduced, but would still exceed the daily thresholds of VOCs and NO<sub>x</sub>.

Sensitive receptors include residences, schools, hospitals, and similar uses that are sensitive to noise. There are no existing residential uses immediately adjacent to the project site. However, it is expected that during the construction of Phases 2 and 3, some of the residences in Phase 1 could be occupied. The distance from Phases 2 and 3 construction operations to Phase 1 residences could be as close as 25 meters. Table 5.1-13 shows that the emissions of these pollutants on the peak day of Phase 1 construction (Development Phases 1A, 1B and Phase 2) will not result in concentrations of pollutants at nearby residences or other sensitive receptors that are at or above the SCAQMD thresholds of significance. However, during Phases 2 and 3 the concentrations of PM<sub>10</sub> and PM<sub>2.5</sub> could exceed the SCAQMD thresholds of significance.

With the proposed project, it is expected that during the construction of future phases some of the residences in Phase 1 could be occupied and construction operations conducted would need additional dust control measures to be implemented. Likewise, the *Reduced Grading Alternate Land Use Plan Alternative* would also result in potential impacts related to dust after construction of Phase 1. Constructing 2,379 units south of Alton Parkway would increase density and concentrations of PM<sub>10</sub> and PM<sub>2.5</sub> would continue to potentially exceed the SCAQMD thresholds of significance. Compared to the proposed project, *Reduced Grading Alternate Land Use Plan Alternative* would also develop residential units in phases in close



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proximity to each other. This alternative would not reduce or eliminate significant and unavoidable impacts related to localized significance thresholds for onsite emissions associated with construction activities.

Long-term operational emissions would be generated by both stationary and mobile sources. Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. The project's unmitigated mobile source emissions would exceed established SCAQMD thresholds for VOC, CO, PM<sub>10</sub>, and NO<sub>x</sub>; refer to Table 5.1-15, *Long-Term Regional Operational Emissions*. Despite implementation of Mitigation Measures AQ MM-1 through AQ MM-15, these emissions would remain above SCAQMD thresholds. Implementation of the *Reduced Grading Alternate Land Use Plan Alternative* results in the same number of residential units and would therefore not eliminate or reduce the project's significant and unavoidable long-term operational air quality impacts. Therefore, with implementation of this alternative, the long-term operational VOC, CO, PM<sub>10</sub>, and NO<sub>x</sub> emissions from mobile sources would still be considered significant and unavoidable.

### **7.4.2 Greenhouse Gas Emissions**

As shown in Table 5.2-3, *Long-Term Operational Greenhouse Gas Emissions*, the total GHG emissions of 46,000 MTons per year of CO<sub>2</sub>e from the proposed project will be higher than the SCAQMD proposed tiered GHG emissions threshold for mixed-use projects of 3,000 MTons per year of CO<sub>2</sub>e (Tier 3). Assuming a service population of just over 6,900, this would also be higher than the 33,100 MTons per year CO<sub>2</sub>e 2020 efficiency target (Tier 4). This emissions level is also likely to result in GHG emission levels that would substantially conflict with implementation of the GHG reduction goals under AB 32 or other State regulations.

As shown in Table 7-2, the *Reduced Grading Alternate Land Use Plan Alternative* would have the same service population compared to the proposed project. GHG emission thresholds are based on the service population, which would not change under this alternative. Therefore, GHG impacts would remain significant and unavoidable.

### **7.4.3 Conclusion**

#### **Avoid or Substantially Lessen Project Impacts**

The project's development footprint would be reduced by approximately 38 percent under this alternative. Grading would be limited to the Phase 1 Grading Plan footprint. As a result, construction activities and emissions associated with grading on the north side of Alton Parkway as part of the Phase 2 Grading Plan would be eliminated. Consequently this alternative would reduce, but not eliminate, short-term construction emissions compared to the proposed project.

#### **Attainment of Project Objectives**

The *Reduced Grading Alternate Land Use Plan Alternative* would meet some, but not all of the project objectives. Shifting all of the development south of Alton Parkway onto approximately 148.5 acres would reduce the development footprint by approximately 38 percent. As shown in Table 7-2, this results in an average density 10 du/ac for the 745 single-family units and an average 23 du/ac for the remaining townhome/apartment units. The reduced footprint would require a general plan amendment to build at a greater density in the areas currently designated as low (2-7 units per acre) in the City's Land Use Element. This alternative would provide an abundance of medium density housing options, but would limit low density development and would not provide the diversity of housing contemplated by the project objectives. Therefore, the objective of developing in accordance with the provisions of the DA, to ensure the orderly and

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economically viable buildout of the project site would not be accomplished as well as with the proposed project.

One of the main project objectives is to protect natural resources in the project area, in particular by improvements to the slopes, vegetation, habitat, and water-carrying capacity of the Borrego Canyon Wash that will be installed as part of Phase 2 Grading Plan. As shown on Figure 3-6, *Phase 2 Grading Plan*, in order to fill the eroding Borrego Canyon Wash, soil would be removed from site's interior, as well as from the large knoll northwest of Alton Parkway. With this alternative, the Phase 2 Grading Plan would not be implemented and the Borrego Canyon Wash would not be improved. In addition, the 5.05-acre Borrego Linear Park and the 8.37-acre Central Linear Park would not be developed. The proposed project provides non-park open space of approximately 55.76 acres contained within slopes, paseos, the detention basin, and other open spaces, and approximately 15 acres within parkways and medians. In addition, improvements to Borrego Canyon Wash include 14.93 acres of non-park open space. Given the site's reduced footprint, non-park open space could be significantly reduced under this alternative. Therefore, although this alternative would provide the same number of residential units, adequate recreational facilities, usable open space and trail linkages, and achieve completion of Alton Parkway to its ultimate condition, it would not satisfy all of the provisions of the DA and all of the project's objectives.

### Comparative Merits

Compared to the proposed project, *Reduced Grading Alternate Land Use Plan Alternative* would reduce, but not eliminate, short-term construction emissions. It would not reduce or eliminate significant and unavoidable impacts related to localized significance thresholds for onsite emissions associated with construction activities. Implementation of the *Reduced Grading Alternate Land Use Plan Alternative* results in the same number of residential units and would therefore not eliminate or reduce the project's significant and unavoidable long-term operational air quality impacts. Finally, under this alternative, even with mitigation incorporated, short-term emissions would be reduced, but would still exceed the daily thresholds of VOCs and NO<sub>x</sub>. GHG emission thresholds are based on the service population and GHG impacts would remain significant and unavoidable. This alternative would achieve some, but not all of the objectives established for the project and would require general plan amendment. This alternative's feasibility is questionable because one of the project's main objectives – providing improvements to the eroding Borrego Canyon Wash – would not be met as the Borrego Canyon Wash improvements are planned to occur as part of the Phase 2 Grading Plan.



### 7.5 REDUCED INTENSITY/REDUCED GRADING ALTERNATIVE

This alternative also assumes that all development would occur south of Alton Parkway, with no development occurring north of Alton Parkway. Project development would be limited to areas within Grading Phase 1, shown in Figure 3-5, *Phase 1 Grading Plan*.

A total of 1,957 units and 25,000 square feet of commercial are proposed for this alternative. As discussed above in Section 7.2.2, the applicant has a vested right to develop a minimum of 1,957 residential units, a maximum of 2,815 residential units, and 320,000 square feet of non-residential space pursuant to recorded DA. The 1,957 residential units, 25,000 square feet of neighborhood serving commercial, roadways, infrastructure, and recreational facilities would be built on approximately 148.5 acres within Development Phases 1A, 1B, and Phase 2, as shown on Figure 3-7, *Overall Project Phasing*. As a result, the project's development footprint would be reduced by approximately 38 percent under this alternative.

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As with the Reduced Grading Alternative, limiting the development footprint to Grading Phase 1 would result in 1 million cy of cut and 2 million cy of fill (including 1 million cy of import from other portions of the 386.8-acre project site). Overall, this alternative would reduce grading by approximately 2 million cy of cut and fill.

As shown in Table 7-3, this alternative would result in an average density of 10 du/ac for the 745 single-family units and an average 18 du/ac for the remaining townhome/apartment units.

**Table 7-3  
Reduced Intensity/Reduced Grading Buildout Statistical Summary**

	<i>Proposed Project</i>	<i>Reduced Intensity Alternative</i>	<i>Difference</i>	<i>% Difference</i>
<b>Dwelling Unit Type</b>				
Single Family Detached	1,144	722 <sup>1</sup>	-422	-36%
Condominium	641	641 <sup>2</sup>	0	0
Apartment	594	594 <sup>2</sup>	0	0
<b>Total</b>	<b>2,379</b>	<b>1,957</b>	<b>-422</b>	<b>-18%</b>
Commercial	25,000	25,000	0	0
Population	6,923	5,695	-1,228	-18%
Employment	50	50	0	0
ADT	22,933	18,895	-4,038	-18%
Park Dedication	25	17.1	-7.9	-32%

Notes:

<sup>1</sup> 7-15 dwelling units (du) per acre (ac) with an average of 10 du/ac

<sup>2</sup> 15-25 du/ac with an average 18 du/ac

### 7.5.1 Air Quality

The project's development footprint would be reduced by approximately 38 percent under this alternative. Grading would be limited to the Phase 1 Grading Plan footprint. As a result, construction activities and emissions associated with grading on the north side of Alton Parkway as part of the Phase 2 Grading Plan would be eliminated. Consequently this alternative would reduce short-term construction emissions compared to the proposed project and fewer large pieces of construction equipment would be necessary. Under this alternative, even with mitigation incorporated, short-term emissions would be reduced, but would still exceed the daily thresholds of VOCs and NO<sub>x</sub>.

With the proposed project, it is expected that during the construction of future phases some of the residences in Phase 1 could be occupied and construction operations conducted would need additional dust control measures to be implemented. Likewise, the *Reduced Density/ Reduced Grading Alternate Land Use Plan Alternative* would also result in potential impacts related to dust after construction of Phase 1. Constructing 1,957 units south of Alton Parkway would increase density and concentrations of PM<sub>10</sub> and PM<sub>2.5</sub> would continue to potentially exceed the SCAQMD thresholds of significance. Compared to the proposed project, this alternative would also develop residential units in phases in close proximity to each other. This alternative would not reduce or eliminate significant and unavoidable impacts related to localized significance thresholds for onsite emissions associated with construction activities.

Long-term operational emissions would be generated by both stationary and mobile sources. Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions. The project's unmitigated mobile source emissions would exceed established SCAQMD thresholds for VOC, CO, PM<sub>10</sub>, and NO<sub>x</sub>; refer to Table 5.1-15, *Long-Term Regional Operational Emissions*. Despite implementation of

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Mitigation Measures AQ MM-1 through AQ MM-15, these emissions would remain above SCAQMD thresholds. Implementation of the *Reduced Intensity/Reduced Grading Alternate Land Use Plan Alternative* results 422 fewer residential units and 18 percent reduction in average daily trips. This alternative would slightly reduce the project's significant and unavoidable long-term operational air quality impacts. Although eliminated, even with implementation of mitigation measures, impacts would not be reduced to a less than significant level. Therefore, with implementation of this alternative, the long-term operational VOC, CO, PM<sub>10</sub>, and NO<sub>x</sub> emissions from mobile sources would still be considered significant and unavoidable.

### 7.5.2 Greenhouse Gas Emissions

As shown in Table 5.2-4, *Long-Term Operational Greenhouse Gas Emissions*, the total GHG emissions of 46,000 MTons per year of CO<sub>2</sub>e from the proposed project will be higher than the SCAQMD proposed tiered GHG emissions threshold for mixed-use projects of 3,000 MTons per year of CO<sub>2</sub>e (Tier 3). Even with a reduction service population to 5,695 persons, the annual emissions would still be higher than the 33,100 MTons per year CO<sub>2</sub>e 2020 efficiency target (Tier 4). This emissions level is also likely to result in GHG emission levels that would substantially conflict with implementation of the GHG reduction goals under AB 32 or other State regulations.

As shown in Table 7-2, the *Reduced Intensity/Reduced Grading Alternate Land Use Plan Alternative* would result in a reduced service population compared to the proposed project. GHG emission thresholds are based on the service population, which would change by 18 percent under this alternative. Although reduced, GHG impacts would remain significant and unavoidable.

### 7.5.3 Conclusion

#### Avoid or Substantially Lessen Project Impacts

The project's development footprint would be reduced by approximately 38 percent under this alternative. Grading would be limited to the Phase 1 Grading Plan footprint. As a result, construction activities and emissions associated with grading on the north side of Alton Parkway as part of the Phase 2 Grading Plan would be eliminated. Consequently this alternative would reduce, but not eliminate, short-term construction emissions compared to the proposed project.

#### Attainment of Project Objectives

The *Reduced Intensity/Reduced Grading Alternate Land Use Plan Alternative* would meet some, but not all of the project objectives. Shifting all of the development south of Alton Parkway onto approximately 148.5 acres would reduce the development footprint by approximately 38 percent. As shown in Table 7-2, this results in an average density 10 du/ac for the 745 single-family units and an average 18 du/ac for the remaining townhome/apartment units. The reduced footprint would require a general plan amendment to build at a greater density in the areas currently designated as low (2-7 units per acre) in the City's Land Use Element. This alternative would provide an abundance of low-medium and medium density housing options, but would limit low density development and would not provide the diversity of housing contemplated by the project objectives. Therefore, the objective of developing in accordance with the provisions of the DA, to ensure the orderly and economically viable buildout of the project site would not be accomplished as well as with the proposed project.

One of the main project objectives is to protect natural resources in the project area, in particular by improvements to the slopes, vegetation, habitat, and water-carrying capacity of the Borrego Canyon Wash that will be installed as part of Phase 2 Grading Plan. As shown on Figure 3-6, *Phase 2 Grading Plan*, in order



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to fill the eroding Borrego Canyon Wash, soil would be removed from site's interior, as well as from the large knoll northwest of Alton Parkway. With this alternative, the Phase 2 Grading Plan would not be implemented and the Borrego Canyon Wash would not be improved. In addition, the 5.05-acre Borrego Linear Park and the 8.37-acre Central Linear Park would not be developed. The proposed project provides non-park open space of approximately 55.76 acres contained within slopes, paseos, the detention basin, and other open spaces, and approximately 15 acres within parkways and medians. In addition, improvements to Borrego Canyon Wash include 14.93 acres of non-park open space. Given the site's reduced footprint, non-park open space could be significantly reduced under this alternative. Therefore, although this alternative would provide the same number of residential units, adequate recreational facilities, usable open space and trail linkages, and achieve completion of Alton Parkway to its ultimate condition, it would not all of the provisions of the DA and all of the project's objectives.

### **Comparative Merits**

Compared to the proposed project, *Reduced Intensity/Reduced Grading Alternate Land Use Plan Alternative* would reduce, but not eliminate, short-term construction emissions. It would not reduce or eliminate significant and unavoidable impacts related to localized significance thresholds for onsite emissions associated with construction activities. Implementation of this alternative would reduce the number of residential units by 18 percent. It would reduce, but not eliminate the proposed project's significant and unavoidable long-term operational air quality impacts. Even with mitigation incorporated, short-term emissions would be reduced, but would still exceed the daily thresholds of VOCs and NO<sub>x</sub>. The *Reduced Intensity/Reduced Grading Alternate Land Use Plan Alternative* would a reduced service population compared to the proposed project by 18 percent. Although reduced, GHG impacts would remain significant and unavoidable. This alternative would achieve some, but not all of the objectives established for the project. This alternative's feasibility is questionable because one of the project's main objectives – providing improvements to the eroding Borrego Canyon Wash – would not be met as the Borrego Canyon Wash improvements are planned to occur as part of the Phase 2 Grading Plan.

### **7.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

CEQA requires a lead agency to identify the “environmentally superior alternative” and, in cases where the “No Project” Alternative is environmentally superior to the proposed project, the environmentally superior development alternative must be identified. It should be noted that the “No Project” alternative, in this case the *No Development/Existing General Plan Alternative*, was rejected for being environmentally inferior to the proposed project in Section 7.2.3. One alternative has been identified as “environmentally superior” to the proposed project:

- Reduced Intensity/Reduced Grading Alternative

The Reduced Intensity/Reduced Grading Alternative has been identified as the environmentally superior alternative. This alternative would lessen impacts associated with air quality and greenhouse gas emissions. As concluded in the analysis presented above, the Reduced Intensity/Reduced Grading Alternative would lessen the impacts associated with development of the proposed project, because it would involve an approximately 18 percent decrease in both residential units and population, as well as a 38 percent decrease in the development footprint. This would reduce site grading, construction activities, and traffic volumes. These decreases would result in decreases in air quality and greenhouse gas emissions.

Table 7-4 compares the levels of significance of the proposed project impacts with the impacts of the two alternatives. Both alternatives would have fewer or lessened environmental impacts compared to the proposed project.

## 7. Alternatives to the Proposed Project

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CEQA does not require the City to choose the environmentally superior alternative. Instead CEQA requires the City to consider environmentally superior alternatives, explain the considerations that led it to conclude that those alternatives were infeasible from a policy standpoint, weigh those considerations against the environmental impacts of the proposed project, and make findings that the benefits of those considerations outweighed the harm.

**Table 7-4  
Summary of Impacts of Alternatives Compared to the Proposed Project**

<i>Topic</i>	<i>Proposed Project</i>	<i>Reduced Grading Alternative</i>	<i>Reduced Intensity/Reduced Grading Alternative</i>
Air Quality			
Short-term	Significant and Unavoidable	(-)	(-)
Long-term	Significant and Unavoidable	(=)	(-)
Global Climate Change	Significant and Unavoidable	(=)	(-)

- (-) The alternative would result in less impacts than the proposed project.  
 (+) The alternative would result in greater impacts than the proposed project.  
 (=) The alternative would result in the same/similar impacts as the proposed project.



## *7. Alternatives to the Proposed Project*

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